

Practice Areas

- Tax
- Tax Controversy & Litigation
- Tax Planning

Education

- Montclair State University, B.A., 2005, graduated Magna Cum Laude
- Georgia State University College of Law, J.D., 2008, graduated Magna Cum Laude

Bar Admissions

- Pennsylvania
- Georgia

Court Admissions

- U.S. Tax Court
- U.S. Court of Federal Claims
- Supreme Court of Georgia

Dustin Covello

Associate
Philadelphia

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Dustin Covello's practice focuses on tax controversy and litigation, as well as transactional tax matters and tax structuring for corporate and partnership entities. In tax controversy and litigation matters, Mr. Covello has represented clients during the audit and appeals process and has served on the trial team in nationally prominent litigation matters. His transaction experience includes advising on the tax issues related to private equity funds, real estate investment trusts, joint ventures, corporate mergers and acquisitions, and equity and debt issuances.

Prior to joining the firm, Mr. Covello worked in the tax and litigation departments of a prominent Southeastern law firm. He has also provided pro bono assistance to low-income taxpayers by representing them in tax controversies and preparing tax returns on their behalf as part of the Volunteer Income Tax Assistance program.

Mr. Covello is also a contributor to Chamberlain Hrdlicka's taxblawg.net.

Significant Cases

- *Frontier Oil Corporation v. Commissioner*, Docket No. 21151-10 (U.S. Tax Court, filed Sept. 23, 2010). Trial counsel for taxpayer in case involving treatment of stock options issued under section 162(m)(4)(C) performance-based compensation rule.
- *Colorcon, Inc. v. United States*, Docket No. 09-594T (Fed. Cl., filed Sep. 9, 2009). Trial team member for taxpayer seeking deduction of interest resulting from a contested short-form merger.
- *WFC Holdings Corp v. United States*, Docket No. 07-CV-3320 (D. Minn., filed July 13, 2007). Trial team member in case involving claim of \$423 million capital loss from the sale of stock in a contingent liability real estate subsidiary.

Seminars and Presentations

- Return Preparation 2012

Dustin Covello, *Continued*

Articles and Publications

- *Transfer Pricing Dispute Resolution, United States*, BNA Transfer Pricing Forum Vol. 2, No. 4, September 2011 (with Jonathan Prokup).
- Co-author, *Federal Tax Law*, 60 Mercer Law Review 1235 (2009) (surveying significant federal tax decisions decided in the 11th Circuit during 2008)
- Co-author, *Federal Tax Law*, 61 Mercer Law Review 1133 (2010) (surveying significant federal tax decisions decided in the 11th Circuit during 2009)

Speaking Engagements

- Panelist, Financial Statements 101, An Accounting Primer for Tax Attorneys, ABA Tax Section 2011 Joint Fall CLE Meeting
- Panelist, Find a Career in Tax, ABA Tax Section 2010 May Meeting

Taxblawg.net Blog Posts

- IRS Reopens Offshore Voluntary Disclosure Initiative (OVDI) For Delinquent FBAR Filers: 27.5 Percent Penalty (Jan. 10, 2012)
- The Tax Story Behind The Big Story: The Taxation Of Carried Interests In 'Buyout Profits Keep Flowing To Romney' (Dec. 20, 2011)
- If MF Global Lost My Money, Do I At Least Get A Tax Deduction? (Dec. 14, 2011)
- Tax Court May Be The Forum Of Choice For Taxpayers Seeking To Challenge Treasury Regulations (June 23, 2011)
- Even After Mayo, Fourth Circuit's Home Concrete Opinion May Have Paved The Way For Invalidating The 6501(e) Regs (Feb. 10, 2011)
- Will IRS Limit Exam's Assertion of the Economic Substance Penalty? TIGTA Report Suggests Not (Dec. 31, 2010)
- Senate Fixes An Onerous Reporting Requirement With An Onerous Reporting Requirement? (Sept. 16, 2010)
- Deconstructing Canal Corp. v. Commissioner - Part III (Sept. 8, 2010)
- Deconstructing Canal Corp. v. Commissioner - Part II (Aug. 27, 2010)
- Deconstructing Canal Corp. v. Commissioner - Part I (Aug. 19, 2010)

Professional Affiliations

- Member, ABA Tax Section
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