



## Jon Holbrook

Partner

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### PRACTICE AREAS

#### Tax

- Arbitration & Litigation Support
- International Tax
- Tax Controversies
  - IRS Audit Defense
  - IRS Appeals Proceedings
- Tax Litigation
- Tax Planning & Advisory Services

#### Benefits & Compensation

- Executive Compensation
- Payroll Tax & Fringe Benefits

### EDUCATION

Harvard Law School, 2016, J.D.,  
*magna cum laude*

Yale University, 2012, B.A., *summa cum laude*, Phi Beta Kappa

### BAR AND COURT ADMISSIONS

District of Columbia  
Maryland

A former competitive fencer, Jon develops cutting-edge solutions for his clients.

Clients engage Jon throughout the income tax lifecycle for assistance in planning transactions, developing reporting positions, assessing refund opportunities, and defending positions in tax controversy scenarios.

His clients include accounting firms, law firms, entrepreneurs and Fortune 500 companies. He advises on U.S. and international business operations in a wide range of industries, including financial services, manufacturing, crop sciences, pharmaceuticals, cryptocurrency, software and real estate.

Clients have sought Jon's advice on issues including: the corporate alternative minimum tax (CAMT), controlled foreign corporations (CFCs), global intangible low-taxed income (GILTI), subpart F income, section 245A, the base erosion and anti-abuse tax (BEAT), the foreign-derived intangible income (FDII) deduction, section 1031 like-kind exchanges, section 168(k), FIRPTA, the section 199A (QBI) deduction, worker classification, the employee retention credit, and claim-of-right relief. He also has significant experience with administrative law in the income tax context.

Jon regularly presents on income tax issues and has spoken before groups including the American Bar Association, the DC Bar Association, Tax Executives Institute and the International Fiscal Association. Before joining the firm, Jon graduated *magna cum laude* from Harvard Law School, where he was a winner of the Williston



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Negotiation Competition and co-founded HLS Effective Altruism. He also served on the General Board of the Harvard Civil Rights-Civil Liberties Law Review and was active in the school's Federal Tax Clinic.

#### **HONORS & AWARDS**

*Best Lawyers in America: Ones to Watch* 2022 - present

*Super Lawyers Rising Star* 2019 - present

#### **SPEECHES & PRESENTATIONS**

"AMT: Overview and Developments," TEI Carolinas Chapter: Corporate, April 20, 2023

"Tax Strategies for Artists & Creatives", March 21, 2023

"Uncertainty around Uncertain Tax Positions," ABA Tax Section Midyear Conference, February 10, 2023.

"Taxation of S Corporations," ABA Real Property, Trust and Estate Law Section, February 9, 2023.

"Tax Strategies for Creative Entrepreneurs," Washington Area Lawyers for the Arts (WALA), October 19, 2022.

"Tax Strategies for Creative Entrepreneurs," Washington Area Lawyers for the Arts (WALA), April 8, 2022.

"Tax Strategies for Creative Entrepreneurs," Washington Area Lawyers for the Arts (WALA), October 19, 2021.

"Lawyer to Lawyer," DC Bar Taxation Panel, May 27, 2021. Co-presenter with Joel Swearingen of Nixon Peabody LLP.

"Tax Strategies for Creative Entrepreneurs," Washington Area Lawyers for the Arts (WALA), February 22, 2021.

"Tax Strategies for Media Professionals," Women in Film & Video of Washington D.C. February 4, 2021

"Corporate Tax Changes to Expect from a Biden Administration," CPA Academy, October 26, 2020.

"Tax Strategies for Artistic Entrepreneurs," Washington Area Lawyers for the Arts (WALA), October 14, 2020

"COVID-19 Tax Issues for Entrepreneurs," Washington Area Lawyers for the Arts (WALA), May 15, 2020

"Tax Strategies for Creative Entrepreneurs," Washington Area Lawyers for the Arts (WALA), October 23, 2019



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"Tax Strategies for Creative Entrepreneurs," Washington Area Lawyers for the Arts (WALA), April 11, 2019

"Tax Strategies for Creative Entrepreneurs," Washington Area Lawyers for the Arts (WALA), March 28, 2019

"Hybridity: Landmines in Your Org Chart?" TEI Baltimore Washington Chapter Conference, May 16, 2019

"Hybrids, BEPS and the TDCIA ." International Fiscal Association, USA Branch, Westchester County, NY/Connecticut Region, May 9, 2019

"Recent U.S. Tax Reform," University of Florida Law Course on , July 26, 2018.

"Tax Strategies for Creative Entrepreneurs," Washington Area Lawyers for the Arts (WALA), March 27, 2018.

"Tax Strategies for Creative Entrepreneurs," Washington Area Lawyers for the Arts (WALA), February 5, 2018.

#### **NEWS**

- March 5, 2026  
IPB Recognized in Best Law Firms 2026
- May 30, 2025  
Thirteen IPB Attorneys Included in Super Lawyers 2025
- November 7, 2024  
IPB Recognized in Best Law Firms 2025
- August 15, 2024  
Twenty-Two IPB Attorneys Recognized in Best Lawyers in America and Ones to Watch 2025 Editions