

# Tax

## **For comprehensive tax planning, the numbers are in our favor.**

In today's marketplace, it's no longer enough to be business-savvy. You have to be tax-savvy, too. Heightened regulation and enforcement, complex rules, and never-ending reforms impact your bottom line and the ability to compete. Navigating this intricate landscape requires prudent thinking and creative solutions from top advisors like the business tax attorneys at Howard & Howard.

Our seasoned tax practitioners leverage their business, financial, and academic backgrounds; broad industry exposure; and in-depth technical knowledge to provide comprehensive tax counsel to for-profit companies of all sizes, as well as tax-exempt nonprofits.

Howard & Howard helps businesses maximize value first through proper entity selection, formation, and transaction structuring. In addition, we assist in return preparation, elections, and disclosures; consult on employee benefit plans and executive compensation; and offer guidance on state, local, employment, and other taxes. As ventures grow and mature, we assist with tax planning, compliance, and structural considerations in:

- Mergers, acquisitions, divestitures, reorganizations, and spinoffs
- Partnerships and joint ventures
- General contract and transaction matters
- Private equity, private funds, and securitizations
- Litigation settlements
- Bankruptcy and insolvency restructurings

With offices strategically placed across the U.S., our corporate tax attorneys not only team up with one another to address clients' needs, but also collaborate with CPAs, financial managers and advisors, appraisers and valuation specialists, economists, litigation support, and other professionals regarding:

- State and local income, sales, and use taxes
- Franchise, personal property, transfer, and severance taxes
- Unitary business group analysis
- Constitutional nexus limitations
- Unclaimed property compliance and audits
- Real property taxes, appeals, and uncapping transfers
- Opportunity Zone Funds
- Audit defense and development of corporate policy
- Multi-national tax planning
- Tax treaty and tariff interpretation and guidance

- Transfer pricing agreements, policy drafting, and counseling
- Corporate policy for international workforces
- Excise tax for medical devices, firearms, and other products
- Employer excise tax
- Fuel, heavy highway vehicles, VAT, GST, and other indirect taxes

Research and development tax credits provide substantial opportunities, and we assist clients in the manufacturing, product design, transportation, construction, engineering, financial, and software industries in capturing these benefits. We also help clients take advantage of energy and sustainability incentives; incentives for corporate expansions; and accelerated cost recovery strategies for facilities, fixed assets, repairs, and maintenance.

Howard & Howard attorneys counsel high-net-worth individuals and families on tax planning, wealth preservation, and asset protection by:

- Assisting with income tax return and disclosure preparation
- Complying with disclosure requirements related to foreign trusts, entities, and financial accounts
- Counseling expatriates on tax matters
- Establishing family offices and charitable foundations
- Determining gifting and philanthropic strategies

Despite careful monitoring and compliance, tax controversies and disputes do occur, and clients count on us to advise and defend them in:

- IRS audits and appeals
- Formal litigation before the U.S. Tax Court and other federal courts
- State and local audits and appeals to state tax tribunals and other applicable state courts
- Federal, state, and local administrative proceedings
- Contested estate and gift tax matters
- Real estate and property tax appeals
- Unclaimed property audits
- Voluntary disclosure programs on a federal, state, or local level

We have also represented tax professionals in tax preparation penalty disputes.

Perhaps the strongest attribute of Howard & Howard's Tax Group attorneys is their experience and ability to apply insight and perspective across the full spectrum of business and personal tax planning. Our depth and breadth of knowledge demonstrate that no one knows their way around tax codes and laws like we do.