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## International Tax

Domestic and foreign clients regularly retain Steptoe & Johnson LLP for tax-efficient structuring of their cross-border transactions and operations, as well as international tax advocacy before Congress, the Treasury Department, the IRS, the courts, as well as foreign tax authorities. Our successes in these areas are achieved by leading lawyers with decades of practical experience and a strong commitment to solving our clients' problems with practical judgment, technical skill, professionalism, and integrity.

Steptoe lawyers assist clients in the planning and the implementation of transactions, alert to the possibility that an audit or controversy may ensue. Our substantial tax litigation experience enables us to anticipate how issues may be presented in the controversies and to plan accordingly. Decisions made at the pre-controversy stage about substantive strategies, procedural tactics, and privilege questions may have a dramatic impact in later adversary proceedings.

### Representative Practice Areas

We have produced superb results in hundreds of matters for our clients in the following practice areas:

- Audit, Appeals, and Tax Litigation
- Competent Authority and Other Treaty Matters
- Compliance and Withholding Tax
- Criminal Tax
- Expert Witness Depositions and Testimony
- Governments and Multilateral Organizations
- High-Net-Worth Individuals
- Investment Fund, Private Equity and Joint Ventures
- Legislative and Regulatory Advocacy
- Operational Structuring & Restructuring
- Strategic Transactions
- Tax Planning and Structuring
- Transfer Pricing

## International Tax

### Noteworthy

- Phil West is ranked in Tier 1 by *Chambers Global* 2011 for international tax practice
- Recommended by *Chambers Global* 2011 for Tax: Corporate & Finance (US), and Mark Silverman ranked for corporate tax
- Phil West and Mark Silverman were listed in the 2011 edition of *The International Who's Who of Business Lawyers* for corporate tax
- *Best Lawyers in America* 2011 list Mark Silverman and Philip West for tax law
- Recognized in *International Tax Review's* "World Tax 2009," notably mentioning Phil West for international tax and Mark Silverman for mergers and acquisitions
- Phil West served as the Treasury Department's International Tax Counsel, the highest ranking international tax official in the US government