

## Benefits Rulings and Audit Defense

### **RELATED PRACTICES**

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### **ATTORNEYS**

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Reflecting both our deep understanding of the standards governing employee benefit plans and familiarity with agency procedures -- our main office is located in the heart of Washington, D.C., two doors down from the IRS and a block from the Treasury Department -- we have achieved remarkable success securing favorable rulings from the IRS on even the most complex employee benefits issues. For example, in just the past several years, we negotiated the largest pension plan funding waivers ever granted by the IRS and PBGC, helped two other multinational corporations secure IRS private letter rulings on complex qualified plan issues of first impression, received IRS approval for a never-before-approved accounting method change permitting a multi-million acceleration of deductions for VEBA retiree medical contributions, and secured IRS approval for an innovative retiree-medical funding vehicle involving a multinational employer's 401(k) plan.

We also frequently represent plan sponsors in defending against IRS and Department of Labor audits of qualified retirement plans, welfare plans, executive compensation arrangements, fringe benefit programs and payroll tax filings, with a remarkable record of success helping clients fend off agency challenges. Ivins is particularly well qualified to assist employers against current IRS audit initiatives relating to worker classification and executive compensation, including compliance with Section 409A.

### **NEWS**

- September 23, 2011  
Rosina Barker Gives 409A Presentation to the Southern Federal Tax Institute

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**PUBLICATIONS**

- September 23, 2011  
409A Failures: Correcting With and Without the IRS Formal Correction Programs  
*46th Southern Federal Tax Institute*
- November 18, 2010  
Achieving Success in a Worker Classification Audit  
*Practical Tax Strategies*
- October 25, 2010  
Taxing Clawbacks  
*Tax Notes*