STITES & HARBISON PLLC



Bruce M. Reynolds

Title: Senior Member

Phone: 859-226-2364

Location: Lexington, KY

Email: breynolds@stites.com

Download: vCard

Bruce Reynolds is a Senior Member of the firm based in its Lexington office although he advises lawyers located in other offices as to complex tax matters. His practice focuses primarily on taxation and tax related matters, including tax controversies and disputes, business transactions and estate planning for business owners. He also has been involved in numerous disputes involving fiduciary relationships.

During his long career with Stites & Harbison, Bruce has assisted many of the firm's largest clients with a myriad of complex federal, state, and local tax matters. His most notable tax case involved the successful representation of a Chicago Board of Trade floor trader before the United States Tax Court in a commodity straddles case which resulted in a decision that invalidated two Treasury regulations. He also has assisted clients in obtaining favorable private letter rulings from the Internal Revenue Service in a variety of matters of first impression.

CAPABILITIES

Practice Areas

- Business Services
- Taxation
- Mergers & Acquisitions
- Conservation Easements

RECENT ASSIGNMENTS

- Obtained, in a case of first impression, a U.S. District Court injunction against IRS collection activities pursuant to IRC § 6331(i)
- Assisted a community hospital to terminate its participation in a health alliance by successfully arguing in court a breach of the health alliance's fiduciary duties to the hospital
- Successfully represented a thoroughbred horse farm against IRS claims that losses incurred by the horse operation were non-deductible as hobby losses pursuant to IRC § 183
- Represented a spouse nine years after her divorce in obtaining a greater share of the sales proceeds of a marital business by asserting a breach of a continuing post-marital fiduciary duty by her former husband
- Continues to represent various members of the equine and real estate industries in tax related transactions including tax-free exchanges, entity formation, and business dissolution
- Continues to assist many business owners plan for succession

BAR ADMISSIONS

- Kentucky
- U.S. Claims Court
- U.S. Court of Appeals for the 6th Circuit
- U.S. Court of Appeals for the 7th Circuit
- U.S. District Court for the Eastern District of Kentucky
- U.S. District Court for the Western District of Kentucky
- U.S. Supreme Court
- U.S. Tax Court

RECENT NEWS, ARTICLES & SPEAKING ENGAGEMENTS

- Recent Cases Define the Prohibition Against Tax Collection During Refund Suits
  co-author with Susan R. Crowe, *Journal of Taxation*, Vol. 106, No. 5, May 2007
- Corporate Taxation
  Teacher, University of Kentucky College of Law, Spring 2006
- IRS Modifies Position and Allows Discounts on Intra-Family Stock Transfers
  Vol. 71, No. 6, *Taxes Magazine*, 381, June 1993

- Is There Any Statute of Limitations on the 'Tax Shelter' Penalties?
  Vol. 77, No. 6, *Journal of Taxation*, 342, December 1992
- Planning for Partnership Disputes
  Chapter 4, *Kentucky Partnership Law Handbook,* 1991
- Applying I.R.C. Section 1033 to Involuntary Conversion of Thoroughbred Horses
  Vol. 70, No. 4, *Kentucky Law Journal*, 987, 1983
- Tax Free Exchange of Interests in Thoroughbred Horses
  Vol. 69, No. 8, *Taxes Magazine*, 547, August 1981

MEMBERSHIPS

- American Bar Association
- Kentucky Bar Association

EDUCATION

- Georgetown University LL.M., Taxation, 1974
- University of Kentucky College of Law J.D., 1970
- University of Kentucky B.A., 1968

MORE THAN STITES & HARBISON

After graduating from college and law school at the University of Kentucky, Bruce spent four years in Washington, D.C. working first for the Chief Counsel of the Internal Revenue Service and then as an attorney-advisor to the Hon. J. Gregory Bruce, Judge of the United States Tax Court. Also, while in Washington, he earned an LL.M. in Taxation from Georgetown University. Bruce and his wife, Kathy (a certified public accountant), have been married since 1970 and they have a son, Ben, a New York investment banker. Bruce is an avid sports fan with a love of basketball and soccer. His idea of a vacation is being on a bicycle on the back roads of Italy looking forward to his next glass of wine and bowl of pasta.

ACCOLADES

- *Martindale-Hubbell*® AV-Preeminent® Peer Review Rated
- *Best Lawyers in America*®, Employee Benefits (ERISA) Law; Litigation & Controversy - Tax; and Tax Law (1993-2027)

- *Best Lawyers in America®,* Lexington Area Lawyer of the Year for Tax Law (2011, 2025)
- *Best Lawyers in America*®, Lexington Area Lawyer of the Year for Employee Benefits (ERISA) Law (2014)
- *Kentucky Super Lawyers®* (2010-14)