



Elizabeth K. Blickley

Partner

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Elizabeth is a tax attorney who approaches every matter with a simple rule: don't accept the premise. A trial lawyer who spent her career steeped in federal tax disputes, she has earned a reputation for devising novel arguments and proving that the right challenge, raised at the right time, can reshape the outcome entirely.

As the firm's go-to authority on U.S. Tax Court rules, procedure and judges, Elizabeth is the one who other attorneys turn to — from associates tackling their first petitions to partners with decades of trial experience — when they need to know how a case should move through Tax Court. That depth of knowledge is not academic. It is the product of 15 years of practice, years spent inside the Tax Court and the IRS Office of Chief Counsel, and a relentless habit of reading extensively and remembering where the landmines are.

Elizabeth's deep knowledge base means she can confidently identify the issue, reframe the argument, connect the caselaw others have missed, and chart a course forward — often in a single conversation. She sees flawed assumptions where others see settled conclusions and she's adept at presenting creative arguments as the more attractive and elegant solution.

For clients navigating high-stakes tax disputes, that combination of speed, precision, and tenacity is exactly what the situation demands.

Elizabeth is also a trusted resource beyond the courtroom. She frequently educates certified public accountants on navigating the intersection of tax compliance and controversy, including when to bring in counsel and how to protect both themselves and their clients from civil and criminal exposure.

Broad Experience

Elizabeth represents businesses, partnerships, and individuals in the full range of federal tax controversies and litigation. She has deep experience in matters involving income, estate, gift, corporate, partnership, employment, excise and criminal tax matters, as well as disputes involving nonprofit status revocations, Foreign Bank Account Report (FBAR) compliance, FOIA issues, employee classification, and collection actions.

She defends clients in proceedings before U.S. Tax Court, and in civil and criminal cases before district courts and courts of appeal. When the situation calls for it, Elizabeth works to achieve her client's goals through settlement negotiations with the Department of Justice and the IRS.

Strategic and Aggressive

Her approach is strategic and procedure-driven. Elizabeth uses aggressive motions practice to narrow the battlefield well before trial, eliminating issues one by one so that by the time a case reaches the courtroom, the government is fighting on the ground she chose. She challenges regulations head-on, takes on entrenched lines of case law, and positions her clients to benefit not only from wins in their own matters but from shifts in the legal landscape that open doors for others facing similar disputes.

Clients come to Elizabeth because they want more than competent counsel — they want someone who will fight for the right answer and find creative legal solutions to get them there. Many of her clients have felt poorly treated by the IRS before they ever walk through the door, and they are looking for vindication. Elizabeth's instinct is to deliver it: to prove entitlement, challenge the government's assumptions, and use every procedural tool available to reach the most favorable and efficient resolution.

A sought-after voice in the tax community, Elizabeth is regularly quoted in the media on significant developments in federal tax law and controversy. She writes for the firm's Tax Controversy blog and contributes to industry publications on topics ranging from penalty approval procedures to enforcement policy and taxpayer rights.

Services

- Taxation & Wealth Planning
- Tax Controversy & Litigation
- White Collar Criminal Defense & Government Investigations

Before Fox Rothschild

Previously Elizabeth was an attorney in the IRS Office of Chief Counsel and an attorney-advisor and law clerk with the U.S. Tax Court prior to entering private practice.

She also spent a year as a John S. Nolan Fellow with the American Bar Association's Section on Taxation and before that was a tax controversy associate at two law firms in Chicago.

Beyond Fox Rothschild

Elizabeth speaks frequently on tax topics. She has presented to the Greater Washington Society of CPAs and the Northern Virginia Society of CPAs on tax policy issues, particularly those involving U.S. Tax Court rules and procedure.

Bar Admissions

- District of Columbia
- Massachusetts
- New York

Court Admissions

- U.S. Tax Court
- U.S. Supreme Court
- U.S. Court of Appeals, Fourth Circuit
- U.S. Court of Appeals, Eleventh Circuit

Education

- Syracuse University College of Law (J.D., *Dean's List*, 2009)
 - cum laude
- Louisiana State University (*Dean's List*, 2005)
 - B.A., History
 - B.A., Political Science

Memberships

- American Bar Association, Section of Taxation
- The District of Columbia Bar, Taxation Section
- J. Edgar Murdock Inn of Court, Barrister
- Women's White Collar Defense Association

Publications

April 28, 2026

The Presumption of Innocence Podcast Series

September 24, 2025

The 2025 White-Collar Symposium: Key Takeaways on the IRS, Trump Administration Enforcement Priorities and the False Claims Act

July 10, 2023

Firm Criticizes IRS's Penalty Approval Rules as 'Self-Serving'

Tax Notes

February 6, 2023

Comments to Syndicated Conservation Easement Transactions as Listed Transactions

December 12, 2022

Comments to Proposed Regulations - Taxpayer First Act

December 5, 2022

Birnam Wood Comes for IRS Appeals

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Tax Notes Federal