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Matthew S. Reddington

Principal

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Matthew Reddington represents businesses and individuals in complex tax controversies and litigation. He focuses on defending clients in disputes with the Internal Revenue Service and state taxing authorities, delivering strategic solutions that protect financial interests and minimize risk. Known for his ability to navigate high-stakes tax matters, Matthew provides strong advocacy in cases involving captive insurance arrangements, research and development tax credits, accounting method changes, intermediary transactions, fraud allegations, real estate issues, foreign income exclusions, and interest abatement.

Matthew approaches every case with precision and determination, ensuring that clients receive the most effective representation possible. He is recognized for taking cases beyond the United States Tax Court when necessary and presenting them before a jury, a strategy that often leads to favorable outcomes. His ability to challenge agency assumptions and control the narrative makes him a sought-after attorney for tax litigation.

Before joining private practice, Matthew served for nearly a decade as a Senior Attorney in the IRS Office of Chief Counsel. This experience gives him unique insight into IRS procedures and litigation tactics, allowing him to anticipate challenges and develop proactive strategies. During his tenure, he earned multiple awards for trial success and contributed to large-case litigation as both a team leader and a team member.

Matthew's track record includes securing a unanimous jury verdict for a captive insurance manager in a multimillion-dollar penalty dispute, obtaining summary judgment in a research credit case, and negotiating settlements that saved clients significant amounts. His results-driven approach reflects a commitment to excellence and a readiness to fight for clients when the stakes are highest.

Education

- New York University School of Law (LL.M.)
  - Tax
- The George Washington University School of Law (J.D.)

Services

- Commercial Litigation
- Tax Law

- Boise State University (B.S.)

State Bar Admissions

- New York
- Texas

Court Admissions

- United States Tax Court

Publications & News

January 21, 2026
Offit Kurman Expands Dallas Office with Addition of Two Principals

Offit Kurman Blogs

June 16, 2026
United States Tax Court Delivers Important R&D Credit Win for Architectural Innovation
The United States Tax Court released its opinion today on Smith v. Commissioner, T.C. Memo. 2026-50, and it is a significant R&D credit win for taxpayers that perform sophisticated technical work for clients. I am particularly satisfied with the...

May 8, 2026
Cannabis Tax Relief Is Here — But IRS Risk Is Just Beginning
For years, cannabis operators have functioned under a fundamentally distorted tax regime. Section 280E denied deductions that every other business takes for granted, forcing companies to pay tax on something closer to gross income than net profit. That framework...

April 15, 2026
Developments in IEEPA Refund Litigation
Through multiple court filings, the U.S. Customs and Border Protection (CBP) and the U.S. Court of International Trade (CIT) have identified significant updates affecting importers seeking refunds of additional ad valorem duties imposed under the International Emergency Economic Powers Act (IEEPA). These developments signal meaningful progress...

March 23, 2026
Defeating the IRS at Trial: Lessons from the Taxpayer Victory in Ankner v. United States
After successfully trying Ankner v. United States and defeating a multi-million-dollar promoter-penalty assessment, Matthew S. Reddington analyzes what the verdict means for the government’s burden of proof under IRC § 6700—and for taxpayers and advisors facing promoter investigations. In...

March 4, 2026
When Hypothetical Liquidations Become “Illogical”: Otay Project LP v.

Commissioner

The Tax Court's recent decision in Otay Project LP v. Commissioner , T.C. Memo. 2026-21, is likely to become one of the most discussed partnership cases of the year — not because it announces a new doctrine, but because...

March 2, 2026

Tariff Litigation & Section 122 Tariffs

On February 20, 2026 the U.S. Supreme Court issued a landmark decision in Learning Resources, Inc. v. Trump holding that the International Emergency Economic Powers Act (IEEPA) does not authorize the President to impose tariffs. The decision invalidates the...

February 12, 2026

When the Chicken Does Come Before the Egg: The Taxpayer-Friendly Takeaways from George v. Commissioner, Plus a Few 'Egg-cellent' Judicial Puns

Some tax court opinions are dry. Others are dense. And then there are the rare decisions where the court clearly enjoyed the assignment. George v. Commissioner , T.C. Memo. 2026-10 falls squarely in the third category. From its opening...