

#### Practice Areas

- Tax
- Tax Controversy & Litigation

#### Education

- Florida State University College of Law, J.D., with high honors, 1998
- Columbia College, Columbia University, B.A., 1991

#### Honors

- Order of the Coif, Florida State University College of Law
- Executive Editor, Law Review, Florida State University College of Law
- Vice-President, Public Interest Law Student Association, Florida State University College of Law

#### Bar Admissions

- Georgia
- Florida

#### Court Admissions

- U.S. District Court for the Northern District of Georgia

## George B. Abney

Shareholder  
Atlanta

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George Abney's practice focuses on civil and criminal tax controversy matters, and white-collar criminal defense. Mr. Abney has significant trial and appellate experience gained from years as a federal prosecutor with the Tax Division of the U.S. Department of Justice in Washington, D.C., and as an Assistant U.S. Attorney in the Northern District of Florida. Since joining Chamberlain Hrdlicka, he has successfully represented clients facing Federal Grand Jury investigations and IRS criminal investigations. Mr. Abney also represents clients in civil tax controversy matters before the IRS, the U.S. Tax Court, the U.S. District Courts, and the U.S. Bankruptcy Courts.

Upon graduating from law school, Mr. Abney joined the Tax Division of the U.S. Department of Justice through the Attorney General's Honors Program. While with the Justice Department, Mr. Abney directed and oversaw complex tax fraud investigations and he successfully litigated numerous criminal jury trials in Federal Courts throughout the southeastern United States. In 2001, Mr. Abney was recognized by then Attorney General John Ashcroft as a Tax Division Outstanding Attorney.

After serving four years with the Tax Division, Mr. Abney joined the U.S. Attorney's Office for the Northern District of Florida. As an Assistant U.S. Attorney in Tallahassee, Florida, Mr. Abney prosecuted a wide variety of criminal matters ranging from financial fraud offenses to narcotics and firearms offenses, and drafted numerous appeals to the Eleventh Circuit Court of Appeals. In 2004, Mr. Abney received special recognition from FBI Director Robert S. Mueller, III, for his work in successfully prosecuting *United States v. Dugas*, which involved kidnapping, Mann Act, and firearms charges.

#### Significant Representations

- Represented a client during the course of a Federal Grand Jury investigation involving allegations of mail fraud, wire fraud, and securities fraud. The investigation was concluded with no charges brought against the client.

- U.S. District Courts for the Southern, Middle, and Northern Districts of Florida
- All Florida state courts

#### Clerkships

- Judicial Externship, the Honorable Robert L. Hinkle, U.S. District Court, Northern District of Florida, 1998

## George B. Abney, *Continued*

- Obtained a refund for a client in excess of \$1 million based on the IRS's miscalculation of the amount of interest due on an underpayment of income tax liabilities.
- Represented a healthcare provider forced into bankruptcy by overly aggressive IRS collection actions. Convinced the Justice Department and the IRS to reduce its claimed tax liabilities by over \$500,000, which facilitated the client's successful emergence from bankruptcy.
- Negotiated a mediation settlement agreement on behalf of a client facing civil RICO allegations. The dispute was resolved for a fraction of the claimed damages.
- Represented a client in an IRS criminal tax investigation involving allegations of false individual and corporate income tax returns. The investigation was concluded with no charges brought against the client.
- Represented an R&B singer/songwriter during an audit and convinced the IRS that no penalties should be imposed.
- Convinced the IRS to remove significant liens from a client's property, where the liens arose from the tax liability of the client's former fiancée, and the former fiancée had obtained an interest in the properties through fraudulent representations.

#### Media and Speaking Engagements

Mr. Abney provides commentary to reporters and media outlets regarding civil and criminal tax matters, and recently provided background information to reporter and author Lance Williams of the San Francisco Chronicle regarding the Barry Bonds investigation. Mr. Abney is also a regular speaker on criminal tax matters and related topics. Mr. Abney's recent speaking engagements include:

- *When Bad Things Happen to Good Accountants: How far will the IRS go in pursuing criminal charges against return preparers and other tax professionals?* Chamberlain Hrdlicka Monthly Tax Forum, Atlanta, January 2009.
- *Conflicts, Ethics, and Criminal Prosecutions.* 2009 Tax Update Conference, sponsored by Tarpley & Underwood, P.C., Atlanta, January 2009.
- *Ever Been Audited? Coping With and Audit by the IRS.* Technology Association of Georgia, Tax & Finance Society, Atlanta, December 2008.
- Panelist, *The Perils and Pitfalls of Parallel Proceedings.* Institute of Continuing Legal Education in Georgia, Nuts and Bolts of Criminal Law for Non-Criminal Lawyers Seminar, November 2008.
- *Keeping it Civil: How to Prevent an IRS Audit from Becoming a Criminal Investigation.* Technology Association of Georgia, Tax & Finance Society, Atlanta, April 2008.

## George B. Abney, *Continued*

- *Litigation Arising from the IRS's New Policies on Parallel Civil and Criminal Investigations.* Georgia Institute of Continuing Legal Education, Atlanta, December 2007.
- *You Might be a Target if . . . How to Determine if Your Client is Under Audit or Criminal Investigation?* Chamberlain Hrdlicka 22<sup>nd</sup> Annual Tax and Business Planning Seminar, Atlanta, November 2007.
- *Parallel Criminal and Civil Investigations: Is the IRS Doomed to Repeat History?* Chamberlain Hrdlicka Monthly Tax Forum, Atlanta, June 2007.
- *The Eroding Wall Between Civil and Criminal Tax Investigations.* Chamberlain Hrdlicka 21<sup>st</sup> Annual Tax and Business Planning Seminar, Atlanta, November 2006.

## News

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- National Law Firm Chamberlain Hrdlicka Launches State and Local Tax Practice

## Articles and Publications

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- The Perils of 'Parallel' IRS Investigations, *Practical Tax Strategies*, October 2010.

