

Counsel, Chicago

Tax Controversy and Litigation



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Education

J.D., Georgetown University
Law Center, 2020 (Executive Editor,
The Tax Lawyer)

B.A., Georgetown University, 2014

Bar Admissions

District of Columbia

Illinois

Connecticut

U.S. Tax Court

Dominic Reilly concentrates his practice on a broad range of tax controversy matters, as well as transactional and planning situations.

Mr. Reilly focuses on complex tax controversies and litigation involving a range of federal tax issues, including transfer pricing, substance over form and international tax. He advises on all stages of tax disputes — from audit and administrative appeals before the IRS to litigation before the U.S. Tax Court and other federal courts.

Mr. Reilly's representations include, among others:

- *Amgen Inc. v. Commissioner*, U.S. Tax Court Docket No. 16017-21 (multibillion-dollar transfer pricing dispute concerning the licensing of complex biopharmaceutical products from the U.S. to Amgen's Puerto Rican subsidiary)
- *Eaton Corp. & Subsidiaries v. Commissioner*, U.S. Tax Court Docket No. 2608-23, (multiple ongoing cases involving significant issues relating to the transfer pricing of various transactions and the taxation and treatment of a partnership)
- *j2 Global, Inc. v. Commissioner*, U.S. Tax Court Docket No. 8392-21, and *Advanced Messaging Technologies, Inc. v. Commissioner*, U.S. Tax Court Docket No. 8383-21 (challenges to claimed Section 199 deductions)
- *Newell Brands Inc. & Subsidiaries v. Commissioner*, U.S. Tax Court Docket No. 11897-24 (transfer pricing dispute centered on the value attributable to a foreign sourcing agent in the consumer products industry)
- *pro bono* clients in administrative hearings and Chancery Court proceedings against the Illinois Department of Child and Family Services

Mr. Reilly also counsels on corporate tax planning related to domestic and international transactions, including post-acquisition integrations, multinational reorganizations and the implementation of global tax structures and strategies.

Mr. Reilly has significant experience working with clients in the pharmaceutical and medical device industries, as well as with companies in the high-technology and consumer goods sectors, among others. Prior to joining Skadden, Mr. Reilly was a tax consultant at a "Big Four" public accounting firm.