

Tax Accounting

Miller & Chevalier has long had one of the nation's premier tax accounting practices and a reputation for creatively and successfully resolving tax accounting issues for our clients. Our team includes the authors of the most widely cited tax accounting treatise, *Federal Tax Accounting*, and our expertise and work in this area has contributed to our ranking as a national tax leader in *Chambers USA*.

Our clients include some of the world's largest companies, many of whom we've served for decades in connection with highly complex tax accounting needs. Although we serve clients in a range of industries, we have especially deep experience with tax accounting issues arising in the oil and gas, utilities, and insurance industries.

We help our clients navigate the rules governing when to include income and take deductions for U.S. federal income tax purposes and decide whether and how to adopt or change a method of accounting. We do this in various circumstances—planning, audit preparation, and audit defense to name a few—and develop bespoke solutions to accommodate particular facts and circumstances. Our team has deep expertise with the full range of tax accounting matters, including income and expense accruals, deferral of advance payments, the economic performance rules, the clear-reflection-of-income doctrine, inventory accounting, installment obligations, capitalization, and depreciation and amortization.

When clients need assistance interacting with the government, they can rely on our unparalleled reputation and experience with the IRS and Treasury Department and our long track record of successfully resolving high-stakes tax accounting controversies. We work to resolve issues early in the process and without litigation, if that is the client's objective. But when litigation is called for, we are among the best. Our tax controversy team, nationally ranked by *Chambers*, has resolved some of the most important tax accounting controversies on record.

RANKINGS AND RECOGNITION

- *Chambers USA*: Tax Team of the Year, 2016
- *Chambers USA*: Tax: Controversy (Nationwide), 2007 - 2021
- *Chambers USA*: Government Relations: Specialist Tax Firms (Nationwide), 2019 - 2021
- *Chambers USA*: Tax (District of Columbia), 2003 - 2021
- *Chambers USA*: Tax: Corporate & Finance (Nationwide), 2020 - 2021
- *Legal 500*: Tax: Contentious (U.S.), 2007 - 2021
- *Legal 500*: Tax: International Tax (U.S.), 2013 - 2021
- *Legal 500*: Tax: Non-Contentious (U.S.), 2013 - 2021
- *U.S. News - Best Lawyers*[®] "Best Law Firms": Tax Law (National), 2010 - 2022
- *U.S. News - Best Lawyers*[®] "Best Law Firms": Tax Law (District of Columbia), 2010 - 2022
- *International Tax Review "Americas Tax Awards"*: Americas Tax Policy Firm of the Year, 2012 - 2013, 2015 - 2016
- *International Tax Review "Americas Tax Awards"*: Washington, DC Tax Firm of the Year, 2013
- *International Tax Review "Americas Tax Awards"*: Washington, DC Transfer Pricing Firm of the Year, 2012
- *International Tax Review*: World Tax (Washington, DC), 2012, 2014 - 2020
- *International Tax Review*: World Transfer Pricing (National), 2014 - 2020

