



Scott Malone

Counsel

New York

T: +1 212.419.5881 | F: +1 973.597.2400

smalone@lowenstein.com

Scott's practice focuses on tax controversies.

He represents investment funds, multinational corporations, trusts, family offices, and high net worth individuals in disputes with the IRS and state and local taxing authorities at the examination and administrative appeals levels. He has handled a wide range of matters, including partnership adjustments, the taxation of derivatives and captive insurance companies, accounting method changes, transfer pricing, statutes of limitations, the application of civil penalties, and voluntary disclosures of delinquent international information returns.

Scott also advises on the tax aspects of domestic and cross-border structuring and planning matters, such as trust restructuring, business formation and exit planning, debt and non-debt financial instruments, investments in controlled foreign corporations and passive foreign investment companies, family investment companies, residency planning, charitable giving, application of tax treaties, and compliance with FATCA and Chapter 3 withholding tax provisions.

His state tax planning experience includes counseling individuals and businesses on residency, sourcing, apportionment, telecommuting, and tax credit issues.

NEWS & INSIGHTS

In the Media

> March 1-2; March 4-5; March 11, 2021

The arrival to Lowenstein of partners **Edmund S. Cohen** and **Rachel Ingwer** and counsel **Scott Malone** to the firm's **Tax** practice is noted in **CPA Practice Advisor**, **General Counsel News**, **The Daily Docket**, **Law Fuel**, **Bloomberg Law**, **The American Lawyer**, and the **New York Law Journal**. The lawyers will work closely with the firm's **Investment Management**, **Family Office**, **Private Equity**, and **Mergers & Acquisitions** teams on sophisticated transactions and disputes. ***View Lowenstein's news announcement about these lawyers' arrival to the firm.***

EDUCATION

> New York University (LL.M. 2013), Taxation

> St. John's University School of Law (J.D. 2008), magna cum laude; staff member, *St. John's Law Review*

> College of the Holy Cross (B.A. 2001)

ADMISSIONS

> New York