



## Jonathan M. Wasser

Partner

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Jon focuses his practice on federal and state tax controversies. He provides legal counsel to businesses of all sizes on a wide variety of tax matters, including:

- Tax controversies
- Tax compliance
- Tax litigation and appeals
- Tax credit eligibility
- Restructurings
- Mergers and acquisitions

### Services

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

### Representative Matters\*

- Represented nationwide retailer in litigation pertaining to unitary business group composition and bonus depreciation in before the Michigan Tax Tribunal, reaching a no additional tax due settlement.
- Advised nationwide mortgage lender on the state and local tax implications of their Up-C restructuring and \$1.8 billion initial public offering.
- Advised on the state tax implications of mergers and acquisitions for *Fortune* 1000 companies, including a generic drug manufacturer's acquisition of an oral care business for more than \$100 million.
- Managed state audits for nationwide mortgage lender and multistate disaster restoration and recovery clients, including successfully defending state audits in Texas, Louisiana, New York, and Michigan \*Results may vary depending on your particular facts and legal circumstances.

### Before Fox Rothschild

Prior to joining Fox Rothschild, Jon was a manager in the state and local tax group in the Detroit office of PricewaterhouseCoopers LLP. Before that, he was a staff accountant for a New Jersey accounting firm.

In law school, Jon worked in the Villanova University School of Law Federal Tax Clinic representing low-income individuals in disputes with the Internal Revenue Service.

## Bar Admissions

- Pennsylvania
- New Jersey

## Education

- Villanova University School of Law (LL.M., 2014)
- Villanova University School of Law (J.D., 2013)
- University of Michigan - Flint (B.A., 2007)

## Publications

April 28, 2026

**The Presumption of Innocence Podcast Series**

February 27, 2026

**Court Ruling Creates Refund Opportunity for Pandemic-Era IRS Interest and Penalties**

August 4, 2025

**The One Big Beautiful Bill Act Changes Employee Retention Tax Credit Program**

May 23, 2025

**DOJ Targets DEI Programs with False Claims Act Enforcement**

May 6, 2025

**Trump and Congress Nullify IRS Reporting Rule for Digital Assets**

January 29, 2025

**Employee Retention Credit Claim Resolution Has No End in Sight**

*Bloomberg Tax*

October 23, 2024

**Want to Sue the IRS for Unpaid ERC Claims? Consider These Factors**

*Bloomberg Law*

August 19, 2024

**IRS Reopens Employee Retention Tax Credit Voluntary Disclosure Program**

August 12, 2024

**IRS Begins Processing Some Employee Retention Tax Credit Claims Filed During the Moratorium**

August 7, 2024

**IRS Increases Pressure on Businesses That Claimed Employee Retention Tax Credits**

June 5, 2024

**Why Some Taxpayers With Unprocessed ERC Claims Should Consider Filing a Refund Lawsuit**

March 19, 2024

**ERC Voluntary Disclosure Deadline Rapidly Approaching on March 22**

March 4, 2024

**IRS to Focus on High-Income Earners Who Have Not Filed Tax Returns**

February 21, 2024

**IRS Identifies Seven ERC Red Flags (and Other ERC Updates)**

January 23, 2024

**Bill Proposes January 31 as Last Day to File Employee Retention Credit Claims**

January 16, 2024

**Employee Retention Tax Credit: Updates From Congress and the IRS**

January 2, 2024

**New IRS Program Lets Businesses Repay Questionable Employee Retention Credits at a Discount**

December 11, 2023

**IRS Rejects 20,000 Employee Retention Credit Claims, Plans to Offer New Voluntary Disclosure Program**

October 25, 2023

**IRS Offers Employers a Chance to Withdraw Inaccurate Employee Retention Credit Claims**

September 19, 2023

**IRS Halts Processing of New Employee Retention Credit Claims, Redoubles Efforts Against Fraud**

March 16, 2023

**IRS Renews Warning on Employee Retention Credit Fraud, DOJ Files First Criminal Charges**

October 31, 2022

**Inspector General Faults Internal Revenue Service for Handling of Pandemic Relief Benefits**

September 22, 2022

**AICPA Urges IRS to Extend Deadline for COVID-19 Penalty Relief, Expand Scope**

August 30, 2022

**Internal Revenue Service Announces Sweeping Penalty Relief for 2019, 2020 Tax Returns**