



## Tax Services

### Overview

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Our tax lawyers counsel clients in federal, state, local, and international tax planning; appeals of assessment of sales and use tax, property tax, and franchise tax; audits; and tax litigation in U.S. District Courts, United States Tax Court and the United States Court of Federal Claims.

### AREAS OF EMPHASIS

- General taxation: international, federal, state, and local
- Appeals of assessment of sales and use tax, property tax, and franchise tax
- Tax audits, appeals, and litigation
- Tax-exempt organizations
- Healthcare providers
- Tax-exempt bond securitization and financing
- Real estate taxation
- Employee benefits planning
- Charitable/planned giving
- Oil & gas and other energy tax matters
- International investment transactions

### Experience

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- Obtained one of the first IRS rulings regarding the structure of a Hospital-Clinic integrated delivery system
- Successfully represented clients in tax litigation in U.S. District Courts, United States Tax Court, and United States Court of Federal Claims
- Performed tax analysis for financing of oil & gas drilling ventures
- Performed tax analysis of proposed acquisition by joint venture between U.S. and Japanese companies
- Obtained first IRS-exempt Organizations Division ruling concerning a healthcare joint operating company involving private and public parties