

People



**Stefi N. George**

Partner, Tax

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vCard

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A versatile tax lawyer, Stefi George advises clients in tax planning, compliance, controversy, and litigation. Versed in state and local, international and federal taxation, clients value her expansive knowledge of the intricacies of tax issues and her ability to navigate complex tax issues in all areas of taxation. Stefi works with multinational corporations, including health care providers, equipment and vehicle lessors, digital services, marketing and SaaS companies, financial institutions, manufacturers, and individuals and families. Stefi also advises insurers on complex tax issues in the underwriting process across multiple insurance products.

Stefi's state and local tax practice encompasses income and sales tax controversy and planning. International clients rely on Stefi for counsel on the tax consequences of reorganizations and other corporate transactions as well as on international information reporting requirements. A significant aspect of her practice includes representing clients before the Internal Revenue Service (IRS), U.S. Tax Court, and numerous state and city departments of revenue, tribunals, and state courts, and in administrative hearings, both in New York and across the country.

Stefi maintains a significant pro bono practice advising clients on obtaining and maintaining tax exempt status with the Internal Revenue Service and various state agencies. She has been recognized as a New York "Rising Star" for tax law by *Super Lawyers* Magazine.

**Notable Work**

**State and Local Tax:** Represents clients on corporate and sales tax nexus matters, including the licensing of intangibles. Advises on post-*Wayfair* sales tax compliance and economic nexus, including complex issues facing digital services and SaaS companies. Negotiates with departments of revenue and state counsel and practices before administrative law judges and tax tribunals. Represents individuals on domicile and residency matters.

**Areas of Experience**

Tax  
 State and Local Tax Litigation and Controversy  
 State and Local Tax Consulting  
 International Tax  
 Federal Tax Litigation and Controversy  
 Corporate Tax  
 Digital Goods and Emerging Technologies Taxation  
 Taxation in the Sharing Economy  
 Hospitality  
 Tax-Exempt Organizations  
 Qualified Opportunity Zones  
 Distressed Property  
 Staffing Law

**Education**

J.D., Fordham University School of Law, 2006  
 B.A., Washington University in St. Louis, 2002, magna cum laude

**Admissions**

**Bars**

New York  
 Connecticut

**Courts**

U.S. Tax Court  
 U.S. Court of Federal Claims

**Related Content**

Akerman Partners Examine Ohio's Taxpayer-Friendly Commercial Activity Tax  
 March 18, 2024

Stefi George Provides Thoughts on New York Foreign Royalties Tax Cases  
 March 18, 2024

**International Tax:** Represents clients on multinational taxation issues including pre-immigration and inbound tax planning, income tax treaty issues, compliance with U.S. income tax requirements and international corporate reorganizations. Provides guidance to foreign financial institutions, foreign trusts and other entities and individuals on compliance with FATCA, foreign bank account reporting (FBARs) and IRS international information return disclosures.

**Federal Tax:** Represents clients before the IRS, U.S. Tax Court, and U.S. Court of Federal Claims. Negotiates complex legal issues with the IRS. Advises and consults on health care transactions, particularly with respect to nonprofit tax issues and compliance. Serves as tax underwriting counsel for insurers.

## Published Work and Lectures

- American Bar Association and the Institute for Professionals in Taxation, Advanced Income Tax Seminar, Speaker, “The Pros and Cons of Insuring State Tax Controversies,” March 11, 2024
- *Tax Notes State*, SALT Insights, Co-Author, “It’s Not All Gross: The (Taxpayer) Friendly Side of Ohio’s CAT,” February 12, 2024
- Chicago Tax Club’s Indirect and Operational Tax Committee’s Webinar Series, Speaker, “The Many Challenges of Complying with State Marketplace Facilitator Rules,” January 30, 2024
- American Bar Association Tax Section’s Midyear Tax Meeting, Speaker, “The Many Challenges of Complying with State Marketplace Facilitator Rules,” January 19, 2024
- *Tax Notes State*, SALT Insights, Co-Author, “The Illinois Sales Tax: Origin Sourcing in a Destination World,” October 2, 2023
- The Chicago Tax Club’s 69th Annual Fall Seminar, Speaker, “Navigating Inconsistent Marketplace Rules – How can Multistate Facilitators and Sellers Comply?” October 26, 2023
- COST 2023 Annual Tax Conference for Technology Companies, Speaker, “Best Practices for Handling Complex Technology Industry Audits,” August 16, 2023
- Institute for Professionals in Taxation 47th Annual Conference, Speaker, “How to Successfully Manage Tax Audits and Appeals,” June 28, 2023
- Council on State Taxation (COST) North Atlantic Regional State Tax Meeting, Speaker, “Discussion of State Tax Cases, Issues and Policy Matters to Watch,” May 24, 2023
- *Tax Notes State*, SALT Insights, Co-Author, “Good Idea Gone Wrong? Evaluating Marketplace Facilitator Laws,” May 8, 2023
- Council on State Taxation (COST) 2022 SALT Workshop for Technology Companies, Speaker, Best Practices for Handling Complex Technology Industry Audits,” August 10, 2022
- ABA, 22nd Annual U.S. and Europe Tax Practice Trends, Panelist, “The Role of Platform Companies in Digital Economy Tax Compliance,” March 29, 2022
- New York State Bar Association (NYSBA) Webinar, Speaker, “DAC 7 And Wayfair: VAT And Sales Tax Compliance In Europe and the U.S.,” September 23, 2021
- Council on State Taxation (COST), 2021 State and Local Tax Webinar for Technology Companies, Speaker, “Transfer Pricing in the Technology Arena,” August 11, 2021
- *Law 360*, Co-Author, “Controversial Md. Digital Ad Tax Leaves Sourcing Undefined,” March 3, 2021
- Brazil-Florida Business Counsel Webinar, Presenter, “Doing Business in Florida: Legal Framework and Tax Considerations for

Foreign Corporations,” February 25, 2021

- Fordham University School of Law, Presenter, “Tax Considerations in a Real Estate Transaction,” February 23, 2021
- Council On State Taxation (COST), State and Local Taxation (SALT) Webinar for Health Care Companies, Speaker, July 30, 2020
- Institute for Professionals in Taxation (IPT) 43rd Annual Conference, Speaker, “How to Successfully Navigate Tax Audits and Appeals and Minimize Liability,” June 23, 2019
- Equipment Leasing and Finance Association (ELFA), Tax Best Practices Roundtable, Speaker, “Sales Tax Update,” June 12, 2019

## Affiliations

- New York State Bar Association, Tax Section, Member

## Honors and Distinctions

- *The Legal 500*, 2023, Recommended for U.S. Taxes - Contentious
- *Super Lawyers* Magazine, 2014-2017, Listed in New York as a “Rising Star” for Tax