

People

**Brittney M. Little**

Associate, Tax

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vCard

Brittney Little focuses her practice on complex tax matters for a diverse range of clients. She represents businesses, individuals, trusts, and estates in all stages of tax disputes, including IRS audits, appeals, and litigation before the U.S. Tax Court, with a particular emphasis on international tax issues and offshore voluntary disclosure programs.

Brittney has successfully negotiated substantial tax settlements and regularly advises clients and tax professionals on developments in tax law, administrative procedures, and cross-border structuring. Her work includes drafting pleadings, legal memoranda, and ruling requests on topics such as transfer pricing, FBARs, foreign trusts, and tax treaties.

Previously, Brittney served as a law clerk at the U.S. Tax Court, where she conducted in-depth legal research and contributed to the drafting of judicial opinions and orders. She also gained valuable experience at a global accounting firm, preparing tax returns, analyzing treaty provisions, and collaborating on U.S. inbound and outbound structuring proposals. Her background includes significant contributions to legal scholarship and thought leadership through published articles and advisory memoranda, all of which underpin her current focus on providing strategic, solutions-oriented counsel in private practice.

Related Professional Experience

- U.S. Tax Court, Judicial Law Clerk, 2025-2026
- Crowe Horwath LLP, International Tax Senior Associate, 2018; International Tax Associate, 2016-2018
- Florida House of Representatives, Legislative Intern, 2015
- U.S. Attorney's Office, Law Clerk, 2014

Affiliations

Areas of Experience

Tax
Federal Tax Litigation and Controversy
International Tax

Education

LL.M. in Taxation, University of Florida Levin College of Law, 2016
J.D., Nova Southeastern University, Shepard Broad College of Law, 2014, *Nova Law Review*
B.B.A., University of Georgia, 2011

Admissions**Bars**

Georgia
District of Columbia
Florida

Courts

U.S. Supreme Court
U.S. Tax Court

- American Bar Association's (ABA) Young Lawyers Division, *TYL*, Associate Editor, 2024-2025; *After the Bar*, Associate Editor, 2024-2025

Honors and Distinctions

- *Best Lawyers*, 2022-2025, Listed as "One to Watch" in Georgia for Tax Law