

Associate, Chicago

Tax



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#### Education

J.D., Washington University School of Law, 2009

A.B., Washington University, 2004

#### Bar Admissions

Illinois

Sonja Schiller advises clients on federal tax controversy matters. She represents individuals and multinational corporations at various stages of federal income tax controversies, including audits, administrative appeals and judicial proceedings.

Ms. Schiller's substantive experience encompasses a variety of complex tax issues, including foreign tax credits, transfer pricing and related international tax issues, debt-equity determinations, employee/independent contractor classifications, information reporting and withholding requirements, and procedural issues. She also regularly advises clients on European Commission state aid developments and the OECD Transfer Pricing Guidelines.

Additionally, Ms. Schiller consults companies on a variety of pre-audit tax planning issues, including international tax issues related to cross-border intangible property, service and financing transactions, foreign tax credits, and return of capital distributions.

Her representative cases include:

- *Eaton Corp. v. Commissioner*, Tax Court Dkt. No. 5576-12;
- *Radian Group, Inc. v. Commissioner*, Tax Court Dkt. Nos. 028714-14, 028712-14;
- *Marvel Entertainment LLC v. Commissioner*, No. 15-3335 (2d Cir. 2016);
- *Starwood Hotels & Resorts Worldwide v. United States*, No. 16-1172 T (Ct. Fed. Cl. 2016); and
- *Larian v. Commissioner*, Tax Court Dkt. No. 012589-12.