

Tax

Foster Garvey's Tax group is dedicated to helping clients minimize risk and maximize tax benefits. We work closely with our clients to develop solutions reflective of their business objectives and assist in a wide range of tax matters – from handling complex transactions to resolving tax controversies and valuation disputes.

Clients look to us to address sophisticated tax matters for corporations, limited liability companies, closely held companies, high-net-worth individuals, partnerships, municipalities, trusts and nonprofit organizations relating to a variety of issues, including real estate transactions, corporate acquisitions and reorganizations, financial institutions, the formation and operation of partnerships and limited liability companies, and international transactions.

Our attorneys offer counsel to clients on federal, state and local tax issues associated with the structuring of domestic and international mergers and acquisitions, corporate formations and restructurings, debt workouts, liquidations, joint ventures, divestitures, and spin-offs. We have extensive experience in business and occupation tax (B&O Tax), sales and use tax, real estate excise tax, leasehold excise tax, and property tax.

Foster Garvey assists clients in matters involving:

Accounting Firms

Foster Garvey represents a large number of accounting firms throughout the Pacific Northwest. Our attorneys assist accounting firms with many legal issues, including: entity formation, agreements among owners, quality assurance, ethics, claims defense, and the drafting of engagement letters. We also provide accounting firms with support on tax and accounting matters, tax opinions, tax appeals and controversy, and tax planning. Additionally, our firm and its attorneys regularly host seminars and forums for accounting firms and CPAs, providing the opportunity to discuss hot tax issues and understand the ever-changing tax laws and regulations, enabling accounting professionals to better serve their clients. We are dedicated in

Service Contact

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Related Professionals

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J. Scott Galloway
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Zachary J. King
David M. Knutson
Jim McNeill
Steven D. Nofziger
William G. Tonkin

Areas Of Focus

Federal Tax
Property Tax
State & Local Tax

our support of the accounting profession. Foster Garvey's tax attorneys regularly publish insights and legal updates on [Larry's Tax Law](#), a blog dedicated to providing technical support to tax and accounting professionals.

Corporate Transactions

Our lawyers help business clients plan for, identify and resolve tax issues arising in mergers, acquisitions, divestitures, recapitalizations, real estate and other transactions.

Disputes

We represent clients in disputes with the Internal Revenue Service, the Oregon Department of Revenue, the Washington Department of Revenue, and other state and local taxing authorities throughout the audit process, at the various levels of administrative appeal and in litigation. We have assisted a number of clients regarding tax consequences incident to civil litigation, as well as in divorce matters. Additionally, we provide representation in criminal tax investigations, appeals and trials.

Federal Taxation

We represent clients in disputes with the Internal Revenue Service at the audit level, at the appellate level, and in litigation. Our experience also includes obtaining private letter rulings or technical advice from the Internal Revenue Service. We regularly address the special concerns of tax-exempt entities under the Internal Revenue Code, including participating mortgage loans, unrelated business taxable income, prohibited transactions under ERISA, and the Department of Labor's plan asset rules defining real estate operating companies and venture capital operation companies. We are also experienced in organizing and operating REITs and have set up REMICs for our financial institution clients.

International Tax

We have substantial experience in advising clients with respect to the tax aspects of international transactions under U.S. tax laws and tax treaties with other countries. This includes advice regarding outbound transfer of assets; inbound investments into the U.S.; considerations in the formation of joint ventures and the holding of other investments from the standpoint of both income tax and estate tax; considerations under the Foreign Investment in United States Real Property Tax Act and other withholding tax requirements, as modified by relevant treaties; and the tax treatment of non-resident aliens and foreign corporations (with and without permanent establishments in the U.S.) under various circumstances. We also advise our U.S. clients about the special federal income tax rules of international transactions such as controlled foreign corporations, foreign tax credits, passive foreign investment company rules, foreign personal holding company rules, tax treaties, and transfer pricing.

