



→ Judith R. Fiorini

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Judith R. Fiorini is a partner in the Tax practice Group in the firm's New York Office.

Areas of Practice

Judith focuses her practice on advising multinational banks and financial institutions, international corporations, private equity funds, S-corporations and high net worth individuals on complex tax issues, including domestic and cross-border transactions; mergers and acquisitions; structured finance; financial products and derivatives; partnership transactions, passive foreign investment company (PFIC) issues, controlled foreign corporations (CFC) issues and foreign tax credit issues. She regularly advises on tax reporting, disclosure and withholding requirements including foreign bank account reporting (FBAR) and Foreign Account Tax Compliance Act (FATCA). Her experiences include developing policies and guidelines and leading training programs for financial institutions with respect to tax reporting, disclosure and compliance and advising on complex tax audit issues. She has significant experience in tax controversy matters, including conducting negotiations with the Internal Revenue Service.

Judith spent nearly 20 years in the tax group at Sullivan & Cromwell LLP and three years as a Managing Director at the Royal Bank of Canada before joining Sheppard Mullin.

Media Mentions

The Lateral Audit: Tax Attorney Moves In June
Law360, 07.03.2018

Memberships

New York State Bar Association (Tax Section)
American Bar Association

Practices

Tax
Employee Benefits
Corporate Tax

International Tax

Real Estate Tax

Industries

Blockchain Technology and Digital Assets

Retail

Education

J.D., Emory University, 1996, *with Distinction, order of the coif*

B.A., Oberlin, 1985

Admissions

New York