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**CURRENT DEVELOPMENTS IN
CORPORATE TAX**

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Mark J. Silverman

Mark J. Silverman is a partner in the Washington office of Steptoe & Johnson LLP. Mr. Silverman was named one of the top ten tax lawyers in Washington in 2005 by Legal Times. He is a member of The American Law Institute, Tax Advisory Group for the Study of Subchapter C of the Internal Revenue Code. He was formerly an advisor to the Committee on Ways and Means during their consideration of revisions to the corporate tax provisions of the Internal Revenue Code. He is a Fellow of the American College of Tax Counsel. Mr. Silverman was formerly a Council member of the American Bar Association, Section of Taxation and was formerly Chair of the Corporate Tax Committee. He chaired the Tax Section Task Force on Leveraged Buyouts. Mr. Silverman co-authored the Tax Advisors Planning Series on Financially Troubled Businesses. Mr. Silverman is currently a member of the advisory boards of BNA Tax Management, Consolidated Returns Tax Report, M&A Tax Report, and Corporate Taxation magazines. Mr. Silverman is on the Editorial Board of The American Journal of Tax Policy, and is on the Board of Trustees of the Southern Federal Tax Institute. Mr. Silverman chairs the ALI-ABA annual consolidated returns program. He was formerly Corporate Tax Editor of The Journal of Taxation, and a member of the advisory boards of NYU Institute on Federal Taxation. Mr. Silverman was formerly a member of the Executive Committee of the New York State Bar Association. In addition, he is an Adjunct Professor of Law at Georgetown University Law Center and was formerly attorney-advisor to Judge Samuel B. Sterrett of the United States Tax Court. Mr. Silverman is a frequent speaker on tax matters and has published numerous articles on the subject.

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EDUCATION

Indiana University, B.S.,
1967

Suffolk University Law
School, J.D., 1970

New York University
School of Law LL.M., 1971

BAR & COURT ADMISSIONS

District of Columbia
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Planning & Transactional Practice

Mr. Silverman focuses on planning and transactional matters. He has extensive experience in structuring acquisitions, mergers, and spin-off transactions for large public corporations, as well as closely held businesses. He has authored a book on the tax consequences of financially troubled businesses and advises corporations on consolidated return issues. Mr. Silverman advises leverage buyout groups, venture capitalists and privately held commercial real estate developers with respect to various transactional matters. He is often called upon to advise the Internal Revenue Service, Treasury Department, and the staffs of the Congressional tax writing committees with respect to corporate tax issues.

Tax Policy Practice

A significant part of Mr. Silverman's practice involves the resolution of tax policy issues before Congress and the Treasury Department. These issues arise in the context of pending or proposed legislation and proposed Treasury Department regulations. Mr. Silverman is currently meeting with members of Congress and their staffs on many of the corporate tax provisions proposed by the Administration and by members of Congress (including corporate spin-offs, financial product provisions, and corporate capital gains).

Audit & Controversy

Mr. Silverman also handles audit and controversy matters. He has extensive experience negotiating with field agents, appeals officers and district counsel in settling significant audit issues. Mr. Silverman frequently prepares technical advice requests and often meets with National Office officials with respect to audit and tax litigation matters. Recently, Mr. Silverman was successful in negotiating global tax shelter settlements with the IRS.

Noteworthy

- Received a #1 Ranking, Chambers USA 2010: America's Leading Business Lawyers; Tax (District of Columbia)
- Ranked, Chambers Global 2008–2010: The World's Leading Lawyers for Business — Tax: Corporate (US)
- Distinguished as a Top 100 attorney in Washington, DC Super Lawyers
- Listed in Washington, DC Super Lawyers 2007–2010
- Listed in Best Lawyers in America 2011 for Corporate Law, Mergers & Acquisitions Law, and Tax Law
- Mentioned in Legal 500 US 2008–2010 for Tax
- Listed in Who's Who Legal for Corporate Tax in 2007–2010
- Listed among the "Top Lawyers in Washington" by Washingtonian, 2009
- Ranked, PLC Cross-border Tax on Corporate Transactions Handbook 2008/09
- Named Among the “Top Ten Tax Lawyers in Washington, DC” by Legal Times, 2005
- Former advisor to Committee on Ways & Means Counsel, ABA, Tax Section
- Chair, Corporate Tax Committee, ABA, Tax Section
- Advisory Board Member, NYU Institute and BNA Tax Management
- Member, Board of Trustees, Southern Federal Tax Institute
- Adjunct Professor, Georgetown University Law Center

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