



## John E. Hurley | Counsel | Team Co-Leader - Tax Planning

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During his twenty-year tax career, Mr. Hurley has represented and advised individuals, small and midsize businesses, as well as multiple Fortune 500 companies on a wide array of sophisticated tax issues in various tax disciplines, such as; tax controversy, tax planning, international tax and transfer pricing.

Mr. Hurley began his legal career in a law firm in which he primarily represented a large conglomerate multinational corporation on state and local tax audits and appeals throughout the United States. Subsequently, Mr. Hurley moved inhouse into the client's tax department to continue his tax controversy work eventually expanding into federal tax.

Afterwards, Mr. Hurley led the tax controversy practice for one of the world's leading global oil and gas companies, and continued his career path into international taxation, tax planning, and Mergers and Acquisitions for other large corporate tax departments at various multinational corporations.

Mr. Hurley has primarily worked in tax departments of some of the world's largest multinational corporations leading tax controversy teams and successfully representing organizations before numerous tax authorities at the state, federal, and international levels, as well as providing tax planning solutions to complex transactions and corporate structures.

Mr. Hurley has managed the full lifecycle of tax controversy from the initial audit stage through the appeals and settlement process. As a result, Mr. Hurley has handled and successfully resolved a broad range of sophisticated international, federal, and state tax issues before numerous tax authorities.

After many years inhouse, Mr. Hurley returned to private law practice where he continues to provide legal tax services to a wide array of clients representing individuals and businesses before the IRS, Tax Court, and the SBA Office of Hearings and Appeals, as well as providing tax planning

### CAPABILITIES

#### Tax Controversy

- Audit Representation
- International Tax Controversy
- Residency & Domicile
- Tax Collection Defense
- Tax Litigation
- White Collar Criminal Tax Defense

#### Tax Planning

services.

Mr. Hurley can represent clients before the IRS, U.S. Tax Court, and U.S. District Court (S.D. Fla.), as well as clients before Florida state tax authorities and Florida state courts (and other state tax authorities where permitted under specific State rules).

## **EDUCATION**

- University of Miami School of Law, LL.M. Taxation, certification in international tax, 2009
- Florida State University, College of Law, J.D. 2002
- Florida State University, B.A. International Affairs and Spanish, 1997

## **ADMITTED TO PRACTICE**

- Florida
- U.S. Tax Court
- U.S. District Court, Southern District of Florida