



## Stefanie E. Kavanagh

Senior Associate

+1 202 239 3914 | stefanie.kavanagh@alston.com

Washington, D.C. | The Atlantic Building, 950 F Street, NW | Washington, DC 20004-1404

### *Related Services*

Federal & International Tax ■ Tax ■ Transfer Pricing ■ Corporate & Finance ■ Corporate & Business Transactions ■ International ■ Investment Products ■ REITs & Funds ■ Japan Business Team ■ Tax - Japan Business Team

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*Stefanie assists clients with their tax planning and structuring, focusing on domestic and international business entities and REITs.*

Stefanie Kavanagh is a senior associate in the Federal & International Tax Group and focuses her practice on transfer pricing, tax planning and structuring for domestic and international business entities. She is also a member of the firm's REITs and Real Estate Funds tax team. She assists multinational corporate clients to secure advance pricing agreements and competent authority relief from the IRS and foreign tax authorities. She also advises REITs (both privately owned and publicly traded) on numerous tax issues and assists with taxable and nontaxable acquisitions and dispositions, and public offerings of equity and debt securities. Stefanie was identified as "One to Watch" by *The Best Lawyers in America*® in Tax Law.

Before joining Alston & Bird, Stefanie was an intern with the financial institutions and products division of the Office of Chief Counsel of the IRS while completing her LL.M. in taxation at the Georgetown University Law Center. She received her J.D. from the Vanderbilt University Law School and her B.A. in economics and political science, summa cum laude, from Westminster College.

### *Representative Experience*

- Representing multinational companies on unilateral, bilateral, and multilateral advance pricing agreements (APAs) involving the IRS and other tax authorities.
- Assisting companies in maximizing the benefits of tax credits under the Inflation Reduction Act of 2022, including transfer pricing implications.
- Sustaining the deductibility of Sec. 174 research expenses in a post-Tax Cuts and Jobs Act amortization environment.
- Secured favorable discretionary relief from the IRS under tax treaty limitation on benefits provisions.
- Advised companies on transfer pricing planning, including related to the base erosion anti-abuse tax, cost allocation approaches, and ESG initiatives.
- Advised clients on federal tax issues concerning the effect of COVID-19 and related supply chain disruptions, including deductibility of expenses, shut-down issues, net operating losses, and the impact on APAs.
- Secured favorable competent authority agreements to eliminate double taxation in controversies involving the U.S., Canada, France, Germany, Italy, Japan, Mexico, Switzerland, and the UK.
- Assisting multinational companies in the implementation of complex intercompany agreements.

- Advised multinational companies on restructuring projects and tax treaty planning.
- Represented issuers and underwriters in billions of dollars of offerings of REIT securities.
- Represented numerous REITs on mergers with other REITs, including an industry-leading mortgage REIT on its merger with a specialty finance REIT that focuses primarily on investments in residential mortgage-backed securities.
- Counsel to the worldwide leader in automotive safety during an internal reorganization and spinoff of its electronics business into a new, separate public company.

## ***Publications & Presentations***

### ***Publications***

- “What to Make of IRS’ New Advance Pricing Guidance,” *Law360*, June 15, 2023.
- “2 Tax Decisions Hold Key Transfer Pricing Takeaways,” *Law360*, October 13, 2022.
- “Allocating Losses When COVID-19 Disrupts Your Supply Chain,” *Law360*, April 22, 2020.
- “Taxpayer Takeaways from the Latest BEAT Rules,” *Law360*, January 28, 2020.
- “Proposed Cloud Tax Regs Foggy on Sourcing,” *Law360*, September 20, 2019.
- “5 Important Points from Latest Altera Cost-Sharing Opinion,” *Law360*, August 5, 2019.

### ***Presentations***

- IBA 2023, International Bar Association, Paris, October 29–November 3, 2023.
- “Changes Abound for Transfer Pricing: A Look into the Future,” Federal Bar Association 2023 Tax Law Conference, Washington, D.C., March 5, 2023.
- 2023 Midyear Tax Meeting, American Bar Association, San Diego, CA, February 9 – 11, 2023.

## ***Professional & Community Engagement***

- ABA Section of Taxation, Transfer Pricing Committee; Young Lawyers Liaison
- IBA Taxation Section; National Reporter for United States
- FBA Section on Taxation, Steering Committee; Women in Tax Law, chair
- Legal Aid Society of the District of Columbia - Making Justice Real Campaign, citywide coordinator (2020 – present)

## ***Education***

- Georgetown University (LL.M. Taxation, 2015)
- Vanderbilt University (J.D., 2014)
- Westminster College (B.A., 2011)

## ***Admitted to Practice***

- District of Columbia
- Maryland