From: Maybank, Burnet R. III <BMaybank@nexsenpruet.com>
To: Maybank, Burnet R. IIIBMaybank@nexsenpruet.com
Date: 11/13/2014 4:42:51 PM
Subject: ED & SALT LSs: Expiring federal tax credits (Part 2); efforts to renew (multiple articles)

Below are a number of articles on where Congress is on renewing the various tax credits/deductions/incentives which sunset this year

1) From The Washington Examiner on Nov. 11, 2014: available at http://www.washingtonexaminer.com/gop-looks-to-extend-tax-breaks-during-lame-duck/article/2555998

GOP Looks to Extend Tax Breaks During Lame Duck by Joseph Lawler

Republican leaders hope that they can extend dozens of expiring tax provisions worth into the hundreds of billions of dollars even before they take control of the Senate in January, clearing the way for other work and gaining an early victory on tax policy.

Soon-to-be Senate Majority Leader Mitch McConnell listed passing the provisions, known as “extenders,” just behind a government funding bill as a priority for when the Senate reconvenes for the first time since the midterm elections this week.

“We’ll be talking about whether to do the tax extender package,” McConnell said in a press conference in Louisville, Ky., following his re-election last week.

“[T]here’s a whole lot of unfinished business sitting there, some of which it might be advantageous to get out of the way,” McConnell said. “The Democrats may want to do it and we may want to do it in order to clear off some of the necessary work that’s simply been undone in the dysfunctional Senate.”

The extenders include 55 temporary tax provisions that expired at the end of 2013, including business provisions such as credits for research and experimentation as well as measures that affect individuals, such as the state and local tax deduction. They also include energy credits, most notably the renewable electricity production tax credit that has aided the U.S. wind farm industry.

Top Senate Republicans involved in tax policy see the extenders package as a way to reduce uncertainty for businesses and possibly make permanent some of the provisions, such as the research and experimentation credit, that most affect investment.

In addition to providing certainty to businesses, there’s another reason legislators would like to resolve the status of the expired provisions in the lame duck: The Internal Revenue Service says the tax-filing season could be delayed if the extenders are not addressed before the end of November, giving legislators little time to act.

Yet there is uncertainty about how Republicans will coordinate between the Senate and the House, in which conservative lawmakers have opted to pass provisions one-by-one on a permanent basis.

The Senate Finance Committee had moved a measure reauthorizing most of the provisions for two years in the spring, a package that would be a convenient vehicle for legislation in the lame duck.

But speaking at an event last week, a tax staffer for the House tax-writing committee suggested that a two-year measure would face trouble in that chamber.

“I’m not even sure the House, especially after the election, can do a two-year bill,” said George Callas, staff director of the House Ways and Means Subcommittee on Select Revenue Measures. “Looking at the lay of the land, I think a two-year bill that didn’t get any permanence … would be a very heavy lift in the House.”

Callas said at the conference hosted by Bloomberg BNA that some conservatives in the House would prefer to “punt” the issue until the next Congress with a retroactive one-year bill, allowing them to renegotiate the issue with a GOP Senate in place.

Jim Lyons, a tax counsel for Sen. Orrin Hatch, R-Utah, on the Senate Finance Committee, responded that leaving extenders for the next year was a “a misguided view” because it would involve significantly delaying tax filing season or doing nothing for the tax provisions that were expired for all of 2014. “Neither of those seems an optimal outcome, and it could be avoided by reaching a deal in the lame duck,” said Lyons, who cautioned that he was giving his own view and not necessarily Hatch’s.

Looming over the process are questions about the fiscal impact of extending the provisions. The two-year extension approved by the Senate Finance Committee in April would have increased the deficit by $84.1 billion over 10 years, according to the Joint Committee on Taxation and Congressional Budget Office. Making the credits permanent, as the House has sought to do, would inflate the estimated cost by even more, by up to $1 trillion over 10 years for all the provisions, according to the Committee for a Responsible Federal Budget, a centrist nonprofit that advocates fiscal restraint.

Yet many Republicans and Democrats agree that those figures are due to budgeting conventions that use baselines that don’t reflect the fact that the temporary provisions are for all meaningful purposes permanent, as they are regularly extended.

The bigger obstacle to reform might be House Republican concerns about cronyism through credits that benefit companies, as well as resistance to doing anything other than permanent policy.

