

Philip Wolf

Senior Associate

pwolf@fbm.com

San Francisco: 415.954.4468

Philip Wolf represents public and private companies, boards, executives, founders, investors, and high-net-worth individuals in sophisticated tax planning and transactional matters, as well as tax controversies and government investigations.

On the planning side, Philip advises clients on a broad range of federal, state, and local tax matters, including helping structure transactions and investments to achieve clients' business objectives while managing tax and regulatory risk. Philip's experience includes corporate and partnership tax planning, tax credit transactions, executive compensation, real estate, and fund structuring. He also advises individuals and companies on complex multistate tax matters, including income and franchise taxes, sales and use taxes, apportionment, nexus, residency and domicile planning, and California property tax issues such as change-in-ownership determinations, legal entity transfers, reassessments, exclusions, and valuation matters. Philip has significant experience advising on New Markets Tax Credits, Federal Historic Tax Credits, Qualified Opportunity Zones, Qualified Small Business Stock, 1031 Exchanges, corporate reorganizations (including F reorganizations), and charitable planning. He regularly advises companies in sectors including digital assets, Web3, renewable energy, artificial intelligence, and other emerging technologies.

Philip also represents businesses, executives, investors, property owners, and individuals in civil tax disputes. He handles audits, administrative appeals, refund claims, voluntary disclosures, collection matters, valuation disputes, assessment appeals, and litigation in state and federal courts. He regularly appears before the Internal Revenue Service, the California Franchise Tax Board, the California Department of Tax and Fee Administration, the Employment Development Department, county assessors and assessment appeals boards throughout California, and local taxing authorities, including the Cities of Oakland, Los Angeles, and San Francisco.

Finally, Philip represents corporations, executives, boards, and individuals in connection with internal investigations, government inquiries, and sensitive regulatory matters involving potential fraud, misconduct, and noncompliance. He has particular experience with enforcement matters involving allegations of tax fraud, accounting fraud, securities fraud, money laundering, market manipulation, Foreign Corrupt Practices Act violations, Paycheck Protection Program and Economic Injury Disaster Loan fraud, and other complex regulatory issues. Philip also advises clients on emerging enforcement risks involving digital assets, cryptocurrency, decentralized finance, and artificial intelligence (particularly AI washing). He has experience with cross-border enforcement matters involving Latin America, the Middle East, and countries formerly part of the Soviet Union, and has represented clients in matters involving the U.S. Department of Justice, the Internal Revenue Service Criminal Investigation, the Enforcement Division of the Securities and Exchange Commission, the Federal Bureau of Investigation, the Small Business Administration Office of Inspector General, the California Franchise Tax Board Criminal Investigation Bureau, various state attorneys general, and other federal and state enforcement authorities and regulators. Through his work, Philip has developed strong credibility with enforcement agencies and regulatory bodies.

Philip is a columnist at *Tax Notes*, covering topics ranging from property tax reform to tax policy in emerging technologies and criminal investigations. He is fluent in Spanish, Russian, Portuguese, Catalan, and Italian, and he is conversational in French and Hebrew.

Services

- Tax
- Private Client
- White Collar Criminal Defense and Internal Corporate Investigations

Education

- New York University School of Law (LL.M.)
 - . Taxation
- University of California College of the Law, San Francisco (formerly UC Hastings) (J.D.)
- University of California, Berkeley (B.A.)
 - . Dean's Honors, Phi Beta Kappa

Bar Admissions

- California

Court Admissions

- U.S. Tax Court
- U.S. District Court (N.D. Cal.)
- 9th U.S. Circuit Court of Appeals

Outside the Office

Philip enjoys nature, puzzles, foreign languages, traveling with his family, and writing simply for the pleasure of it. He loves exploring the ever-growing Bay Area food scene with his wife and believes that, day or night, there is never a bad time for a great taco, especially a quesabirria or carne asada. When he's not out exploring, he can usually be found at home in Alameda, relaxing in his favorite La-Z-Boy chair with his cat Jessie nearby or, when she decides he's worthy, curled up on his lap.