



Pat Smith Quoted in Bloomberg BNA Daily Tax Report article

PRACTICE AREAS

Tax Controversies

Bloomberg BNA Daily Tax Report

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Ivins attorney Pat Smith was quoted in a Bloomberg BNA *Daily Tax Report* article on possible challenges to regulations issued under the new tax reform legislation. *IRS May Face Legal Challenges on Tax Law Regulations*.

"The IRS and Treasury will need to issue a lot of guidance under the legislation and their resources are already stretched very thin," said Patrick Smith, a partner at Ivins, Phillips & Barker Chartered in Washington. "That combination of circumstances provides fertile ground for the agencies not being able to devote the necessary resources to every issue, and that in turn increases the risk of noncompliance with APA requirements."

In the aftermath of the *U.S. Chamber* case, Smith said the IRS will need to "explain why they are doing what they are doing and responding to comments" when it issues tax regulations.

"The huge job they have ahead of them to interpret this legislation is going to be even more burdensome because of the consciousness that they have to be more careful and more diligent in explaining their decisions," Smith said.