House Ways and Means Committee Chairman Dave Camp "believes it is critical that we pass these policies on a permanent basis in order to strengthen our economy," said a representative. Camp is retiring at the end of the year.

Whether the differences between the Senate and House can be resolved through making some provisions permanent and others temporary or horse-trading remains to be seen.

"We think the odds substantially favor passage of an extenders package before the end of the year. But like much in Washington today, what may be possible for policy reasons can be derailed for political reasons, making this an issue where sudden changes in fortune would not be surprising," wrote Deloitte tax policy analysts Jon Traub and Jeff Kummer in a research note.

2) From Fox News on Sept. 20, 2014: available at http://www.foxnews.com/politics/2014/09/30/dozens-tax-breaks-set-to-expire-unless-congress-votes-for-extenders-in-lame/#.VGUQA4kGW6Q.email

Tax breaks worth billions set to expire unless Congress acts

Time is running out for Congress to extend more than 50 tax breaks worth nearly $85 billion, including popular ones for college expenses and energy-efficient appliances.

Democrats and Republicans have shown a willingness to extend the tax breaks -- including some that expired in 2013. But the midterm elections largely have brought to a standstill votes on such major issues as taxes and immigration and even military action against the Islamic State.

Among the expiring breaks is a benefit enjoyed in the seven states that do not have an income tax. Taxpayers in those states have been allowed by Congress for years to deduct state and local sales tax instead. According to the Dallas Morning News, more than 2 million filers in Texas -- one such state with no income tax -- used the deduction in 2012, for an average benefit of $1,906.

But if Congress doesn't extend it, the deduction goes away.

This spring, the Senate Finance Committee passed a bill to extend through 2015 nine tax credits, deductions or exemptions that expired in 2013 -- and 26 more that will expire at the end of year.

The legislation has widespread bipartisan support, but Republicans kept it from getting a final vote when denied the opportunity to have their amendments considered.

"I support the tax extenders legislation. I want to see it passed," Utah Sen. Orrin Hatch, the top Republican on the finance committee, said afterward. "I don't want to speak for anyone else, but I suspect that the majority of Senate Republicans feel the same way."

It remains to be seen whether lawmakers would be more amenable to extending at least some of the breaks after the election, and before a new Congress is sworn in. A Senate staffer told FoxNews.com on Monday the fate of the bill during the lame-duck session rests on the shoulders of Senate Majority Leader Harry Reid, D-Nev.

In the Republican-controlled House, the Ways and Means Committee has voted in favor of extending 14 of the 50-plus tax breaks, making 12 of them permanent.

But nothing appears headed for a full floor vote yet, in large part because the so-called "breaks" result in less revenue for the Treasury Department and an increase to the deficit -- like the projected $84.1 billion the Senate bill would add if passed in full.

A House staffer said Monday a vote that in effect increases the deficit would be especially difficult in that chamber because every member is up for re-election, and especially hard for Republicans running as hardline fiscal conservatives.

The chamber's Joint Committee on Taxation has identified 79 expired or expiring federal tax provisions from 2013 to 2023.

Beyond the ones for college tuition and energy efficiency, the list includes the popular deductions for expenses for school teachers, mass transit, mortgage-insurance premiums and for the use of alternative fuels and the vehicles that run on them.

Congress has talked for years about comprehensive tax reform, essentially by implementing a major overhaul to simplify the U.S. tax code. But such a task is complicated and politically perilous.

In March, House Ways and Means Chairman Dave Camp, R-Mich., produced a sweeping tax-reform plan that would create just two tax brackets and lower the corporate tax rate by 25 percent without increasing the deficit, a plan lawmakers call "revenue neutral."

However, the plan went nowhere with Republican leaders in part because it covered the lost tax revenue by capping or eliminating tax credits and deductions.

House Speaker John Boehner, when asked about the details of the Camp plan at the time, responded in part by saying "blah, blah, blah."

Still, supporters of tax reform hope the desire to make changes is being stoked by the recent debate over U.S. corporations establishing overseas headquarters to avoid taxes. The Treasury Department imposed new regulations earlier this month to make it harder for corporations to pull off the so-called "inversions."

