

## Charlie Papavizas Discusses Tax Lawsuit Against Foreign Offshore Shipowner

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Winston & Strawn partner Charlie Papavizas was quoted in the October 31, 2014 *Tradewinds* article “Adams Offshore’s Tax Trouble Reveals Extent of IRS Dragnet.”

The article discusses how Adams Offshore’s \$24 million tax lawsuit demonstrates the U.S. Internal Revenue Service’s intense scrutiny of foreign offshore shipowners working on the U.S. Outer Continental Shelf (OCS).

“We don’t have to speculate now. This case proves, right there in black and white, that the IRS is relatively sophisticated in finding out what ships are on the OCS and in gathering information,” Mr. Papavizas said.

Many tax cases against foreign offshore owners have ended with settlements or favorable IRS determinations for the owners. This case is the first to come close to litigation, but the IRS has filed for its dismissal.

“I hope it is not dismissed because it will be useful for the industry at large if the tax court is forced to deal with the substance of this issue,” said Mr. Papavizas.

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Charlie Papavizas