# WILLIAMS MULLEN TAX



With approximately 350 attorneys practicing in over 30 practice areas, Williams Mullen provides comprehensive legal services to regional, national and international clients. Our clients include multinational Fortune 500 companies, private family-owned businesses, nonprofit organizations and government entities. The Tax Law Section of Williams Mullen advises clients in all areas of tax law. Our practice includes international, federal, state, and local tax matters. Our clients include both publicly held and privately held corporations.

Williams Mullen's tax attorneys have extensive experience in wide-ranging commercial, individual and tax controversy matters, including the following:

### **Commercial Taxation**

The corporate and commercial tax attorneys of Williams Mullen provide wide-ranging services with respect to corporate tax planning, including corporate formation, reorganization, liquidations, distributions and consolidated group issues. Having many years of transactional experience, our lawyers represent businesses in various stages of acquisitions and divestitures (including taxable and tax-free mergers), general business tax planning (including selecting appropriate entities, business continuity planning, and general tax management), design and analysis of complex partnership and limited liability company arrangements, and structuring real estate transactions, including like-kind exchanges and other tax deferral techniques.

#### **Employee Benefits & Executive Compensation**

The Williams Mullen employee benefits & executive compensation practice has the experience and capacity to help public and private employers navigate the complex challenges of managing employee benefits. Every day we work closely with clients on issues involving all areas of employee benefits law, such as ESOPs, 401(k) plans, pension plans, health plans, disability plans, cafeteria plans, nonqualified deferred compensation, stock-based compensation, severance arrangements, and executive compensation. Our team also helps employers create executive compensation arrangements that complement qualified plan benefits for key employees. In addition to our consulting services, our attorneys are prepared to represent our clients if ERISA litigation or income tax controversies arise.

#### Local Tax

Our state and local tax practice group is staffed by experienced attorneys having practiced extensively in the state and local tax area for many years. They have handled matters involving all types of state and local taxes, including corporate income and franchise tax, sales and use tax, property tax litigation involving real and personal property and the tax exempt status of real and personal property, intangibles tax, excise and license taxes and personal income tax. We have counseled clients on county and state tax incentives, have assisted them in negotiations to obtain tax incentives and have defended against efforts by the local Departments of Revenue to attack tax credits. Our state and local tax attorneys also collaborate regularly with our corporate attorneys on behalf of clients on multistate tax consequences of corporate structures and transactions.

#### International Tax

Williams Mullen attorneys provide practical cross-border tax planning strategies that include inbound and outbound tax planning, as well as complex cross-border M&A transactions. We understand our client's specific business goals and objectives as they expand on a global basis and guide them through the complexities of cross-border tax laws and relevant business issues. Whether you are at the start of a new foreign investment, planning additional foreign investments or desire to restructure and make existing operations more tax efficient, our professionals tailor and employ business-driven structures and uncover planning opportunities that address your needs. Our planning analysis and strategies focus a on number of factors that potentially impact global investment, including legal entity structure, holding company planning, repatriation, treasury management, debt financing, and transfer pricing.

## Tax Controversy

Williams Mullen's tax controversy team represents individuals, and regional, national and multi-national businesses on a broad range of tax dispute issues and litigation matters. Our clients benefit from the specific experience of attorneys who focus on tax controversy matters, as well as from the capabilities of seasoned litigation and tax attorneys. Our attorneys have successfully defended clients in all stages of federal and state tax audits and appeals -- from pre-audit planning, through handling the audit process for the client on an off-site basis, to negotiation of post-audit offers in compromise to appeals of litigated decisions. This experience makes our team especially adept at developing proactive, or defensive, strategies that best serve our clients' interests. As a result, we have successfully represented our clients in civil and criminal tax matters at all levels including the Federal District Court, Federal Court of Claims, federal appellate courts, state courts, and state and local administrative tribunals.

## Personal Tax, Trust & Estate Planning

Williams Mullen offers an array of sophisticated estate planning services for the disposition of family wealth and the sheltering of assets from income, gift, estate and generation-skipping transfer taxes. Our experienced team of attorneys helps individual and institutional fiduciaries handle the legal and tax complexities of estate and trust administration. Trust and estate planning and administration have long been among the special strengths of Williams Mullen. For many years, the firm has been general counsel to major bank trust departments, and this relationship has provided a unique opportunity for experience and insight into practical considerations in planning and administration. Because estate planning calls for approaches and techniques that vary with the particular client's needs, the firm offers an array of estate planning services. These include not only the preparation of wills and trust agreements but also a variety of more sophisticated planning devices for the disposition of family wealth and the sheltering of assets from income, gift, estate and generation-skipping transfer taxes.

## **Contact**

For more information on Williams Mullen's tax practice, please contact Sean King, Chair of the firm's International Tax Practice group.



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