



Allison O. Woodbury

SHAREHOLDER

Minneapolis

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Services

Business & Tax Planning

Private Equity

Mergers & Acquisitions

Renewable Energy

Allison's experience, from her tenure at the IRS Office of Chief Counsel to her years in transactional tax planning, is invaluable to clients seeking advice on federal and state tax law.

Using that foundation, Allison tailors tax planning based on industry and client objectives. As tax counsel, Allison guides clients, primarily corporations and partnerships, through the entire business life cycle. She advises on entity formation and corporate structure, mergers, acquisitions, dispositions, exchanges, restructurings, reorganizations, financings and liquidations. Allison works with companies from formation through liquidation. In addition to providing strategic tax advice on transactions, she takes a business-minded approach to her counsel and guidance on day-to-day operations. Allison thrives on finding the most tax-efficient path to achieving the business objective.

Allison counsels companies in the renewable energy industry on transactions, project development and financing, and tax credits, including renewable electricity production tax credits (PTC) and energy investment tax credits (ITC). In this sphere she works primarily with wind, solar, open-loop biomass, closed-loop biomass, and geothermal renewable energy facilities.

In addition to her counseling work, Allison has represented companies in federal and state tax controversies and litigation and handled all aspects of audits and administrative appeals.

Allison began her legal career at the IRS Office of Chief Counsel, Large and Mid-Size Business Division (now Large Business and International). At the Chief Counsel's office, she provided tax law advice to revenue agents in audits and litigated tax court cases.

Credentials

Education

- University of Minnesota Law School, J.D., 2004, *cum laude*
- Jamestown College, B.A., 2000, *summa cum laude*

Admissions

- Minnesota, 2004
- U.S. Tax Court, 2004

Recognition

- *The Best Lawyers in America*, Tax Law, 2015-present
- Minnesota Rising Stars, *Super Lawyers*, 2015-2017
- North Star Lawyer, Minnesota State Bar Association 2012-2021

Civic & Professional

Professional Activities

- American Bar Association, Tax Section and Energy Section
- Minnesota State Bar Association, Tax Law Section: Chairperson, 2011 – 2012; Vice-chair, 2010 – 2011; Treasurer, 2009 – 2010; Secretary, 2008 – 2009
- Minnesota State Bar Association, Business Law Section
- Minnesota Women Lawyers
- Hennepin County Bar Association, Tax Law Section
- NAPABA-MN Foundation, Board of Directors

News

Firm News | 01.27.2023

Fredrikson Represented Astara Capital Partners in its Investment in Wyandot Snacks

Firm News | 06.16.2022

Fredrikson & Byron Attorneys Recognized as North Star Lawyers

Firm News | 02.07.2022

Business and Tax Planning Attorney Allison Woodbury Joins Fredrikson & Byron

Speaking Engagements

Event | 05.25.2022

Let's Talk About Tax--An Annual Sampler

Publications & Presentations

“IRS Reverses on Deductibility of Expenses Paid with PPP Loans,” January 2021