

Business Tax

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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

- 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
- 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
- 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

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- 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
- May 18, 2010
Danielle Rolfes to Speak at DC Bar Taxation Section/International Tax Committee Luncheon
- April 29, 2010
Robert Stack Speaks to DC Bar on Cross-Border M&A transactions
- April 5, 2010
Danielle Rolfes to Moderate International Tax Panel at ABA Tax Section May Meeting
- April 1, 2010
Danielle Rolfes Appointed Vice-Chair of ABA Foreign Lawyers Forum
- March 29, 2010
Leslie Schneider Comments on Licensing Fee Decision
Tax Notes Today
- March 17, 2010
Robert Wellen Comments on Proposed Amendment to Section 361
Tax Notes Today
- March 8, 2010
Leslie Schneider Comments on Bonus Compensation Plan Liability
Tax Notes Today
- March 8, 2010
Robert Wellen Comments on All-Cash D Reorganization Proposal
Tax Notes Today

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- March 5, 2010
Danielle Rolfes Chairs FBA International Panel

STRATEGIES & OPPORTUNITIES

- Tax-Free Exchange Treatment for Exchanges of Intangible Property

PUBLICATIONS

- 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
- June 20, 2011
Life After Mayo: Silver Linings
Tax Notes
- April 25, 2011
Mannella, State Farm, and the Arbitrary and Capricious Standard
Tax Notes

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- 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
- April 20, 2010
Codification of the Economic Substance Doctrine
Business Tax Insider