Nonprofits & Tax-Exempt Organizations

We have extensive experience representing nonprofit and tax-exempt entities. This includes providing tax advice regarding investments and joint ventures in order to avoid or minimize the tax on unrelated business taxable income (UBTI). Also, we advise tax-exempt entities regarding

the special rules associated with the acquisition of debt-financed property.

Partnerships & Joint Ventures

Our tax attorneys are experienced in identifying and addressing the issues imbedded in the complex regulations specifically applicable to these entities governing capital contributions, taxable and nontaxable distributions, tax allocations, apportionment of liabilities in investors' tax basis, the award of interests to service members, dispositions of entity interests, and dissolution and terminating transactions.

Real Estate

Our tax attorneys handle matters for our various real estate clients, including taxable institutional and private investors, corporate real estate users, financial institutions, foreign investors, developers, syndicators, tax-exempt organizations, and public and private pension funds. Foster Garvey tax attorneys frequently assist clients with real and personal property taxation, as well as real estate transactions and personal property exchanges. We are particularly skilled at structuring and restructuring partnership, limited liability company, and joint venture ownership vehicles.

State & Local Tax

In addition to helping clients with entity formation and business and real estate transactions, we handle a broad range of state and local taxes, including income, sales, estate, employment and special excise taxes.

Blog Posts

The Corporate Transparency Act Hits a Roadblock

Larry's Tax Law, 12.6.24

What Is Likely the Last Chapter in the Wild Journey of the Washington State Capital Gains Tax Occurred on November 5, 2024, With Voters Getting the Final Say

Larry's Tax Law, 12.3.24

A Journey Through Subchapter S / A Review of The Not So Obvious & The Many Traps That Exist For The Unwary: Part XIII – What Happens to a Shareholder's Return When There Is an Error on the S Corporation Return?

Larry's Tax Law, 11.13.24

A Birthday Greeting to the Tax Reform Act of 1986

Larry's Tax Law, 10.22.24

A Journey Through Subchapter S / A Review of The Not So Obvious & The Many Traps That Exist For The Unwary: Part XII – A Reoccurring Theme: Don't You Know That Keeping Adequate Business Records Is Required?

Larry's Tax Law, 10.15.24

You're Invited – NYU 83rd Institute on Federal Taxation (New York and San Diego)

Larry's Tax Law, 10.3.24

A Journey Through Subchapter S / A Review of The Not So Obvious & The Many Traps That Exist For The Unwary: Part X – Converting a C Corporation to an S Corporation/Nothing Could Go Wrong or Could It?

Larry's Tax Law, 8.20.24

A Journey Through Subchapter S / A Review of The Not So Obvious & The Many Traps That Exist For The Unwary: Part IX – Taking the Mystery Out of the S Corporation Distribution Rules

Larry's Tax Law, 7.17.24

The U.S. Supreme Court Overrules the Landmark Decision in *Chevron – Loper Bright Enterprises v. Raimondo*

Larry's Tax Law, 7.1.24

A Journey Through Subchapter S / A Review of The Not So Obvious & The Many Traps That Exist For The Unwary: Part VIII – Shareholder Eligibility & The Peril of Having an Ineligible Shareholder Causing the Termination of the S Election

Larry's Tax Law, 6.27.24

The Newest Chapter in the Tumultuous Journey of the Washington State Capital Gains Tax – Judge Allyson Zipp Rules From the Bench

Larry's Tax Law, 6.10.24

A Journey Through Subchapter S / A Review of The Not So Obvious & The Many Traps That Exist For The Unwary: Part VII – Unreasonable Compensation In The S Corporation Setting

Larry's Tax Law, 6.5.24

The Corporate Transparency Act Is Under Attack – The Battle Continues to Rage

Larry's Tax Law, 5.29.24

A Journey Through Subchapter S / A Review of The Not So Obvious & The Many Traps That Exist For The Unwary: Part VI – Revocation of an S Corporation Election

