



## Robert B. Stack

*Partner*

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### **PRACTICE AREAS**

Business Tax  
International Tax  
Tax Controversies

### **EDUCATION**

Georgetown University Law  
Center, 1984, J.D.

*Editor-in-Chief, Georgetown  
Law Journal*

Georgetown University, 1984,  
M.S.F.S.

New York University, 1980, M.A.

State University of New York,  
1976, B.A.

### **CLERKSHIP(s)**

Law clerk for the Honorable  
Potter Stewart (Ret.), United  
States Supreme Court (O.T.  
1985)

Law clerk for the Honorable  
Thomas A. Flannery, United  
States District Court for the  
District of Columbia (1984-85)

### **BAR AND COURT ADMISSIONS**

District of Columbia  
New York

Bob Stack is head of the firm's international tax practice group. Bob has over 24 years of experience in international tax matters, representing both businesses and individuals. His work for business clients has included structuring both inbound and outbound ventures, the establishment of efficient cross border structures, the formation of joint ventures and private equity funds and all aspects of international mergers and acquisitions. He regularly represents U.S. and non-US multinational companies and counsels them with respect to a wide variety of international tax issues, including Subpart F, transfer pricing, foreign tax credits, foreign currency, withholding taxes, dual consolidated loss rules, and a wide variety of treaty issues. Bob also has extensive experience in the international tax aspects of e-commerce, including planning with respect to the cross-border ownership of intangible property, advising with respect to cross-border license arrangements, withholding issues, cost sharing, and similar issues. He has extensive experience in representing business clients before the Internal Revenue Service, including with respect to audits and appeals, competent authority proceedings, pre-filing agreements, private letter rulings, and advance pricing agreements.

His work for high net worth individuals has included advising U.S. citizens living abroad, nonresident aliens, and expatriating residents with respect to U.S. federal income tax compliance issues, as well as representation of such

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individuals before the Internal Revenue Service, including participation in the IRS Voluntary Compliance Program.

Bob is known for his keen intellect, his understanding of the business context in which tax issues arise, practical solutions to difficult tax issues, and his outstanding service. Recent clients have included, Electronic Arts, AIG, Alex Brown Realty, Oki Electric Industry, Ltd and its U.S. subsidiaries, Milliken & Company, Northrop Grumman, Bayer Corporation, and H.J. Heinz.

He is a member of the American Bar Association Tax Section, New York State Bar Association Tax Section, Washington International Tax Study Group, and International Fiscal Association. Mr. Stack has participated in numerous panels on international tax issues at the meetings of the American Bar Association Tax Section as well as the Federal Bar Association.

Prior to joining Ivins, Phillips & Barker, Bob spent 16 years at the national law firm of Wilmer Cutler Pickering Hale and Dorr LLP where he was Co-Chair of the Tax Group. After his clerkships, and before joining Wilmer, Bob was a tax associate in the District of Columbia office of Davis Polk & Wardwell.

#### **REPRESENTATIVE MATTERS**

- Qualifying as an expert witness on U.S. international taxation in the Tax Court of Canada in *TD Securities (USA) LLC v. Her Majesty the Queen, 2008-2314(IT)G (C.T.C.)*
- Structuring multinational corporate structures for publicly traded and private companies, including coordination of tax advice with local counsel
- Assisting French multinational in connection with reorganization of U.S. corporate structure
- Advising private textile company in connection with intercompany transfer pricing, including preparation of associated transfer pricing study
- Representing publicly traded multinational video game company in all aspects of international licensing of intellectual property, including U.S. federal income tax aspects of related income and expense
- Representing publicly traded multinational entertainment company in competent authority request regarding intercompany royalties.
- Representing publicly traded multinational company in connection with dual consolidated loss issues relating to its international tax structure
- Assisting U.S. insurer in connection with planning for offshore structured settlement arrangements
- Assisting Japanese multinational computer company in negotiating renewal of Advance Pricing Agreement

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- Assisting multinational auto company in connection with audit issues relating to implementation of its Advance Pricing Agreement
- Representing several individuals in connection with Internal Revenue Service voluntary disclosure program as it relates to disclosure of foreign bank accounts
- Representing U.S. real estate fund in connection with fund structuring for non-US and tax exempt investors
- Representing U.S. publicly traded brokerage in connection with U.K. acquisition
- Representing Europe based broker-dealer in connection with structuring U.S. activities, including transfer pricing aspects
- Representing U.S. individual in connection with "passive foreign investment company" (PFIC) issues in connection with a multi-million dollar disposition of shares of a non-U.S. company
- Representing non-US person in connection with expatriation issues under Section 877 of the Internal Revenue Code

#### **HONORS & AWARDS**

Chambers Ranked

Best Lawyers in America

#### **MEMBERSHIPS & AFFILIATIONS**

Member, ABA Tax Section

Member, International Fiscal Association

Member, Washington International Tax Study Group

#### **PUBLICATIONS**

- January 30, 2012  
Expedited Opt-Out Needed for OVDI Participants Who Owe No Tax  
*Tax Notes*

#### **NEWS**

- January 23, 2012  
Bob Stack Quoted in Reuters Article on Romney's IRA  
*Reuters*
- November 2, 2011  
Ivins Attorneys Speak at 66th TEI Annual Conference

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- 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
- February 17, 2011  
Ivins Attorneys Speak at TEI Event
- September 24, 2010  
Bob Stack Speaks to ABA on Economic Substance Codification
- April 29, 2010  
Robert Stack Speaks to DC Bar on Cross-Border M&A transactions