

#### Practice Areas

- Tax
- Tax Controversy & Litigation

#### Education

- University of Alabama School of Law, L.L.M. in Taxation
- University of Alabama School of Law, J.D.
- University of Alabama, B.S. in Accounting with a minor in Political Science

#### Honors

- Best Lawyers: Ones to Watch in America (2025)
- The National Black Lawyers Top 100
- Legal Division Award for litigation in Syndicated Conservation Easements (2019)

#### Bar Admissions

- Georgia

#### Court Admissions

- U.S. Tax Court

## Jerrika Anderson

Senior Associate

Atlanta

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Jerrika Anderson is a member of both the Tax Controversy & Litigation Group and the Tax Group, based in the Atlanta office. As a former Senior Trial Attorney with the IRS Office of Chief Counsel, Jerrika specializes in tax, federal and state tax controversies and investigations, including sensitive issue examinations, administrative appeals, and civil tax litigation. Her clients often include high net worth individuals and their closely held entities, business enterprises, partnerships, limited liability companies, corporations and others.

At the Chief Counsel's Office, Jerrika litigated cases on behalf of the IRS and was honored with the Legal Division Award for her work on syndicated conservation easement cases. Jerrika was responsible for issuing written guidance to IRS revenue agents, appeals officers, and settlement officers on various substantive tax issues. Her knowledge about IRS procedures, resolution mechanisms, and litigation tactics, makes her an effective advocate for her clients.

As the proud recipient of an LL.M. in Taxation from the University of Alabama, Jerrika's practice areas include the full spectrum of substantive and procedural tax issues and all phases of the tax controversy and tax litigation process. Although based in the Firm's Atlanta office, Jerrika works closely with her colleagues in every office, often representing clients throughout the country. She has handled cases in the following areas:

- Civil Fraud Penalty
- Conservation Easements
- Captive Insurance
- Collection Due Process
- Employee Retention Credit
- Estate and gift tax
- Tax and tax penalty issues involving cryptocurrency
- Foreign tax credits

## **Jerrika Anderson, *Continued***

- Section 183 Hobby Loss
- Res judicata and collateral estoppel
- Treatment as employee or independent contractor
- Rehabilitation tax credits, low-income housing tax credits, and economic development credits
- Innocent Spouse
- Promoter Penalty

### **Significant Cases**

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- [May 2023] – Received full concession in whipsaw assessment case including multi-million dollar deficiency and civil fraud penalty
- [August 2022] – Achieved highly favorable settlement in civil fraud penalty case
- Hewitt v. Commissioner – conservation easement
- Coosa Towers v. Commissioner – syndicated conservation easement case
- [March 2020] – civil injunction suit involving captive insurance
- [November 2019] – multi-million dollar refund litigation
- Sleeth v. Commissioner – won multi-year innocent spouse case, win was upheld on appeal

Jerrika is an active participant in Diversity, Equity, and Inclusion (“DEI”) programs that promote fair representation, equal opportunities, and respectful workplaces. Jerrika serves as a Tax Subject Matter Specialist for Operation Hope’s 1 Million Black Businesses (1MBB) project. As a Tax Subject Matter Specialist, Jerrika provides guidance, expertise, and support tailored to the needs of the 1MBB participants. Jerrika is a Loretta Collins Argrett Fellowship mentor that advises tax attorneys with diverse backgrounds.

Jerrika is the head of the training program for the Firm’s tax controversy practice group. Her role is pivotal in shaping the professional development and expertise of the legal team. She is dedicated to equipping lawyers with the latest knowledge and skills essential for navigating complex tax laws and regulations. Through comprehensive training programs, Jerrika ensures the Firm’s tax controversy practice group remains at the forefront of industry trends, procedural changes, and strategic approaches to resolving tax disputes. By fostering a culture of continuous learning and excellence, Jerrika upholds the Firm’s commitment to providing top-tier legal services that effectively advocate for her clients’ interests while adhering to the highest ethical standards in the tax controversy practice.

### **Professional Affiliations**

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- American Bar Association, Tax Section
  - Georgia Bar Association, Tax Section
  - Atlanta Bar Association, Tax Section
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