

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

645 South Cache Street, Suite 100, P.O. Box 68, Jackson, WY 83001

P 307.734.4510

wfcolgin@hollandhart.com

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

"Four Things Every Tax Adviser Should Know About Loper Bright," *Tax Notes*, January 7, 2025

"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

SPEAKING ENGAGEMENTS

"Uses of AI in Tax and Other Hot Topics," *Tax Hot Topics: TEI TopGolf 2026*, June 24, 2026

"Tax Hot Topics: TEI TopGolf 2026," June 24, 2026

"Who Really Won the Facebook Transfer Pricing Case?," *TEI Top Golf Event 2025*, June 25, 2025

"Professionalism in the Legal Field," *University of Wyoming College of Law*, Laramie, Wyoming, January 27, 2025

"Ethical Rules and Privilege Management for In-House Tax Professionals," *TEI Webinar Series: Ethics CPE for Tax Professionals*, December 11, 2024

"Navigating IRS Appeals: Managing Internal Expectations, Pacifying Exam and Counsel, & Negotiating the Best Result," Panelist, *TEI's 79th Annual Conference*, October 29, 2024

"Appeals Update - Challenges and Best Practices in the Current Environment," *TEI's 2024 Audits & Appeals Seminar*, September 11, 2024

"Hot Topics in Tax Controversy," *TEI Denver Chapter Tax Seminar*, June 26, 2024

"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

RECOGNITION

- *The Best Lawyers in America*®, Tax Law, 2023, 2025-2027
- *Chambers USA*, Tax, Colorado, 2020-2026
- *Chambers USA*, Litigation: General Commercial, Wyoming, 2019-2023, 2025-2026
- *Chambers USA*, Litigation: General Commercial, Colorado, 2019-2020, 2024
- *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