

## The Laterals Audit: Tax Attorney Moves In February

By **Derek Major**

*Law360 (February 28, 2018, 9:16 PM EST)* -- In the latest edition of the Laterals Audit, the Wagner Law Group welcomes an executive compensation attorney, Morgan Lewis boosts its tax team with four new hires and Todd Steinberg joins Loeb & Loeb LLP.



James W. Forsyth

Cozen O'Connor announces the hiring of tax attorney James W. Forsyth, who joins the firm as senior counsel and will anchor its federal, state and local tax practice in Pittsburgh.

Forsyth will work with Cozen O'Connor's national as well as western Pennsylvania clients to analyze the federal, state and local income tax consequences of corporate transactions, including reorganizations, divisions, debt restructurings, and joint ventures. A substantial percentage of his practice will also involve resolving taxpayer disputes with the Internal Revenue Service and the Pennsylvania Department of Revenue.

Forsyth has helped defeat a range of tax assessments asserted by the Department of Revenue, against developers of downtown Pittsburgh office buildings in foreclosure settings and against an international electronics manufacturer.



Mark Poerio

The Wagner Law Group welcomes executive compensation attorney Mark Poerio.

Poerio, who will be based in Wagner's Washington, D.C., office, has 30 years of experience focused on equity compensation plans, performance-based incentives, employment agreements, golden parachutes, mergers and acquisitions, changes in control, and severance matters, both individualized and broad-based.

Additionally, Poerio serves as president of the American College of Employee Benefit Counsel, an invitation-only organization of nationally recognized employee benefits lawyers, and he is an executive board member of the American Benefits Council.



Pieter de Ridder

With the retirement of Kevin Owen, Mayer Brown JSM has appointed tax partner Pieter de Ridder as its new managing partner in Singapore

De Ridder takes over the 16-lawyer office from Owen, who relocated from Hong Kong in 2011 to launch the outpost, and will handle tax matters for mergers and acquisitions and financing transactions, with expertise in Indonesia-related deals.

Owen had been a partner with Johnson Stokes & Master, remaining after the Hong Kong firm's merger with Mayer Brown in 2008.



Joshua Richardson



Adam Beckerink



Michael Liu

Joshua Richardson, Adam Beckerink, Michael Liu and Matt Mock have joined the Chicago office of Morgan Lewis & Bockius LLP as partners on the firm's tax team. Richardson will focus his practice on advising multinational companies with domestic and international tax planning, with a concentration in post-acquisition integration planning and implementation. He also counsels clients on the foreign tax credit and Subpart F planning, as well as serving as counsel in administrative tax disputes. Richardson arrives from Baker McKenzie's Chicago office.

Beckerink's practice focuses on advising clients on state and local tax disputes and planning, concentrating on transactional issues, controversies and litigation. He has also worked on False Claims Act tax defenses, state tax refund class action defense, individual residency, telecommunications excise taxes and sales and income taxes. Beckerink arrives from Baker McKenzie in Chicago.

Liu focuses on international tax planning with cross-industry clients in the biotechnology and life sciences, technology, semiconductor, software and automotive industries. He advises on cross-border transactions, such as inversions and redomestication of private and publicly traded companies, also focusing on tax-efficient cash repatriation strategies and loss-utilization planning. He also works in post-acquisition integration planning and implementation and transfer pricing. Liu arrives from Baker McKenzie in Palo Alto, California, and will continue working with clients in Morgan Lewis' Silicon Valley office.

Mock is the ninth tax lawyer to join Morgan Lewis, and he will focus on SALT litigation and planning.

Mock represents entities across the U.S. at all levels of administrative controversy and in all aspects of litigation through trial and appeal involving a wide variety of SALT issues, including sales and use tax, income tax and unclaimed property disputes. He also advises multinational companies on the SALT aspects of corporate restructurings and transactions, providing counsel on the application of the myriad state and local tax issues.



Austin Bramwell

Austin Bramwell has rejoined Milbank, Tweed, Hadley & McCloy LLP as a partner in the trusts and estates group after a stint as senior adviser in the Office of Tax Policy in the Treasury Department.

Bramwell's practice includes domestic and international estate and charitable planning, tax, compliance, organization and strategic matters. He has also been an adjunct professor of law at New York University School of Law. He will advise individuals, families and nonprofit organizations in his return to Milbank, and will represent corporate and individual fiduciaries in trust and estate administration matters, including in litigation, as well as taxpayers in contested proceedings.



Alan Kravitz

Alan Kravitz has joined Hughes Hubbard & Reed LLP's New York office.

Kravitz has extensive knowledge in aviation and equipment finance transactions, where he has provided tax advice to underwriters, issuers, lenders and other involved parties. He has also assisted companies and funds with tax matters relating to acquisitions and dispositions of subsidiaries and portfolio companies, both domestic and multinational, with a focus on the media and technology, telecommunications, and transport and logistics sectors.

