

Federal Tax

Federal tax attorney services for complex transactions & compliance

We partner with businesses, individuals and their accountants to assist them in understanding and knowing how to navigate and apply complex federal tax laws to their particular situation. Clients and their accountants regularly engage a Foster Garvey federal tax attorney to assist them in developing a good understanding of our tax laws and implementing effective tax planning tools aimed at minimizing tax burdens and ensuring compliance. With our tax team's deep technical knowledge backed by decades of experience, we're committed to making sure you achieve your business and financial objectives confidently.

Our tax attorneys provide critical guidance across a wide range of matters involving federal taxation, from managing major transactions and handling tax controversies to navigating the tax aspects of employment matters, establishing a new business or venture, real estate matters, dispute resolution, bankruptcy and employee benefits.

Transactional Tax Planning

We help our business clients plan for, identify and resolve tax issues arising in asset or stock sales, redemptions, joint ventures, mergers, acquisitions, divestitures, recapitalizations, reorganizations, real estate transactions (including IRC Section 1031 exchanges) and other business transactions. We also assist clients relative to a myriad of other tax matters, including opportunity zone investments, investment, and energy, research and other credits. Our team also assists existing and new businesses in selecting and maintaining the most tax-appropriate legal structure.

Civil Tax Controversies: IRS Audits, Appeals and Litigation

Our tax attorneys have a strong track record and decades of experience to back up, advising and defending individuals and businesses in tax controversies with the Internal Revenue Service on audit, administrative appeal, before the US District Court and the US Tax Court. We represent clients in income tax, employment tax, estate and gift tax, worker classification examinations, appeals and litigation. We also provide legal support to accountants and tax return preparers during examinations and appeals. Likewise, we routinely represent individuals with collections, offers in compromise and other administrative matters before the Internal Revenue Service. In circumstances where an Internal Revenue Service ruling is required, we represent clients and assist in navigating them through the ruling process.

Bankruptcy and Tax Litigation

Bankruptcy proceedings have significant tax implications for creditors and debtors. We advise creditors, debtors and potential third-party investors on federal tax issues arising out of bankruptcy or debt restructuring. In addition, we help clients negotiate disputes with taxing authorities over the priority of tax liabilities.

Employee Benefit Plans

Our benefits attorneys provide a variety of services to businesses. We design and qualify a variety of retirement plans, including traditional defined benefit plans, cash balance plans, profit-sharing plans, 401(k) plans and other employee benefit arrangements. Our attorneys also advise clients on the day-to-day administration of plans and help them prepare reports and returns. We assist clients in executive compensation and benefit arrangements. Additionally, we assist businesses with assessing feasibility, establishing and maintaining employee stock ownership plans. Also, we represent clients in disputes involving the duties of fiduciaries and the rights of participants and beneficiaries. For more information, please see our [Employee Benefits & Executive Compensation](#) practice.

Tax-Exempt Organizations

Our tax-exempt clients include health care providers, social service organizations, educational institutions and other nonprofit organizations, including private foundations. We assist nonprofit organizations (including public charities, private foundations and other tax-exempt organizations) with various tax and governance matters, including assisting with entity formation and applying for tax-exempt status, advising on corporate governance and fiduciary issues, advising on donation and endowment matters, preparing and reviewing contracts, and assisting with federal and state tax compliance matters (including issues relating to tax-exempt status, unrelated business income tax (UBIT) matters and IRC chapter 42 excise taxes). We help our clients obtain and maintain tax-exempt status. In addition, we offer advice on structuring joint ventures, characterizing income and obtaining tax-exempt financing. For more information, please see our [Charitable & Tax-Exempt Organizations](#) practice.

Contacts

[Larry J. Brant](#)

[503.553.3114](tel:503.553.3114) larry.brant@foster.com

[Steven D. Nofziger](#)

[503.553.3126](tel:503.553.3126) steven.nofziger@foster.com