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Practices / Industries

Tax

Federal Tax Controversy &
Tax Policy

Litigation

Appellate

Corporate Investigations &
White Collar Defense

Federal Tax Controversy &
Tax Policy

Estates, Trusts & Tax Planning

Fiduciary Administration &
Dispute Services

Health Care & Life Sciences Health Care

Admissions

District of Columbia

Education

J.D., The Catholic University
of America, Columbus School
of Law

B.S.B.A., Columbus State
University



Eileen J. O'Connor

Partner

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Lee O'Connor is a partner in Pillsbury's Washington, DC office, and leader of the law firm's federal tax controversy and tax policy group. Ms. O'Connor represents clients in civil and criminal federal tax investigations, and in disputes with other government agencies, and formulates and advises on regulatory and legislative solutions to government disputes. She has presented oral arguments in the United States Supreme Court and in the United States Courts of Appeals.

Ms. O'Connor joined Pillsbury in July 2007 after serving for six years as the Assistant Attorney General for the Tax Division of the United States Department of Justice. While at the Department of Justice, she was a member of the President's Corporate Fraud Task Force.

As Assistant Attorney General, Ms. O'Connor headed a division of more than 600 people, including 350 attorneys, and was in charge of all United States civil and criminal tax trials and appeals. Significant cases during her tenure involved corporate and individual abusive tax shelters and offshore tax evasion. She created and implemented continuing programs to coordinate parallel civil and criminal investigations and judicial proceedings with the Internal Revenue Service and United States Attorneys Offices throughout the country. In recognition of her outstanding contributions to the accomplishment of the Justice Department's mission, Ms. O'Connor received the Edmund J. Randolph Award for Outstanding Service. And for her contributions to federal tax administration and enforcement, the Commissioner of the Internal Revenue Service and the IRS Chief Counsel awarded her their highest honors.

Ms. O'Connor has been an authority in corporate tax law with the National Office of the Internal Revenue Service. She is also a CPA and, for more than 20 years, was a national tax consultant with top national accounting firms.

Ms. O'Connor has taught in the graduate tax law program of Georgetown University School of Law, and was Distinguished Adjunct Professor of Tax Policy at the George Mason University School of Law, and has long been a frequent speaker at bar conferences and business seminars.

Honors & Awards

- *Legal 500 US*, Tax Controversy (2011-2012)
- Nation's Top 50 IRS Representation Practitioners, *CPA Magazine* (2008)
- Washington's Top Lawyers, Tax, *Washingtonian* (2007)

Affiliations

Chairman, Administrative Law Group of the Federalist Society for Law and Public Policy Studies

Vice-Chairman, Board of Directors, Americans United for Life

Advisory Council, Republican National Lawyers Association

Fellow, American College of Tax Counsel

Member, National Association of Former United States Attorneys

Member, American, Federal and District of Columbia Bar Associations

Former member, Tax Executive Committee, American Institute of Certified Public Accountants

Courts

United States Supreme Court

United States Court of Appeals for the Fifth Circuit

United States Court of Appeals for the Federal Circuit

District of Columbia Court of Appeals

United States Court of Federal Claims

United States Tax Court

Recent Speaking Engagements

"What, if any, is the Proper Role of the IRS in the Administration of Social Welfare Programs?" ABA Tax Section Mid-Year Meeting, January 24, 2014.

"Executive Branch Gone Wild? Checks and Balances in the 21st Century," Moderator, Federalist Society's National Lawyers Convention, November 16, 2013.

Teleforum with Peter Schweizer about this book "Extortion: How Politicians Extract Your Money, Buy Votes, and Line Their Own Pockets," November 7, 2013

Teleforum with Clark Neily about his book "Terms of Engagement: How Our Courts Should Enforce the Constitution's Promise of Limited Government," October 10, 2013

Teleforum with Christopher deMuth about his essay, "The Bucks Start Here," October 3, 2013

"The Use and Abuse of the Internal Revenue Code - The Chances for Meaningful Tax Reform in 2013." National Black Chamber of Commerce's 21st Annual Convention - Innovation: Growth, Profit & Prosperity, Palm Beach, FL, July 25, 2013

"A Stewardship Challenge: Harmonizing Ecology, Prosperity and Liberty," Foundation for Research on Economics & the Environment Conference, Three Forks, Montana, July 15-19, 2013.

"*City of Arlington* – How Much Deference?" Moderator, Federalist Society Administrative Law and Regulation Practice Group Teleforum, May 20, 2013

"Prospects for Meaningful Tax Reform in 2013." Republican National Lawyers



Association 14th Annual National Policy Conference, Washington, DC, April 25, 2013

"The Use and Abuse of the Internal Revenue Code, and Chances for Tax Reform," Ave Maria Law School, Naples, Florida, April 18, 2013

"Hot Issues Appellate Tax Litigation," Moderator, Federal Bar Association 36th Annual Tax Law Conference, Washington, D.C., March 2, 2012

"The Use and Abuse of the Internal Revenue Code," University of Washington School of Law, Seattle, WA, May 13, 2011

"What Today's Lawmakers Could Learn from President Reagan's Tax Policy," Republican National Lawyers Association's 12th Annual National Policy Conference, Washington, D.C., May 6, 2011

"U.S. Tax Reform and International Trends: Implications for Global Business and U.S. Competitiveness," Council on Foreign Relations Corporate Meeting, Washington, D.C., June 18, 2010

"Federal and State Tax Laws in 2010 and Thereafter," Republican National Lawyers Association's 11th Anniversary National Policy Conference, Washington, D.C., April 16, 2010

"What Tax Law Can Tell Us About How 'Health Care Reform' Will Work," Presentation to Harvard Law School Federalist Society with Abigail Adams Society, Cambridge, MA, March 25, 2010

Publications

IRS Will Scrutinize Fringe Benefits During Employment Tax Audits, 8/3/2010

Supreme Court to Decide Application of Six-Year Limitations Statute to Tax Refund Claim, 12/21/2007