



Caroline Rule Partner

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Biography

Caroline Rule is a tenacious advocate for her clients, many of whom face white collar criminal investigations and prosecutions, or civil tax audits and investigations. During her over 30 years in practice, Caroline has successfully championed both individual and corporate clients, defeating allegations of fraud so as to preserve their reputations and, in the case of individuals, their careers.

Caroline's winning record includes cases involving alleged tax fraud, tax evasion, failure to file tax returns and related tax forms, money laundering, and other white collar controversies. Caroline has achieved outstanding results for individuals and corporations under criminal investigation by the IRS and other governmental and regulatory agencies, as well as by state and federal prosecutors' offices in New York and around the country.

Caroline's successful practice also focuses on complex civil tax matters, including sensitive audits by the IRS and state tax authorities, as well as civil cases involving "tax shelters," failure to report offshore assets, abatement of penalties, and residency issues. Caroline has extensive experience in advising accounting firms on how to comply with confidentiality rules protecting disclosure of client tax return information, under Section 7216 of the Internal Revenue Code and associated Treasury Regulations and IRS authorities, the Gramm Leach Bliley Act, and the AICPA Rules of Conduct, particularly as firms begin to outsource return preparation offshore. Caroline also represents clients in investigations by the New York City Business Integrity Commission and is experienced in handling complex commercial litigation.

Caroline has published many articles in legal journals and magazines, and was author of the BNA Tax Management Portfolio No. 623 – 3rd "IRS Procedures: Examinations and Appeals" (July 2013).

Caroline works to clarify application of tax laws through her chairmanship of the Subcommittee on Tax Crimes, Criminal Litigation Committee, ABA Litigation Section. She also is a Fellow of the Litigation Counsel of America; and is an active member of the New York Council of Defense Lawyers, the Criminal Advocacy Committee and the Mass Incarceration Task Force of the New York City Bar Association, and the Federal Bar Council Special Committee on Sentencing Reform and Alternatives to Incarceration. She is also a Master of the Federal Bar Council Inn of Court.

Education

- University of Cape Town, South Africa, B.F.A. (1981), With Honors
- San Francisco Art Institute, M.F.A. (1984), Cum Laude
- Yale Law School, J.D. (1989), Senior Editor, Yale Law Journal

Bar Admissions

- New Jersey, 1989
- New York, 1990
- U.S.D.C., S.D.N.Y., 1990
- U.S.D.C., E.D.N.Y., 1998
- U.S. Tax Court, 1998
- U.S. Court of Appeals (2d Cir.), 2007
- U.S. Court of Appeals (3d Cir.), 1990
- U.S. Court of Appeals (9th Cir.), 2019
- U.S. Supreme Court, 2014

Awards & Recognition

- Caroline Rule has been recognized by "New York Super Lawyers" since 2011

Before Joining Kostelanetz LLP

- Associate at Rabinowitz, Boudin, Standard, Krinsky & Lieberman, PC
- Served as court-appointed counsel for indigent criminal defendants at the Office of the Appellate Defender for a two-year term.
- Associate at Cahill Gordon & Reindel, LLP
- Law Clerk to the Honorable John J. Gibbons, Chief Judge, United States Court of Appeals for the Third Circuit