

## Business Tax

### **RELATED PRACTICES**

Exempt Organizations and  
Charitable Giving

Family-Owned Businesses

Tax Controversies

### **ATTORNEYS**

H. Stewart Dunn, Jr.

Eric R. Fox

Leslie J. Schneider

Robert H. Wellen

Patrick J. Smith

Robert B. Stack

Jeffrey E. Moeller

William L. Sollee, Jr.

H. Carter Hood

Joshua T. Brady

Alex E. Sadler

Brenda Jackson-Cooper

David D. Sherwood

John D. Bates

John Lovelace

Douglas M. Andre

Kasey A. Place

Steven C. Caywood

Benjamin L. Grosz

Clifton B. Cates, III

Our attorneys regularly provide sophisticated tax planning for publicly traded and closely held corporations, limited liability companies, partnerships, and individuals, both in the United States and abroad. In addition, our lawyers represent clients in tax disputes with the Internal Revenue Service or state revenue departments. Whatever your tax planning needs, from the relatively straightforward, to complex matters most firms simply cannot handle, you can count on us for a creative solution.

We concentrate our tax planning advice and strategy in the following areas:

- Corporate Tax
- International Tax
- Tax Accounting
- Partnership Tax
- General Tax

We work closely with our clients to create customized solutions that incorporate your tax, business and, as in the case of closely held businesses, estate planning needs. We regularly coordinate our tax advice with planning for employee benefits and executive compensation. Our lawyers stay on top of the constantly changing landscape of federal tax law and can notify you of any changes to the tax law that may affect you or your business.

We have offices in Washington, D.C. and Los Angeles, California and provide legal advice and services to clients both nationally and internationally.

**NEWS**

- May 8, 2012  
Ivins Attorneys Named to 2012 Washington DC Super Lawyers
- May 3, 2012  
John Bates Presents on Foreign Tax Credit Guidance Webinar
- April 26, 2012  
Robert Wellen Speaks at J. Nelson Young Tax Institute on Contingent M&A Prices
- April 19, 2012  
Robert Wellen Speaks at Ninth Annual Institute on Tax Aspects of Mergers and Acquisitions
- March 28, 2012  
Robert Wellen Speaks at ALI-ABA on Taxable Acquisition Structures
- March 2, 2012  
Ivins Attorneys Speak at Federal Bar Association Tax Law Conference
- February 27, 2012  
Robert Wellen Speaks at Consolidated Tax Return Regulations 2012 PLI Course
- January 24, 2012  
Alex Sadler Comments Regarding Third-Party Return Information Disclosure Exception  
*Tax Analysts*
- January 23, 2012  
Bob Stack Quoted in Reuters Article on Romney's IRA  
*Reuters*
- December 7, 2011  
Ivins Attorney Presents at BNA CITE International Tax Seminar
- December 1, 2011  
Ivins Attorneys Named Best Lawyers in Washington DC  
*Washingtonian*
- November 30, 2011  
Ivins Attorney Presents to Young IFA Network on Foreign Currency Tax Issues Webinar
- November 2, 2011  
Ivins Attorneys Speak at 66th TEI Annual Conference
- October 20, 2011  
Ivins Attorneys Speak at 2011 ABA Joint Fall CLE Meeting
- September 28, 2011  
Ivins Attorneys Speak at Fort Worth TEI Meeting
- September 19, 2011  
Ivins Attorneys Speak at Cincinnati TEI Seminar
- August 31, 2011  
Ten Ivins Attorneys Named to 2012 Best Lawyers in America

