



Former Justice Department Lawyer Rejoins Ivins' Premier Tax Controversy Team

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James E. Brown

PRACTICE AREAS

Tax Controversies

DOJ Tax trial lawyer adds bench strength as transfer pricing and tax regulation fights grow

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WASHINGTON, DC - Ivins, Phillips & Barker, Chartered, the nation's premier tax and employee benefits specialty law firm, is pleased to announce that James E. ("Jamie") Brown has rejoined the firm as a partner. Mr. Brown, a former trial lawyer with the U.S. Department of Justice's Tax Division who twice received the Tax Division's Outstanding Attorney award, will rejoin the firm's tax controversy practice.

"Jamie is an exceptionally gifted attorney, and his experience as lead counsel for the government in scores of tax cases brings to the team a level of confidence and trial sophistication rarely found in the tax bar," commented Eric Fox, Ivins' Managing Partner. "He is a superb addition to our team of controversy experts, and we are absolutely delighted to have him back in the fold."

Mr. Brown earned his M.A. from the University of St. Andrews and his J.D. from Harvard Law School. He began his career at Ivins in 2003, where he worked principally with the tax controversy, corporate and international tax, and tax accounting groups. In 2006, he was called to public service as a trial attorney with the DOJ's Tax Division. During his tenure there, Mr. Brown served as lead counsel for the government in over 100 civil tax cases and received accolades for his distinguished service. In 2013, Mr. Brown returned to private practice in Washington where he has focused on Tax Court litigation and tax dispute resolution at the administrative level. He serves as the chair of the Tax Audits and Litigation Committee of the D.C. Bar's Tax Section.



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At Ivins, Mr. Brown will work principally with attorneys in the firm's prominent tax controversy practice group. The group provides audit and tax controversy support and litigates significant cases, drawing particularly on the firm's expertise in tax accounting, transfer pricing, the R&D credit, and the Administrative Procedure Act. Although the group has aided clients at all levels of dispute, it has earned a reputation for handling precedent-setting cases of national significance to industry. In 2001, for instance, the group secured an 8-1 decision in favor of client United Dominion Industries in the first consolidated tax return case argued before the U.S. Supreme Court in more than 60 years. In 2012, the group secured a victory for client Dominion Resources in the first case (and the only appeals court case) to invalidate Treasury's tax regulations under the Administrative Procedure Act's arbitrary and capricious standard. The firm presently is handling R&D credit litigation with \$200 million in dispute.

In addition to working with the tax controversy group, Mr. Brown will assist the corporate and international tax groups on planning matters. Pat Smith, a partner in Ivins' corporate tax group, noted that "Jamie has the ability to move seamlessly between technical practice areas - from transfer pricing to M&A tax to tax accounting - which means that our clients will always have access to practical insight from a front-line controversy specialist as part of larger planning engagements."

As to why Mr. Brown chose to return to Ivins, he said "I had a great experience here working on complex tax controversy projects, and I am honored to return. Ivins is a premier tax specialty firm whose sophisticated and loyal clients turn to it for help with their most challenging tax disputes." He continued, "I am thrilled by this opportunity to use my hands-on experience from the DOJ to serve Ivins' clients again."

The arrival of Mr. Brown continues Ivins' expansion of its tax services teams. Earlier this year, Hank Gutman, former Chief of Staff of the U.S. Congress Joint Committee on Taxation and former Deputy Tax Legislative Counsel with the U.S. Treasury Department, joined the firm to lead its Federal Tax Policy Group.

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Ivins, Phillips & Barker, Chartered, is a specialty law firm devoted exclusively to tax and employee benefits, with offices in Washington, DC and Los Angeles. Ivins specializes in representing Fortune 100 and Fortune 500 clients in corporate tax and employee benefits matters, and has developed an extraordinary number of senior-level tax executives in U.S. government service. For more information about Ivins, please visit our website at www.ipbtax.com.