

**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**

50 South 16th Street, Suite  
1700  
Philadelphia, PA 19102  
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

## Criminal Tax Defense

**Criminal Tax Defense**

True to our co-founding by former United States Department of Justice tax litigators, Chamberlain Hrdlicka has a long history of defending criminal tax prosecutions and investigations. And like our founders, our criminal tax attorneys have been lauded for their work both inside and outside the government and are some of the most recognized criminal tax defense attorneys in the country.

Our criminal tax attorneys understand that the best result to avoid criminal indictment altogether. Therefore, we have worked hard to establish a well-deserved reputation for integrity among government prosecutors. This reputation for integrity along with our knowledge of the most critical facets of criminal tax investigations means we are often able to convince government decision-makers to decline prosecution.

However, if the government chooses to indict despite our best efforts, Chamberlain Hrdlicka's attorneys have the litigation and trial experience to obtain favorable plea deals or acquittals. Chamberlain Hrdlicka's founding as a tax litigation firm enables us to draw upon our broad and deep institutional tax expertise to put forth the strongest defense possible when a case is moving towards trial. We have the tangible results to prove it.

Some of our notable accomplishments in the area of criminal tax defense:

- 1 Representation of a prominent tax/real estate attorney who was acquitted after trial by a jury in a tax evasion case.
- 2 Computer manufacturer/promoter acquitted by a jury in a tax evasion case.
- 3 Professional athlete acquitted by the Court after trial to a jury.
- 4 Husband and wife tennis professionals acquitted by a jury in a tax evasion case.
- 5 Prosecution declined by the United States Attorney respecting alleged tax evasion by a night club owner.
- 6 Prosecution declined by the United States Attorney respecting alleged tax evasion by owners of a nursery business.
- 7 Prosecution declined by the Department of Justice, Tax Division of alleged tax evasion by owners of an aircraft business.
- 8 Prosecution declined by the Department of Justice Tax Division of a high-profile personal injury lawyer accused of tax evasion.
- 9 Tax Division dismisses felony charges against a doctor in a tax shelter case and accepts a plea to misdemeanor charges resulting in a sentence of probation.

## **Criminal Tax Defense,** *Continued*

10 Obtained probation for doctor and wife sentenced after their conviction for tax evasion.

11 Obtained sentencing alternatives to avoid deportation of a resident alien convicted of subscribing a false income tax return.

### **Types of Criminal Tax Cases:**

---

Tax Evasion

False Returns

Tax Conspiracy

Tax Fraud: Federal and state tax fraud including estate tax cases

Willful Failure to File

Willful Failure to Pay