Larry's Tax Law, 5.2.24

Larry's Tax Law Has Surpassed the One-Decade Milestone

Larry's Tax Law, 4.25.24

A Journey Through Subchapter S / A Review of The Not So Obvious & The Many Traps That Exist For The Unwary: Part V – Spouses Owning Shares of an S Corporation
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A Journey Through Subchapter S / A Review of The Not So Obvious & The Many Traps That Exist For The Unwary: Part IV – Suspended Losses of an S Corporation
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Corporate Transparency Act Mini-Update – The Obvious Exemptions May Not Be So Obvious
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A Journey Through Subchapter S / A Review of The Not So Obvious & The Many Traps That Exist For The Unwary: Part III – Code Section 1361(b)(1)(C)
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A Journey Through Subchapter S / A Review of The Not So Obvious & The Many Traps That Exist For The Unwary: Part I – The Built-In-Gains Tax
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The IRS's New Voluntary Disclosure Program: Bringing Cheer to Taxpayers This Holiday Season Rather Than Placing Coal in Their Stockings
Larry's Tax Law, 12.22.23

Holiday Greetings from Larry's Tax Law
Larry's Tax Law, 12.7.23

You're Invited – NYU 82nd Institute on Federal Taxation (New York and California)
Larry's Tax Law, 9.27.23

You're Invited – 49th Annual Notre Dame Tax & Estate Planning Institute
Larry's Tax Law, 7.12.23

The Corporate Transparency Act Is Coming Your Way – Be Prepared
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IRS Commissioner Werfel Issues the 2023-2031 Strategic Plan
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Taxpayers Take a Hit in the Washington Capital Gains Tax Battle

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A Narrow Aspect of the Check-the-Box Regulations that Deserves Some Press – Changing an Entity's Tax Classification From That of a Partnership to That of an S Corporation

Larry's Tax Law, 11.9.22

You're Invited – NYU's 81st Institute on Federal Taxation

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The Remote Worker Platform Continues to Baffle the Tax and Human Resources Departments of Many Employers

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The National Taxpayer Advocate Issued the IRS a Mid-Year Report Card

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Disregarded Entities Under the Check-the-Box Regulations Are Not Disregarded for All Tax Purposes

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Revisiting Remote Workforces – They May Be Here to Stay in Some Form

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The Washington State Capital Gains Tax May Have More Than Nine Lives – The Saga Continues With the State Attorney General Appealing to the Highest State Court

Larry's Tax Law, 4.12.22

The Oregon Legislature and the Oregon Department of Revenue Bring Some New Year Cheer to the State's Taxpayers and Tax Community – The Office of the Taxpayer Advocate Is Here to Help

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The Build Back Better Act Was Passed in the House and Is Now in the Senate

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The Turbulent Ride for Washington's New Capital Gains Tax Continues – The New Tax Regime Took Another Hit, But This Setback Came Outside of the Courts

Larry's Tax Law, 11.4.21

The Oregon SALT Cap Workaround for Pass-Through Entities Is Finally Here – Governor Kate Brown Has Signed Senate Bill 727 Into Law

Larry's Tax Law, 11.2.21

House of Representatives 5376: Current Tax Legislation Pending in the U.S. House of Representatives

Larry's Tax Law, 10.14.21

The Washington State Supreme Court Renders a Decision Impacting Financial Institutions Doing Business in the State

Larry's Tax Law, 10.6.21

The Calm Before the Storm – The Anticipation of the Current Administration's Federal Tax Legislation Is Creating Anxiety Among Many Taxpayers

Larry's Tax Law, 9.30.21

Two Lawsuits Are Better Than One – A Second Lawsuit Was Filed to Strike Down the New Washington State Capital Gains Tax

Larry's Tax Law, 6.17.21

You're Invited – OSCP's 2021 Annual Real Estate Conference

Larry's Tax Law, 5.24.21

To All of the Tax Return Preparer Professionals and Their Staffs: Thank You for Your Service

Larry's Tax Law, 5.18.21

The Colorful and Continuing Journey of Senate Bill 5096 – the New Washington State Capital Gains Tax

Larry's Tax Law, 5.7.21

The State of Washington May No Longer Be a Tax Haven – A New Capital Gains Tax May Be on the Horizon