3) From Financial Executives International Spring 2014 Report: available at http://www.financialexecutives.org/KenticoCMS/Financial-Executive-Magazine/2014_02/20014-Mid-Year-Tax-Policy-Outlook.aspx#axzz3lyviRMbu

2014 Mid-Year Tax Policy Outlook by Ed McClellan-Principal in Washington National Tax Services practice of PwC U.S.

Divided government, competing legislative goals and budget constraints have made it difficult for Congress in recent years to respond to calls for a more competitive U.S. tax system. These difficulties increased this year as the political parties position themselves for the upcoming November 4 midterm Congressional elections.

While enactment of comprehensive tax reform is unlikely in 2014, business taxpayers should consider how recent reform proposals in the House and Senate may shape future efforts to overhaul U.S. tax laws. As was true under the 1986 Tax Reform Act, sweeping changes to our domestic and international tax rules could have markedly different effects on various sectors of the economy and particular businesses within a sector — effects that financial executives will want to monitor and measure.

The release of a comprehensive tax reform discussion draft in late February by House Ways and Means Committee Chairman Dave Camp (R-MI) was a significant development that could influence future Congressional action on tax reform. In late 2013, former Senate Finance Committee Chairman Max Baucus (D-MT) also offered a series of tax reform discussion drafts, before he became U.S. ambassador to China earlier this year. Senator Ron Wyden (D-OR), the new Finance Committee Chairman, has a long-standing interest in tax reform, having introduced bipartisan tax reform bills with Republican senators in previous sessions of Congress.

While tax reform efforts will continue beyond 2014, the specific reform proposals discussed below warrant close attention because of their potential to significantly affect how businesses are taxed. [OMITTED MATERIAL]

Tax Extenders

The Senate and House tax-writing committees each have taken action to extend certain expired tax provisions. More than 50 temporary business and individual tax provisions expired at the end of 2013. Additional provisions are set to expire at the end of 2014.

Senate Finance Committee

The Senate Finance Committee on April 3 approved the Expiring Provisions Improvement Reform and Efficiency (EXPIRE) Act, which retroactively extends for two years — from January 1, 2014 through December 31, 2015 — nearly all of the business and individual tax provisions that expired at the end of 2013. The EXPIRE Act also extends for one year several provisions that are scheduled to expire at the end of 2014.

In his opening statement at the committee markup, Chairman Wyden said many expired provisions are "well-intentioned and ought to be permanent," and the fact that the committee is again marking up a temporary tax extenders bill "shows the urgency of tax reform." Chairman Wyden expressed his hope that "this will be the last tax extenders bill the committee takes up as long as I'm chairman."

Significant expired business provisions that would be extended through the end of 2015 under the Finance Committee-approved bill include the research credit, look-through treatment of payments between related controlled foreign corporations (CFCs), and the Subpart F active financing exception. The EXPIRE Act also would renew 50 percent 'bonus' depreciation for qualified property and would continue to allow an election to accelerate AMT credits in lieu of bonus depreciation. In addition, the bill would extend 15-year straight-line cost recovery rules for qualified leasehold improvements, qualified restaurant buildings and improvements, and qualified retail improvements.

Additional business tax provisions that would be extended through 2015 include the Section 179 small business expensing limits, the Work Opportunity Tax Credit, and tax rules governing the treatment of S corporation built-in gains and basis adjustments to stock of S corporations making charitable contributions of property.

The bill includes a two-year extension of the renewable electricity production tax credit (PTC) and the election to claim the energy credit in lieu of the PTC. Additional energy tax provisions that would be extended through 2015 include the credit for construction of energy-efficient homes and the energy-efficient commercial building deduction, with modifications.

The Finance Committee approved several amendments to the EXPIRE Act as initially proposed by Chairman Wyden, including a proposal to modify the research credit to allow qualifying start-up businesses to claim the credit against payroll taxes. The Joint Committee on Taxation staff estimates the EXPIRE ACT as proposed by Chairman Wyden would reduce net tax revenues by $85.3 billion from 2014 through 2024.

As a signal of bipartisan interest in advancing tax reform, the Finance Committee extenders bill includes a

‘Sense of the Committee’ statement calling for action on comprehensive tax reform in the next Congress before the proposed tax extenders would expire, and with a major focus on “fostering economic growth and lowering tax rates by broadening the tax base.”

