



## Rachel Austin Supiro

Associate

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**Rachel advises clients on a broad range of corporate, partnership, and individual income tax matters in the context of tax litigations, controversies, and transactions.**

She has particular experience in the areas of mergers and acquisitions, joint ventures, and private equity funds, has assisted public charities with formation and operation and has supported small business owners on general business matters and SBA relief. Rachel uses her broad experience to provide clients with thoughtful and pragmatic advice.

Prior to joining Holland & Hart, Rachel was an associate at Cleary Gottlieb Steen & Hamilton LLP in New York and served as a law clerk for the Honorable Lewis A. Kaplan of the U.S. District Court for the Southern District of New York.

### PRACTICES

Tax Controversy and Litigation  
Federal Income Taxation  
Tax

### EDUCATION

Columbia Law School, J.D., 2016  
James Kent Scholar

New York University, B.A., 2011  
*cum laude*  
Dean's List

### BAR ADMISSIONS

Colorado  
New York

### PUBLICATIONS

"Top 10 Things to Know: Proposed Regs for Renewable Energy Direct Pay & Direct Transfer," *Holland & Hart Client Alert*, June 19, 2023

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

"Carbon Capture Tax Credit Ruling Issued," *Holland & Hart News Update*, 07/21/2021

### SPEAKING ENGAGEMENTS

"IRS Focus on Cryptocurrency: Navigating Tax Compliance," *Denver Tax Conference 2023*, December 14, 2023

"Tax Treatment of Transaction Expenses," *Holland & Hart 15 Minutes of Tax Series*, August 24, 2023

"BBA Audits," *Holland & Hart 15 Minutes of Tax Series*, May 25, 2023

"Business Development for Associates," *Holland & Hart 15 Minutes of Tax Series*, March 30, 2023

"Ex Parte Violations at IRS Appeals," *Holland & Hart 15 Minutes of Tax Series*, 05/12/2022

"IRS Streamlined Procedures," *Holland & Hart 15 Minutes of Tax Series*, 03/03/2022

"Case Update: Whirlpool," *Holland & Hart 15 Minutes of Tax Series*, 01/27/2022

"Tax Controversy Update," *2021 Holland & Hart Tax Conference*, December 7, 2021

"Current Issues in Tax Accounting," *TEI Denver Chapter Federal Tax Day*, November 3, 2021

"Legislative Update," *TEI Denver Chapter Federal Tax Day*, 11/03/2021

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

"Proposed Tax Reforms Under the Biden Administration," *TEI Webinar: Current Tax Developments & Legislation*, 09/29/2021

"What You Need to Know About the Updated Power of Attorney Process," *Holland & Hart 15 Minutes of Tax Series*, 09/23/2021

"Researching Tax Issues," *Holland & Hart 15 Minutes of Tax Series*, 06/17/2021

## **RECOGNITION**

- *Chambers USA*, Tax, Associate to Watch, 2020-2023
- *Best Lawyers: Ones to Watch® in America*, Tax Law, 2023, 2024

## **PROFESSIONAL AND CIVIC AFFILIATIONS**

- American Bar Association, Member
- Colorado Bar Association, Member