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Maryland Takes a Beat on Its New Digital Advertising Tax

Larry's Tax Law, 4.15.21

Eligibility for Federal Stimulus Benefits Appears to Be Benign, But When You Peel Away the Onion, a Major Flaw Appears

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Maryland's New Tax – The Nation's First State Tax on Digital Advertising

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Does the Oregon CAT Have Nine Lives? – Time Will Tell Whether Senate Bill 787 Repeals the Oregon Corporate Activity Tax

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Tax Planning Out of Fear Usually Doesn't End Well

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There Is a Santa Claus After All – Lawmakers Deliver a Wonderful Holiday Gift to Businesses and Their Owners in a Time of Need

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Get Ready – The Internal Revenue Service May Be Knocking on Partnership Doors Next Year

Larry's Tax Law, 12.8.20

The Changing Face of Employer State Tax Reporting and Payment Obligations in the Coronavirus Telework "New Normal"

Larry's Tax Law, 10.2.20

The IRS Provides Some Good News to Oregonians During a Time When Positive News Is Rare – News Releases OR-2020-23 and IR-2020-215

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No Final Word From Congress – It Is Late in the Game and We Still Do Not Know If the Use of Forgiven PPP Loan Proceeds on Business Expenses Will End Up Being Deductible

Larry's Tax Law, 9.8.20

Potential Payroll Tax Deferral Is Available – Employers Must Understand the Program and Use Extreme Caution Before Blindly Jumping Into the Deferral Pool

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Shark Tank – Be Aware of the Deadly Creatures in the State and Local Tax Waters

Larry's Tax Law, 8.26.20

What House Bill 4212 and Chief Justice Order No. 20-027 Mean for Oregon Taxpayers

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Curiosity Killed the Cat – Unfortunately the Oregon Legislature's Curiosity Has Not Gone That Far With Respect to Our CAT: The Oregon Corporate Activity Tax

Larry's Tax Law, 7.14.20

He Who Pays the Piper Calls the Tune – The IRS Announces in Notice 2020-142 That It Is Now Time for Taxpayers to Resume Paying Taxes

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Required Minimum Distributions From Retirement Plans Have Been Waived for 2020 – IRS Notice 2020-51 May Give Taxpayers That Have Already Received Distributions a “Mulligan” If They Act Timely

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The Oregon Department of Revenue Held Its CAT Call as Scheduled – The Business and Tax Community Were Represented

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We Can Work It Out: The SBA Continues Providing Guidance on the PPP and Loan Forgiveness

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Taxpayers May Want to Wait to File Their PPP Loan Forgiveness Applications

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Upcoming CAT Call – Speak Now or Forever Hold Your Peace!

Larry's Tax Law, 6.15.20

The Oregon Department of Revenue Formalizes Guidance on Estimated Tax Penalties Under the Oregon Corporate Activity Tax

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Paycheck Protection Program Alert – Application Deadline Remains June 30, 2020

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The Paycheck Protection Program Flexibility Act of 2020 Is Now Law

Larry's Tax Law, 6.5.20

The IRS Is Taking Going Digital to the Next Level – Electronic Filing of Amended U.S. Individual Income Tax Returns Will Be Available Soon

Larry's Tax Law, 6.2.20

Let the Good Times Roll – The SBA Issues Interim Final Rules on PPP Loan Forgiveness, Including Guidance on the Payment of Bonuses and Hazard Pay, Loan Prepayments and the Loan Forgiveness Application

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Lawmakers May Not Have Abandoned Small Businesses After All – The Paycheck Protection Program Flexibility Act of 2020 May Be Just What the Doctor Ordered

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Having Employees Working Remotely May Become the New Norm – There May Be Tax and Other Traps Lurking Out There for Unwary Employers

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Love Thy Landlord – Prepayment of Rent with PPP Loan Proceeds May Not Be a Good Idea

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News From the Washington Department of Revenue to Taxpayers Subject to Its Business and Occupations Tax – Whether It Is Welcome News Is Yet to Be Determined

