



# Tax

Hinshaw's tax attorneys develop sophisticated and creative solutions designed to help clients meet their goals within the complex and ever-changing body of federal and state tax law. We provide this value-added advice to corporations, limited liability corporations, partnerships, tax-exempt organizations and individuals.

### Tax Controversies

Our tax group has extensive experience in representing clients on tax matters both in court and before the Internal Revenue Service and state revenue agencies. Our services include:

- Representing clients in litigation before the U.S. Tax Court, as well as U.S. district courts
- Negotiating with the Internal Revenue Service and state revenue agencies in resolving tax controversies, both at the audit level and in subsequent appeals, often securing very substantial reductions in the taxes claimed, ranging from corporate income taxes to federal trust fund taxes to personal income taxes

# Tax Planning

We counsel businesses at every stage of their life cycle in effectively managing the tax consequences of various activities and taking advantage of available planning opportunities. Our services include:

- Advising on tax issues relating to corporate mergers, acquisitions, reorganizations, and divestitures, including in the context of private and public securities offerings
- Assisting tax-exempt organizations and private foundations in navigating hot-button issues, such as business income, executive compensation, joint ventures with for-profit partners, lobbying, and the prohibition against participating in political campaigns
- Designing executive compensation arrangements, including restricted stock, stock appreciation rights, stock options, and other equity-based compensation techniques
- Organization of corporations, limited liability companies and partnerships for start-up businesses with proper consideration given to those choices which may maximize tax savings

# **Attorneys**

Eliot C. Abbott

Anthony E. Antognoli

Steven W. Cutler

John W. Dubbs III

James D. Harbert

Kevin J. Moore

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#### **Related Services**

Antitrust & Trade Regulation

Business & Commercial Transactions

Corporate Governance Structure

Employee Stock Ownership Plans (ESOPs)

Family-Owned Businesses

Mergers & Acquisitions

Securities

Sustainability & ESG

### **Related Industries**

Banking & Finance



- Preparing requests for private letter rulings to the IRS and state revenue agencies
- Providing federal tax opinions on a wide range of transactions in compliance with IRS Circular 230, which regulates the provision of federal tax advice

## **News**

Steven Cutler Discusses the For The 99.5% Act in FLN Presentation June 8, 2021

Deal Spotlight: Client Oak Bank Acquired by Wintrust Financial Corporation June 10, 2019

Deal Spotlight: Midwest Medical Center Refinances Outstanding Tax Exempt Debt May 6, 2019

Hinshaw White Paper Reviews New Partnership Audit Rules and their Impact on Partnerships and LLCs November 7, 2017

Steven W. Cutler Reviews a Florida Legislative Proposal that Would Authorize Use of "Electronic Wills" May 11, 2017

Steven Cutler Quoted in Article Discussing How Changes to Foreign Investment Tax Law Will Affect Miami Real Estate February 9, 2016

Eliot Abbott Quoted in Miami Today Article on Small Business Lending Growth January 15, 2015