

MASSACHUSETTS Lawyers Weekly

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Taxation
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BRIAN C. McMANUS

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Brian C. McManus, chair of Latham & Watkins' Boston tax department, has developed a reputation as one of the nation's leading tax litigators and advisors, making him an invaluable resource to companies and high net-worth individuals facing all varieties of civil and criminal tax disputes.

McManus's practice focuses on everything from Internal Revenue Service audits and appeals to litigation before federal and state courts across the U.S.

In that capacity, he advises a wide mix of American and international clients, including multinational and Fortune 500 corporations in the technology, banking, insurance, energy, pharmaceuticals, airlines, entertainment and retail sectors; global professional services firms and international charitable organizations; trust companies; and offshore corporate providers.

McManus is particularly experienced with disputes involving cross-border and international tax matters, sophisticated corporate transactions, enterprise and asset valuations, transfer pricing, partnerships, and cryptocurrency. He also handles sensitive tax matters involving allegations of fraud and potential criminal tax charges, as well as voluntary disclosures of domestic and offshore filing errors.

His representative engagements include securing, prior to discovery, a taxpayer-favorable settlement with the IRS on behalf of Weyerhaeuser, one of the world's largest lumber companies, in a case involving a \$700 million alleged "disguised sale." McManus obtained a desired tax deferral with a pennies-on-the-dollar resolution.

He also successfully represented major international energy player NAGP (Scottish Power) in U.S. Tax Court when the IRS challenged interest deductions the company took on nearly \$5 billion in intercompany debt.

He is currently engaged in pre-litigation representation on a client's behalf in the single largest dollar transfer pricing tax dispute in history, with tens of billions of dollars at stake, while representing another client in U.S. Tax Court in a dispute over the deductibility of a multibillion-dollar settlement payment. *MLW*



ACHIEVEMENTS AND PROFESSIONAL ACTIVITIES

Chair, Boston Tax Department, Latham & Watkins; adjunct professor, Georgetown University Law Center; vice chair, Civil and Criminal Tax Penalties Committee, American Bar Association Tax Section