HansonBridgett



Wilson Feng

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Areas of Focus

- Tax

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Wilson advises and represents clients on tax controversy matters, and manages federal audits, protests, and appeals. He also represents clients in state and local tax matters (SALT), with an emphasis on California tax controversies such as tax audits, administrative hearings, settlements with the California Franchise Tax Board, and appeals with the California Office of Tax Appeals. He also advises clients on tax compliance issues and provides opinions on income tax-related matters.

Wilson advises and provides tax planning on California residency issues. He also represents clients in California residency audits and appeals.

Before joining Hanson Bridgett, Wilson worked at a nationally recognized boutique tax law firm where he represented clients in tax controversy matters as well as provided tax opinions on California state residency, structured fees, and taxation of litigation and settlement awards. Wilson also previously worked at a Big 4 accounting firm in its indirect tax controversy division and was a member of a tax consulting team that routinely guided technology companies, marketplaces, and marketplace facilitators through sales and use tax issues following the U.S. Supreme Court's *South Dakota v. Wayfair, Inc.* decision.

While studying at King Hall (UC Davis School of Law), he interned at the California Franchise Tax Board and Board of Equalization.

Publications

“No Joke. California Office of Tax Appeals Rules Against Comedian in Residency Dispute,” author, Tax Legal Alert (November 2025)

“Appeal of S. Ferreira: A Cautionary Tale on Changing Your California Residency and Domicile,” author, Tax Legal Alert (January 2025)

“California Residency Factors – An Exhaustive List? Maybe Not.,” Tax Legal Alert (December 2023)

“An Overview of California Tax Residency,” Tax Insights & Analysis (May 2023)

Honors & Awards

California Lawyers Association, Wiley W. Manuel Pro Bono Legal Services Award (2023)

Education

LL.M., Tax, New York University School of Law (2018)

J.D., University of California, Davis School of Law (2017)

B.A., University of California, Irvine (2011)

Admissions and Courts

California