



OVERVIEW

David Jacobson advised a diverse client group on a wide range of federal income tax matters, the bulk of his practice consisted of representing utility industry clients. Prior to his retirement, he addressed Internal Revenue Service audit and appeals issues, secured private letter ruling, technical advice memoranda and permission to change methods of accounting from the national office of the Internal Revenue Service, and participated in tax litigation, tax planning, and the structuring and evaluation of proposed transactions. He provided tax return review services to a large number of utility clients advising these companies regarding the appropriate positions to be reflected on income tax returns. David also served as an expert witness on tax matters in utility rate cases.

In addition, David represented clients with respect to legislative and tax policy matters emanating from Capitol Hill, the Internal Revenue Service, and the Department of Treasury. His knowledge and facility in this area was, at least in part, a function of his prior experience as tax counsel to the Senate Finance Committee and as attorney advisor in the office of chief counsel of the Internal Revenue Service.