



## Stuart M. Schabes

Shareholder

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Stuart M. Schabes is an experienced attorney with a focus on complex tax, tax controversy, and business matters.

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Mr. Schabes is an experienced tax and corporate attorney. He has extensive dealings on an array of tax controversy matters with the IRS on a national and international level, as well as with various state tax authorities. Most recently, he has been assisting clients on an array of tax matters under the CARES Act, including matters related to the Employee Retention Credit.

His vision and deep understanding of how clients can benefit from cutting-edge tax planning and structures for domestic and in-bound transactional matters is opening new doors for clients seeking innovative tax counsel and new business opportunities.

Mr. Schabes represents clients in complex business matters. His many successes include negotiation of countless mergers, acquisitions, management buyouts and sales to – and from – private equity and other joint venture-related entities.

Experienced in virtually all aspects of tax litigation at both the federal and state level, Mr. Schabes has taken the lead in many tax controversy cases involving the IRS and various state taxing authorities. These include IRS examinations and appellate matters involving income tax, excise tax and employment tax, as well as worker classification issues. His clients operate in widely diverse industries, including aviation, credit card, trucking and transportation, logistics, health care, real estate, hospitality, entertainment and the not-for-profit/exempt sectors.

Mr. Schabes has a successful track record of resolving disputes at all levels of the IRS. With many years of experience dealing with the IRS Collection Division on a national level, he is known for his determination in negotiating and resolving IRS tax assessments for both domestic and international based corporations, including Fortune 100 entities, limited liability companies, trusts and estates, entrepreneurs, sole proprietors, and individuals. Once a tax liability is imposed, Mr. Schabes helps clients navigate numerous payment and priority issues. Such issues include the erroneous issuance of IRS tax liens and levies, and their subsequent release and withdrawal.

Recent economic conditions are prompting many clients to seek Mr. Schabes' counsel to handle tax workout situations involving large tax liabilities and abatement of various penalty and interest-related matters. He represents corporate and business directors, officers and employees who are confronting Trust Fund Recovery Penalty matters and similar issues at the state and local level. He provides legal counsel to both domestic and non-U.S.-based clients on participation in various voluntary compliance and amnesty-based programs, including the FBAR filing rules.

Mr. Schabes continues to serve as special tax counsel to several global companies, assisting them with numerous IRS and other regulatory and compliance-related issues, including those uniquely applicable under the federal excise tax provisions. He helps secure significant tax refunds for business clients and is often involved in groundbreaking federal excise tax matters such as those affecting various airlines and charter companies.

In addition to his involvement in various legal and aviation industry associations, Mr. Schabes is active in an array of charitable and community activities. He currently serves as a board member of THE ASSOCIATED: Jewish Community Federation of Baltimore.



## Case Studies

- Baker Donelson Represents Unsecured Creditors' Committee of Remington Outdoor Company in Chapter 11 Proceedings - Bankruptcy



## Professional Honors & Activities

### Professional Memberships

- Member – American Bar Association
- Member – Maryland State Bar Association
- Member – National Business Aircraft Association

### Community Service

- Board Member – The Associated: Jewish Community Federation of Baltimore

### Honoraries

- Listed in *The Best Lawyers in America*® for Business Organizations (including LLCs and partnerships) since 2012; Tax Law since 2013; Litigation and Controversy - Tax since 2021
- Named the Best Lawyers® 2021 Litigation and Controversy - Tax "Lawyer of the Year" in Baltimore
- Listed in *Maryland Super Lawyers*, Business/Corporate (2007 – 2012)
- Listed in *Smart CEO's* Legal Elite (2010)



## Professional Background

- Partner, Galland, Kharasch, Greenberg, Fellman & Swirsky, P.C.
- Partner, Blum, Yumkas, Mailman, Gutman & Denick, P.A.
- Attorney, Frank, Bernstein, Conaway & Goldman
- Attorney, Advisor to Judge Herbert L. Chabot of the United States Tax Court



## Publications

- "No More Lists – IRS Concedes on Reportable Transaction Penalties" (January 2025)
- "IRS Issues New Guidance on ERC Program – Should You Hold or Fold?" (August 2024)
- "S.A.L.T. Select Developments: Washington, D.C." (July 2024)
- "S.A.L.T. Select Developments: Maryland" (July 2024)
- "S.A.L.T. Select Developments: North Carolina" (July 2024)
- "S.A.L.T. Select Developments: Washington, D.C." (May 2024)
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- "S.A.L.T. Select Developments: Washington, D.C." (February 2024)
- "S.A.L.T. Select Developments: Maryland" (February 2024)
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- "IRS Launches Employee Retention Credit Voluntary Disclosure Program – Is It Time to Hold or Fold?" (January 2024)
- "S.A.L.T. Select Developments: Washington, D.C." (January 2024)

- "S.A.L.T. Select Developments: Maryland" (January 2024)
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- "IRS Increases ERC Enforcement and Prepares to Launch New Voluntary Disclosure Program" (December 2023)
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- "S.A.L.T. Select Developments: Maryland" (June 2021)
- "Creative Approaches to the Employee Retention Credit" (May 2021)
- "Tax Extenders: What Is Likely To Be Expanded or Modified?," *Washington, D.C. Update* (September 2020)
- "Executive Order "Deferring" Taxes: Notice 2020-65 Postures Guidance," republished October 8, 2020, in *Corporate Compliance Insights* (September 2020)
- "INSIGHT: Navigating Covid-19 Relief Loans, Employer Tax Deferral, and Tax Credits," *Bloomberg Law: Tax* (July 9, 2020)
- "Paycheck Protection Program Extended; SBA Releases Borrower Data," republished in *Banking Exchange* (July 7, 2020)
- "Navigating PPP, Employer Tax Deferral, and Tax Credits Under the FFCRA and CARES Act" (June 17, 2020)
- "No News is Not Always Good News: IRS's Offshore Voluntary Disclosure Program is Ending," *Bank & Lender Liability* (April 2018)



