

Tax Accounting

RELATED PRACTICES

Executive Compensation and
Fringe Benefits

General Tax

Health and Welfare Plans

Tax Controversies

ATTORNEYS

Patrick J. Smith

William L. Sollee, Jr.

Douglas M. Andre

Tax accounting is normally thought to be solely within the province of the accounting firms. At Ivins, Phillips & Barker, however, our attorneys have developed a nationally-recognized expertise in this area.

The treatment of inventories, particularly dollar-value LIFO and the uniform capitalization method, is at the top of the list of subjects to which our tax accounting lawyers devote significant time. Our inventory work ranges from planning and consulting on the design and establishment of particular cost accounting systems as they affect tax compliance to controversy work with the IRS in tax audits and litigation.

Additional major areas of our tax accounting practice include issues relating to income and expense accruals and economic performance, accounting for long-term contracts (both government and non-government), accounting for other types of contracts, such as service contracts and non-long-term hardware contracts, application of section 199 regarding the deduction for domestic production activities, accounting for R&D costs, capitalization versus deduction issues, the tax problems associated with financial products, and the handling of accounting method changes. We have extensive experience in dealing with the National Office of the IRS on such matters as well as in representing clients in the IRS Appeals Office in connection with such matters.

NEWS

- May 8, 2012
Ivins Attorneys Named to 2012 Washington DC Super Lawyers
- March 2, 2012
Ivins Attorneys Speak at Federal Bar Association Tax Law Conference

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- 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
- August 17, 2011
Danielle Rolfes Appointed Deputy International Tax Counsel at Treasury
- April 29, 2011
Rosina Barker Spoke on Taxation of Executive Clawbacks
- December 9, 2010
Danielle Rolfes to Speak at GWU/IRS Institute on International Taxation

STRATEGIES & OPPORTUNITIES

- VEBA Retiree Medical Reserves -- Two New Tax Reduction Strategies
- Tax-Free Exchange Treatment for Exchanges of Intangible Property
- Accelerated Deductions for Self-Funded Medical Reimbursements – Even Faster than You May Have Believed

PUBLICATIONS

- February 20, 2012
Standards for Tax Court Review in Equitable Innocent Spouse Cases
Tax Notes
- November 28, 2011
Is the Anti-Injunction Act Jurisdictional?
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
- August 16, 2010
Omissions From Gross Income And the Chenery Rule
Tax Notes