

Larry R. Langdon

Partner

lrlangdon@mayerbrown.com

Palo Alto

T +1 650 331 2075

F +1 650 331 4575



"a great tax mind." Chambers USA 2006

Attorney Larry Langdon brings comprehensive experience in the areas of tax controversy and planning to clients' service. He is widely recognized for his knowledge of federal tax policies and applications and has been characterized by *Chambers USA 2006* as "a great tax mind."

Larry has been a speaker at the American Bar Association Section of Taxation, American Institute of CPAs, Manufacturers Alliance [MAPI], Tax Executives Institute and many other professional and industry groups.

Larry joined Mayer Brown in 2003. Previously, he held senior positions with the US Internal Revenue Service (Commissioner, Large & Mid-Size Business Division, 1999–2003; Legislation and Regulations Division, Office of Counsel, 1964–1968; and Joint Committee Division, Office of Chief Counsel, 1961–1962) and, in the private sector, with leading firms such as Hewlett-Packard (VP, General Transition Manager, 1999; VP, Tax, Licensing and Customs, 1978–1999); Vetco, Inc. (Director of Taxes and Corporate Secretary, 1976–1978); and the Ford Motor Company (Senior Tax Attorney, General Counsel's Office, 1968–1976). Larry also worked with the CARE organization from 1962–1964.

Mayer Brown was recently named Tax Controversy Team of the Year for the second consecutive year in the *Legal 500* United States Awards. "Mayer Brown is 'among the best' and fields a large team...dedicated exclusively to tax controversy and transfer pricing," said *Legal 500* and its sources in the US edition. The firm is "regularly seen in the most high-profile controversy cases before the US Tax Court" and produced "yet another impressive run of work" in 2014.

Education

- New York University School of Law; LLM, Taxation
- The Ohio State University Michael E. Moritz College of Law, JD
- The Ohio State University; BS, Business Administration

Admissions

- California
- Michigan
- Ohio
- US Supreme Court
- US Tax Court

Activities

- Chair and member of several non-profit boards
- American Bar Association, Section of Taxation
- Tax Executives Institute (Santa Clara Valley President, 1984–1985; International President, 1988–1989)
- Manufacturers Alliance for Productivity and Innovation (Chair, Tax Councils I, II and III)
- Chair, Tax and Fiscal Policy, Joint Venture Silicon Valley (1996–1999)
- National Tax Association (Vice President, 1999)
- International Fiscal Association, Council member and Executive Committee member (1996–1999); Executive Vice President (1999); member of 1990–1991 IRS Commissioner's Advisory Group

News & Publications

- "International Tax Review lists 15 Mayer Brown and Two Tauil & Chequer partners in *Tax Controversy Leaders* guide," 9 September 2015
- "International Tax Review lists 17 Mayer Brown and 2 Tauil & Chequer lawyers in *Tax Controversy Leaders* guide," 17 September 2014
- "IRS Releases Directive on Information Document Request Enforcement Process," Bloomberg BNA Daily Tax Report, 25 November 2013
- "Hand over tax audit information, clock is running: IRS," Reuters, 22 November 2013
- "Internal Revenue Service Releases Directive on Information Document Request Enforcement Process," Mayer Brown Legal Update, 5 November 2013
- "Silicon Valley firms build tax practices," Daily Journal (subscription required), 19 December 2012
- "Alternative Dispute Resolution Processes In the Current U.S. Transfer Pricing Landscape," Bloomberg BNA Transfer Pricing Report, 28 June 2012
- "US District of Columbia Circuit Issues Important Decision Relating to Protection of Tax Department Documents," Mayer Brown Legal Update, June 2010
- "US IRS Proposes New Disclosure Rules for Information on Uncertain Tax Positions," Mayer Brown Legal Update, 29 January 2010
- "IRS official, practitioners discuss privilege issues," Tax Analysts, 17 November 2009
- "Advance Pricing Agreements: A Defense against Periodic Adjustments under New Cost Sharing Regulations," Mayer Brown Legal Update, 5 March 2009
- "Protecting a Public Company's Confidences," Briefly, National Legal Center for the Public Interest, 2005
- "The New School of Audit Effectiveness: A Report and Evaluation of the Strategies, Tools and Tax Administration Techniques of the Large and Mid-Size Business Division of the IRS," Journal of Tax Practice & Procedure, October/November 2003

Events

- "Challenges and Opportunities of BEPS," Pacific Rim Tax Institute, 3 March 2016 - 4 March 2016
- "Navigating Into, Through, and Out of CAP," TEI Audits and Appeals Seminar, 20 May 2015
- TEI Chicago Chapter Selected Topics in Tax Controversy and IRS Update, 26 February 2015
- "BEPS III – Administrative and Audit Focus – US and Foreign Perspectives, include IGAs, Joint Audits Competent Authority Transparency etc. (Action 11-15)," Pacific Rim Tax Institute, 19 February 2015 - 20 February 2015
- "Current Development in IRS Audits, Appeals and Tax Litigation," Silicon Valley Tax Director's Group, 14 November 2014
- "IRS Examination Developments for High Tech Firms," TEI - SJSU High Technology Tax Institute, 10-11 November 2014
- "Transfer Pricing Compliance - Past, Present and Future," TEI's 69th Annual Conference, 2-5 November 2014
- "LB&I's New Enforcement Priorities, Ethical Issues, & Financial Reporting in Tax Controversies," TEI & University of San Diego – Tax Litigation Update, 26 September 2014
- Annual Internal Revenue Service Day of the San Francisco Chapter of Tax Executives Institute, 13 May 2014
- "Recent Changes in IRS Audit and Transfer Pricing Administration," Manufacturers Alliance for Productivity and Innovation, Palo Alto, CA, 13 March 2014
- "New Cases & Examination and Appeals Trends," USA Branch of the International Fiscal Association's Annual Conference, 27-28 February 2014
- "Challenges, Risks and Best Practices Under the New IDR and Summons Rules," Palo Alto Tax Controversy Roundtable, 6 February 2014
- "'Current IRS Audit Developments – Emphasis on Revised Information Document Request Processes and Section 199 Audits' and 'Current Tax Court Litigation'," TEI Philadelphia Chapter - Federal, Financial Reporting and International Tax Update & Developments, 13 November 2013
- Tax Executives Institute Current Topics in Tax Controversy, 30 May 2013
- Tax Controversy Seminar Series: Understanding and Countering the Government's Current Audit and Litigation Tactics - Chicago, 19 January 2010