



# Evgeny Magidenko

PARTNER

Gene is a tax attorney who advises individual and business clients nationwide and internationally on tax planning, tax controversies, and transactional tax matters.



## Industries

[Private Companies](#)

## Practices

[Corporate & Securities](#)

[Private Clients, Trusts & Estates](#)

[Reproductive Health Task Force](#)

[Tax](#)

## International

[Japan](#)

## Languages

Russian

## Education

New York University School of Law, LL.M.,  
Taxation, 2016

University of Michigan Law School, JD, magna cum  
laude, 2012

University of Michigan, BA, Public Policy, with  
Distinction, 2009

## Offices

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Gene brings a strategic perspective to his clients' matters, whether they involve tax counseling or disputes with the IRS, by drawing on his breadth of experience in the field. He also advises both for-profit businesses and tax-exempt organizations on a wide array of organizational and operational matters at all stages of their lifecycles.

Before joining ArentFox Schiff, Gene worked in the Ann Arbor office of a large Detroit firm, where his practice focused on estate planning and tax matters, and earlier 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.

## Boards, Memberships & Certifications

- American Bar Association, Section of Taxation
- Council Member, State Bar of Michigan Taxation Section Council
- International Bar Association

## Professional Activities

- Firm Liaison, Japan America Society of Michigan and Southwestern Ontario

## Pro Bono Work

Gene has handled a number of matters on a pro bono basis, including work with:

- 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)

## Publications, Presentations & Recognitions

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### Presentations

- Taxation of Corporations (presenter) ABA Section of Real Property, Trust and Estate Law, Webinar (Jan. 19, 2023)
- S Corporations: Preventing and Mitigating Problems with S Elections (presenter) Advanced Topics in Flow-Through Taxation Conference, Illinois CPA Society, Webinar (Dec. 7, 2022)
- Avoiding Liquidation Pitfalls (co-presenter) Advanced Topics in Flow-Through Taxation Conference, Illinois CPA Society, Webinar (Dec. 9, 2021)
- Paycheck Protection Program Loans: The Latest Insights (presenter) Advanced Topics in Flow-Through Taxation Conference, Illinois CPA Society, Webinar (Dec. 9, 2020)
- 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)

### 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)

### Recognitions

- Best Lawyers: *Ones to Watch* (2021-2024)

## Previous Work

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

[Michigan](#)

[District of Columbia](#)

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### Court Admissions

[US Tax Court](#)

[US Supreme Court](#)