



## PRACTICES

Tax Controversy and Litigation  
Federal Income Taxation  
Tax

## INDUSTRIES

Technology  
Financial Institutions  
Food, Beverage, and Consumer  
Products

## EDUCATION

University of Denver College of Law,  
J.D., 1992

University of Wyoming, M.A., 1989

University of Wyoming, B.A., 1987

## BAR ADMISSIONS

Wyoming  
Colorado  
California

## COURT ADMISSIONS

U.S. District Court for the Western District  
of Michigan  
U.S. District Court for the Middle District  
of Florida  
U.S. Tax Court  
U.S. Court of Federal Claims  
U.S. Courts of Appeals for the First,  
Third, Fifth, Sixth, Seventh, Eighth, and  
Ninth Circuits  
U.S. Court of Appeals for the District of  
Columbia  
U.S. District Court for the Northern  
District of California  
U.S. District Court for the District of  
Nebraska

# William Colgin

## Partner

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**Bill represents corporate taxpayers in complex, high-stakes federal tax controversies and tax litigation with significant implications for his clients' bottom line.**

Bill litigates in the US Tax Court, federal district courts, state courts, and appellate courts throughout the country. His cases and controversies typically involve high dollar amounts and tend to include international tax, transfer pricing, intellectual property, economic substance, and other high-profile areas of tax dispute.

Bill began his tax litigation career as a trial attorney in the Tax Division of the US Department of Justice and he draws on that experience to represent clients in complex Internal Revenue Service (IRS) examinations and appeals, anonymous IRS disclosure disputes negotiations, and coordinated resolution of multistate state tax issues. Bill continues to defend clients in federal criminal and civil tax investigations by the Tax Division of the US Department of Justice or the US Attorney's Offices around the country.

Prior to joining Holland & Hart, Bill was a partner at Morgan Lewis.

## EXPERIENCE

### Tax Litigation and Controversy

- High profile tax litigations involving deficiency and refund suits
- Examination defense involving complicated and contentious issues
- Extensive IRS Appeals negotiations
- Anonymous IRS disclosure disputes
- Qui Tam suits involving tax-related claims
- False Claim Acts suits, both single-state and multistate
- Coordinated management and resolution of multistate tax issues, including amnesty programs

## PUBLICATIONS

"Court News: Economic Substance Doctrine Nullifies Transaction," *Tax*

*Legal Update*, November 3, 2023

"Tax Court Denies Coca-Cola's Request for Reconsideration in Pivotal Transfer Pricing Case," *Holland & Hart News Update*, December 1, 2021

"IRS Appeals Conferences During the Pandemic," *Tax Executive*, July 9, 2021

## **SPEAKING ENGAGEMENTS**

"In House Ethics Questions: Five Answers You Should Know," *TEI Webinar Series: Ethics CPE for Tax Professionals*, December 20, 2023

"Hot Topics in Tax Enforcement," *Denver Tax Conference 2023*, December 14, 2023

"Ethics Panel," *University of Denver, Graduate Tax Program*, October 26, 2023

"Tax Controversy Fundamentals," *University of Wyoming Low Income Tax Clinic*, October 2, 2023

"Important Tax Court Opinions and IRS Arguments in Current Matters," *AICPA Cannabis Conference*, August 16, 2023

"The Unwelcome Rise of Economic Substance in Transfer Pricing: What It Means and What to Do About It," *TEI 73rd Midyear Conference*, March 21, 2023

"Tax Controversy Update," *University of Wyoming Low Income Tax Clinic*, February 13, 2023

"Major Strategic Decisions: The Liberty Global Case Study," *Holland & Hart 15 Minutes of Tax Series*, January 26, 2023

"Update on IRS Appeals," *TEI Annual Conference*, October 25, 2022

"Documentation Best Practices: What, How, Where, for How Long?," *TEI Audits & Appeals Seminar*, September 20, 2022

"What Is the IRS Up To? Updates From the Front Line of Tax Controversies and Litigations," *2022 Holland & Hart Wyoming Tax Conference*, May 19, 2022

"The Next Generation of Cannabis Tax Issues: Lessons from the Front Lines," *Cannalaw Summit*, May 3, 2022

"How to Hash it Out with the IRS," *Cannabis Higher Learning: Your Legal Roadmap*, April 19, 2022

"Alarming Trends in Penalty Assertions: When Did Penalties Become Their Own Substantive Issue?," *TEI 72nd Midyear Conference*, March 22, 2022

"Tax Controversy Update," *2021 Holland & Hart Tax Conference*,

December 7, 2021

"Tax Court Cases to Watch in 2022," *Holland & Hart 15 Minutes of Tax Series*, December 2, 2021

"Hot Topics in Federal Controversy: Part I," *Holland & Hart 2021 Utah Tax Conference*, November 18, 2021

"Federal Tax Controversy Update," *TEI Denver Chapter Federal Tax Day*, November 3, 2021

"Tax Controversy Essentials for Your In-House Team," *TEI Denver Chapter Federal Tax Day*, November 3, 2021

"What keeps you up at night? Practical ethics for in-house tax professionals," *TEI's 76th Annual Conference*, October 26, 2021

"Hot Topics in Federal Tax Litigation," *TEI Webinar: Current Tax Developments & Legislation*, September 29, 2021

"Post-Pandemic Readiness to Succeed Before the IRS," *Holland & Hart 2021 Wyoming Tax Conference*, May 26, 2021

"Mylan v. Commissioner," *Holland & Hart 15 Minutes of Tax Series*, May 13, 2021

"Advocacy and Communication on Virtual Platforms," *Holland & Hart 2020 Tax Conference*, December 16, 2020

"What Keeps You Up at Night? Practical Ethics for In-House Tax Professionals," *Tax Executives Institute, Denver Chapter*, December 9, 2020

"Coca Cola IRS Case," *Holland & Hart 15 Minutes of Tax Series*, November 19, 2020

"Whirlpool Decision: Controlled Foreign Corporations," *Holland & Hart 15 Minutes of Tax Series*, May 21, 2020

"Whirlpool Decision," *Holland & Hart 15 Minutes of Tax Series*, May 7, 2020

"Tax Opinion Letters – New Shapes, Sizes and Uses: A Critical Look," *Tax Executives Institute 2019 Audits & Appeals Seminar*, May 21, 2019

## RECOGNITION

- *The Best Lawyers in America*®, Tax Law, 2023
- *Chambers USA*, Tax, Colorado, 2020-2023
- *Chambers USA*, Litigation: General Commercial, Wyoming, 2019-2023
- *Chambers USA*, Litigation: General Commercial, Colorado, 2019-2020

- *Chambers USA*, Tax, California, 2008-2018
- *Chambers USA*, Tax: Controversy, Nationwide, 2008-2018
- *The Legal 500 US*, Tax – US Taxes – Contentious, 2011–2015, 2017

#### **PROFESSIONAL AND CIVIC AFFILIATIONS**

- California Bar, Executive Committee, Taxation Section, Past Vice Chair
- Tax Court Pro Se/Pro Bono Program, San Francisco, California, Past Director
- American Bar Association, Tax Section, Technology Subcommittee, Past Chair
- American Bar Association, Tax Section, Court Practice and Procedure Committee, Past Member
- Advisory Board for the University of San Diego School of Law Procopio International Tax Institute, Past Member