

## Phillip Colasanto

SENIOR ASSOCIATE | NEW YORK

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SECRETARY KAREN PAPA



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### Phillip is a senior associate in the private client and tax team.

His practice is focused on domestic and international tax controversy and compliance matters. He has represented clients before the U.S. Tax Court, U.S. district court, U.S. Court of Appeals, and various state courts. He has represented clients from audit through trial and at the appellate level.

His experience includes examinations, collection matters, Appeals hearings (including collection due process hearings), innocent spouse relief, whistleblower claims, advising clients on international and domestic filing requirements, advising clients on compliance options, and oral argument before the Tax Court and Court of Appeals.

Phillip received the New York County Lawyers' Association Pro Bono Award in 2022. He was also recognized as a John S. Nolan Fellow by the American Bar Association in 2019-2020. He has spoken on various tax topics and at various forums, including the American Bar Association, New York County Lawyers' Association, IRS Nationwide Virtual Tax Forum, CPA Academy, and NYU Tax Controversy Forum. He has also published several tax-related articles, which have been published by Tax Notes, Bloomberg BNA, Journal of Tax Practice and Procedure, EA Journal, and The Practical Lawyer. In addition to his publications and speaking engagements, he is heavily involved with the American Bar Association, where he is the Chair of the Tax Collections Bankruptcy and Workouts Committee.

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## Talks

'International Penalties and the Current State of Tax Controversy,' Withers Event - Framing the Future: The Path to Legacy Preservation - September 26, 2025, speaker

'*Managing Statutes of Limitations*,' NYU's 17th Annual Tax Controversy Forum - June 26, 2025, speaker

'*What to Do With All the Data? Substantiating Tax Positions and Privacy Concerns in the Face of Tidal Waves of Information*,' American Bar Association 25th Annual U.S. and Europe Tax Practice Trends - April 11, 2025, speaker

'*Working with LITCs - Handling Pro Bono Cases*,' California Lawyers Association 2024 Tax Bar and Tax Policy Conference - November 8, 2024, speaker

'Corporate Transparency Act | New York LLC Transparency Act,' NYU's 16th Annual Tax Controversy Forum - June 28, 2024, speaker

'*International Trust and Estate Planning 2024 - Controversy Cascade: The Latest on International Tax Reporting and Compliance*,' ALI CLE International Trust and Estate Planning 2024 - June 6, 2024, speaker

'Fundamentals of Tax Noncompliance and Controversy,' TRTCLE Webinar - February 15, 2024, speaker

'Collections are Collections, No?,' ABA May Tax Meeting - May 2023, speaker

'The Prisoner's Tax Dilemma,' ABA May Tax Meeting - May 2023, speaker

'Conservation Easements: How a green incentive has the IRS seeing red,' 39th National Institute on Criminal Tax Fraud and 12th Annual National Institute on Tax Controversy - December 2022, speaker

'Representing Taxpayers that Disagree with Information Reports,' IRS Nationwide Virtual Tax Forum 2022 - July 2022, speaker

'Coming in From the Cold: The Future of Voluntary Disclosures,' NYU 14th Annual Tax Controversy Forum - June 2022, speaker

'Foreign Financial Reporting and Enforcement Subcommittee Report,' ABA Midyear Meeting - May 2022, speaker

'Tax Collection and Federal Litigation Updates,' ABA May Tax Meeting - May 2022, speaker

'How to Try a Civil Tax Fraud Case,' 38th National Institute on Criminal Tax Fraud and 11th Annual National Institute on Tax Controversy - December 2021, speaker

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## External Publications

'*Keeping Up With Seismic Shifts at IRS as Shutdown Continues*,' Thomson Reuters - October 23, 2025, quoted

'*Proposed Amendments to Real Property Tax Act Withholding Exemption*,' Tax Notes International - July 7, 2025, co-author

'*Extend Collection Due Process Deadlines - Here's How*,' Tax Notes Federal - June 24, 2024, co-author

'*Procedural Due Process and International Information Reporting*,' Tax Notes, Vol. 170, No. 2 - January 2021, co-author

'*An Introduction to the Supervisorial Approval of Penalties Under Internal Revenue Code Section 6751(b)*,' EA Journal - Jan./Feb. 2021, co-author

'*The Summons Interview: Potted Plant or Rambo Approach?*,' Tax Notes, Vol. 163, No. 7 - May 2019, co-author

'*The IRS's Illegal Assessment of International Penalties*,' Tax Notes, Vol. 163, No. 2 - April 2019, co-author

'*Examination of Large Foreign Gifts and Inheritances: Code Sec. 6039F, Notice 97-34, and Form 3520*,' 20 J. TAX PRAC. & PROC. 3 - June-July 2018, co-author

'*How Natural Disasters Affect Tax Returns*,' The Practical Lawyer, Vol. 63, No. 6, p. 19 - Dec. 2017, co-author

'*How Hurricanes and Natural Disasters Affect Tax Return Preparation and Examination*,' Bloomberg BNA Tax Management Real Estate Journal, v. 33, 10, p. 247 - Oct. 2017, co-author

'*The "Hobby Loss" Examination Audits of Activities Not Engaged in for Profit*,' 19 J. TAX PRAC. & PROC. 3 - June-July 2017, co-author

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# Experience

Private client

Tax

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## Admissions

New York, 2011

New Jersey, 2010

United States Tax Court

U.S. District Court:

District of New Jersey

Eastern District of New York

Southern District of New York

U.S. Court of Appeals:

Second Circuit

Third Circuit

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## Education

New York Law School, LL.M

New York Law School, JD

Wagner College, BA

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## Languages

English

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## Memberships

American Bar Association

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## Withers History

Joined 2023