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**“2021 Forecast: Tax Attorneys Will Be in High Demand Thanks to the Pandemic and a New President”**

**David Aughtry quoted in article on “2021 Forecast: Tax Attorneys Will Be in High Demand Thanks to the Pandemic and a New President”**

*The American Lawyer*

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In an article that published in *The American Lawyer* on December 30, 2020, Chamberlain Atlanta-based Shareholder David Aughtry discusses how tax practice leaders expect a busy year for tax lawyers in 2021 due to the economic impact of the COVID-19 pandemic, practices still working through the changes of the 2017 tax reform legislation and a new presidential administration.

“Two areas under particular federal scrutiny are conservation easement and captive insurance company cases,” explains Aughtry. “After the 2017 reforms, the IRS began examining every conservation partnership dating from 2016, and formed 12 audit groups just for captive insurance cases.”

Aughtry shared that in doing so it has “created a surge of tax controversy cases that won’t get resolved, due to the IRS’s aggressive enforcement posture. It’s all going to end up in tax court.” He also mentioned that the COVID-19 pandemic has delayed trials for bellwether cases that would have provided guidance, and that backlog, combined with the surge in new cases, “is putting a lot of pressure on the litigation pipeline.”

The most critical tax planning issue Aughtry sees is a potentially sharp reduction in the federal estate tax exemption, which doubled under the 2017 legislation. That could have serious consequences for owners of closely held, family-owned businesses.

To view the full article, subscribers may [click here](#).