



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

[Energy & Cleantech](#)
[Nonprofits & Associations](#)
[Private Companies](#)

Practices

[Corporate & Securities](#)
— [Business Counseling](#)
— [Business Loan Task Force](#)
— [Employee Stock Ownership Plans](#)
[Private Clients, Trusts & Estates](#)
— [Business Succession Planning](#)
— [Charitable Planning](#)
— [Qualified Opportunity Funds & Opportunity Zones](#)
[Tax](#)
— [Corporate Tax](#)
— [International Tax](#)
— [Tax Controversy](#)
[Real Estate](#)
— [Real Estate 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.

Additionally, Gene advises clients on all aspects of the Corporate Transparency Act and leads the ArentFox Schiff Corporate Transparency Act Task Force.

Gene clerked for the Honorable David Laro at the U.S. Tax Court in Washington, D.C.

Boards, Memberships & Certifications

— Council Member, State Bar of Michigan Taxation Section Council

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

Presentations

- “Corporate Transparency Act in the Cross-Hairs,” FBA, Corporate and Association Counsel Division, Webinar (May 16, 2024)
- “Corporate Transparency Act: An Overview,” (presenter) Advanced Topics in Flow-Through Taxation Conference, Illinois CPA Society, Webinar (Dec. 7, 2023)
- “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

- “The Corporate Transparency Act Whipsaw Continues,” *Wealth Management* (Jan. 27, 2025)
- “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* (2021-2026)

Previous Work

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

[Michigan](#)

[District of Columbia](#)

Court Admissions

[US Tax Court](#)

[US Supreme Court](#)