House Ways and Means Committee

The House Ways and Means Committee held an April 8 hearing on several expired business tax provisions that would be made permanent or given long-term extensions in Chairman Camp’s tax reform discussion draft. In his opening statement, Chairman Camp said “making some tax policies permanent now will open the door to economic growth” in advance of comprehensive tax reform, adding that “this is just the beginning of the conversation we must have to overhaul the tax code.”

Following the April 8 hearing, several senior Ways and Means Committee Republicans intro-duced stand-alone bills that would permanently extend expired provisions that were examined by the Ways and Means Committee. Other committee members have introduced bills that would make permanent other expired provisions that are not addressed by Chairman Camp’s tax reform discussion draft.

The House Ways and Means Committee on April 29 approved six of the separate bills to permanently extend certain expired tax provisions. The bills address the research credit, look-through treatment for payments between CFCs, the Subpart F active financing exception, Section 179 small business expensing limits, and tax rules governing the treatment of S corporation built-in gains and basis adjustments to stock of S corporations making charitable contributions of property. The Joint Committee on Taxation staff estimates that the bills would reduce federal revenues by roughly $310 billion over 10 years.

It may take some time to resolve differences between the House Ways and Means Committee effort to make permanent only a limited number of expired provisions and the Senate Finance Committee effort to temporarily renew nearly all expired tax provisions through the end of 2015. The full House on May 9 passed the Ways and Means Committee bill to make the research credit permanent, but Senate action on the Finance Committee extenders bill was delayed by a May 14 procedural vote, which failed to secure the required 60 votes. If both chambers can pass bills on tax extenders, Congress could hold a summer conference on extenders. Other--wise, as noted above, a final decision on tax extenders could be delayed until after the November elections. The revenue effects of renewing expired tax provisions are another reason why action may be delayed until after the elections.

Tax Reform

While enactment of comprehensive tax reform is unlikely in 2014, business taxpayers should consider how recent tax reform proposals in the House and Senate may shape future efforts to overhaul U.S. tax laws. Chairman Camp’s discussion draft in particular is the most significant comprehensive tax reform proposal since enactment of the Tax Reform Act of 1986. Chairman Camp’s draft proposal would modify nearly 40 business-related deductions and exclusions, 30 separate business tax credits, more than 15 tax accounting methods, and nearly 40 provisions affecting pass-through entities such as S corporations and partnerships.

Financial executives will want to be aware of how these recent tax reform proposals could shape future tax law and affect their businesses.

Camp Tax Reform Discussion Draft

Chairman Camp in February released a 979-page tax reform discussion draft that would lower corporate and individual tax rates, reform U.S. international tax rules, and broaden the tax base by repealing or limiting business and individual tax deductions, credits, and income exclusions. Under Chairman Camp’s discussion draft, the current 35 percent top corporate rate would be reduced over five years to 25 percent. The proposed corporate rate reduction would be phased in by two percentage points each year from 2015 through 2019.

The proposal is designed to be revenue neutral, i.e., not resulting in a net revenue gain or loss over the 10-year budget measuring period. Some of the key proposals to broaden the tax base by limiting deductions, credits, and income exclusions affecting businesses would:

• Eliminate the modified accelerated cost recovery system (MACRS), resulting in longer deduction periods for the cost of certain property;
• Require, after a phase-in period, five-year amortization of research and experimental expenditures;
• Require, after a phase-in period, 10-year amortization for 50 percent of certain advertising expenses;

• Phase out and repeal the domestic manufacturing deduction (Section 199);
• Repeal the 'last-in, first-out' (LIFO) and lower-of-cost-or-market (LCM) inventory accounting methods;
• Limit use of the cash accounting method for certain large pass-through entities;
• Repeal special net operating loss (NOL) carryback rules;
• Repeal deferral of gain on like-kind exchanges; and
• Impose an excise tax on systemically important financial institutions (SIFI).

Building on a 2011 international tax reform discussion draft released by Chairman Camp, the new discussion draft would move from the current U.S. worldwide system of taxation to a "territorial" tax system in which 95 percent of qualified foreign-source dividends received by U.S. corporations from foreign subsidiaries would not be subject to U.S. tax (through a dividend received deduction).

Note: S corporations and U.S. partnerships (and their respective owners) would not be eligible for this territorial tax treatment under Chairman Camp's draft. Chairman Camp proposes to address concerns about U.S. corporations shifting profits to low-tax jurisdictions by providing for taxation of all intangible income of foreign subsidiaries when the income is earned, at a reduced rate of 15 percent. The same reduced rate would apply to foreign intangible income of U.S. parent companies. The draft proposal also would limit certain interest deductions.

