



## Joshua T. Brady

*Partner*

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### **PRACTICE AREAS**

Business Tax

Corporate Tax

Partnership Tax

International Tax

General Tax

Tax Controversies

### **EDUCATION**

Yale Law School, 1999, J.D.,

*Yale Law Journal*, Editor,  
1997-1999

Georgetown University, 1994,  
A.B., Economics, *magna cum laude*

Phi Beta Kappa

### **BAR AND COURT ADMISSIONS**

Maryland

District of Columbia

Joshua T. Brady is a partner in the Business Tax practice. He advises clients on a wide variety of tax matters involving corporations, partnerships, and their owners and investors. Josh is a recognized expert on the taxation of mergers and acquisitions, distributions, financings, restructurings, and corporations filing consolidated returns. Josh currently serves as the Chair of the D.C. Bar Taxation Section Corporation Tax Committee. He is a frequent speaker on corporate and other tax matters.

Josh has advised both public and private clients on a number of sophisticated acquisition and disposition structures, including tax-free mergers, tender offers, going-private transactions, and cross-border joint ventures. Josh also has extensive experience in some of the largest public spin-offs and split-offs, including spin-offs attendant to mergers, joint ventures, private equity investments, and cash-rich split-offs.

Josh regularly advises high net-worth individuals and their financial advisors on the tax aspects of business investments and complex financial transactions.

Josh also represents taxpayers before the Treasury and IRS on a variety of tax policy issues involving proposed legislation, regulations, and other guidance. A large part of his practice involves obtaining IRS private letter rulings on novel transactions. A key aspect of Josh's success is his reputation among attorneys within the Treasury and IRS.

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Josh joined Ivins, Phillips & Barker as a partner in 2008. Prior to joining the firm, Josh was a member of the Mergers and Acquisitions Group in the Washington National Tax office of KPMG LLP, where he specialized in corporate tax matters. Prior to joining KPMG, Josh was an associate in the tax group of Wilmer, Cutler & Pickering. Before law school, Josh was a research analyst at the Office of Federal Tax Services of Arthur Andersen LLP, where he specialized in transfer pricing and other tax valuation matters.

Josh is an adjunct professor at Georgetown University Law Center, where he teaches corporate tax in the Tax LL.M program. Josh also has served as an adjunct professor at George Mason University School of Law. Josh also is a volunteer in the IRS Military Volunteer Income Tax Assistance Program, where he trains military personnel to prepare tax returns for members of the armed services and their families.

#### **REPRESENTATIVE MATTERS**

- Obtained private letter rulings involving public spin-offs, split-off exchange offers, and cash-rich split-offs, including financing structures.
- Obtained private letter rulings relating to rescissions of transactions, including the first rescission of a corporate merger. PLR 200911004 (March 13, 2009).
- Represent U.S. parent corporations in reorganizing European and other foreign subsidiaries in tax-efficient holding company structures.
- Represent life insurance settlement trade association in connection with revenue rulings affecting industry participants.
- Represent clients in taxable and tax-free mergers and acquisitions, distributions, and financings.
- Represent clients on consolidated return matters, including during examination and appeals.

#### **ACADEMIC APPOINTMENTS**

Adjunct Professor of Law, George Mason University School of Law

#### **MEMBERSHIPS & AFFILIATIONS**

Vice Chair, D.C. Bar Taxation Section Corporation Tax Committee

#### **NEWS**

- March 2, 2012  
Ivins Attorneys Speak at Federal Bar Association Tax Law Conference
- September 19, 2011  
Ivins Attorneys Speak at Cincinnati TEI Seminar

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- September 24, 2010  
Joshua Brady Speaks to ABA Tax Section Meeting On Consolidated Returns