



## Alexander Zakupowsky

MEMBER

Alexander Zakupowsky handles federal tax controversy matters at all judicial and administrative levels. His practice focuses in particular on tax accounting, transfer pricing, and tax matters specific to a number of industries. He has first chair litigation experience. In addition, he has handled legislative and policy matters for taxpayers and industry groups.

Mr. Zakupowsky resolves issues of importance to specific industries and coalitions of taxpayers with the IRS and the Treasury's Office of Tax Policy. He has extensive experience with a number of IRS administrative and compliance programs.

Mr. Zakupowsky has served as outside tax counsel to a number of industry associations including long-standing relationships with the Edison Electric Institute and the American Gas Association.

Clients quoted by *Chambers* emphasize that Mr. Zakupowsky has "great judgment," emphasizing "his ability to take what is generally a very complex issue and simplify it into a concrete, yet simple idea for how to get things done."

Before joining Miller & Chevalier in 1984, Mr. Zakupowsky served as an adviser to the Assistant Secretary of Tax Policy for the U.S. Department of the Treasury and was a partner in a Big-4 accounting firm.

Mr. Zakupowsky is a frequent speaker on tax matters.

azakupowsky@milchev.com  
(202) 626-5950

### PRACTICES

Energy Policy  
International Tax & Transfer Pricing  
Tax Accounting  
Tax Controversy & Litigation  
Tax Policy

### EDUCATION

- J.D., Georgetown University Law Center, 1972
- B.S., Georgetown University, 1968

### REPRESENTATIVE ENGAGEMENTS

- Represented two coalitions of taxpayers in obtaining published guidance from the IRS on specific tax matters to substantially reduce administrative burden and controversy.
- Represented foreign-based multinational corporations in obtaining a number of successful advance pricing agreements and competent authority agreements.
- Litigated and successfully settled a \$100 million plus tax controversy filed in a U.S. District Court.

### GOVERNMENT EXPERIENCE

- Advisor to the Assistant Secretary for Tax Policy, U.S. Department of the Treasury, 1976 - 1978

### RANKINGS AND RECOGNITION

- *Chambers USA*: Tax (District of Columbia), 2010 - 2019
- *International Tax Review*: Tax Controversy Leaders (U.S.), 2017
- *Washington, DC Super Lawyers*<sup>®</sup>: Tax, 2007 - 2011, 2013 - 2018

- *The Best Lawyers in America*<sup>®</sup>: Litigation & Controversy - Tax, 2011 - 2020
- *The Best Lawyers in America*<sup>®</sup>: Tax Law, 2018 - 2020
- *Legal 500*: Tax: Domestic Tax, 2015

## **AFFILIATIONS**

- Member, Section of Taxation, American Bar Association
- Former Chair, Tax Accounting Problems Committee, American Bar Association
- Vice Chair, Tax & Accounting Committee, Public Utility, Communications and Transportation Section, American Bar Association

## **ADMISSIONS**

### **Bar Admissions**

- District of Columbia

### **Court Admissions**

- District of Columbia Superior Court
- United States Court of Appeals for the Eighth Circuit
- United States Court of Appeals for the Federal Circuit
- United States Court of Federal Claims
- United States Tax Court