

Stefanie E. Kavanagh

Senior Associate

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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. She focuses her practice on tax planning and structuring for domestic and international business entities, transfer pricing, and matters relating to real estate investment trusts. 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 Vanderbilt University Law School and her B.A. in economics and political science, summa cum laude, from Westminster College.

Representative Experience

- Represented a public, non-traded real estate investment trust (REIT) in a merger with another public, non-traded REIT.
- Represented issuers and underwriters in billions of dollars of offerings of REIT securities.
- Advised Autoliv Inc. on the spinoff of its electronics business segment to separate its passive safety and electronics business segments.
- Advised Veoneer on a joint concurrent offering of up to \$400 million in common equity and \$170 million of convertible debt.
- Advised the underwriters in connection with three SEC-registered investment-grade notes offerings totaling \$900 million.
- Represented several multinational companies on unilateral and bilateral advance pricing agreements (APAs) involving the IRS and other tax authorities.

Publications & Presentations

Publications

- “Allocating Loss 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.

Professional & Community Engagement

- FBA Section on Taxation, membership chair

Education

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

Admitted to Practice

- Maryland
- District of Columbia

Related Services

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