



Evgeny Magidenko

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Overview

Gene is a tax attorney who advises individual and corporate clients nationwide and internationally on transactional tax matters, tax controversies, and tax compliance. Gene brings a strategic perspective to his clients' matters, whether they involve tax planning or disputes with the IRS, by drawing on his breadth of experience in the field, including his work in the private sector and Federal government service.

Before joining Schiff Hardin, Gene worked in the Ann Arbor office of a large Detroit firm, where his practice focused on estate planning and tax matters, and earlier as an associate at a Washington, D.C., law firm, where he advised companies on tax planning, international tax compliance, and tax aspects of domestic and cross-border transactions.

Gene clerked for the Honorable David Laro at the U.S. Tax Court in Washington, D.C., with whom he also co-taught the Business Planning Seminar at the Georgetown University Law Center for two semesters.

Practices

- Tax
- International
- Corporate and Transactional
- Business Succession Planning
- Tax Exempt Organizations and Charitable Planning

Credentials

Education

- New York University, LL.M., Taxation, 2016
Tax Law Review, Graduate Editor
- University of Michigan Law School, J.D., 2012, *magna cum laude*
University of Michigan Journal of Law Reform, Contributing Editor
Certificate of Merit in International Taxation
- University of Michigan, B.A., Public Policy, 2009, with Distinction
Phi Beta Kappa
James B. Angell Scholar

Bar Admissions

- Michigan
- District of Columbia
- U.S. Supreme Court
- U.S. Tax Court

Clerkships

- Honorable David Laro, U.S. Tax Court, Law Clerk (2016-2018)

Professional Memberships

- American Bar Association, Section of Taxation
- Washtenaw County Bar Association

Languages Spoken & Fluency

- Russian, Natively Fluent

Insights

10.07.2020

News Release

Schiff and Attorneys Named to Michigan Pro Bono Honor Roll for Second Year

08.20.2020

News Release

Best Lawyers Recognizes 59 Schiff Attorneys, Six “Lawyers of the Year,” and 21 Ones to Watch

05.28.2020

Alert

Changes Proposed to Paycheck Protection Program in Newly Passed House Bill

05.01.2020

Alert

IRS Guidance: No Tax Deductions Allowed for PPP-Paid Expenses

04.21.2020

Alert

Senate Approves Additional Funding for Small Businesses

04.06.2020

Article

Understanding New COVID-19 Federal Sick Leave Policies

03.27.2020

Alert

CARES Act: Key Tax Provisions Offering Relief to Businesses and Individuals

03.26.2020

Alert

IRS Updates Operational Status and Introduces People First Initiative (and Illinois Extends Tax Filing and Payment Deadline)

03.23.2020

Alert

What the Stay-At-Home Executive Order Means for Michigan Businesses

03.20.2020

Alert

Treasury Secretary Extends Tax Filing Deadline to July 15

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Other Publications

- “Classifying Federal Taxes for Constitutional Purposes,” 45 *U. Balt. L. Rev.* 57 (2015)
- “The U.S. Federal Taxation of Bitcoins and Other Convertible Virtual Currencies,” (co-author) *Inside Basis* (Summer 2014), reprinted in *The Computer & Internet Lawyer* (Apr. 2015)
- “Is a Broadly Based Mark-to-Market Tax Unconstitutional?” 143 *Tax Notes* 952 (2014)
- “A 360-Degree Look at Secondment Tax Issues: China, United States, and Germany,” (co-author) *The Federal Lawyer* (Sep. 2013)

Speeches & Presentations

- “Sales Taxation in the Post-Wayfair World and Modernizing State Sales Tax Systems After Wayfair,” (panelist) COST Mid-West Regional State Tax Seminar, Dearborn, Mich. (Aug. 22, 2018)
- “A Defense of Citizenship Taxation,” (presenter) Citizenship & Taxation Symposium, University of Michigan Law School, Ann Arbor, Mich. (Oct. 8-9, 2015)
- “Bitcoins, Bitcoins, Everywhere! How New IRS Rules Impact Bitcoin Users,” (co-presenter) Federal Bar Association Section on Taxation Tax Practice & Procedure Monthly Roundtable (Apr. 28, 2014)

Citizenship

Pro Bono Activities

- Accounting Aid Society Low Income Taxpayer Clinic, Pro Bono Panel, Member
- State Bar of Michigan Tax Pro Bono Referral Panel Program, Member
- The University of Michigan Low Income Taxpayer Clinic, IRS Virtual Settlement Days, Volunteer Attorney, Detroit (May 2020)

AWARDS & HONORS

- **Best Lawyers: Ones to Watch (2021)**
U.S. News & World Report