Proskauer



Contact

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Stephen Severo is a partner in the Tax Department. Stephen represents corporate, private equity and investment fund clients in connection with all tax-related aspects of their businesses, including fund formation, secondary transactions, taxable and tax-free mergers and acquisitions, tax-free spin-offs, taxable divestitures, domestic and cross-border bank financing arrangements, investments, partnerships and joint ventures, debt restructurings, securities issuances and REIT and other specialized real estate transactions. He provides tax advice and planning for U.S. inbound and outbound investments, including treatment of U.S. shareholders under the PFIC and CFC regimes, foreign tax credit issues, treaty issues and reporting obligations. Additionally, he provides ongoing federal income tax counsel to clients in connection with tax structuring and strategy to minimize tax liability and effective tax rate, improve tax efficiencies, and ensure proper tax treatment and reporting.

Prior to joining Proskauer, Stephen was an associate in the tax department of Cravath, Swaine & Moore LLP.

Practices

Tax, Investment Management, Secondary Transactions and Liquidity Solutions

Industries

Private Capital

Education

Columbia Law School, J.D.

James Kent Scholar

Harlan Fiske Stone Scholar

Columbia Journal of Tax Law, Tax Matters Editor

American Constitution Society Moot Court

Brown University, Sc.B.

Admissions & Qualifications

Massachusetts

New York

Awards & Recognition

Best Lawyers: Ones to Watch in America 2026-2027

The Legal 500 United States: International Tax 2021-2022, 2024-2025

Chambers USA: Tax: Massachusetts, 2026