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PRACTICES

Federal Excise Taxes
International Tax
Tax Controversy & Litigation
Transfer Pricing

EDUCATION

J.D., Georgetown University
Law Center, *cum laude*, 1995

B.S., University of Florida, *high honors*, 1992

Brian S. Gleicher

MEMBER

Brian Gleicher focuses on international and domestic tax matters with an emphasis on resolving tax controversies. He routinely represents taxpayers in complex disputes with the Internal Revenue Service (IRS), achieving favorable results at exam and with the IRS Independent Office of Appeals. Mr. Gleicher has almost 30 years of experience resolving international tax disputes issues through the Mutual Agreement Procedure (MAP) of bilateral income tax treaties. He has spent a considerable portion of his career on transfer pricing matters, including advisory work, dispute resolutions, and advance pricing agreements (APAs). He counsels on tax treaty matters before U.S. and foreign competent authorities on a broad range of issues, including double taxation, residency, and permanent establishment questions.

Mr. Gleicher routinely partners with the firm's other practices to bring his tax expertise to matters where tax intersects with other areas of the law. He has represented companies with tax issues arising in bankruptcy and those involved in investor-state disputes. Because of his focus on transfer pricing, he routinely works on matters involving trade and customs issues.

Mr. Gleicher was described by clients in *Chambers USA* as "intelligent, driven, and strategic" and "able to very quickly become an expert on the issue at hand and craft a winning strategy for resolution."

Prior to joining Miller & Chevalier, Mr. Gleicher was a partner at a multinational law firm. He is the former chair of the Federal Bar Association's (FBA) Section of Taxation.

Rankings and Recognition

- *Chambers USA*: Tax (District of Columbia), 2016 - 2025
- *Chambers USA*: Tax Controversy (Nationwide), 2012 - 2019
- *Legal 500*: U.S. Taxes: Contentious, Leading Individual
- *Euromoney Expert Guide*: Leading Lawyer for Transfer Pricing in the United States, 2018
- *Euromoney Guide to the World's Leading Transfer Pricing Advisors*

Affiliations

- Former Chair, Section of Taxation, Federal Bar Association

Admissions

STATE ADMISSIONS

- District of Columbia
- Florida (inactive)