

Associate, Chicago

Tax



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Education

J.D., University of Michigan
Law School, 2015

B.A., University of Wisconsin, 2012

Bar Admissions

Illinois

Vanessa Johnson advises multinational clients on U.S. and international tax planning and administrative controversy, with a particular emphasis on transfer pricing. She regularly counsels clients in the technology, pharmaceutical, biotechnology and consumer goods industries, among others.

Ms. Johnson's tax planning practice focuses on issues arising from cross-border transactions involving ongoing business operations, including intangibles and services transactions, as well as supply chain management. She also has advised on the application of Organisation for Economic Cooperation and Development (OECD) transfer pricing and EU state aid rules.

Her controversy practice includes working on pre-audit, audit and administrative appeals. In addition, she has significant experience with competent authority matters, such as advance pricing agreements and mutual agreement procedures, between U.S. and foreign tax authorities.

Ms. Johnson's experience includes advising clients on:

- the domestic and international tax treatment of intellectual property, including cost-sharing arrangements, transfer pricing, foreign tax credit planning, Subpart F, FDII, BEAT and GILTI considerations
- optimizing post-acquisition integration and implementation of acquired business lines, with a particular focus on intellectual property planning
- the tax, organizational and supply chain implications of global expansions of research, manufacturing and support service operations
- bilateral and multilateral competent authority proceedings for a number of multinational life sciences, technology and consumer goods companies
- resolutions of complex corporate audits with IRS Examination and Appeals
- foreign tax audits and EU state aid investigations for U.S. multinationals
- analyzing and updating tax structures to reflect ongoing global developments in OECD transfer pricing rules and global tax harmonization
- obtaining private letter rulings and accounting method changes
- transfer pricing aspects of U.S. Tax Court litigation and appeals
- operating issues of specialty real estate investment trusts
- public and private securities offerings, including an \$8.9 billion initial public offering

In recognition of her work, Ms. Johnson has been named one of *Best Lawyers'* Ones To Watch in America.