



### Mumi Hemrajani

*ADMITTED IN CALIFORNIA, NEW JERSEY AND NEW YORK  
NOT ADMITTED IN THE DISTRICT OF COLUMBIA BUT BEING  
SUPERVISED BY A LICENSED DISTRICT OF COLUMBIA BAR MEMBER*

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Mumi Hemrajani concentrates her practice on international tax planning, international transfer pricing and tax controversy.

Before joining DLA Piper, Mumi served as a General Attorney in the Office of the Associate Chief Counsel International at the Internal Revenue Service.

During her tenure, Mumi provided legal advice on cases involving transfers of intangibles offshore, buy-in payments and cost sharing arrangements, distressed asset/debt tax shelters, DISC and FSC issues, ETI eligibility and the ETI transition rules, treaty interpretation, sourcing, and blocked income rules. She assisted in the publication of the section 482 final cost sharing regulations (TD 9568) and served as the drafting attorney on related bullet regulations (TD 9569 and TD 9630). In addition, she served as the Branch 6 point of contact for EOI requests that involve transfer pricing issues.

In her time with the IRS, Mumi:

- Worked extensively with Exam and Field Counsel conducting fact finding and helping frame the legal issues relating to large transfer pricing matters.
- Participated in-person in multiple taxpayer interviews to help explore legal theories about high-value services.
- Developed and presented an alternative legal strategy to a DOJ trial team to potentially simplify discovery and the trial record.

- Tax
- Tax Controversy and Disputes
- International Tax Counsel

## Admissions

- California
- New Jersey
- New York

## Education

- LL.M., Taxation, Georgetown University Law Center
- J.D., Georgetown University Law Center
- B.A., Brown University