



MEET PAULINE

*"I enjoy the mental challenge of understanding the intricacies of the tax Code and finding order in what initially appears to be chaos to resolve a client's tax issue."*  
 — Pauline Markey

Pauline focuses her practice on **United States federal income tax**. Her practice includes tax planning for mid-size LLC and partnerships, public financing, mergers and acquisitions, executive compensation, and tax controversy.

Some of Pauline's skills include drafting and reviewing partnership/LLC agreements, reviewing and revising stock/asset purchase agreements, and, with respect to executive compensation, negotiating the employment or separation agreement.

As one may expect with a tax attorney, Pauline welcomes challenges with open arms. She enjoys intellectual tasks. In fact, when Pauline is not working, she can often be found reading. She also enjoys traveling to remote locations to observe wildlife.

EXPERIENCE

Pauline has significant experience translating complex tax issues for general business application and providing practical tax advice to CFOs and other stakeholders. She specifically provides tax advice and planning for small to mid-sized companies, and prepares sophisticated tax memorandums, opinions, and private letter rulings.

Pauline's notable work includes the following:

- Advising start-up and middle market companies on executive compensation plans and structuring nonqualified deferred compensation plans through the use of phantom stock and restricted stock plans;
- Representing a CEO and his business in a \$4 million settlement of a tax audit with the elimination of fraud penalties, along

with a significant reduction in accuracy-related penalties;

- Obtaining favorable long-term capital gain treatment for an executive in a \$15 million patent transaction;
- Supervising the legal entity rationalization of a multinational chemical manufacturing company with a project budget of \$2 million; and
- Leading the simultaneous acquisition and sale of a business line with a purchase price of more than \$11 billion.

Pauline also has over a decade of AM Law 100 and big four accounting firm experience, including time spent working with stakeholders of private and public entities.

## NEWS & INSIGHTS

### **Pauline Markey to Represent Bar Foundation in Philanthropy Network Greater Philadelphia's Equity Cohort**

June 05, 2019 by Pauline W. Markey

### **Economic Development Grants – Good News, Bad News**

April 23, 2019

### **IRS Clarifies the New Section 162(q) Related to the Settlement of Sexual Harassment Claims**

April 10, 2019 by Qiwei Chen, Pauline W. Markey

### **Qualified Opportunity Funds: Rental Real Estate Investments – Active Conduct of Trade or Business Test**

March 13, 2019 by Warren W. Ayres, Pauline W. Markey

### **Qualified Opportunity Zones: What Investors and Developers Need to Know**

February 28, 2019 by Warren W. Ayres, Pauline W. Markey, David A. Nasatir

### **Pauline Markey to Serve as Mentor at Philadelphia Business Journal's Mentoring Monday**

January 22, 2019 by Pauline W. Markey

## ACTIVITIES & HONORS

Pauline was chosen as one of *Philadelphia Business Journal's 2018 Best of the Bar award winners* in the Tax and Employee Benefits category. *The Best of the Bar awards* were designed to honor the top lawyers within the Philadelphia region in business litigation, employment litigation, intellectual property, plaintiff personal injury, bankruptcy, corporate, real estate, tax/employee benefits, and in-house counsel. Pauline was also invited to sit on the Board of Trustees for the Philadelphia Bar Foundation.

Awards Won\*



\*[Click here](#) for a description of the standard or methodology on which the awards and honors are based. No aspect of this advertisement is approved by the Supreme Court of New Jersey.

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EDUCATION

- University of Florida Levin College of Law, JD; L.L.M in Taxation
- Vanderbilt University, BA, Economics

ADMISSIONS

- Pennsylvania
  - New Jersey
  - Florida
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## CAPABILITIES

### **Bankruptcy & Business Reorganizations**

Asset Acquisition

### **Trusts & Estates**

Charitable Giving

Estate Planning & Asset Protection

### **Business & Finance**

Corporate

Mergers & Acquisitions

Real Estate

Tax

### **Government & Public Policy**

Election Law

Government Relations

### **Labor & Employment**

Executive Compensation & Employee  
Benefits

### **Industry Focus**

Financial Services

Health Care

Individuals & Private Clients

International Businesses

Local Governments & Municipal Authorities

Nonprofit Organizations

Real Estate & Construction

Universities & Secondary Schools