



INTERNAL
REVENUE
SERVICE

**Arent Fox
Government
Relations**

**Tax
Policy**

A Record of
Success

Smart in your world®
Arent Fox

Insight, Inspiration and Advocacy. When and Where You Need It.

Two former U.S. Senators... A former member
of the U.S. House of Representatives...
Expert lobbying teams... Proven success...
Part of a law firm with more than 350
smart legal minds to draw from...

This is Arent Fox Government Relations.

A vital team in one of the most respected law
firms in Washington, DC, we're a bipartisan
and bicameral group of attorneys and policy
professionals with deep experience at the
highest levels of politics and public service.

Policy Pros. Deep Knowledge of Tax Issues.

Our clients benefit from the experience of a diverse group of tax policy experts, including former Members of Congress, senior staff, and tax lawyers who comprise a deep bench. With Congress and the Administration certain to focus on tax policy in 2012, it is critical to know what's taking place and to have a seat at the table.

Accordingly, we are pleased to provide strategic guidance from former **Senator Byron Dorgan**, who served for 10 years on the Ways and Means Committee in the U.S. House of Representatives, former **Congressman Phil English**, who spent 14 years on the committee and was a leading advocate of fundamental tax reform, and former **Senator Robert Bennett**, who as Chairman of Joint Economic Committee held hearings on and produced papers on tax policies and their economic impacts.

Actively involved in tax policy for a wide range of clients, our team has the skills and understanding to help you get results.



What We've Accomplished. With Intelligence, Resourcefulness and Ingenuity.

If you want to grow your business and expand your markets, advocate for change, affect regulatory and tax issues, defend rights and privileges, we're your tax policy partner.

Successes.

- ▶ **Institutional Tax Benefits** Advocating for tax policy changes to benefit a whole range of institutions, including colleges, churches, commercial real estate developers, drug companies, and small businesses.
- ▶ **Tax Incentives for Wind Energy** Helping a company stimulate additional production of wind power through tax legislation – ultimately enacted in the American Recovery and Reinvestment Act of 2009.
- ▶ **Estate Taxes** Representing Americans Standing for the Simplification of the Estate Tax (ASSET), a tax coalition dedicated to reforming and simplifying the estate tax. We help generate new members, develop legislative proposals and support materials, and obtain meetings with key members of Congress and think tank experts.
- ▶ **Partnership Income Taxes** Formulating policy and tax laws, Arent Fox eliminated double taxation in business partnership income tax laws in the District of Columbia.
- ▶ **International Taxation** Leading House advocate for the Homeland Reinvestment Act, which temporarily allowed international companies to repatriate foreign earnings to the United States without double taxation.
- ▶ **Nonprofit and Association Tax Issues** Won enactment of a \$1 million annual tax abatement for a large trade association in exchange for bringing additional convention and tourist revenue to the District of Columbia.
- ▶ **Transportation Tax Issues** Members of the group have experience successfully advocating and legislating on an array of miscellaneous matters with fuel taxes, excise taxes, and highway/transit program tax matters.
- ▶ **Stimulated Local Economic Development** Arent Fox obtained numerous tax incentives for local commercial and nonprofit development projects.

For more advocacy and public policy accomplishments, go to [arentfox.com/practices/govrelations](https://www.arentfox.com/practices/govrelations)



What's Coming on the Horizon? Ask Arent Fox.

Experience and accomplishments clearly demonstrate our high level of expertise in government relations, but look ahead. Tax issues will be a driver of your business in the future. They are a legislative priority in Federal and state governments as well as internationally – and critical to your business goals, too.

- ▶ Tax reform will be an enormous legislative priority on the Federal, state and local levels. Simplifying the tax code will be an underlying theme in any reform, as well as greater scrutiny of existing deductions.
- ▶ Elimination of tax preferences and tax exemptions for special situations will be concerns in every economic sector, including higher education, commercial real estate, the pharmaceutical industry, and small businesses.
- ▶ International tax reform could end tax penalties on foreign earnings.
- ▶ Taxation of the use, extraction and production and various kinds of energy including clean energy will be an enormous priority in the power and fuel industry.
- ▶ Other tax reform initiatives will arise, affecting policies such as cost recovery, bonus depreciation, and expensing.
- ▶ Congress will move toward eliminating situations where big corporations pay no federal tax and others pay such a high rate that it drives them overseas or prevents them from competing.
- ▶ Non-profit organizations and particularly colleges and universities will see reforms, particularly with Unrelated Business Income Tax (UBIT).
- ▶ Alternative Minimum Tax (AMT) reform or elimination will come to the forefront of national policy discussions and lawmakers.



