



Federal Tax Controversy and Litigation

Reinhart's Federal Tax Controversy and Litigation group helps clients resolve tax controversies and avoid or minimize long, protracted battles with the IRS or various state revenue agencies. As one of the largest tax groups in Wisconsin, we offer a high level of experience and insight and have earned a reputation for obtaining significant tax reductions, both in and prior to court.

We leverage our experience and depth of knowledge to effectively resolve tax disputes, resulting in considerable savings to our clients. Our team also works closely with companies' internal tax departments and other professionals to address a wide variety of tax issues. We have obtained significant tax reductions for our clients, both in and out of court, including

- Civil tax audits and administrative appeals
- Criminal tax investigations and litigation
- Litigation in the Wisconsin Tax Appeals Commission, Wisconsin Court of Appeals, circuit courts and local Boards of Review
- Litigation in the United States Tax Court, United States Court of Federal Claims and federal district courts
- Litigation in other state boards and commissions
- Appeals to numerous federal and state appellate courts

We have handled a wide range of cases with amounts in dispute from thousands to hundreds of millions of dollars. Some of the issues that our Federal Tax Controversy and Litigation attorneys have successfully resolved for our clients include:

- [Federal Tax](#)
- [International Tax](#)
- [State and Local Tax Planning, Controversy and Litigation](#)
- Estate tax
- Gift tax
- Sales and use tax
- Excise taxes



- Criminal tax
- Tax accounting
- Midco transactions
- Passive loss
- Derivatives
- Unclaimed property
- Intangibles
- UPREIT transactions
- Hobby loss adjustments
- Related party issues
- Ownership succession
- Special purpose entities
- Mixing bowl transactions
- Property tax valuation
- Property tax exemption
- Nonfiler negotiations
- Ad valorem and unit valuation tax issues
- Mergers, acquisitions and joint ventures
- Corporate reorganizations and conversions
- Valuation and valuation discount issues
- Health Care provider tax issues
- Tax-exempt organization disputes
- Research and development credit
- Consolidated return issues



- Real estate transfer fees
- S corporation, partnership and limited liability company issues
- Real estate transactions, including like-kind exchanges
- Payroll tax imposition and responsible person issues
- Charitable contributions, including contributions of easements
- Transfer pricing, including negotiations with authorities of foreign governments
- Income/franchise tax allocation and apportionment
- Taxation of foreign companies with U.S. activities
- Taxation of U.S. companies with foreign activities
- Property tax issues for tax-exempt health care providers
- Income and sales tax nexus including impact on out-of-state businesses
- Property taxation of utilities, telecommunications and airlines
- Unemployment compensation/worker's compensation
- Executive compensation and fringe benefits, including reasonable compensation issues