



**Jeffrey C. Brown**  
Attorney / Of Counsel

### Areas of Concentration

- Tax
- Foundations, Non-Profits, and Exempt Organizations
- Intellectual Property

### Education

L.L.M., Boston University  
J.D., Albany Law School  
B.A., *magna cum laude*, Phi Beta Kappa, Boston University

### Admission & Qualifications

State Bar of Texas  
State Bar of New Mexico

### Languages

- English
- Spanish

### Contact Information

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Mr. Brown is of counsel to ScottHulse after being a Shareholder of the firm for over 25 years. He has been recognized as one of the “Best Lawyers in America” by Woodward White.

Mr. Brown represents taxpayers in their tax disputes with the Internal Revenue Service, the Texas Comptroller of Public Accounts and the New Mexico Department of Revenue.

Mr. Brown serves as counsel to clients during tax audits, administrative appeals and tax litigation, and also assists taxpayers confronted with Government action to collect unpaid taxes.

Mr. Brown advises both individuals and businesses on tax planning matters, including the formation and reorganization of family and commercial entities. He works closely with accountants, in house accounting personnel and others to ensure that IRS guidelines are complied with and tax savings are maximized. Mr. Brown also helps foreign clients acquire and dispose of U.S. businesses and property. He works with foreign law firms and other advisors to structure client investments abroad. Additionally, he assists clients in complying with foreign bank account (FBAR) disclosure requirements.

Mr. Brown has helped numerous non-profit organizations obtain tax-exempt status, to set up their corporate structure, and to address governance and tax related issues. He has successfully defended against IRS attempts to revoke the tax-exempt status of charitable organizations.



## ScottHulse | Jeffrey C. Brown – Shareholder

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In the intellectual property area, Mr. Brown's practice is focused upon working with businesses and individuals to develop, register, maintain and protect trademarks, service marks, trade names, and trade dress. He has also assisted in the acquisition of trademarks from other parties. Mr. Brown helps clients go after infringers and defends clients charged with infringing the rights of others. He has considerable experience drafting and negotiating complex licensing and joint venture agreements involving intellectual property.

Mr. Brown has the highest Martindale-Hubbell peer rating of AV Preeminent. An AV Preeminent peer rating reflects an attorney who has reached the heights of professional excellence. He or she has usually practiced law for many years, and is recognized for the highest levels of skill and integrity.

With regard to community engagement, Mr. Brown is a member of the El Paso Bar Association, Texas Bar Association, New York Bar Association, and American Bar Association. Mr. Brown served in the U.S. Navy Reserve from 1971 to 1995, and retired with the rank of Captain.

### Representative Matters

- Successfully defended taxpayers in tax audits where the IRS sought millions of dollars in estate, gift and/or income tax.
- Prevailed against IRS attacks of family limited partnerships.
- Negotiated settlements with IRS collection personnel that resulted in the reduction of tax liabilities by millions of dollars.
- Serves as counsel to numerous charities of all sizes including large multi-member, corporate structures.
- Counsels Mexican businesses and individuals in structuring operations in the United States.
- Counsels U.S. businesses and individuals in structuring operations in the European Union, Central America, and South America.
- Creates and reorganizes entity structures of businesses of large and modest means to compartmentalize liability and minimize tax.
- Assists real estate investment trust (REIT) in complying with the complex tax rules governing REIT operations.
- Assists taxpayers in negotiating Offers in Compromise, Installment Agreements and other arrangements with the IRS.

### Organizations

- El Paso Bar Association
- State Bar of Texas
- New York State Bar Association
- American Bar Association