A one-time transition tax would apply to all previously untaxed earnings and profits of foreign subsidiaries of U.S. corporations. The cash portion of previously untaxed E&P would be subject to an 8.75 percent rate, and the reinvested portion would be subject to a 3.5 percent rate.

Chairman Camp proposes to replace the current seven individual income tax brackets — ranging from 10 percent to 39.6 percent — with two tax brackets of 10 percent and 25 percent. A new 10 percent surtax would apply to broad range of 'modified' adjusted gross income above $450,000 for joint filers and above $400,000 for single filers. The standard deduction would be increased, but personal exemptions would be repealed. The discussion draft would repeal both the individual and corporate alternative minimum tax.

Chairman Camp has announced he intends to hold public hearings on his tax reform discussion draft this year after completing a series of briefings for other House members.

Senate Finance Committee Plans

Senate Finance Committee Chairman Wyden has said his initial focus is on tax extenders because he does not believe enacting tax reform is possible by the end of 2014. Chairman Wyden plans to discuss options for future action on tax reform with Finance Committee members, and those options could include reform proposals he has offered in the past.

Senator Wyden in 2010 and 2011 introduced comprehensive tax reform bills with Republican Senators. Although he has not introduced a tax reform bill in the current Congress, Senator Wyden has been a strong advocate of the need to reform both the domestic and international tax regimes.

At the same time, he has stated reservations about switching to a territorial tax system rather than the worldwide tax system currently in effect for U.S. multinationals.

Senator Wyden's most recent 2011 tax reform bill proposed to lower the corporate tax rate to 24 percent and broaden the tax base. Major business base broadeners included current taxation of all foreign income without benefit of deferral and adoption of a per-country FTC limitation; repeal of the Section 199 domestic manufacturing deduction; replacing MACRS depreciation with the slower alternative depreciation system (ADS); and reducing corporate interest deductions.

Note: The earlier bills introduced by Senator Wyden include some proposals that are similar to those in Chairman Camp's draft (e.g., repeal of the Section 199 domestic manufacturing deduction), while differing significantly on certain issues, including the taxation of foreign earnings.

Before leaving the Senate, former Finance Chairman Baucus in late 2013 released a series of tax reform discussion drafts prepared by his committee staff. These Baucus staff discussion drafts also are important, since they could influence future tax reform legislation:

• An international reform discussion draft proposes to repeal or modify the current deferral system. In its place, the discussion draft provides statutory language for two differing regimes that would generally impose current taxation on all CFC income at a minimum rate.
• A tax administration reform draft proposes to improve tax return filings, expand information reporting and

IRS collection tools, and combat tax-related identity theft.

• A cost recovery and tax accounting discussion draft proposes to replace MACRS and ADS with a new system that approximates economic depreciation based on estimates provided by the Congressional Budget Office. This discussion draft also proposes to repeal LIFO and limit the use of cash accounting by large pass-through entities.

• An energy tax reform discussion draft focuses on simplifying approximately 40 current energy tax incentives into two basic categories of activity: clean electricity production and clean transportation fuel production.

Note: Former Chairman Baucus expressed support for reducing the corporate rate below 30 percent, but his Finance staff discussion drafts did not propose a specific corporate tax rate reduction.

White House Tax Reform Proposals

While the House and Senate tax committees are focusing on comprehensive individual and corporate tax reform, President Barack Obama continues to call for reducing the top corporate rate to 28 percent while his FY 2015 budget proposes $651 billion in tax increases on higher-income individuals for deficit reduction.

President Obama has not released a detailed tax reform plan, but a "framework for business tax reform" released in early 2012 identified some options for offsetting the cost of a lower corporate tax rate, such as limiting depreciation deductions. These options are similar to proposals included in Ways and Means Chairman Camp's discussion draft and tax reform bills previously introduced by Finance Chairman Wyden.

President Obama's FY 2015 budget proposes to reserve proceeds from certain revenue-raising proposals for "long-run revenue-neutral business tax reform," with $150 billion in one-time revenue from tax reform to be used for infrastructure spending.

