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FIRM MANAGEMENT

Lowenstein Sandler Expands Tax Practice

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[Edmund S. Cohen](#), [Rachel Ingwer](#), and [Scott Malone](#) have joined Lowenstein Sandler's [Tax](#) practice. Cohen and Ingwer will join as partners, and Malone will join as counsel; the team will be based in the New York office. The lawyers, who all until recently practiced at Winston & Strawn LLP, are expected to work closely with the firm's [Investment Management](#), [Family Office](#), [Private Equity](#), and [Mergers & Acquisitions](#) teams on sophisticated transactions and disputes.

The new group has extensive experience representing funds, corporations, and family offices and high net worth individuals with investments and philanthropic initiatives around the world. They advise on tax issues and controversies involving fund formation across asset classes, cross-border M&A, and a wide range of financial products.

Cohen has over 40 years of experience providing tax advice to multinational corporations, many of the largest investment funds, and numerous ultra-high net worth individuals. He has provided tax advice in connection with investment and cross-border corporate matters, as well as PFICs, Subpart F issues, the application of

the GILTI tax, derivatives, and other financial product transactions, including life insurance investments. Cohen also has extensive experience in structuring foreign investment in U.S. real estate and tax planning for family offices and international families with U.S. family members. He is consistently ranked as a leading tax law practitioner in numerous independent surveys, including *Who's Who in America*, *Chambers USA*, *The Legal 500*, *Super Lawyers*, and *Best Lawyers in America*. Prior to Winston & Strawn he was Chair of Coudert Brothers LLP's tax practice for nearly 20 years.

"I'm delighted to join Lowenstein," he says. "They are a group of smart, energetic people, and our practices have a synergistic fit. We can assist Lowenstein in their growing international practice as well as provide them support with respect to their world class investment fund, venture capital, and private equity practices. We could not be happier to be here."

Ingwer counsels both corporate clients and high net worth individuals on a variety of domestic and cross-border tax issues. She focuses a significant portion of her practice on tax matters relating to private equity transactions and other transactional tax matters, including business formations, taxable and tax-free mergers and acquisitions, divestitures, joint ventures, financings, and restructurings and recapitalizations. She also counsels on debt and equity offerings and fund formation issues, including fund structuring and partnership tax matters.

For her private clients, Ingwer advises on a variety of individual and private foundation tax matters, as well as tax matters relating to their business interests. She has extensive experience advising both high net worth individuals and charitable foundations on structuring investments both into and out of the United States.

She says, "I've been very impressed with everyone I've met at Lowenstein. They work on a variety of sophisticated projects, and I am excited to join them on those matters. The compatibility of our practices lends itself to a real opportunity for all of us to grow and thrive. Plus, I am thrilled to be back working side by side with [Lesley P. Adamo!](#)"

Lowenstein partner Adamo practiced with Cohen, Ingwer, and Malone earlier in her career. Adamo adds, "I feel very fortunate to have the opportunity to work closely with Ed, Rachel, and Scott again. Ed has always been a great mentor, and they are all very talented, creative, and thoughtful tax lawyers."

Scott Malone'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. Malone 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.

"As our practices continue to expand, we wanted to deepen our tax bench to keep up with the demand for in-depth counsel on the tax implications of mergers and acquisitions and complex cross-border transactions, especially involving investment funds, as well as on tax controversies," says Chair and Managing Partner [Gary M. Wingens](#). "These fine lawyers will provide that extra layer of experience and knowledge to this integral aspect of our client services."

Tax Chair [Brian A. Silikovitz](#) says, "This talented team will enhance not only our tax practice, but all of our practice areas with their deep understanding of the most complex investment strategies and vehicles."

In the past 18 months, Lowenstein has significantly grown its capabilities in the areas of domestic and cross-border structuring and planning matters for multinational corporations, trusts, family offices, and high net worth individuals with the addition of partners [Max Karpel](#), Co-chair of the Family Office Practice, [Boris Liberman](#) in Investment Management, and [Michael P. Vito](#) in [Trusts & Estates](#).

[Lowenstein Sandler](#) is a national law firm with over 350 lawyers based in New York, Palo Alto, New Jersey, Utah, and Washington, D.C. The firm represents leaders in virtually every sector of the global economy, with particular emphasis on investment funds, life sciences, and technology. Recognized for its entrepreneurial spirit and high standard of client service, the firm is committed to the interests of its clients, colleagues, and communities.

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