



Pat Smith Quoted in Bloomberg BNA Daily Tax Report

PRACTICE AREAS

International Tax

Tax Accounting

March 28, 2018

Bloomberg BNA Tax Report

Ivins attorney Pat Smith was quoted in an article in Bloomberg BNA *Daily Tax Report* about proposed regulations that would largely eliminate the ability of the IRS to hire non-government attorneys to participate in taxpayer audits. *IRS Proposes Narrower Access to Documents in Tax Examinations.*

For most taxpayers, "the idea of bringing in outside attorneys causes a lot of red flags to go up," Patrick Smith, a partner at Ivins, Phillips & Barker Chartered in Washington, told Bloomberg Tax.

Smith said he was pleased with the proposed regulations, adding that most people have found the idea of hiring outside government counsel extremely inappropriate.

Having tax attorneys "not obviously subject to the same confidentiality constraints" as the government lawyers is concerning to taxpayers, Smith said.