Steptoe advises global businesses and high-net-worth individuals across all industries on their most important and complex international tax matters. Our work includes counseling clients on sophisticated tax planning, advising on transactions, resolving disputes with taxing authorities and in court, and helping clients obtain published and private guidance from the IRS and the US Department of the Treasury. We regularly advise on special issues arising in international tax disputes, including competent authority and information exchange.

Our lawyers are recognized as leaders in the international tax field and speak regularly at tax conferences, teach in top tax programs, and write on international tax issues. Because we assist clients on their most significant and often high-profile matters, we are experienced in working effectively and efficiently with teams of advisors, including other Steptoe lawyers, local counsel, accounting firms, and economists. We are committed to solving clients’ problems with practical judgment, technical skill, professionalism, and integrity.

Noteworthy

- *Chambers USA*, Tax, DC (2006-2020)

Representative Matters

- Successfully advocated on behalf of defense contractor for industry-specific guidance under foreign-derived deduction intangible (FDII) rules.
- Counseled multinational clients with respect to base erosion and anti-abuse tax (BEAT).
- Represented foreign financial institution in connection with successful request for discretionary treaty benefits.
- Advised multiple high-net-worth individuals and family offices on issues such as residency, pre-immigration planning, and voluntary disclosures.
- Advised US technology company on US tax consequences of reorganization transaction.
- Successfully argued on behalf of Puerto Rico before the US Treasury Department and IRS in connection with the release of Notice 2011-29 regarding the creditability of Puerto Rico’s new excise tax.
- Obtained favorable IRS guidance pertaining to qualified dividend rules.
- Represented a large financial institution in connection with a major controversy involving transfer pricing of derivatives transactions.
- Represented a Middle Eastern investment company in groundbreaking Competent Authority resolution of high value and seemingly intractable dispute.
News & Publications

PRESS RELEASES
Amanda Varma Elected DC President of Coalition of Women’s Initiatives in Law
December 30, 2020

CLIENT ALERTS
Treasury and IRS Finalize Targeted Guidance Addressing Section 958(b)(4) Repeal
September 22, 2020
By: Amanda Pedvin Varma

MEDIA MENTIONS
Coalition of Women’s Initiatives in Law Features Amanda Varma in Member Spotlight
July 31, 2020

PRESS RELEASES
Steptoe Receives 28 Practice Rankings, 29 Individual Awards in Legal 500 US 2020
July 7, 2020

PUBLICATIONS
Adapting 2020 Tax Expectations to COVID-19 Developments
Law360
May 6, 2020
By: Eric Solomon, Amanda Pedvin Varma, David A. Fruchtman

CLIENT ALERTS
Treasury, IRS Issue Guidance on Tax Presence and Residency Issues
April 22, 2020
By: Amanda Pedvin Varma

CLIENT ALERTS
April 20, 2020
By: Eric Solomon, Amanda Pedvin Varma, David A. Fruchtman

PRESS RELEASES
Amanda Varma Named a Leadership Council on Legal Diversity Fellow
February 25, 2020

PUBLICATIONS
The Int’l, Federal and State Taxation Forecast for 2020
Law360
January 22, 2020
By: Eric Solomon, Amanda Pedvin Varma, David A. Fruchtman, George Callas

CLIENT ALERTS
2020 Tax Forecast
January 14, 2020
By: Eric Solomon, Amanda Pedvin Varma, David A. Fruchtman, George Callas
Daily Tax Update

DAILY TAX UPDATE
IRS Issues Interim Guidance on Section 4960
December 31, 2018

DAILY TAX UPDATE
IRS Issues Final Regulations for Public Approval of Tax-Exempt Private Activity Bonds
December 28, 2018

DAILY TAX UPDATE
TIGTA Issues Two Audit Reports
December 26, 2018

DAILY TAX UPDATE
Treasury Publishes IRS Lapsed Appropriations Contingency Plan
December 21, 2018

DAILY TAX UPDATE
JCT Releases TCJA Blue Book
December 20, 2018

DAILY TAX UPDATE
Senate and House to Vote on Continuing Resolution
December 19, 2018

DAILY TAX UPDATE
New York Attorney General Announces Stipulation Dissolving Trump Foundation
December 18, 2018

DAILY TAX UPDATE
New Version of Brady Tax Bill Released
December 17, 2018

DAILY TAX UPDATE
IRS, Treasury Issue Guidance on Previously Taxed Earnings and Profits
December 14, 2018

DAILY TAX UPDATE
IRS and Treasury Release Proposed BEAT Regulations
December 13, 2018

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