

Tax

Changing laws, economic upheaval, and market developments demand forward-thinking, tax-informed decision-making, strategies, and programs.

From public multinationals to privately held businesses and tax-exempt organizations, clients, spanning a range of core industries, rely on Jenner & Block for tangible, measurable, flexible solutions that eliminate obstacles and maximize opportunities. We offer clarity in an area of extreme complexity, and efficient, practical, real-world tax advice in state, local, federal and cross-border tax matters, transactions and disputes.

Solutions Across a Range of Transactions

Clients rely on us to minimize taxes and realize significant benefits across the breadth of their operations. When businesses engage in strategic transactions, enter the capital markets, or rationalize their operations, we are there with strategies to make business plans go.

Beyond Mere Compliance—Tax Is Part of the ESG Equation

Without question, compliance with often complex, and uncertain tax rules is something we work closely with clients to achieve. We see clients working not just to achieve growth, but to do so while also promoting their environmental, social and governance (ESG) objectives. Tax strategies and opportunities increasingly touch all three. For example, we are working alongside our Energy team to help our clients not only meet their environmental goals but also to generate substantial sources of revenue from low- and no-carbon solutions like clean fuels and energy projects and joint ventures. And as governments and others push stakeholder interests, we help our clients consider their approach to taxes through the lens of their social responsibility objectives. Finally, our clients' approaches to compliance are, ultimately, a component of and factor into their governance objectives and touch on their social and environmental goals as well. It's a tall order and the Inflation Reduction Act creates a whole new landscape. We're excited by the opportunities and challenges our tax practice is helping our clients face.

Federal, State, and Local Tax Controversy Experience

Our Tax Controversy practice combines the deep technical experience of our tax lawyers with the trial expertise of our Firm's nationally recognized litigators. The practice extends from representing and counseling clients on IRS and other tax audits, to adversarial proceedings and trials, including in the US Supreme Court with our award winning Appellate Practice. We also represent clients involved in litigation that may not be in a tax tribunal but where a focal point of the litigation relates

to a particular tax issue. We have nationwide experience in state and local tax controversy matters, representing clients in state tax audits and successfully negotiating resolutions of audits, assessments, and penalties. We also represent clients before state tax administrative agencies and in state judicial proceedings and have experience from trial through the appellate level. We also assist prospectively, working with clients to formulate legislative and regulatory solutions to pressing state and local tax issues.

A National SALT Practice

We bring extensive experience in all aspects of state and local tax counseling, and across every business segment. We understand the nuances of our client's business operations, enabling us to provide our clients with creative comprehensive state solutions to their tax and business issues, including state income and franchise taxes; sales, use, and gross receipts taxes, real property and transfer taxes, and many more. We assist clients in determining their tax exposure and work to minimize it through tax amnesty programs and negotiating voluntary disclosure agreements. We also have experience in formulating policies and procedures to file effective unclaimed property reports, and in negotiating voluntary disclosure agreements.

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