

Arjun N. Ghosh

Associate

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Arjun Ghosh advises clients, from individuals to multinational corporations, on a broad range of tax issues with a particular focus on international tax and transfer pricing planning. He has experience representing clients in mergers and acquisitions, fund formations, securities offerings, partnership taxation, financing transactions, structured product offerings, reorganizations, and tax equity investments across a wide array of industries that include finance, energy, crypto, technology, real estate, and pharmaceuticals. Additionally, Arjun has represented clients before the Internal Revenue Service and the Department of Justice in connection with tax controversy matters from initial audit through trial.

Prior to joining Foley, Arjun was an associate in the Tax and Political Law groups at a Washington, D.C.-based law firm. He also worked on Capitol Hill as tax counsel for Senator Kirsten Gillibrand, for whom he led the development of the first comprehensive regulatory framework for digital assets. He also served as counsel and tax policy fellow in the U.S. House of Representatives for the Committee on Ways & Means where he worked primarily on federal tax incentives for renewable energy projects.

Awards and Recognition

- M. Carr Ferguson Scholar
- John W. Gardner Fellow

Affiliations

- Pathfinder, Leadership Council on Legal Diversity (2024)
- Member, American Bar Association, Tax Section

Pro Bono

- Volunteer, ABA Tax Section Virtual Settlement Weeks

Presentations and Publications

- Author, “Transfer Pricing End-of-Year Adjustments in the United States,” *IBFD International Transfer Pricing Journal* (November 2024)
- Author, “UPDATE: Puerto Rico May Impose a 15% Minimum Tax on Business Income; What Will Happen to Act 60 Decrees?” *International Tax Alert* (November 2024)
- Author, “Businesses Operating in Puerto Rico Must Consider Pillar Two,” *Bloomberg Law* (March 2024)

Practice Areas

- [Corporate](#)
- [Fund Formation & Investment Management](#)

Education

- New York University School of Law (LL.M., 2022)
 - M. Carr Ferguson Scholar
- University of California, Berkeley, School of Law (J.D., 2019)
 - Member, *Berkeley Business Law Journal*
 - John W. Gardner Fellow
- University of California, Berkeley (B.A., 2011)

Admissions

- District of Columbia
- California