Jonathan Welbel

Skadden

Partner, Chicago

International Tax; Tax Controversy and Litigation



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Education

LL.M. in Taxation, Northwestern University School of Law, 2008 (with Honors)

J.D., Case Western Reserve University, 2007 (*cum laude*)

B.A., University of Illinois at Urbana-Champaign, 2003

Bar Admissions

Illinois

Certifications

Certified Public Accountant

Government Service

Attorney Advisor for the Hon. Harry A. Haines, U.S. Tax Court (2010-12)

Jonathan Welbel has extensive experience counseling on tax controversy, transfer pricing and other international tax issues.

Mr. Welbel advises multinational corporations on tax controversy matters, such as those involving audits, appeals and litigation, particularly in U.S. Tax Court. He has significant experience working with clients in the pharmaceutical and biopharmaceutical industries as well as high-tech, consumer goods and industrial companies.

He also has led competent authority matters, such as advance pricing agreements and mutual agreement procedures, between the U.S. and numerous foreign taxation authorities.

In recognition of Mr. Welbel's work, he has been named one of *Lawdragon*'s 500 Leading Global Tax Lawyers.

Mr. Welbel's representations (including prior to joining Skadden) include:

- *Amgen Inc. v. Commissioner*, U.S. Tax Court Docket No. 16017-21 (multibillion-dollar transfer pricing dispute)
- *AbbVie Inc. v. Commissioner*, U.S. Tax Court Docket No. 2597-23 (challenge to the deductibility of a break fee)
- *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)
- *Cross Refined Coal, LLC v. Commissioner*, U.S. Tax Court Docket No. 19502-17 (challenge to claimed Section 45 credits)
- a transfer pricing dispute for a subsidiary of a U.S. technology company against the Mauritius Revenue Authority in court in Mauritius
- various resolutions on behalf of multinational health care, high-tech and consumer goods companies with IRS Appeals regarding multibillion-dollar Section 482 licensing and cost-sharing buy-in adjustments
- various resolutions on behalf of multinational industrial, restaurant and consumer goods companies with U.S. competent authority regarding transfer pricing matters
- numerous resolutions on behalf of multinational high-tech companies with IRS Examinations regarding tax controversies related to Section 199
- a resolution on behalf of a health care company with IRS Appeals regarding Subpart F foreign base company sales issues (including substantial contribution issues)
- numerous *pro bono* clients in administrative hearings against the Illinois Department of Children and Family Services

Mr. Welbel has served as an adjunct professor at Northwestern University School of Law, where he has taught courses on transfer pricing. He also has written on tax-related topics for a variety of publications and is the co-author of the "Transfer Pricing" chapter of the *Taxation of U.S. Multinational Corporations* treatise.