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The Worlds of Sports and Tax Law Intersect During the COVID-19 Pandemic

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PPP Loans May Not Be as Advertised for Businesses Shut Down During the COVID-19 Pandemic

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More Good News for Oregon Taxpayers – The Oregon Department of Revenue Got It Right

Larry's Tax Law, 5.7.20

Taxpayers May Get to Have Their Cake and Eat It Too After All – Senate Bill 3612 Could Be the Silver Bullet That Makes Things Right After the IRS Issued Notice 2020-32

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The IRS Has Determined That Taxpayers Who Obtain PPP Loan Forgiveness Cannot Have Their Cake and Eat It Too

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The CAT Still Has Sharp Teeth, but the Oregon Department of Revenue Has Temporarily Dulled Them a Bit

Larry's Tax Law, 4.30.20

A Taxpayer's Ability to Use Net Operating Losses Was Significantly Restricted by the TCJA, but the CARES Act Temporarily Loosens Things up – The Proper Use of NOLs Could Prove To Be an Important Strategy in Your Game Plan During These Challenging Times

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The IRS and Treasury Are Working Overtime to Provide Taxpayers with Joy, Hope and Optimism During These Trying Times

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Some Clarity to the Murky: Temporary Rules Relative to the Families First Coronavirus Response Act Have Been Issued

Larry's Tax Law, 4.7.20

Treasury Delivers Some More Good News – Notice 2020-20

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Important Update: Families First Coronavirus Response Act

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The IRS Will Put the American People First — No, Really (But Only for a Limited Time)

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The Oregon Department of Revenue Has Now Granted Relief to Oregon Taxpayers

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Tax Aspects of the Families First Coronavirus Response Act

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Treasury Delivers Some Good News in a Time When Good News Is Rare

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A Pleasant Distraction Courtesy of the Oregon Department of Revenue – Two More CAT Rules Go From Draft to Temporary Status

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The CAT Is Clearly Ruling the Roost in Oregon – It Is Occupying a Large Amount of Time for Tax Practitioners This Busy Season

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The Oregon Department of Revenue Is Hitting the Road Again – the CAT Tour Continues

Larry's Tax Law, 2.13.20

Be Careful What You Wish For – What May Be Good for Federal Income Tax Purposes May Not Be So Good For Purposes of the Oregon CAT

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Temporary Rules Keep Pouring in – the DOR Continues Its Efforts to Provide Guidance Relative to the CAT

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Holiday Greetings from Larry's Tax Law

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Continue to Keep Your Eyes Peeled and Your Ears Tuned-In for CAT Developments—They Are Rolling In

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The IRS Continues Taking Measures to Enhance Security – the EIN Application Process Changed Earlier This Year

Larry's Tax Law, 12.5.19

Hold the Phone, but Not Your Questions – Recent Oregon CAT Updates

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The CAT Has Gone Telephonic

Larry's Tax Law, 10.22.19

You're Invited – NYU's 78th Institute on Federal Taxation

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The CAT Continues to Be on the Prowl – the Oregon Department of Revenue's Town Hall Meetings Roadshow Made It to Portland

Larry's Tax Law, 10.9.19

School is Back in Session and the CAT is Among the Most Popular Courses

Larry's Tax Law, 10.2.19

It's Official! We Are Now Foster Garvey

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Be Aware: The CAT Is on the Prowl – the Oregon Department of Revenue's Town Hall Meetings Begin Tonight

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IRS Cleaning House at the Office of Professional Responsibility

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The Oregon Department of Revenue Plans to Publish Much Needed Guidance on the Newly Enacted Corporate Activity Tax

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Referendum to Repeal Oregon Corporate Activity Tax Has Wind Taken Out of Its Sails – The New Tax May Be Here to Stay

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2019 NYU Tax Conferences in July

Larry's Tax Law, 7.16.19

Now You See It – Now You Don't. Like Magic, the City of Portland Disallows Depreciation Deductions Otherwise Allowable as a Result of Code Section 754

