Kenneth E. Ahl

Partner
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215-246-3132

Philadelphia, PA

Practice Areas

Business Counseling
Estates & Trusts
International Law
NonProfit Law
Tax Law

Admitted

District of Columbia
Pennsylvania
United States Tax Court
Virginia

Education

The American University
Bachelor of Arts, 1970
University of Virginia
Juris Doctor, 1973
George Washington University
LL.M., Taxation, 1979

Mr. Ahl's practice concentrates in the area of taxation and includes business and individual tax planning, estate planning, trust and estate administration and tax litigation. He practices before the Internal Revenue Service representing clients in a variety of matters, including audits, refund claims, ruling requests, collection matters and tax litigation. Ken provides sophisticated tax and business planning for business entities, nonprofit organizations and individuals at the Federal, State and local level.

He represents numerous clients in matters involving international taxation, including tax planning for non-resident aliens, dual citizens, green card holders and U.S. citizens residing abroad. He has extensive experience in U.S. tax issues involving foreign estates and trusts, and the use of tax treaties to avoid the double taxation of income and death taxes. He frequently works with immigration lawyers to plan for the tax issues of non U.S. citizen clients both coming to and exiting from the United States. He is very experienced in dealing with the special tax needs of U.S. citizens and green card holders residing abroad. He has counseled numerous taxpayers on Offshore Account Voluntary Disclosure Initiatives.

Mr. Ahl’s law career started with positions at the Department of State and at the National Office of the Internal Revenue Service, where he obtained a broad range of experience in international and tax issues. At the State Department, he determined issues of citizenship and dual nationality. At the IRS, he issued rulings and technical opinions dealing with numerous tax issues, including tax treaties, capital gains and sales and exchanges of property. He has an in-depth knowledge of the Internal Revenue Code and its regulations as well as in matters of state and local taxation. He has extensive experience in practicing before the IRS including the audit, appeal and collection process.

Ken is experienced in administering Estates and Trusts and serves as a fiduciary of numerous estate and trusts. He advises corporate and individual fiduciaries in matters of taxation and where needed represents them in audits and tax appeals. His expertise includes planning for noncitizens residents of the U.S. and administering estates with foreign tax issues.

Representative Experience

- Represented numerous taxpayers in tax audits and appeals on Federal, State and local levels.
- Advised clients with respect to Offshore Voluntary Disclosure Initiatives.
- Advised clients with respect to tax and estate planning on Federal, State and local level.
- Supervises tax preparation program involving the preparation and review of more than 200 tax returns annually.
- Experienced fiduciary, currently serving as a fiduciary for more than 30 trusts and estates.

- Advises clients on all aspects of double taxation problems involving foreign and U.S. taxation, tax treaties and tax credits
- Prepared Tax Court Petitions and litigated cases before the U.S. Tax Court
- Advised nonprofit organizations and corporations on issues of tax exempt status, tax reporting, and determination of tax liability
- Successful decision in "hobby loss" case before PA Board of Finance and Revenue which clarified the criteria for taking losses arising from horse racing and horse breeding activities.

Professional And Community Involvement

- Member Pennsylvania, Philadelphia, District of Columbia, and Washington, D.C. Bar Associations
- Member Philadelphia Tax Supper Group
- Member of Board of Directors of The Academy of Vocal Arts

Awards And Recognition

- Top Rated Lawyer, "Philadelphia Legal Leaders" Philadelphia Inquirer 2015
- Top rated lawyer in Taxation in 2012 edition of LexisNexis and Martindale-Hubbell Guide to Legal Representation in Philadelphia

Articles

- Archer Client Advisory, December 23, 2015 – "Congress Enacts Legislation to Restore and Expand Tax Savings Provisions"
- National Webinar, The Knowledge Group, June 5, 2015 - "Pre-Immigration Tax Planning: What you need to know in 2015 and Beyond"
- Presentation to The Oxford Club, June 28, 2014 in Istanbul, Turkey - "The IRS Hunt for Unreported Foreign Income"
- Presentation to Philadelphia Paralegal Association, May 2, 2014 – "Special Tax Problems in Handling Estates with International Issues"