

## **CRIMINAL DEFENSE**

---

**Health Care Fraud Defense**

**Tax Fraud Investigations & Prosecutions**

**Anti-Trust Defense**

**Traditional Criminal Defense**

**White-Collar Criminal Defense**

### **About Tax Fraud Investigations & Prosecutions**

For more than thirty years, Clayman Rosenberg Kirshner & Linder LLP has creatively and forcefully advised individuals, small businesses, and large corporations facing civil and criminal tax fraud investigations undertaken by federal, state and local tax authorities, including the Internal Revenue Service, the New York State Department of Taxation and Finance, local district attorneys throughout New York state, and the United States Department of Justice. We have successfully litigated cases involving allegations of conspiracy and filing false income tax returns, tax evasion, failure to file income tax returns, filing fraudulent sales tax returns and related crimes.

---

### **Representative Matters**

- Represented at trial in the United States District Court for the Southern District of New York an attorney from a major law firm charged with orchestrating what the government

claimed was the largest tax shelter fraud in U.S. history.

- Successfully represented a senior tax professional at a Big Four accounting firm charged with participating in a scheme to defraud the IRS in connection with the marketing of tax shelters to the firm's clients.
- Obtained sentence far below the agreed-upon Sentencing Guidelines for business owner charged with federal tax evasion in New Jersey.
- Convinced the New York State Department of Taxation and Finance to drop its criminal investigation of an attorney who failed to file tax returns for multiple years.
- Persuaded the Brooklyn District Attorney's Office to decline prosecution of an accountant recorded on videotape allegedly counseling a client to evade income taxes.
- Dissuaded the United States Attorney's Office for the Southern District of New York from prosecuting an individual who failed to disclose an overseas account and allegedly lied to prosecutors about its existence.
- Represented numerous individuals and businesses in criminal sales tax investigations and prosecutions conducted by the Manhattan, Brooklyn, and Queens District Attorney's Offices.
- Persuaded the Westchester District Attorney's Office to refrain from prosecuting the CEO of a prominent minority-owned asset management company for failure to file personal income tax returns.