



## Angela J. Walitt

Partner

### Practice Group

Tax

### Practice Focus

Ms. Walitt's practice focuses on U.S. federal income taxation of corporations, with an emphasis on international tax planning, transfer pricing and controversies involving international tax issues.

### Practice Description

Ms. Walitt practices primarily in the areas of international tax planning and global tax minimization and has advised U.S.-based and foreign-based companies including manufacturing companies, telecommunications companies, insurance companies and other financial institutions. She advises on cross-border taxation matters, global restructurings, effective tax rate minimization, tax treaties, cross-border tax planning and other matters. She also assists clients with compliance with U.S. and foreign transfer pricing laws and related cross-border tax issues. Ms. Walitt has worked most extensively with insurance companies and has special expertise with issues relevant to the insurance industry.

### Representative Transactions

Representative matters include:

- Assistance with implementation of multijurisdictional integrations following corporate group acquisition.
- Advice to U.S.-based insurers on transfer pricing for intragroup services and intragroup reinsurance and related audit issues.
- Ongoing advice to multinational life insurance company on international equity investments and direct investments in real property.
- Acting for several US-based multinational insurers in negotiating a closing agreement with the IRS regarding tax treatment of foreign operations.

### Professional Affiliations

Ms. Walitt is a member of the District of Columbia Bar; the Texas Bar; the U.S. Court of Federal Claims Bar; the American Bar Association, Section of Taxation, and the Federal Bar Association.

**Speeches & Presentations**

Ms. Walitt speaks frequently on international tax matters, participating in programs sponsored by the Council for International Tax Education (“CITE”), the Tax Executives Institute (“TEI”) and the International Fiscal Association (“IFA”), among others.

**Education & Bar Admittance**Education:

- B.A., Philosophy, Yale University (1991).
- J.D., University of Texas at Austin (1996).
- LL.M., International Commercial Law, University of Nottingham, Nottingham, England (1996).

Admissions:

- District of Columbia
- Texas
- U.S. Court of Federal Claims