

Morgan Lewis Adds Former US Attorney, PwC Tax Lawyer

By David Hansen

Law360 (March 2, 2020, 6:58 PM EST) -- Morgan Lewis & Bockius LLP has added two new partners specializing in white-collar crime and tax law from the U.S. Attorney's Office for the Southern District of New York and PwC, the firm announced Monday.

Daniel Tehrani will join the firm's New York office after serving as deputy chief of the Appeals Unit, Criminal Division, at the U.S. Attorney's Office, Morgan Lewis said in a statement. He will focus on government investigations of clients, and client-initiated internal investigations, the firm said.

Morgan Lewis also announced Daniel Carmody will rejoin the firm as a partner in its Philadelphia office. He comes from PwC, where he served since 2015 in its Washington National Tax Services office.

Tehrani worked at the U.S. Attorney's Office since 2010 after a stint as an associate at Jenner & Block LLP. He prosecuted cases involving complicated financial crimes for the U.S., such as securities fraud, insider trading and cybercrimes, the firm said.

Tehrani's most notable cases include U.S. v. Block, winning guilty verdicts on securities fraud and other crimes against the chief financial officer of American Realty Capital Properties Inc., then the nation's largest publicly traded real estate investment firm. He also handled U.S. v. Jacoby, resulting in a guilty plea by the former chief financial officer of Osiris Therapeutics Inc. to making false statements to company auditors.

"Dan is an outstanding and skilled courtroom lawyer, and we are delighted that he has joined our white-collar team," said J. Gordon Cooney Jr., leader of Morgan Lewis' global litigation practice. "Our clients, particularly those facing U.S. Attorney soft investigations supervised by the Southern District of New York, will benefit from his broad public service background and critical insights."

Tehrani told Law360 that he will bring a "wealth and diversity of experiences" to the firm after working at the U.S. Attorney's Office. Fraud, embezzlement and cybercrimes are just a few of the white-collar investigations he has participated in, Tehrani said. He also oversaw appeals for the office.

"That experience will enable me to provide guidance and insight and counsel to clients on a range of subject matters and throughout the whole process," he said.

Tehrani told Law360 he was drawn to the firm's expertise.



Daniel Tehrani



Daniel Carmody

“I had been with the U.S. Attorney’s Office for nine years,” he said. “As I was thinking about the next challenge in my career, what excited me the most about Morgan Lewis was the strength of the firm’s white-collar practice, both nationally and internationally.”

Tehrani is the latest veteran trial lawyer the firm has added to its white-collar team, Morgan Lewis said.

Tehrani earned his bachelor’s degree from the University of Pennsylvania and law degree from Harvard Law School.

Carmody will advise clients on tax matters involving domestic and international transactions, focusing on structuring partnerships, limited liability companies, and subchapter S corporations, according to the firm. He also will represent clients facing Internal Revenue Service audits and administrative matters.

“I am delighted to welcome Dan back to Morgan Lewis, where our clients will benefit immensely from his expertise in the private and public sectors,” said Jami McKeon, the firm's chairman. “Dan has built a well-rounded career at PwC, in government, and in private practice, and he possesses the unique ability to view our clients’ opportunities and challenges through a truly holistic lens.”

Morgan Lewis’ expertise in partnership law — which he identified as his specialty — attracted Carmody back to the firm, he said.

“I can bring a lot of experience in passive activity and loss rules,” he said. “It is very hard not to come home.” Carmody had previously been an associate with Morgan Lewis from 2005 to 2009.

Carmody also served with the Large Business & International Division of the Office of Chief Counsel of the IRS. He provided substantive and procedural legal advice related to the audits of large corporate taxpayers on issues such as transfer pricing and loss generating transactions, the firm said. He has also worked in the agency’s Passthroughs & Special Industries Division, where he addressed the taxation of partnerships, limited liability companies and Subchapter S corporations, as well as the application of the passive activity loss rules and at-risk loss limitation provisions, the firm said.

At-risk rules are an important area of enforcement the IRS will emphasize in the near future, Carmody said.

“Recent changes to partnership returns suggests the IRS will focus a lot more audit activity in this space,” he said. “It’s an area that hasn’t gotten much attention from lawyers in the past few years, and that may change.”

Carmody earned his bachelor’s degree from Loyola University Maryland and his law degree from the Georgetown University Law Center. He has a master of laws in tax law from Villanova University School of Law.

--Editing by Neil Cohen.