| 3 | Business Tax

- August 22, 2011  
Patrick Smith Quoted in Tax Analysts Article on Omissions from Gross Income Cases  
*Tax Analysts*
- August 17, 2011  
Danielle Rolfes Appointed Deputy International Tax Counsel at Treasury
- August 1, 2011  
Ivins Attorneys Comment on Guidance under Section 355
- July 21, 2011  
Alex Sadler Joins Tax Controversy and Litigation Group
- June 9, 2011  
Robert Wellen to Speak at Texas Federal Tax Institute
- May 8, 2011  
Ivins Attorneys Named to 2011 Washington DC Super Lawyers
- May 6, 2011  
Ivins Attorneys Speak at 2011 ABA Tax Section May Meeting
- April 28, 2011  
Ivins Attorney Speaks at Penn State Dickinson School of Law/New York City Bar Program
- March 31, 2011  
Ivins Attorney Speaks at ALI-ABA Corporate Taxation Program
- February 22, 2011  
Ivins Attorneys to Speak at the FBA Annual Tax Law Conference
- February 17, 2011  
Ivins Attorneys Speak at TEI Event
- December 9, 2010  
Danielle Rolfes to Speak at GWU/IRS Institute on International Taxation
- October 28, 2010  
H. Stewart Dunn Named Washington DC Tax Lawyer of the Year
- October 21, 2010  
Bob Wellen Speaks on Corporate Spin-Offs
- October 1, 2010  
Bob Wellen Speaks on Consolidated Return Corporate Acquisitions and Separations
- September 24, 2010  
Bob Stack Speaks to ABA on Economic Substance Codification
- September 24, 2010  
Joshua Brady Speaks to ABA Tax Section Meeting On Consolidated Returns

**STRATEGIES & OPPORTUNITIES**

- FATCA: Information Reporting Rules for US Individuals Holding Specified Foreign Financial Assets
- Tax-Free Exchange Treatment for Exchanges of Intangible Property

**PUBLICATIONS**

- March 12, 2012  
DCL Separate Unit Combination and Foreign Use Rules Issues  
*Tax Notes*
- February 20, 2012  
Standards for Tax Court Review in Equitable Innocent Spouse Cases  
*Tax Notes*
- February 17, 2012  
FATCA: Information Reporting Rules for US Individuals Holding Specified Foreign Financial Assets  
*Ivins, Phillips & Barker*
- January 30, 2012  
Expedited Opt-Out Needed for OVDI Participants Who Owe No Tax  
*Tax Notes*
- January 16, 2012  
The APA's Reasoned-Explanation Rule and IRS Deficiency Notices  
*Tax Notes*
- November 28, 2011  
Is the Anti-Injunction Act Jurisdictional?  
*Tax Notes*
- September 26, 2011  
Navigating the Research Credit  
*Tax Notes*
- September 26, 2011  
Overcoming Appeals' Bad Rap (quotations in article by J. Coder)  
*Tax Notes*
- August 30, 2011  
DC Circuit: 'The IRS Is Not Special'  
*Tax Notes*
- July 11, 2011  
Omissions From Gross Income and 'Numerators and Denominators'  
*Tax Notes*
- June 20, 2011  
Aggregate or Entity Theory of Partnerships for Currency?  
*Tax Notes International*

| 5 | Business Tax

- June 20, 2011  
Life After Mayo: Silver Linings  
*Tax Notes*
- April 25, 2011  
Mannella, State Farm, and the Arbitrary and Capricious Standard  
*Tax Notes*
- April 4, 2011  
Omissions from Gross Income & Retroactivity  
*Tax Notes*
- February 14, 2011  
Nature Abhors a Splitter: The FTC Splitter and Indirect FTC Rules  
*Tax Notes*
- February 7, 2011  
Avoiding Tax Casualties in the Currency War  
*Tax Notes*
- October 25, 2010  
Mayo and Chenery: Too Much of a Shift in Rationale?  
*Tax Notes*
- September 27, 2010  
Gaps in the Seventh Circuit's Reasoning in Lantz  
*Tax Notes*
- August 16, 2010  
Omissions From Gross Income And the Chenery Rule  
*Tax Notes*
- August 1, 2010  
Contingent Consideration and Contingent Liabilities in Acquisitions  
*Ivins, Phillips & Barker*