

FOR IMMEDIATE RELEASE

Crowell & Moring Expands Tax Group with Addition of Two Tax Controversy and Litigation Partners

Washington, D.C. – July 17, 2012: Crowell & Moring LLP is pleased to announce the addition of two prominent tax controversy and litigation partners to the firm's Tax Group in Washington, D.C. David B. Blair and David J. Fischer bring more than 50 years of combined litigation and trial experience, advising domestic and international clients in the areas of federal tax litigation and controversy, with a specific focus on transfer pricing and international tax issues. The additions expand the tax controversy and litigation capabilities of Crowell & Moring's Tax Group as the firm expands its leading national tax practice. Blair joins from Miller & Chevalier and Fischer joins from Cooley LLP.

"As transfer pricing continues to be a focus of increased IRS audit and litigation scrutiny, both David Blair and David Fischer bring a wealth of credentials and knowledge that will serve our clients well in these and other complex tax controversy matters," said Harold J. Heltzer, chair of Crowell & Moring's Tax Group. "In addition, their work involving the application of the economic substance doctrine, partnership-level litigation, and alternative dispute resolution with the IRS, as well as managing the overall tax needs of multi-national corporations, makes them an excellent fit for our group and clients."

A former trial attorney for the Tax Division of the U.S. Department of Justice, Blair's experience includes representing Fortune 500 companies in the petroleum, retail, timber, pharmaceutical, cosmetics, government contracting, and chemical industries. He has handled large tax litigation and controversy matters in the areas of transfer pricing, foreign tax credits, partnerships, tax-exempt bonds, consolidated returns, federal excise taxes, employment taxes, tax treaties, and tax accounting issues. Blair also has extensive experience handling tax controversies before Internal Revenue Service (IRS) Exam, IRS Appeals, the IRS National Office, and representing taxpayers before the Advance Pricing Agreement program and Competent Authority (now the Advance Pricing and Mutual Agreement (APMA) office).

Blair is the editor of PLI's *The Transfer Pricing Answer Book* and co-author of BNA's *Transfer Pricing: Audits, Appeals, and Penalties*. Active in *pro bono* litigation, Blair represents non-profit organizations and individuals in federal, state, and local tax matters. He is a member of the U.S. Tax Court J. Edgar Murdock Inn of Court. He holds a J.D., *magna cum laude*, from Cornell University and a B.A. from Georgetown University.

"Crowell & Moring has a great heritage of successful tax litigation work," said Blair. "I look forward to being a part of this growing group, which encompasses an impressive mix of substantive technical tax experts and litigators, partnered with a solid transactional practice."

Focusing his national practice on tax controversy work, Fischer represents Fortune 500 companies, publicly traded corporations, and high net-worth individuals in tax matters. His clients include companies in the semiconductor, software, petroleum, mining, automotive, and banking and finance industries. With extensive experience handling IRS alternative dispute resolution procedures, Fischer has worked on accelerated appeals and mediation matters before the IRS Appeals office, and counseled clients on numerous IRS examinations, including coordinated examination audits, the Fast Track Settlement program, and the Industry Issue Resolution program. He also has supervised the litigation of coordinated industry issues, partnership-level cases, and test cases.

Fischer has extensive transfer pricing experience, currently focusing on buy-in royalty payments in connection with cost-sharing arrangements and other related issues. His cases include tax-sensitive leasing, partnership issues, foreign currency, commodity, option and stock trading issues, and amortization of sports player contracts.

Co-author of the Aspen Publishers Examination and Appeals Chapter of *A Practical Guide to U.S. Transfer Pricing*, Fischer has also been an editorial advisor to *The Tax Advisor* and is a frequent speaker on tax topics. He is a director of the Anglo-American Charitable Foundation, Ltd. and represents charities before the IRS as part of his *pro bono* practice. He holds a J.D., *with honors*, from George Washington University and a B.A., *with high honors*, from Michigan State University.

"With its deep roots in Washington, D.C., Crowell & Moring's Tax Group has an impressive platform that will allow my tax controversy practice to continue to grow," said Fischer. "I am thrilled to be joining a firm committed to growth that has such strong regulatory and litigation practices already in place."

Crowell & Moring LLP is an international law firm with approximately 500 lawyers representing clients in litigation and arbitration, regulatory, and transactional matters. The firm is internationally recognized for its representation of Fortune 500 companies in high-stakes litigation, as well as its ongoing commitment to *pro bono* service and diversity. The firm has offices in Washington, DC, New York, Los Angeles, San Francisco, Orange County, Anchorage, London, and Brussels.

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