

John R. Wilson

Graduate Tax Program
University of Denver Sturm College of Law
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EMPLOYMENT

Professor of the Practice of Taxation and Director, Graduate Tax Program, University of Denver Sturm College of Law (2014-date)

Courses: Individual Tax Planning, Property Transactions, Tax Accounting, Partnership Taxation, Consolidated Returns, International Taxation, International Taxation -- Inbound

Adjunct Professor, Graduate Tax Program, University of Denver (1994-2014)

Courses: International Taxation, Advanced International Taxation

Partner, Holland & Hart LLP (2000-date)

Provide strategic advice to clients on complex corporate and individual tax matters, mergers and acquisitions, international business transactions, and IRS audits and appeals.

Partner, Steiner, Darling, Hutchinson & Wilson LLP (1997-2000)

Associate and Partner, Davis, Graham & Stubbs LLP (1986-1997)

EDUCATION

Stanford Law School, Stanford, California

Juris Doctor, with distinction (1986)

Order of the Coif; Urban A. Sontheimer Award (second in graduating class).

Stanford University, Stanford California

Bachelor of Science, Industrial Engineering (1983)

Phi Beta Kappa; Tau Beta Pi; Terman Scholar; Henry Ford II Scholar (first in graduating class).

BAR AND COURT ADMISSIONS

Colorado

U.S. Tax Court

U.S. Courts of Appeal for the District of Columbia and Tenth Circuit

PROFESSIONAL RECOGNITION

The Best Lawyers in America© Tax Law, 1995-2022; Trusts and Estates, 2018-2022

American College of Tax Counsel, Fellow

5280 Magazine Top Lawyers, Tax: Corporate and Tax: Personal, 2015-2021

Colorado Super Lawyers®, Tax, 2006-2014

Chambers USA: Leading Lawyers for Business, Tax, 2020

James E. Bye Lifetime Achievement Award, CBA Tax Section, 2018

PROFESSIONAL AND CIVIC AFFILIATIONS

American Bar Association, Member
Tax Section Member

Colorado Bar Association, Member
Tax Section, Past Chair
International Law Committee, Past Chair

Denver Bar Association, Member

International Fiscal Association, Member
Past Regional Vice President, Rocky Mountain Chapter

Denver Tax Association, Member
Past President

Greater Denver Tax Counsel Association, Member

PUBLICATIONS

“Dual Consolidated Loss Regulations Have Broad Reach,” 1 *Journal of International Taxation* 78 (1990).

Co-author, Taxation Chapter, *American Bar Association International Lawyer’s Deskbook* (2d edition 2002).

Co-author, Taxation Chapter, *European Community Law After 1992: A Practical Guide for Lawyers Outside the Common Market* (Kluwer 1993).

RECENT SPEAKING ENGAGEMENTS

“U.S. International Tax Update”
CPE4U Colorado Annual Tax Update Conference, December 14, 2020

“U.S. International Taxation – Outbound”
CPE4U Colorado Tax Conference, December 2, 2020

“U.S. International Taxation – Inbound”
CPE4U Colorado Tax Conference, November 30, 2020

“U.S. International Tax Update”
CPE4U Colorado Annual Tax Update Conference, December 16, 2019

Holland & Hart 2019 Tax Conference
Denver, CO, December 5, 2019

“U.S. International Taxation – Outbound”
CPE4U Colorado Tax Conference, December 3, 2019

“U.S. International Taxation – Inbound”
CPE4U Colorado Tax Conference, December 2, 2019

“Deference to Administrative Authorities after *Kisor v. Wilkie*”
Tax Executives Institute—Denver Chapter, November 6, 2019

“The New FDII Rules: Incentives for Staying in the US”
Colorado Bar Association Tax Section, October 16, 2019

“2019 U.S. International Tax Update”
Denver Tax Association, September 18, 2019

“International Tax Potpourri”
Denver Tax Institute, 69th Annual Tax Institute, July 23, 2019

“U.S. International Tax Update”
CPE4U Colorado Annual Tax Update Conference, December 17, 2018

Holland & Hart 2018 Tax Conference
Denver, CO, December 5, 2018

“U.S. International Taxation – Outbound”
CPE4U Colorado Tax Conference, November 27, 2018

“U.S. International Taxation – Inbound”
CPE4U Colorado Tax Conference, November 26, 2018

