

Contact**Houston**

1200 Smith Street, Suite 1400
Houston, Texas 77002-4310
Tel: 713.658.1818
Fax: 713.658.2553

Atlanta

191 Peachtree Street, N.E.,
Forty-Sixth Floor
Atlanta, Georgia 30303
Tel: 404.659.1410
Fax: 404.659.1852

Philadelphia

300 Conshohocken State Road
Suite 570
West Conshohocken, PA 19428
Tel: 610.772.2300
Fax: 610.772.2305

San Antonio

112 East Pecan Street, Suite
1450
San Antonio, Texas 78205
Tel: 210.253.8383
Fax: 210.253.8384

IRS Fight Against Pandemic Tax-Credit Scams Wont Be Simple or Fast, Wall Street Journal

Tom Cullinan included in Wall Street Journal article

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In an article published in the Wall Street Journal on October 5, 2023, Atlanta-based Shareholder Tom Cullinan is included in a round-up of legal sources discussing challenges the IRS will face in policing the millions of employee-retention credit claims.

The article outlines insight from tax lawyers noting that they expect several busy years defending tax-credit consulting firms and employers as the IRS tries to claw back some of the \$230 billion it paid in employee-retention credits, or ERC refunds.

If you just start looking at the statute, I think a lot of it is open to various interpretations, and I would expect that taxpayers are going to win some cases, said Cullinan.

The article notes that the IRS will attempt to pierce firms protections, drawing on definitions of promoters and preparers that arent necessarily tied to who signs a return.

The Service has a lot of tools, said Cullinan, the former IRS official. Whether theyre all going to work given some of the structures out there, were going to be setting some precedent.

To reach the full article, [click here](#).