



Tamara L. Shepard

Partner

**HIRING PARTNER, US NATIONAL TAX PRACTICE
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Tamara Shepard has an extensive background working on tax matters, both in private practice and as an Appellate Attorney at the US Department of Justice, Tax Division.

Tamara's practice focuses on tax controversy. She has extensive background handling disputes with the IRS and with state and local authorities, resolving matters on behalf of corporate clients as well as for estates, trusts and individuals. She has worked on both sides of tax issues, having started her legal career in the Tax Division of the US Department of Justice.

Tamara handles a broad range of domestic and international issues including withholding tax liabilities, employment taxes, tax shelters, estate tax, transferee liability, excise taxes, worthless stock losses, subpart F, transfer pricing, permanent establishment, R&D credit issues, and collections procedures. She assists clients through all stages of their interactions with tax authorities, including:

- Evaluation of government claims (or possible claims)
- Planning strategies to mitigate tax risks
- Audit defense and interactions with IRS Examiners
- IRS Appeals process and settlements
- Claims for refund
- Requests for penalty abatement
- IRS account and transcript errors and adjustments
- Litigation when necessary

Tamara has substantial experience working on appellate matters, both with IRS Appeals and in court. She has handled dozens of cases in the US Courts of Appeals and acted as counsel of record in published decisions in the Second, Sixth, Eighth, Ninth and Tenth Circuits.

- Tax
- Tax Controversy and Disputes
- International Tax Counsel
- Transfer Pricing

Admissions

- California
- Connecticut
- Massachusetts
- New York

Prior Experience

Before entering private practice, Tamara worked in the Appellate Section of the Tax Division of the United States Department of Justice in Washington, DC. While at the Department of Justice, she litigated cases on appeal from both US District Courts and the Tax Court, appearing both as appellant and as appellee. Her published cases include *Boles Trucking, Inc. v. United States*, 77 F.3d 236 (8th Cir. 1996) and *Herrmann v. Commissioner*, 85 F.3d 1032 (2d Cir. 1996). She has handled cases before the US Courts of Appeal for the Second, Third, Fourth, Fifth, Sixth, Eighth, Ninth, Tenth, Eleventh and Federal Circuits.

In addition to her background and experience as a lawyer, Tamara has worked extensively in business management, financial planning, and portfolio management. She has held senior positions at a range of emerging and established technology companies including Yahoo!, MarketTools, Intuit, Podbridge, Microsoft Networks (MSN), and Netcentives, and has advised on best practices in strategy, business process and operations. As a result, she is particularly well suited to provide practical legal advice that is in accord with clients' overall business goals and objectives.

Recognitions

The Legal 500 United States has recommended Tamara for her tax work. In this well-regarded legal directory, she has been described as an "excellent communicator."

Education

- J.D., Harvard Law School 1994
cum laude
- B.S., Economics, major in Finance, Wharton School of the University of Pennsylvania 1989
magna cum laude
- B.S., Engineering, major in Systems, University of Pennsylvania 1989
magna cum laude