

# Roseann M. Cutrone

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Tax



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## Education

J.D., Harvard Law School, 1986  
(*cum laude*)

B.A., Bucknell University, 1983  
(*summa cum laude*)

## Bar Admissions

District of Columbia

## Associations

Lecturer for Tax Executives Institute

Roseann M. Cutrone's practice involves controversy, planning, policy and legislative work focusing on a variety of issues, including the U.S. tax treatment of intellectual property (IP) transactions. In particular, Ms. Cutrone has considerable experience advising clients in the areas of joint venture IP licensing transactions and the R&E tax credit, including representing numerous clients in making R&E credit claims, and defending such claims at the audit and appeals stages before the Internal Revenue Service (IRS).

In addition, Ms. Cutrone counsels clients on various U.S. and international information reporting and withholding requirements. She has experience undertaking compliance reviews and remediation efforts and in setting up best practices procedures. She was named to the international reporting and withholding subgroup of the Information Reporting Program Advisory Committee, a federal advisory committee that provides a forum for discussion of tax administration issues with the IRS.

Ms. Cutrone has co-authored several articles, including two published in *Tax Notes*, one on tax deferral and one on the export source rule.