“GILTI Thoughts and More: The International Provisions of the 2017 Tax Act”
Colorado Bar Association Tax Section, October 10, 2018

“International Tax Potpourri”
Denver Tax Institute, 68th Annual Tax Institute, July 24, 2018

“Tax Cuts and Jobs Act—International Provisions”
University of Denver Graduate Tax Program, July 17, 2018

“U.S. International Tax Update”
CPE4U Colorado Annual Tax Update Conference, December 18, 2017
Holland & Hart 2017 Tax Conference
Denver, CO, December 13, 2017

“U.S. International Taxation – Outbound”
CPE4U Colorado Tax Conference, November 28, 2017

“U.S. International Taxation – Inbound”
CPE4U Colorado Tax Conference, November 27, 2017

“U.S. International Taxation – Outbound”
CPE4U Colorado Tax Conference, October 5, 2017

“U.S. International Taxation – Inbound”
CPE4U Colorado Tax Conference, September 28, 2017

“2017 U.S. International Tax Update”
Denver Tax Association, September 20, 2017

“International Tax Potpourri”
Denver Tax Institute, 67th Annual Tax Institute, July 25, 2017

“U.S. International Taxation – Outbound”
CPE4U Colorado Tax Conference, December 2, 2016

“U.S. International Taxation – Inbound”
CPE4U Colorado Tax Conference, November 28, 2016

“2016 U.S. International Tax Update”
Denver Tax Association, September 21, 2016

“International Tax Potpourri”
Denver Tax Institute, 66th Annual Tax Institute, July 22, 2016

“U.S. International Taxation – Inbound”
CPE4U Colorado Tax Conference, July 14, 2016

“U.S. International Taxation – Outbound”
CPE4U Colorado Tax Conference, July 7, 2016

Holland & Hart 2015 Tax Conference
Denver, CO, December 9, 2015

“U.S. International Taxation – Outbound”
CPE4U Colorado Tax Conference, December 4, 2015

“U.S. International Taxation – Inbound”
CPE4U Colorado Tax Conference, November 28, 2015

“U.S. International Taxation – Outbound”
CPE4U Colorado Tax Conference, October 22, 2015

“U.S. International Taxation – Inbound”
CPE4U Colorado Tax Conference, October 1, 2015

“2015 U.S. International Tax Update”
Denver Tax Association, September 16, 2015

“Attacks on the PE Standard”
Denver Tax Institute, 65th Annual Tax Institute, July 31, 2015

“U.S. International Taxation – Inbound”
CPE4U Colorado Tax Conference, June 26, 2015

“U.S. International Taxation – Outbound”
CPE4U Colorado Tax Conference, June 9, 2015

“U.S. International Tax Update”
CPE4U Colorado Annual Tax Update Conference, December 15, 2014

Holland & Hart 2014 Tax Conference
Denver, CO, December 4, 2014

“2014 U.S. International Tax Update”
Denver Tax Association, September 17, 2014

“Inversions Update”
Denver Tax Institute, 64th Annual Tax Institute, August 1, 2014

“International Tax Planning in the News”
Greater Denver Tax Counsel Association, May 28, 2014

“U.S. International Tax Update”
CPE4U Colorado Annual Tax Update Conference, December 17, 2013

“Section 362(e) Limitations on Loss Duplication and Importation”
Holland & Hart 2013 Annual Tax Conference, December 5, 2013

“Hybrid Mismatch Arrangements”
Denver Tax Institute, 63rd Annual Tax Institute, July 26, 2013

“FATCA – the Final Regulations and Beyond”
Greater Denver Tax Counsel Association, March 27, 2013

Holland & Hart 2012 Tax Conference
Denver, CO, December 4, 2012

“U.S. International Tax Update”
D.U. Annual Tax Update Conference, December 13, 2012

“Topics in the Tax Treatment of International Treasury Operations”
D.U. Tax Institute, 62nd Annual Tax Institute, July 20, 2012

“U.S. Tax Treatment of Contract Manufacturing”
World Trade Center Denver-China Business Services, July 17, 2012

“The Impact of FATCA on Your Business”
International Fiscal Association, Rocky Mountain Chapter, April 5, 2012

“The New FATCA Withholding and Compliance Rules:
An Inbound Solution to an Outbound Problem”
Colorado Bar Association Tax Section, February 8, 2012

RECENT MEDIA APPEARANCES

Interview regarding 2017 Tax Legislation, KOA 850 Morning News, November 2, 2017