

Tax

Clients wanting to build a business, prepare for an exit, buy or sell assets, invest in a new portfolio company, or acquire or merge with another company are looking for practical advice and counsel.

Winstead's team of tax lawyers are here to help.

It is our job to help facilitate the transaction while minimizing tax impact to the best extent possible. Our tax lawyers work with you to find ways to solve problems and to make your deal happen.

Often clients find themselves facing issues with tax authorities such as the IRS, DOJ Tax, Texas Comptroller, or others over how much tax is owed or should be refunded. Winstead's lawyers have handled virtually every type of tax controversy and we understand our job is to take the burden off your shoulders and reach the best outcome for you.

We listen to your needs and then we set a course to help achieve the best result. Be it through a dialogue with the tax authority, negotiating, or if need be, litigation, we work to achieve the best overall outcome while minimizing any potential impact going forward.

Our path is fact-intensive, and takes into account not only the amount in controversy, but also time, overall cost, risk tolerance, and long-term effects.

Our job is to solve problems and get things done. No matter the issues, our tax lawyers are effective, creative and practical. We work to make complex tax problems as simple and understandable as possible, while working to help you achieve the overall best result.

Practice Areas

Entity selection, structure, formation and operations

- Type of entity, multiple-entity structures, and business tax planning
- Equity and compensation planning
- Reorganizations and restructuring
- Debt structuring, modification, and conversion

Business transactions

- Mergers and acquisitions, conversions, consolidations, and divisions
- Exit event structuring, planning, and preparation

Tax-exempt entity formation, planning, and defense

- Federal income tax planning
- Wide variety of business tax planning for domestic taxpayers and their investors
- Foreign transactions: investments/acquisitions, dispositions, structuring
- Tax Credits and other tax-driven transactions

Federal income tax controversy

- IRS audits and appeals
- Refund claims and penalty abatement
- Tax deficiency and tax refund litigation
- Private Letter Rulings, closing agreements, other IRS / DOJ Tax interactions
- Collection defense, planning, and management

State tax matters

- Sales and use, property, and franchise tax planning
- Administrative controversy/defense work
- State tax litigation in state court