

Richard Bromley

Partner/Retired



Richard Bromley is a retired partner in the law firm of Foley & Lardner LLP, one of the oldest and largest law firms in America. Founded in 1842, the firm has over 900 attorneys, with offices throughout the United States, Brussels, and Tokyo. Richard was a member and former co-chair of the firm's Insurance & Reinsurance Industry Practice Group and was also a member of the Health Care Industry and Tax Litigation Practices.

Richard's practice concentrated in the area of insurance company taxation, where for more than 30 years he represented the insurance industry's interests with respect to federal and state tax legislation, regulations and rulings. He was selected for inclusion in the 2005-2011 *Illinois Super Lawyers*® lists for his tax work.*

He also represented both life and P & C companies in tax controversies before the IRS and in court.

Richard was counsel for taxpayer in the following cases:

- Utah Medical Insurance Association v. Commissioner, T.C. Memo, 1998-458
- Milwaukee Safeguard Insurance Co., et al. v. Selcke, 179 Ill. 94 (Ill. S. Ct.)
- Sentry Insurance, A Mutual Company, et al. v. Zehnder, et al. (Dkt. No. 98L 50264)
- Milwaukee Safeguard Insurance Co., et al. v. Selcke (Dkt. No. 93 L 50663)
- Gulf Life Insurance Co. v. United States, No. 93-404T (Fed. Cir.)
- Sears, Roebuck & Co. v. Commissioner, 972 F.2d 858 (7th Cir.) (amicus brief)
- Harco Holdings, Inc. v. United States, 969 F.2d 440 (7th Cir.)
- USAA Life Insurance Co. v. Commissioner, 91-2 U.S.T.C. 50,362 (5th Cir.)
- USAA Life Insurance Co. v. Commissioner, T.C. Memo 1993-18
- Central National Life Insurance Co. v. United States, 574 F.2d 1067 (Ct. Cl.)
- GE Life and Annuity Assurance Company v. United States, (Dkt. No. 3:00 CV148)

Richard served as counsel to the National Organization of Life and Health Insurance Guaranty Associations with respect to assisting NOLHGA's member guaranty associations in fulfilling their statutory obligations in several of the largest life insurance company insolvencies in the nation's history. He also served as counsel to several state life and health insurance guaranty associations. He was actively involved in representing the interests of guaranty association and state insurance liquidators before the National Office of the IRS. He also consulted with state insurance regulators in resolving tax issues arising in the context of estates of insolvent insurers.

Richard was a frequent speaker and author on topics relating to the taxation of insurance companies and to insurance company insolvencies. He was a member of the board of advisors of the Insurance Tax Law Review. He was also an officer and a member of the Board of the Insurance Tax Conference. He served as chair of the American Bar Association Tax Section Committee on Insurance Company Taxation, chair of the Insurance Company Subcommittee of the ABA Value Added Tax Committee, and chair of the VAT Task Force of the ABA Committee on Insurance Company Taxation.

Richard served as a lecturer in tax law at DePaul University Law School and an adjunct professor of tax law at IIT Chicago-Kent College of Law. He also served as a member of the Executive Council of the Chicago Bar Association's Federal Tax Committee. He is an officer and member of the Board of the Lookingglass Theatre.

Richard received both his B.A. and J.D. degrees from the University of Iowa. He was an editor of the *Iowa Law Review* and a member of the Order of the Coif. From 1968-1969 he served as law clerk to The Honorable Donald P. Lay, Chief Judge, United States Court of Appeals for the Eighth Circuit. He is a member of the Bars of Illinois, Iowa, United States Supreme Court, United States Tax Court, United States Court of Federal Claims and the United States Courts of Appeals for the Fifth, Seventh, Eighth, Tenth and Federal Circuits.

*The Illinois Supreme Court does not recognize certifications of specialties in the practice of law and no award or recognition is a requirement to practice law in Illinois.