

Sonia K. Kothari

Senior Counsel

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Sonia K. Kothari is a senior counsel with Foley & Lardner LLP. Sonia is based in the firm's Washington, D.C. office as a member of the firm's Taxation Practice. Sonia's practice focuses the U.S. federal tax aspects of a wide range of business transactions.

- Tax planning for sponsors and investors in domestic and cross-border private investment funds, including venture capital funds, opportunity zone and other real property funds, credit funds, continuation funds, and hedge funds.
- Mergers, stock and asset acquisitions and divestitures, tax-free reorganizations, and spinoffs.
- Real estate transactions, including 1031 like-kind exchanges, tenancy-in-common agreements and joint venture agreements.
- Structuring for inbound and outbound investments, application of tax treaties, anti-deferral regimes, withholding tax, choice of entity, and information reporting.

Prior to joining Foley, Sonia served as an attorney in the Passthroughs and Special Industries division at the IRS Office of Chief Counsel in Washington, D.C. She is a principal author of the final regulations under Internal Revenue Code Sections 1400Z-2 (opportunity zones) and 1061 (carried interest).

Sonia previously was a tax associate at international law firms in New York, where she advised clients on the U.S. federal income tax treatment of a variety of domestic and cross-border business transactions.

Publications and Presentations

- Presenter, "Emerging Federal and State Tax Issues for Virtual Assets," *National Association of State Bar Tax Sections 43rd Annual Conference* (November 12, 2022).
- Co-author, "Tax Considerations for Transactions of Non-Fungible Tokens," *175 Tax Notes 729* (May 3, 2022).

Sectors



FOLEY & LARDNER LLP

- Digital Assets, Web3 & NFTs
- Innovative Technology

Practice Areas

- Corporate
- Finance
- Fund Formation & Investment Management
- Mergers & Acquisitions
- Opportunity Zones
- Private Equity
- Real Estate
- Taxation
- Transactions

Education

- New York University School of Law, New York, NY (LL.M., 2014)
- University of Pennsylvania Law School, Philadelphia, PA (J.D.)
- University of Pennsylvania, The Wharton School, Philadelphia, PA (B.S.)

Admissions

- New York
- Washington, D.C.
- U.S. Tax Court