



## Vivian D. Hoard

Partner

**Atlanta, GA**  
Tel: 404.870.3772  
Fax: 404.962.1200

[vhoard@foxrothschild.com](mailto:vhoard@foxrothschild.com)

---

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.

### **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.

### **Honors & Awards**

- Named to "The Best Lawyers in America" list for Tax Law in Georgia by *Best Lawyers* (2020-2021)
- Recognized by *Chambers USA*, Georgia, Tax, 2019
- Named among "Legal Elite" by *Georgia Trends*, Taxes/Trusts and Estates, 2010, 2013-2014, 2016, 2018
- Georgia *Super Lawyers*, 2014-2019
- Rated AV Preeminent™ by Martindale-Hubbell®



### **Practice Areas**

- Tax Controversy & Litigation
- Taxation & Wealth Planning
- Corporate

### **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

## **Publications**

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

August 2013

**Amending Conservation Easements**

Practical Tax Strategies

March 2003

**Offshore Scheme Participants Can Get Onboard IRS Program**

Practical Tax Strategies

June 2002

**Employment Tax Audits: Both IRS Criminal and Civil Divisions Raise the Stakes**

Journal of Taxation, Vol. 96, No. 6