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Bill Curtis and Crystal L. Howard Discuss IRS Settlement Initiative in CPA Practice Advisor

Spencer Fane attorneys Bill Curtis and Crystal L. Howard wrote the article The IRS's 'New' Syndicated Conservation Easement Settlement Offer: Deja Vu All Over Again? recently published by *CPA Practice Advisor.*

In the team's article, originally a firm blog post, they examine the IRS's new settlement initiative for syndicated conservation easement cases and how it affects those who invested. They consider the tradeoffs facing taxpayers, including reduced deductions and a 10% penalty versus the risk of proceeding with the litigation. The analysis also evaluates whether the initiative is likely to encourage participation or lead more investors to continue litigation.

"Most SCE investors will be faced with an unpleasant dilemma: write a big check to the IRS now and get closure, or fight it out in the hopes that skilled counsel can find a foot fault or that the IRS comes out with better terms in the future. Neither option is appealing, but hope is not a strategy," the team wrote.

At the firm, Bill represents clients in government investigations and environmental litigation related to syndicated conservation easements, carbon and energy credits, and traditional environmental issues. His individualized approach to client matters and attention to detail allow him to provide clients with solutions tailored to their unique needs and risk profiles.

Crystal's practice resides at the intersection of business transactions and tax efficiency. She guides clients through complex commercial transactions and develops strategic tax planning solutions. By building compliant, scalable frameworks tailored to the unique demands of the wellness industry, she helps clients minimize risk, maximize operational flexibility, and grow in a sustainable, tax-

efficient manner.

Read the team's full article here.