



Robert H. Wellen

Partner

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PRACTICE AREAS

Tax

Arbitration & Litigation Support
Federal Tax Policy & Advocacy
International Tax
Tax Accounting
Tax Controversies
 IRS Appeals Proceedings
 IRS Audit Defense
 Tax Litigation
Tax Planning & Advisory Services

EDUCATION

Georgetown University Law Center,
LL.M. in Taxation, 1975

Yale Law School, J.D., 1971

Yale College, B.A., 1968, Phi Beta
Kappa; *Magna Cum Laude*; High
Honors in English

BAR AND COURT ADMISSIONS

Colorado
Connecticut
District of Columbia

Bob returned to tax law practice at IPB in 2023, after serving for eight years as IRS Associate Chief Counsel.

Bob's practice focuses on corporate tax issues, with particular emphasis on corporate group restructurings, spin-offs, and M&A transactions. He works with clients, as well as with other law firms and accounting firms, to negotiate and implement the tax aspects of these transactions, to secure IRS private letter rulings, and to develop legal and policy positions on corporate tax matters. He also represents clients in tax controversies and provides arbitration and expert witness services in commercial disputes involving tax issues.

From 2015 to 2023, Bob served as Associate Chief Counsel (Corporate) of IRS. In that position, he supervised 50 lawyers responsible for corporate tax matters, including drafting regulations, revenue rulings, and other published guidance, handling technical aspects of cases in examination, IRS Appeals and litigation, and issuing private letter rulings on corporate transactions. During his tenure at IRS, significant developments occurred in the taxation of M&A transactions, internal restructurings, and spinoffs. In addition, a revamp of the private ruling program improved timeliness, consistency of outcomes, and attention to policy.

Prior to his service at IRS, Bob spent 40 years in private practice of tax law in Washington - including 22 years as a partner at Ivins, Phillips & Barker.



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Bob grew up in Jersey City, New Jersey. He received his B.A. from Yale College, his J.D. from Yale Law School, and his LL.M in Taxation from Georgetown Law Center. Before beginning his career in private practice, he served on active duty in the Navy JAG Corps for three and a half years.

GOVERNMENT SERVICE

Internal Revenue Service, Associate Chief Counsel (Corporate) 2015-2023

Judge Advocate General's Corps, U.S. Naval Reserve, active duty 1971-1975

HONORS & AWARDS

Chambers USA (prior to serving as a senior IRS official)

Best Lawyers in America 1997 - present

MEMBERSHIPS & AFFILIATIONS

American Bar Association Tax Section: Chair, Corporate Tax Committee; Section Council Assistant Secretary

American College of Tax Counsel

District of Columbia Bar Tax Community

Federal Bar Association

SPEECHES & PRESENTATIONS

- "Tax Strategies for Corporate Acquisitions, Dispositions, Spin-Offs, Joint Ventures, Financings, Reorganizations & Restructurings 2024," Practising Law Institute, Panel on "CURRENT ISSUES IN DIVISIVE STRATEGIES - SPIN-OFFS," Chicago IL, November 13-15, 2024.
- "Contingent Liabilities in Spin-offs," University of Chicago Law School, 77th Annual Federal Tax Conference, Chicago IL, November 7-8, 2024. Paper and panel.
- "IRA Update Panel: CAMT and Excise Tax," Tax Executives Institute 2024 74th Midyear Conference, Washington DC, March 17-20, 2024.
- "Contingent Purchase Price and Contingent Liabilities in M&A," Tax Executives Institute Charlotte NC, March 16, 2024.
- "Section 4501 Excise Tax on Stock Repurchases - Selected Issues," Tax Executives Institute Northeast Wisconsin Chapter Meeting, February 22, 2024.



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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
- November 7, 2024
IPB Recognized in Best Law Firms 2025
- August 15, 2024
Twenty-Two IPB Attorneys Recognized in Best Lawyers in America and Ones to Watch 2025 Editions