



# International Tax

## RELATED PRACTICES

Estate Planning  
Tax Controversies

## ATTORNEYS

James E. Brown  
Eric R. Fox  
Jon Holbrook  
H. Carter Hood  
Matthew D. Kim  
Jeffrey E. Moeller  
Eric Solomon  
Benjamin Solomon-Schwartz  
Robert H. Wellen

Ivins, Phillips & Barker is a recognized national leader in handling U.S. federal income tax issues involving activities of United States taxpayers in foreign countries and of foreign taxpayers in the United States. Our firm serves individuals and corporations throughout the United States and the world.

Our international tax attorneys have mastered all areas of international business taxation, including intercompany transfer pricing (including negotiating advance pricing agreements), income sourcing, foreign tax credits, allocation and apportionment of deductions, dual consolidated losses, subpart F, income tax treaties, competent authority proceedings, and use of hybrid entities.

Our team combines technical mastery with a savvy business sense, regularly helping clients plan foreign and multinational acquisitions, dispositions, restructurings, joint ventures, foreign currency transactions, and development and use of intellectual property, including issues relating to the international licensing of intangibles and international intangible structures. We also work with clients to resolve related tax audits, controversies, and litigation with the Internal Revenue Service.

IPB attorneys are at the forefront of the field, routinely writing and lecturing on the latest developments stemming from recent U.S. tax reform and the OECD's base erosion and profit shifting (BEPS) project. We already have deep experience advising clients on the foreign-derived intangible income (FDII) deduction, base erosion and anti-abuse tax (BEAT), and global intangible low-taxed income (GILTI) provisions.

We also work with U.S. and non-U.S. high net worth individuals in connection with U.S. cross-border tax issues, including issues relating to business planning for inbound and outbound investment, such as real estate investments and FIRPTA, expatriation, residency and



## | 2 | International Tax

related treaty issues, and compliance with U.S. foreign bank account reporting rules.

In addition to our talented team of attorneys, we have access to an extensive network of leading firms and practitioners around the world. We are able to call upon the expertise of these colleagues at any time to respond quickly to our clients' needs.

### NEWS

- March 5, 2026  
IPB Recognized in Best Law Firms 2026
- March 5, 2026  
Twenty-One IPB Attorneys Recognized in Best Lawyers in America and Ones to Watch 2026 Editions
- June 5, 2025  
Ivins Attorneys Recognized in Chambers USA 2025
- May 12, 2025  
Eric Solomon Honored by ABA Tax Section, Receives 2025 Distinguished Service Award
- March 5, 2025  
Eric Solomon to Moderate Panel at University of Virginia Tax Panel
- November 7, 2024  
IPB Recognized in Best Law Firms 2025
- October 13, 2024  
IPB Achieves Mansfield Certification Plus for the Third Time
- August 15, 2024  
Twenty-Two IPB Attorneys Recognized in Best Lawyers in America and Ones to Watch 2025 Editions
- June 18, 2024  
2024 Chambers USA Guide Recognizes Four IPB Partners Individually and the Tax and Benefits Practices