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Announcement About Garvey Schubert Barer
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Opportunity Zone Funds – Part IV: The Second Round of Proposed Regulations
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Opportunity Zone Funds – Part III: Lots of Questions But Few Answers
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Opportunity Zone Funds – Part II: Due Diligence Required
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The Seventh Circuit Affirmed the U.S. Tax Court in *Exelon Corporation v. Commissioner* –
Having Expert Tax Advisors on Your Team Will Not Always Relieve You From the Imposition of
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Taxpayers Can Have Their Cake and Eat It at an Entertainment Event, and the Cost of the Cake
May Be 50% Deductible
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Newly Proposed IRS Regulations Put a Monkey Wrench in Plans by Service Businesses
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New York AG Declares That Her State 'Will Not Be Bullied' – New York and Three Other States
File Lawsuit Attacking TCJA Provision That Limits SALT Deduction to \$10,000
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Out-of-State Sellers, Beware: The U.S. Supreme Court Opens the Door for States to Impose
Sales Tax on Out-of-State Sellers Lacking Physical Presence
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While Neither the Carbonation nor the Sweet Syrup Has Been Removed From Soda Pop in Illinois' Cook County, the Local Tax Imposed on the Sweet Drink Has Gone Flat!

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Join Us at NYU's 76th Institute on Federal Taxation!

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The Estate of George H. Bartell et. al. v. Commissioner – IRS Issues an Action on Decision – Was It Too Good to Be True? The IRS Thinks So!

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New Regulations for the Partnership Tax Audit Rules Set to Finalize on September 18, 2017

Family Business Bulletin, 8.23.17

Golly Gee—the U.S. Tax Court Ruled That the Cost of a Taxpayer's Microsoft Xbox 360 and a Nintendo Wii Used by His Children Did Not Constitute Ordinary and Necessary Business Expenses Deductible Under IRC § 162 or Amortizable Under IRC § 167&m

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Who Says There Is No Such Thing as a Free Lunch? -- the US Tax Court in *Jacobs v. Commissioner* Ruled That There May Be Such a Thing!

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The Oregon Corporate Gross Receipts Tax May Be Dead – at Least for Now

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The Complete Saga of Former U.S. Tax Court Judge Diane L. Kroupa is Now Finally Concluded

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Discussion About the New Partnership Audit Rules at the Portland Tax Forum

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The Dream of a Gross Receipts Tax Is Alive in Oregon

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Tackling Tax Reform – Part IV: What Can We Expect To See

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Form Over Substance Sometimes Prevails in Tax Law – Estate of George H. Bartell et. al. v. Commissioner

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Just When We Thought Measure 97 Was Dead—It May Be Back!

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Measure 97 Goes Down in Flames – The Aftermath

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Next Week – NYU's 75th Institute on Federal Taxation in San Diego

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The Saga Ends With Ex-Tax Court Judge Pleading Guilty to Cheating on Her Taxes

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Be Aware – The Venue for IRS Appeals Conferences Has Changed

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Former Tax Court Judge Kroupa Is Back in the News

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The Qualified Subchapter S Subsidiary Election – A Primer and Beyond

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Measure 97 (Formerly Known as Initiative Petition 28) Will Be Presented to Oregon Voters on November 8, 2016: What You Need to Know

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The Death of Prince Rogers Nelson – An Estate Tax Controversy Likely To Follow

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The Battle Between the Estate of Michael Jackson and the IRS Continues

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The New Partnership Audit Regime Will Be Here Soon – Are You Ready?

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While Some Parents May Not Agree to Pay the Cost of Their Child's Law Degree, Maybe the Government Will?

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President Obama's Administration Continues Its Quest to Limit the Ability to Defer Income Under IRC § 1031

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Like Santa Claus, the IRS Keeps a List of Who Has Been Naughty or Nice: It Is the Time of Year When the IRS's Naughty List Gets Longer

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The Oregon Legislature Appears to Have Brought More Joy to the Cannabis Industry: House Bill 4014 Signed Into Law by Governor Kate Brown

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