



# Robert H. Wellen Appointed as Associate Chief Counsel (Corporate) of the Internal Revenue Service

## ATTORNEYS

Robert H. Wellen

## PRACTICE AREAS

International Tax

May 24, 2015

Ivins, Phillips & Barker is proud to announce that Robert H. Wellen will become Associate Chief Counsel (Corporate) of the Internal Revenue Service. Mr. Wellen has been a leader of Ivins' Corporate Tax group since he joined the firm as a partner in 1993. In his new role, he will lead the team of IRS attorneys responsible for issuing regulations, rulings and other guidance, and providing legal advice and recommendations to field personnel, on tax matters involving corporate organizations, mergers and acquisitions, liquidations, spin offs, distributions to shareholders, debt versus equity determinations, bankruptcies, and consolidated return issues affecting affiliated groups of corporations.

"Bob has been a leading light in the corporate tax bar for many years and both the Internal Revenue Service and the bar are very fortunate that an individual of Bob's stature will be in the forefront of resolving issues in the extremely complex area of corporate tax," said Eric Fox, Ivins' managing partner. Les Schneider, head of the firm's Tax Accounting group, commented "Bob had an encyclopedic knowledge of corporate tax and we will miss him as a valuable resource."

While at Ivins, Mr. Wellen advised corporate clients on tax planning; worked on the structure and negotiations for business transactions; and represented taxpayers seeking private letter rulings, in audits and other tax controversies, and tax policy matters before the IRS and the Treasury Department. He also served as an arbitrator and as an expert witness in commercial disputes involving complex tax issues. Mr. Wellen practiced with a nationally known team of Ivins' corporate, partnership and international tax experts, including Eric Fox, Les Schneider, Pat Smith, Jeff Moeller, Carter Hood, Alex Sadler, Brian



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Davis, Jay Singer, David Sherwood, and Doug Andre.

Prior to joining Ivins, Mr. Wellen practiced at the national law firm of Fulbright & Jaworski (now Norton Rose Fulbright). He served in the U.S. Navy Judge Advocate General's Corps from 1971 to 1975. Mr. Wellen graduated from Yale Law School in 1971 and earned his LL.M. in taxation in 1975 from the Georgetown University Law Center.