Kravitz previously worked at Clifford Chance, and from 2009 to 2010 he was a law clerk to Judge Mary Ann Cohen of the U.S. Tax Court in Washington, D.C.



Kevin Glenn

Kevin Glenn has joined King & Spalding LLP in the firm's New York office as a tax partner in the firm's corporate, finance and investments practice group.

Glenn previously spent over 25 years at KPMG, where he advised clients on supply chain planning, post-merger global integration, cash repatriation and foreign tax credit planning. At King & Spalding, he will provide U.S. tax advice to U.S. and foreign multinational companies on cross-border financing, joint

ventures, and merger and acquisition transactions.

Mark Eichler has joined Wachtel Missry LLP's New York office, specializing in tax law.

Eichler has more than 20 years' experience representing clients in a broad range of U.S. federal income tax matters, counseling clients on the tax consequences of sophisticated domestic and cross border commercial transactions including mergers, acquisitions, dispositions and financing transactions, as well as the taxation of corporations, partnerships and real estate investment trusts.

Additionally, he also regularly advises domestic and foreign investors on the tax implications of investing in U.S. real estate.



David Lucas

Miller, Miller & Canby Chtd. has hired David Lucas for its estates and trusts, and business and tax practices, where he will focus on estate planning, trust and administration, elder law and business law.

Lucas is licensed to practice law in Maryland and the District of Columbia and is admitted to practice before the respective local and federal courts. He is a member of the Maryland State Bar Association, the District of Columbia Bar Association, and the Montgomery County Bar Association.



Todd Steinberg

Todd Steinberg has joined Loeb & Loeb LLP's Washington, D.C., office as a partner in the firm's trusts and estates department.

Steinberg's move will expand the firm's preeminent private client platform serving high-net-worth individuals, families, closely held businesses and nonprofit organizations. He will focus on estate and income tax planning for high-net-worth individuals and their families and will assist clients with multigenerational wealth preservation and accumulation, as well as probate and trust administration, and charitable planned giving.

Steinberg has a wealth of experience in complex post-death estate and trust administration, as well as fiduciary litigation matters representing clients in IRS estate and gift tax examinations, IRS appeals and related state and federal tax controversy matters.



David Fuller

David Fuller has returned to McDermott Will & Emery LLP's benefits compensation and employment practice.

Fuller has been advising clients for over three decades on matters involving employment taxes, information reporting, fringe benefits, outsourcing and contingent workers. He has successfully represented corporations, tax-exempt organizations and federal and state agencies with hundreds of millions of dollars at stake on payroll tax and employee fringe benefit controversies, in industries like health care, technology, staffing and transportation. His current work includes representing taxpayer interests in an employment tax case before the U.S. Supreme Court.

Earlier in his legal career, Fuller spent 13 years at McDermott after working for the IRS National Office in the former Office of the Associate Chief Counsel — Employee Benefits and Exempt Organizations.



Scott Jones

Scott Jones has joined Kirkland & Ellis LLP as a partner in its Boston office. Jones is Kirkland's first tax lawyer in the Boston office, which opened in May 2017.

Jones focuses his practice on tax planning and counseling for private equity fund managers. Additionally, he advises on fund raising, complex structuring, operational issues, internal organizational matters and international tax issues associated with non-U.S. investment activities. Jones also advises on tax issues related to U.S. tax-exempt and non-U.S. investors in growth equity funds, buyout funds, credit funds and other investment partnerships.



James Mastracchio

Eversheds Sutherland LLP has hired James Mastracchio to join its tax practice group as a partner in its Washington, D.C., office.

Mastracchio focuses on all aspects of federal tax controversies, including examination and administrative appeals. His clients include corporations, financial institutions and high-net-worth individuals. Additionally, Mastracchio has extensive knowledge in debt versus equity, valuation disputes, accounting methods, tax shelters, structured tax products, insurance, informational return penalties, fraud penalties and other substantive tax issues



Prior to joining Eversheds Sutherland, Mastracchio served as a partner and led the civil tax controversy and criminal tax practices in the Washington, D.C., office of Dentons.



Thomas Humphreys



Remmelt Reigersman

Tax lawyers Thomas Humphreys and Remmelt Reigersman have joined Mayer Brown in New York and Northern California.

Humphreys will join the firm's tax transactions and consulting practice in New York. He is experienced in capital markets transactions, financial instruments, real estate investment trusts, mergers and acquisitions, bankruptcy, tax controversy and other tax issues. Humphreys has made significant contributions to taxation policy and education within the legal community. He is a longtime adjunct professor at New York University Law School, where he teaches taxation of financial instruments in the Master of Laws program.

Reigersman will be joining Mayer Brown's Northern California office to focus on federal and international tax matters. He advises on a wide variety of sophisticated capital markets transactions and

represents issuers, investment banks/financial institutions, and investors in financing transactions, including public offerings and private placements of equity, debt and hybrid securities, as well as structured products.

--Additional reporting by Daniel Tay, Philip Rosenstein and James Nani. Editing by Robert Rudinger.

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