

Danielle Rolfes to Moderate International Tax Panel at ABA Tax Section May Meeting

PRACTICE AREAS

Business Tax

International Tax

April 5, 2010

At the ABA Tax Section May Meeting in Washington, D.C., Ivins, Phillips & Barker partner, Danielle E. Rolfes will moderate the panel entitled, *Foreign Tax Credits, Dual Consolidated Losses, FIN 48, etc.: When You Need an Opinion of Foreign Tax Counsel*. This panel will examine areas in which you may need to obtain an opinion from foreign counsel. In the context of a discussion of FIN 48 and the FTC and DCL regulations that require foreign advice, the panel will explore the technical and process issues that can expedite foreign counsel's provision of clear and prompt written advice and, conversely, the technical and process issues that can impede the provision of clear and prompt written advice. The panel will feature both US and foreign lawyers.