

Michael Senger

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Michael applies his legal and financial experience to guide his clients through intricate matters of tax structuring and controversy.

Michael Senger is an associate in Alston & Bird's Federal & International Tax Group. He dedicates his practice to finding practical solutions to complex tax structuring and planning issues on behalf of domestic and international corporations, partnerships, LLCs, and individuals. He has drafted opinions and technical provisions to effectuate mergers and financings of publicly traded corporations, and has advised U.S. and foreign clients on planning and compliance with the Tax Cuts and Jobs Act. He has also represented businesses and individuals in controversies before the U.S. Tax Court and other state, federal, and foreign courts, and has drafted protests and private letter ruling requests with the Internal Revenue Service.

Michael received his J.D./M.B.A. in 2016 from Emory University, where he served as an articles editor for the *Emory Law Journal* and graduated as a member of the Order of the Coif. In 2010, Michael graduated from Lehigh University with a B.S. in accounting. He is also a certified public accountant (inactive) with experience working for a big four accounting firm, where he conducted audits of multinational banks and other publicly traded financial companies as they navigated the aftermath of the financial crisis of 2008.

Publications & Presentations

Publications

- "Taxable Acquisitions of Foreign Corporations in a Brave New World," *International Tax Journal*, January–February 2019.
- "Good News for Banks Organized as Pass-Through Entities," *Law360*, August 27, 2018.

Education

- Emory University (J.D., M.B.A., 2016)
- Lehigh University (B.S., 2010)

Admitted to Practice

- Georgia

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