TAX

Attorneys in our Tax Practice Group regularly advise clients on local, state, federal, and international tax matters. Such matters involve income, estate, gift, employment, excise, sales and use, property, and other taxes. We are accustomed to achieving favorable outcomes in dealings with the U.S. Department of the Treasury, the Internal Revenue Service ("IRS"), the North Carolina Department of Revenue, and other State and local tax authorities. Our services include both tax planning and dispute resolution.

Tax Planning

Our tax planning services assist clients in structuring transactions in the most tax-favorable manner. We serve clients in a broad range of tax-related matters such as:

- Transactional tax planning;
- Business formation, including choice of entity decisions;
- Ongoing business operational issues;
- Mergers, acquisitions, reorganizations, divestitures, and liquidations; and
- Obtaining and maintaining tax-exempt status.

As a part of our planning services, we prepare documentation to effect tax-incentive transactions involving tax-exempt bonds and tax credits; provide tax opinions and disclosure materials concerning reorganizations, syndications, securities offerings, financings, investments, and other transactions; prepare requests for advance rulings and technical advice from the IRS or local taxing authorities; provide advice on tax reporting and withholding requirements; and prepare documentation to establish and apply for tax-exempt status.

Dispute Resolution

For clients subject to review by or in dispute with taxing authorities, we offer comprehensive representation, at every stage and in every forum. We regularly provide guidance to clients in:

- Audits, proposed assessments, and refund claims;
- Appeals, within agencies and at review bodies;
- Mediation, arbitration, and other alternative dispute resolution;
- Litigation in Federal (Tax, District, and Claims) and State (Tax and Business) Courts; and
- Tax Collection arrangements.

Our Tax Practice Group attorneys have substantial experience in resolving disputes in a cost-effective manner. Our advocacy focuses upon achieving the most successful outcome available, giving careful consideration to the business and legal costs associated with ongoing controversies.

Clients

Our Tax Practice Group represents a diverse and large group of clients including boards, commissions, and associations; corporations in any tax classification; financial institutions; government entities such as housing authorities, cities, towns, and counties; partnerships and limited partnerships; professional corporations; limited liability companies in any tax classification;

sole proprietorships; tax-exempt and nonprofit organizations in any tax classification; individuals; families; personal representatives, trustees, and other fiduciaries; estates; and trusts. We are able to provide experience across many industries in connection with their particular tax environments.

Teamwork

Our Tax Practice Group attorneys are able to draw upon the experience of other groups within the firm — particularly Business, Financial Institutions, Real Estate, Trusts and Estates, and Litigation — and to assist clients referred to us by, or working with, other practice groups. The availability of these diverse capabilities represents a tremendous benefit for our clients. Ward and Smith, P.A. is founded on teamwork, making all of our resources available to each client on a cost-effective basis, throughout the state. Our talent for working as part of a team contributes substantial value to our collaboration with our clients' in-house counsel, corporate outside general counsel, other-state counsel, internal and external accountants, and other tax and financial advisors.

Attorneys in our Tax Practice Group have outstanding credentials. Some have advanced degrees in taxation, public accounting certifications, and admission to practice before the relevant agencies and forums. They often receive recognition and accolades from peer groups and professional organizations.