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Tax Controversies

Pryor Cashman's Tax Group regularly counsels and represents clients in various stages of federal, state and local tax controversies, including matters before the U.S. Tax Court, involving a variety of sophisticated issues including transfer pricing.

Our Tax Group advises clients on audit issues and handles audits and we appear both informally and formally at the administrative level to seek resolutions of contested matters. The Tax Group, with the assistance of our Litigation Group when appropriate, also litigates before New York administrative appellate bodies and state courts.

The high tax rates in New York State and New York City cause many individuals to attempt, with varying degrees of success, to organize their affairs to avoid these high taxes. In cases where such attempts lead to scrutiny by tax officials, Pryor Cashman's Tax Group has significant success in defending these individuals. This involves undertaking a rigorous analysis and cataloguing of the individual's presence and activities within and without New York and then challenging the underlying legal and constitutional basis for the positions taken by New York State and New York City.

At the state and local levels, we have successfully represented clients in connection with New York State residence and domicile disputes as well as the applicability of sales and use taxes to particular transactions or businesses.