## Speaking Engagements

- Panelist – "Fear, Loathing and The Aftermath of the COVID-19 Pandemic: Senior Care Providers and the Primary COVID-19 Financial Support Programs—A View From the Trenches," AHLA Long Term and Post-Acute Care Law and Compliance (February 2025)
- "Presenter - 12th Annual Tax Seminar: How is the IRS Planning on Using the Additional \$80 Billion in Funding? " (May 2023)
- "Presenter - 11th Annual Tax Seminar: Insights on How to Deal With the IRS in the Post-Pandemic World" (June 2022)
- "10th Annual International Tax Seminar: The Significant Impact of COVID-19 on Tax Planning, Tax Compliance and Related Planning Opportunities" (May 2020)
- "Latest Insights to the IRS' New Initiatives Effecting Many Different Categories of Taxpayers," Maryland Association of CPA's (September 2019)

- "The Assessment and Collection of Trust Fund Taxes," Tax Controversy Update (International & Domestic) (June 2019)
- "9th Annual Tax Seminar: Tax Updates You Need to Know Living Abroad and Conducting Business in the U.S." (May 2019)
- Featured – "The Quiet Before the Storm," Interview with Philip L. Stein and Associates (May 2017)
- Presenter – "The Cost Of Non-Compliance: DOL's Final Overtime Rule and Your Bottom Line," Maryland Construction Network (2016)
- Presenter – "6th Annual International Tax Seminar: Tax Compliance in a Transparent Environment," Ober|Kaler CPE Program for Israeli Accountants (2016)
- Presenter – "Major Changes to Taxation of Award Miles," Hotel Tax Executive Committee (HOTEC) Conference (2016)
- Featured – "2015, It's Been a Blast," Interview with Philip L. Stein and Associates (December 2015)
- Presenter – "IRS & Identity Theft," 46th Annual Chesapeake Tax Conference, Maryland Association of CPAs (2015)
- Presenter – "5th Annual International Tax Seminar: Hot IRS Topics for 2015," Ober|Kaler CPE Program for Israeli Accountants (2015)
- Presenter – "New Horizon of Tax Compliance in Light of FATCA, OECD and BEPS - What Does it Mean for Israelis?," Institute of Certified Public Accountants in Israel (2015)
- Presenter – "Offers in Compromise/Deficiencies, Penalties & Negotiations," 45th Annual Chesapeake Tax Conference, Maryland Association of CPAs (2014)
- Presenter – "Israel/US Tax Seminar on Recent IRS Rulings," CPE Program for Israeli Accountants (December 2014)
- Presenter – "How to Solve the U.S. Tax Compliance Problem?," Philip L. Stein and Associates, Israeli CPA Association (November 2014)
- Presenter – "How to Correct the Problem: OVDP Streamline or Other Alternative?," The Perfect Tax Storm II, Philip L. Stein and Associates (November 2014)
- Presenter – "4th Annual International Tax Seminar: Important and Timely IRS and International Tax Issues Faced by US Citizens, Greencard Holders, Business Owners and Entrepreneurs Living Abroad and/or Doing Business in the US," Ober|Kaler CPE Program for Israeli Accountants (May 2014)
- Presenter – "3rd Annual International Tax Seminar: Hot IRS Topics Affecting US Citizens/Green Card Holders Living in Israel and Abroad," Ober|Kaler CPE Program for Israeli Accountants (May 2013)
- Presenter – "Tax Questions Every Israeli Living/Doing Business in the US Needs to Ask and Get Answered," Philip L. Stein and Associates, Israeli CPA Association (May 2013)
- Featured – "OVDI- Breaking News," Interview with Philip L. Stein and Associates (March 2013)
- Presenter – "FATCA – 2013 and Beyond," The Perfect Storm: US Tax Legislation and IRS Compliance 2013, Philip Stein & Associates and ERM (December 2012)
- Presenter – "2nd Annual International Tax Seminar: Very Important IRS Topics for Israeli CPAs," Ober|Kaler CPE Program for Israeli Accountants (December 2012)
- Presenter – "Why is it my Business? New Laws and Tax Return Regulations Relevant to Bank Accounts Outside the US," Israeli CPA Association (December 2012)
- Presenter – "Increased IRS Tax Compliance Involving U.S. Citizens/Green Card Holders in Israel," Philip L. Stein and Associates, Israeli CPA Association (October 2012)



## Webinars

- 2021 Health Care Outlook (February 2021)



## Education

- Georgetown University Law Center, LL.M. in Taxation, 1986

- Hofstra University School of Law, J.D., 1984
  - Notes and Comment Editor – *Hofstra Law Review*
- Duquesne University, B.S., magna cum laude, 1981



## Admissions

- Maryland
- Ohio
- Court of Appeals of Maryland
- Supreme Court of Ohio
- U.S. Tax Court