



ONE FIRM
WORLDWIDE®

GLOBAL EXPERIENCE

Jones Day Tax Controversy & Litigation: Global Experience

We Resolve Tax Disputes Pragmatically, Leveraging Our Depth of Government Insight

Our lawyers include former senior officials from the IRS Office of Chief Counsel, the U.S. Department of Justice, the U.S. Treasury Department, the OECD, the Australian Tax Office, and tax authorities in key emerging markets. Many have helped write the rules, shape enforcement policy, and litigate the very issues now confronting our clients. This practical insight gives us a sophisticated understanding of policy objectives, procedural pressure points, and the institutional and personal dynamics that drive decision-making. Combined with disciplined, cross-border strategic coordination, it allows us to anticipate enforcement priorities, craft persuasive narratives grounded in the government's own framework, align positions across jurisdictions, and engage authorities with credibility to achieve early, durable, and favorable resolutions for our clients.

Our Philosophy Is Relationship-Oriented and Solution-Driven

We engage revenue authorities constructively, leveraging advance pricing agreements, cooperative compliance programs, joint audits, fast-track mediation, competent-authority proceedings, and other alternative-resolution mechanisms to achieve results that preserve commercial objectives while minimizing cost and uncertainty. By aligning technical mastery with pragmatic communication, we have helped clients resolve significant proposed adjustments through withdrawals, penalty abatements, and negotiated settlements measured in pennies on the dollar—often before formal litigation has commenced.

When Litigation Is the Best Way Forward, Our Courtroom Pedigree Is Significant

We have delivered precedent-setting victories in the U.S. Tax Court, federal district and appellate courts, and high courts, prevailing in matters involving billions of dollars of alleged deficiencies and shaping doctrine on transfer pricing, economic substance, anti-abuse rules, and penalties. Whether the dispute turns on complex valuation models, novel constitutional questions, or fact-intensive penalty defenses, we field trial teams built for the particular forum, fortified by appellate advocates prepared to carry the record through the highest courts.

We Are Committed to Meaningful Engagement With Clients, Industry Peers, and Policymakers

We regularly host tax controversy roundtables across the United States, Europe, and Asia-Pacific. These invitation-only sessions bring together taxpayers from the same sectors alongside, where appropriate, representatives of revenue authorities to share perspectives under the Chatham House Rule. Participants compare emerging audit and litigation trends, discuss what authorities are prioritizing on the ground in their jurisdictions, and stress-test strategies in a candid, practical forum. The result is real-time intelligence, actionable takeaways, and connections that help you anticipate risk and respond with confidence.

Key Contacts

For further information regarding our Tax Practice, please contact your principal Firm representative or one of the lawyers listed below.



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