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# Catherine A. Rude

## Managing Director

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Texas tax litigation attorney Catherine Rude is an integral part of the Brown, P.C. team. Ms. Rude's approach to law reflects our firm's philosophy about the importance of communication to our cases' successful outcomes. She has technical knowledge about the ever-changing law and the creativity, ingenuity and an open-mindedness to develop successful solutions. Ms. Rude truly loves strategizing solutions for our clients who face devastating circumstances.

## Technical and Communication Skills to Guide Our Clients

Ms. Rude earned her Bachelor's degree in theater and communication. These skills are evident in her approach to the practice of law. She can take a complex tax situation and break it down into something that is easier for a client to understand. She puts the client's mind at ease by demonstrating that the problem is not insurmountable and that she can help them reach a solution.

This high-level of communication was effective in convincing the IRS to grant our client more time to pay his taxes in a case that saved a respected doctor's practice. The case involved a popular and extremely successful surgeon who owed the IRS over \$1 million, but had his assets tied up in business-related investments. The IRS Revenue Officer threatened to levy receipts from the doctor's insurance providers, which would have effectively shut down his practice. In addition, the IRS planned to foreclose on his home, which was worth considerably more than the taxes due.

# A Strong Negotiator

When negotiating with the U.S. government, Ms. Rude applies her professional communication skills to break down the issue and turn the government's analysis on its head. She has the unique ability to persuade the government to view our clients' actions from a different perspective that leads to a more equitable settlement.

For example, our client ran a small manufacturing company from a shed on his property that earned a net income of about \$100k per year. During an audit, the IRS discovered that he had never reported or paid taxes on any of the business' income and had a \$1 million Swiss bank account. He faced a 75 percent civil fraud penalty in addition to 30 years of taxes. We negotiated 20 percent accuracy and a limitation of six years that the IRS could assess additional taxes, instead of the typical unlimited years.

In another case involving an established financial professional who had underreported his income by about \$300,000 per year for six years, we successfully guided him through domestic voluntary disclosure to prevent criminal investigation or prosecution. However, the IRS proposed a 75 percent civil fraud penalty, which we negotiated to a 20 percent accuracy-related penalty, saving our client more than \$200,000 in penalties and interest.

## Related Practices

- IRS Audits and Appeals
- Texas Tax Litigation
- IRS Collection Matters
- Business Tax Matters
- Criminal Tax Matters
- Offshore Accounts

## Bar Admissions

- California
- U.S. Tax Court

## Education

- LL.M., University of San Diego School of Law, San Diego, California

- Honors: Merit Scholar
- Honors: Outstanding Student, Federal Low Income Taxpayer Clinic
- Major: Taxation
- J.D., University of Washington School of Law, Seattle, Washington
  - Honors: Diversity representative, ABA Judicial Midyear Meeting
- B.A., University of Texas at Austin
  - Major: French
- B.A., Hawaii Pacific University
  - Major: Theater and communications

## Professional Associations

- California State Bar, Section of Taxation
- San Diego County Bar Association, Section of Taxation
- American Bar Association, Section of Taxation

## Former Legal Positions

- Law Office of Richard Carpenter, associate attorney
- Stoel Rives, LLP, Summer Associate