

## John Arszulowicz

he/him/his  
Associate

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**John is a highly skilled tax attorney with a broad range of experience in tax law, corporate finance, and government investigations.**

Before joining Winston, John was a tax attorney for the IRS Office of Chief Counsel, Procedure and Administration. He also previously served as Assistant Counsel with the U.S. Department of the Navy, and was an associate for various international law firms, where he practiced in areas that include tax, corporate finance, and international trade.

John brings a comprehensive understanding of tax law, supported by substantial experience across both the government and private sectors.

## Key Matters

*Some of the experience represented below may have been handled at a previous firm.*

- Defended IRS audit of US\$16M stock charity donation and procured a no change letter
- Advised IRS LB&I on the reopening of a multinational taxpayer audit for previous tax years
- Advised IRS LB&I on privileges for transfer pricing valuation documents
- Advised on SALT tax implications for multimillion-dollar M&A deals
- Advised on SALT tax implications on the sale of renewable energy tax credits
- Closed 20+ cross-border finance transactions and fund finance deals ranging from US\$50M–US\$1.5B
- Represented client on NFT opinion letter addressing securities classification
- Represented the U.S. Department of the Navy (DON) on 41 suspension and debarment proceedings under FAR § 9.4
- Represented the DON on parallel government economic crimes investigations
- Represented major financial institution on receivership proceedings
- Submitted Section 301 Tariff Exclusions on behalf of domestic businesses impacted by the 301 duties
- Advised on distribution of Personal Protective Equipment under an emergency use authorization (EUA) during the COVID-19 public health emergency (PHE) declared under section 319 of the Public Health Service (PHS) Act

# Recognitions

- 2017 Gary S. Tell ERISA Litigation Scholar
  - U.S. Department of Justice J-Stars Award
  - U.S. Food and Drug Administration Commissioner's Special Citation Award
  - U.S. Food and Drug Administration Group Recognition Award
  - U.S. Food and Drug Administration Leveraging Collaboration Award
  - U.S. Food and Drug Administration Team Excellence Award
  - United States Air Force Achievement Medal
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# Activities

- Federal Bar Association Section on Taxation, Member
  - Woolly Mammoth Theatre Company, Volunteer Ambassador
  - Arena Stage at the Mead Center for American Theater, Volunteer Staff Member
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# Credentials

## EDUCATION

John earned his J.D., with honors, from The George Washington University Law School in 2019, where he was an associate member of *The George Washington Business & Finance Law Review*. He is currently pursuing his L.L.M. in taxation from the Georgetown University Law Center. He received his M.A. in human relations from the University of Oklahoma, and B.S. in business administration from the University of Phoenix.

## ADMISSIONS

- District of Columbia

# Related Insights & News

- [U.S. Department of the Navy \(DON\) Office of Small Business Programs Lunch & Learn: DON Acquisition Integrity Office](#), Presenter, May 9, 2023

# Capabilities

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