The budget includes several new revenue-raising proposals along with other previously proposed international and domestic business revenue raisers (e.g., repeal of LIFO) that could offset part of the cost of business tax reform, with adverse effects on some businesses.

New provisions in the President's FY 2015 budget include proposals that would:

• Restrict deductions for excessive interest of members of a financial reporting group;
• Prevent avoidance of foreign base company sales income through manufacturing services arrangements;
• Create a new category of Subpart F income for transactions involving digital goods or services;
• Limit the ability of domestic entities to expatriate; and
• Modify like-kind exchange rules for real property.

The President's budget proposes to make certain provisions permanent as part of tax reform, including a modified research credit, certain renewable energy tax provisions, and several temporary individual and small business tax provisions.

What Happens Next

While Congress is expected to act on renewing expired business and individual tax provisions in 2014, recent tax reform proposals could have a far more significant long-term impact on how businesses are taxed.

There is bipartisan agreement that an overhaul of U.S. tax laws is long overdue since it has been nearly 30 years since the Tax Reform Act of 1986. Efforts in Congress to make U.S. tax laws more competitive will continue in 2015. Financial executives need to understand these tax reform proposals and be in a position to assess the impact of specific reform proposals on their businesses.

4) From Reuters News on Nov. 3, 2014: available at http://www.reuters.com/article/email/idUSKBN0IN1U320141103

Expired Corporate Tax Breaks Await U.S. Congress after Elections by Kevin Drawbaugh

(Reuters) - When the U.S. Congress returns to work next week after Tuesday's midterm elections, one of its first tasks will be dealing with dozens of expired corporate tax breaks, whose renewal and extension are seen as likely though not guaranteed.

Known as "extenders," the 55 temporary laws - including tax breaks for depreciation and research - have been in limbo since the end of 2013, when their last authorized extension ran out.

Corporations have been clamoring for months for Congress to renew the laws, which also involve offshore finance, green energy and narrow interests such as Puerto Rican rum production.

But lawmakers, deeply divided over fiscal issues, have not acted and now are under heavy pressure to deal with the extenders in the "lame duck" session that ends in December.

The session is expected to cover only 14 legislative days, so lawmakers will have to work fast and stay focused, with must-pass budget items also on their agenda, analysts said.

"The fate of the 55 expired special interest tax breaks ... will be the marquee legislative fight of the lame duck session," said Guggenheim Securities senior policy analyst Chris Krueger.

In a research note, Krueger offered a 70 percent probability that Congress will renew retroactively and extend the entire package through 2015. Others around Washington are not so sure.

"Suddenly, passage of the extenders no longer looks certain," said Greg Valliere, chief political strategist at Potomac Research Group, in a research note last week.

Young fiscal hawks may resist renewal, arguing that many of the extenders provisions are egregious examples of Washington picking winners and losers in the private sector, he said.

Some of the laws could be in danger, such as a tax break for NASCAR race tracks, testing "whether the pro-business (Republican) leadership can fend off restive Young Turks who don't see this as a proper role of government," Valliere said.

The extenders also include tax deductions for individuals for college tuition costs, state and local sales taxes paid, schoolteacher expenses and the child tax credit.

A wild card will be whether Democrats try to add new curbs on tax "inversions" to extenders legislation. A 2013-2014 surge in these deals - in which U.S. companies reincorporate overseas to cut U.S. tax costs - has faded, but some Democrats want action beyond a recent Treasury Department crackdown.

Anti-inversion legislation is unlikely to win approval this year, said Height Securities analyst Henrietta Treyz on Monday.

Such measures will likely be put forward during the lame-duck session as possible offsets for government tax revenue losses that would be presented by separate Republican proposals to make certain temporary extender laws permanent.

"However, we do not believe at this time that a permanent extension of any of the tax credits sought by members of Congress will be enacted into law this year," Treyz said.

"We expect that, while the road to a final bill will be rocky, it will ultimately result in a short-term extenders package being authorized," she said.

Burnet R. Maybank, III
Nexsen Pruet, LLC
1230 Main Street, Suite 700 (29201)
P.O. Drawer 2426
Columbia, SC 29202
T: 803.540.2048, F: 803.253.8277
Cell: 803.960.3024
bmaybank@nexsenpruet.com
www.nexsenpruet.com

NEXSEN PRUET

Bio | vCard | Home | Practice Areas | Attorneys | Offices