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PRACTICES

Government Affairs
International Tax & Transfer Pricing
Tax Controversy & Litigation
Tax Planning & Financial Products
Tax Policy

EDUCATION

- LL.M., Georgetown University Law Center, with distinction, 2006
- J.D., American University Washington College of Law, cum laude, 2002
- A.B., Davidson College, 1999

LANGUAGES

French, German

Loren C. Ponds

MEMBER

Loren Ponds centers her practice on providing strategic counsel to clients on legislative, regulatory, and other tax policy issues, as well as advising on technical tax matters related to transfer pricing and other international tax topics.

She advises clients on the impacts of tax policy, such as the implementation of the Tax Cuts and Jobs Act of 2017 (TCJA), and issues related to technical corrections, administrative guidance, and legislative amendments to various provisions. In addition, Ms. Ponds advises clients on Advance Pricing Agreements, mutual agreement procedure (MAP) negotiations, and international tax controversy matters before the Internal Revenue Service (IRS), intangible property transactions, and other transfer pricing and international tax issues.

Prior to joining Miller & Chevalier, Ms. Ponds served as Majority Tax Counsel to the U.S. House of Representatives Committee on Ways and Means, where she developed, analyzed, and refined the international tax provisions of the TCJA.

Previously, Ms. Ponds served in Ernst & Young LLP's National Tax Department with a focus on transfer pricing and other international tax issues, where she counseled multinational companies on tax planning projects, including intellectual property planning, supply chain optimization, and restructurings.

Fluent in French and German, Ms. Ponds worked abroad as Ernst & Young's Global Transfer Pricing Operations Manager in Düsseldorf, Germany. Ms. Ponds was also a German Chancellor Fellow of the Alexander von Humboldt Foundation at the Universität Hamburg-International Tax Institute in Germany, as well as a Trainee at the Organization for Economic Cooperation & Development in Paris, France.

GOVERNMENT EXPERIENCE

- Majority Tax Counsel, U.S. House of Representatives Committee on Ways and Means, 2017 - 2018

RANKINGS AND RECOGNITION

- *Legal 500*: Government: Government Relations, 2019
- *Legal 500*: Tax: International Tax, 2019
- *Legal 500*: Tax: Contentious, 2019
- *Legal 500*: Tax: Non-Contentious, 2019

ADMISSIONS

Bar Admissions

- District of Columbia

Court Admissions

- United States Tax Court