



Vivian D. Hoard

Partner

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Vivian helps solve complex tax controversy issues for individuals and businesses.

Her practice is defined by her significant experience in civil and criminal tax controversy, tax litigation, whistleblower claims and voluntary offshore disclosures. Clients span a range of industries and include individuals, small and mid-sized businesses and their owners, publicly traded companies, professional athletes and their agents, entertainers, doctors, lawyers and accountants.

As a strategic adviser, Vivian consults with accounting firms and her clients during audits to ensure that procedural options for resolving tax disputes remain at the lowest level possible. When needed, she assists the taxpayer and accountant with appeals before the U.S. Tax Court or U.S. District Court.

In the event that a tax case proceeds to litigation, Vivian has successfully tried or settled civil tax controversies involving many varied tax issues, including tax shelter/sham transactions, conservation easements, family limited partnerships, excise taxes, passive loss issues, the civil fraud penalty, hobby loss issues, worker classification, trust fund liability and innocent spouse claims. She has also successfully represented taxpayers targeted for criminal prosecution as well as those who choose to voluntarily disclose offshore accounts.

Services

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

Before Fox Rothschild

Prior to joining Fox Rothschild, Vivian was a Partner in the Tax Practice of an Atlanta law firm.

Beyond Fox Rothschild

An advocate for local causes, Vivian participates in the Juvenile Diabetes Research Foundation's Ride to Cure Diabetes and in the past has taken part in the Leukemia & Lymphoma Society's endurance events. She is also a former Girls Scouts Leader and a member of Northwest Presbyterian Church.

Bar Admissions

- Georgia

Court Admissions

- U.S. Supreme Court
- U.S. Tax Court
- U.S. Court of Appeals, Eleventh Circuit
- U.S. District Court, Northern District of Georgia

Education

- Emory University School of Law (LL.M. in Taxation, 1990)
- University of Georgia School of Law (J.D., 1985)
- University of Georgia (B.A., 1982)
 - Phi Beta Kappa; Alpha Lambda Delta

Memberships

- American Bar Association
- American Bar Foundation, Fellow
- Atlanta Bar Association
 - Tax Law Section, Past Chair
- State Bar of Georgia
 - Children and the Courts Committee
 - Taxation Law Section, Past Chair

Honors & Awards

- Recognized by *Law360* as a Tax Law MVP (2020)
- Recognized by *Chambers USA*, Georgia, Tax (2019, 2024-2025)
- Named a Georgia Trailblazer by the *Daily Report* (2020)
- Selected to the "Best Lawyers in America" list for Tax Law (2020-2026) and Tax Litigation and Controversy (2024-2026) in Atlanta, GA by *Best Lawyers*
- Named among "Legal Elite" by *Georgia Trends*, Taxes/Trusts and Estates (2010, 2013-2014, 2016, 2018)
- Selected to the "Super Lawyers" list for Tax Law in Georgia (2014-2025)
- Selected to the "Super Lawyers Top 50" list for Women Attorneys in Georgia (2024)
- Rated AV Preeminent™ by Martindale-Hubbell®

Publications

December 18, 2024

Is Compelled Mediation a Viable Option for the Tax Court?

Tax Notes

October 30, 2023

Taking Inventory of the IRS's Latest Attack on Qualified Conservation Contributions

Tax Notes

March 22, 2021

Coverage for Low-Frequency Risks Is Not a Sham

Tax Notes Federal

August 3, 2020

The Inviolability of Real Property Rights Meets the Tax Court

Tax Notes

June 23, 2020

IRS Audits to Resume on July 15

April 13, 2020

Last Minute IRS and Tax Court Deadline Update

March 23, 2020

Important Limits on IRS Tax Deadline Extension

February 1, 2018

Defending Micro-Captive Insurance Transactions Before the IRS

October 2016

The Business Owners' Guide to Handling Tax Issues and the IRS: Tips for Avoiding Trouble With the IRS

90-Minute Books