

## **Tax**

Hawkins has more tax lawyers dedicated to public finance than any other law firm in the country. Our tax lawyers are experienced with all types of projects eligible to be financed on a tax-exempt or tax-advantaged basis and have significant experience with related transactional and entity tax issues. Our firm's focus on public finance provides us with a unique understanding of the application of federal tax law, as well as the skill to assist our clients in planning and structuring their financings. The firm's tax lawyers work with other national and regional law firms around the country in connection with complex finance transactions.

### **Tax-Exempt & Tax-Advantaged Transactions**

Hawkins tax lawyers have extensive experience dealing with all federal tax issues that may arise in tax-exempt or tax-advantaged financings. We address emerging tax issues earlier and more often in municipal securities transactions as a result of the number, diversity and nature of the financings we work on.

Our familiarity with the federal tax aspects of the full range of tax structures for tax-exempt and tax-advantaged transactions enables us to efficiently and effectively analyze alternative approaches available to issuers and borrowers seeking to finance their various programs and projects.

### **Arbitrage Rebate Services**

Hawkins has an in-house arbitrage rebate compliance group, the Financial Analysis & Services (FAS) Group. The FAS Group, which is staffed with professionals with finance, mathematics, statistics and engineering backgrounds, works under the direction of [Takashi Iwata](#).

Our FAS Group works closely with our tax lawyers and performs the entire range of calculations that are necessary or incidental to tax-exempt and tax-advantaged bonds, including arbitrage rebate, yield restriction and financial structuring services. The relationship between the quantitative and legal experts of the firm enables us to comprehensively and efficiently undertake complex analyses.

Please click [here](#) for the brochure.

### **Post Issuance Compliance**

Hawkins tax attorneys routinely help clients develop and implement policies and procedures that best ensure its clients' compliance with the tax law following the issuance of tax-exempt or tax-advantaged bonds.

We provide assistance in this area by responding to specific questions and issues, conducting seminars to discuss tax compliance and preparing and disseminating advisories to notify clients of changes in the tax law.

Additionally, we counsel our clients in applying the self-help remedies provided in the tax law in circumstances in which changes occurring after the issuance of bonds jeopardize the status of such tax-exempt or tax-advantaged bonds.

### **IRS Voluntary Closing Agreement Program Experience**

Hawkins has extensive experience and expertise in representing and advising issuers and borrowers in connection with IRS proceedings.

Our tax lawyers routinely represent issuers and borrowers in audits, as well as the IRS's voluntary closing agreement program (VCAP). Clients benefit from our broad experience in successfully addressing technical tax issues that arise in both IRS audits and VCAP proceedings.

### **Private Letter Rulings and Regulatory Experience**

Hawkins has significant experience in obtaining favorable IRS private letter rulings on behalf of our clients. Many of the private letter rulings we have obtained have established the foundation for various tax principles in the tax-exempt area.

Additionally, our tax lawyers actively participate in the federal tax legislative, regulatory and administrative process. We confer, when appropriate, with IRS and Treasury officials on tax policy issues and the development of tax-exempt and tax-advantaged bond regulations. The scope and breadth of our practice gives us the opportunity to make significant contributions to establishing tax policy.

### **Practices**

- Bank Counsel
- Bond Counsel
- Borrower's Counsel
- Disclosure Counsel
- Private Placements
- Securitization
- Underwriters' Counsel

### **Industries**

- Cultural Institutions and Foundations
- Economic Development
- Education
- Health Care
- Housing
- Power and Renewable Energy
- Public Buildings
- Solid Waste
- Transportation
- Water