

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 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

- Represented several multinational companies on unilateral and bilateral advance pricing agreements involving the IRS and other tax authorities.
- Secured favorable competent authority agreements to eliminate double taxation in controversies involving the U.S., Germany, France, Japan, Switzerland, and the UK.
- Represented issuers and underwriters in billions of dollars of offerings of REIT securities.
- Represented 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

- "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

- “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

- 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

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