



Senior Counsel | Providence, RI

Kristen R. Alberione

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Overview

Kristen is Senior Counsel and Chair of the firm's Tax Group. Her practice areas include federal and state tax resolution, corporate tax, partnership tax and tax exempt entities. She advises both businesses and individuals in navigating complex IRS and state tax matters, including audits, appeals, and collection issues.

Kristen brings over 20 years of experience, having held senior roles in the private sector where she led initiatives in audit oversight, tax compliance, transfer pricing, and financial modeling. Her background includes extensive work with multinational corporations, providing strategic guidance on cross-border tax planning, APA negotiations, mergers and acquisitions, and international project management.

Prior to joining Adler Pollock & Sheehan, Kristen served as Senior Tax Counsel at a boutique tax law firm in Providence, where she focused on federal and state tax audits, litigation before the IRS and U.S. Tax Court, and representation before state tax authorities.

Experience

- Achieved favorable outcomes in federal and state tax disputes, delivering substantial tax savings for clients through strategic advocacy in audits, collections, and penalty abatement proceedings.
- Obtained a reduction of over \$2.5 million in federal tax liability through a negotiated settlement with IRS Appeals in U.S. Tax Court litigation.
- Navigated partnerships through the complex federal audit and modification processes governed by the centralized partnership audit regime of the Bipartisan Budget Act of 2015 (BBA).
- Successfully litigated against the Rhode Island Division of Taxation in the Rhode Island District Court, challenging the agency's interpretation of the state's personal income refund statute.
- Selected to serve as a nominee witness for a Fortune 500 company before Canadian Crown Counsel, delivering crucial testimony regarding sophisticated international corporate tax structures.
- Managed complex international tax matters including transfer pricing strategies, cross-border transactions, and multi-jurisdictional compliance.

Credentials

Practices

- [Tax](#)
- [Business & Corporate](#)
- [Cannabis](#)

Education

- Boston University School of Law (LL.M., Taxation, 2006)
- Boston College Law School (J.D., 2003)
- Northeastern University (B.S., magna cum laude, 1998)

Admissions

- Rhode Island
- Massachusetts
- U.S. Tax Court
- U.S. Court of Federal Claims
- U.S. District Court, District of Rhode Island
- U.S. District Court, District of Massachusetts

Professional Affiliations

- Member, Rhode Island Bar Association
- Member, Rhode Island Women's Bar Association
- Member, American Bar Association, Taxation Practice Section.

In The Community

- Member, Board of Directors, Rhode Island Tutorial & Education Services (RITES).