Robert Bennett
Arent Fox Senior
Policy Advisor

Former U.S. Senator and senior member of the Senate Banking Committee (1993–2011); Senior member of the Appropriations Committee; Member of the Joint Economic Committee; Member of the Republican leadership team.

“Everything’s at stake in the next few years. Arent Fox is an extremely well connected law firm. We know the legislative side and we have tax partners that know the tax code inside and out. Reform is a process, and you need political and legal help, as well as lobbying expertise.”



Byron Dorgan
Arent Fox Senior
Policy Advisor

Former U.S. Senator and Congressman (1981–2011); Member of the House Ways and Means Committee; Member of the Senate Democratic Leadership for 14 years; Senior Member of Appropriations Committee, Science and Transportation Committee; Tax Commissioner of North Dakota.

“I have substantial knowledge of tax issues along with my friends Senator Bennett and Phil English. But beyond former Members of Congress, we have experts that served on boards of banks and in diverse other areas. This gives strength to our government relations function.”



Philip English
Arent Fox Senior
Government
Relations Advisor

Former Congressman (1995–2009); Member of the Ways and Means Committee and Ranking Member, Subcommittee on Select Revenue; Co-Founder of the Congressional Real Estate Caucus; Controller of Erie, Pennsylvania.

“We advocate on tax policy changes to benefit a whole range of institutions, including energy, health care, life sciences, manufacturing, and others. Our experts will refine your position and pitch and do the regulatory work. We do more than open doors.”



Unmatched Depth and Breadth of Expertise. On Your Side.

Tax is just one area in which Arent Fox provides smart advocacy solutions, strategic guidance and counsel.

Our Government Relations Practice Group is a bipartisan team of policy professionals and attorneys with extraordinary experience in Republican and Democratic politics and government service. Dynamic and diversified, we provide critical knowledge, judgment and experience for tax issues, health care matters, environmental questions and more.

We draft legislation and work with Congress to leverage regulatory action. Among our capabilities, we build and maintain coalitions, grassroots efforts and constituent support. We provide business consulting and advise our clients on how to obtain favorable public policy results. While solving existing issues as your partner, we anticipate and prevent others. Our Political Law attorneys advise on campaign finance, corporate PAC, lobbying disclosure, and Congressional ethics issues to ensure that our clients are acting appropriately while undertaking public policy initiatives.

Strategic advice and services come from former U.S. Senators, a member of the U.S. Congress, a former member of the Board of Directors of the Export-Import Bank of the United States, a former ambassador, senior Hill insiders, and recognized experts in more than 30 practice groups.

Collaboration. Knowledge. Experience.

Arent Fox clients also leverage our firm's knowledge and experience with tax issues in a more traditional legal context:

▶ **Howard Hughes
Medical Institute**

Arent Fox represented Howard Hughes Medical Institute over the last two decades in numerous financing and derivative transactions, including a \$600 million taxable bond financing, a \$500 million tax-exempt bond financing, an \$83.5 million tax-exempt bond financing, and a \$23 million tax-exempt bond financing.

▶ **Georgetown
University**

Arent Fox represented Georgetown University (including Georgetown University Medical Center) in more than \$1.275 billion tax-exempt and taxable financings, including new construction, refundings, interest rate conversions and derivative transactions, using auction rate securities, fixed rate bonds and variable rate demand bonds.

▶ **Globe Specialty
Metals, Inc.**

Arent Fox advised Globe Specialty Metals on tax matters related to its acquisition of Ospraie Funds (owner of Core Metals Group, LLC), a producer and marketer of high-purity ferrosilicon and other specialty steel ingredients, for \$52 million.

Arent Fox Delivers. Responsiveness and Results.

Arent Fox LLP is a full service government relations and law firm assisting clients with a wide range of matters. Strategically located in Washington, DC for more than 65 years, with offices in New York and Los Angeles, our teams work seamlessly to handle lobbying and legal concerns affecting your business.

The firm represents a wide range of clients in local municipalities, state government, on Capitol Hill and in the executive branch, as well as internationally. Clients include *Fortune 500* companies, government agencies, trade associations, small businesses of all kinds, foreign governments and other entities.

We're proud of the work we do for every client and of our reputation for understanding their business, their industry, and their world.

Arent Fox. Smart in Your World.

How Can We Help You Accomplish Your Goals?

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