

State & Local Tax

Regional tax insight, real results

Foster Garvey's State & Local Tax practice is broad and deep. We help clients with planning, compliance and disputes involving a myriad of state and local tax matters, including the tax aspects of transactions, income taxes, worker classification, payroll taxes, income taxes, excise taxes, sales and use taxes, business and occupation (B&O) and other gross receipts taxes, corporate activity taxes, property taxes, real estate transfer taxes, tobacco taxes and other state and local taxes. Our team regularly represents clients in discussions with state and local tax authorities, including ruling requests, audits, administrative appeals and litigation. The group's litigation experience includes both trial work and appellate practice.

We pride ourselves on understanding our clients' unique business needs, which allows us to create effective, tailored tax solutions. Our clients span diverse industries including healthcare, accounting, law and other professional services, real estate, energy, food processors and manufacturers, transportation, maritime, manufacturing, technology, construction and hospitality. We represent both individuals and a range of major corporations, including well-known REITs and large commercial property owners.

State and Local Income Taxation

Multistate businesses are subject to a myriad of state and local tax laws. Understanding the framework of these laws and how income is allocated and apportioned between states and local jurisdictions is essential. We regularly advise businesses on the complexities of state and local income tax laws, particularly in light of frequent tax law changes. We keep our pulse on the ever-changing state and local tax laws. As an example, we began advising individuals how to navigate Washington's capital gains tax and the City of Seattle's payroll tax even before both pieces of legislation/ordinance were signed into law.

Service Contacts

Larry J. Brant
T 503.553.3114
larry.brant@foster.com
Steven D. Nofziger
T 503.553.3126
steven.nofziger@foster.com

Related Professionals

Larry J. Brant
William O. Etter
Peter A. Evalds
Cynthia M. Fraser
Steven D. Nofziger
Cristopher D. Sinan
William G. Tonkin

Gross Receipts Taxes: Oregon's Corporate Activity Tax (CAT); Washington's Business and Occupation (B&O) Tax

Out-of-state companies unfamiliar with Oregon's and Washington's gross receipts taxes may be caught off guard to learn that they may be subject to tax on their gross receipts earned from business activities in these states. Oregon's CAT is imposed on "commercial activity" in Oregon. In Washington, B&O taxes can be imposed at both state and city levels.

Fundamentally, the CAT and B&O taxes are computed as a percentage of gross revenue rather than net income, and they can substantially impact businesses used to operating under typical state income tax systems. We help companies navigate these tax regimes, including recognizing applicable exemptions and conducting strategic planning to minimize their potential impact.

Property Taxation

Our team brings decades of experience reducing real and personal property taxes for a wide range of commercial, industrial, transportation and utility companies. We are recognized leaders in this arena and have successfully handled some of the most complex and challenging property tax cases. We regularly represent clients in matters involving exemptions, deferrals, incentives, special assessments and a variety of state and federal constitutional issues. Our firm is a longtime member of American Property Tax Counsel, the national affiliation of independent property tax attorneys, representing the organization in the states of Washington, Oregon and Idaho. Visit our [Property Tax practice](#) for more information.

Residency

Whether an individual taxpayer is a resident of one state or another may be a major issue, especially if one state has an income tax (e.g., Oregon) and the other state does not have an income tax (e.g., Washington). Understanding state residency is imperative. Our lawyers regularly advise individual taxpayers about residency, assist them in planning relative to residency, and represent them in controversies with state tax authorities relative to residency.

Other Taxes and Fees

We represent clients subject to a variety of other tax issues, including nexus questions, sales and use taxes, and a variety of taxes unique to the Pacific Northwest states. Washington and Alaska, in particular, impose specialized excise taxes that can produce substantial tax liabilities. Faced with the need to find new revenue sources, state and local governments have been imposing new fees in a variety of contexts. Our attorneys have been involved in landmark litigation that successfully argued certain fees are unconstitutional.

Legislation and Consulting

We frequently collaborate with industry associations, taxpayer groups and professional organizations interested in improving the tax laws. We also provide expert testimony before legislative committees and draft proposals for laws and administrative rules. Our experience includes assessment of environmentally contaminated property, taxation of intangible personal property and appeal rights of taxpayers. Our attorneys are active in the American College of

Tax Counsel, the American Bar Association Tax Section, the Tax Sections of the Oregon and Washington Bar Associations, Institute for Professionals in Taxation, the Council on State Taxation (COST), American Property Tax Counsel, the Associated Oregon Industries and the Association of Washington Business.

Blog Posts

Senate Bill 1507 Was Passed by the Oregon Legislature and Will Likely Become Law – Breaking Down What It Means to Oregon Businesses

Larry's Tax Law, 3.26.26

The Oregon SALT Workaround for Eligible Pass-Through Entities Has Been Extended by Oregon Lawmakers – So, We Have Nothing to Worry About, or Do We?

Larry's Tax Law, 3.10.26

The Oregon SALT Workaround for Eligible Pass-Through Entities May, Like the Cat, Have More Than One Life

Larry's Tax Law, 3.5.26

The SALT Workaround for Eligible Pass-Through Entities May Be Dead in Oregon

Larry's Tax Law, 2.26.26

Holiday Greetings – 2025 Year-End in Review From Larry's Tax Law

Larry's Tax Law, 12.16.25

You're Invited – NYU 84th Institute on Federal Taxation (New York City and San Francisco)

Larry's Tax Law, 10.7.25

One Big Beautiful Bill Act, H.R. 1 – 119th Congress (2025-2026): Part X – One Hundred Percent Expensing Lives On

Larry's Tax Law, 9.18.25

A Journey Through Subchapter S / A Review of The Not So Obvious & The Many Traps That Exist For The Unwary: Part XVII – A Brief Stop at an Important Destination – Code Section 1361 (b)(1)(D)

Larry's Tax Law, 8.26.25

One Big Beautiful Bill Act, H.R. 1 – 119th Congress (2025-2026): Part IX – Deductibility of Automobile Loan Interest

Larry's Tax Law, 8.7.25

One Big Beautiful Bill Act, H.R. 1 – 119th Congress (2025-2026): Part VIII – Worker Moving Expenses

Larry's Tax Law, 8.5.25

One Big Beautiful Bill Act, H.R. 1 – 119th Congress (2025-2026): Part VII – The Rules Relating to the Deductibility of Individual Charitable Contributions Have Changed

Larry's Tax Law, 7.31.25

One Big Beautiful Bill Act, H.R. 1 – 119th Congress (2025-2026): Part VI – Corporate Charitable Deductions / A Floor Has Been Added to Code Section 170(b)(2)(A)

Larry's Tax Law, 7.29.25

One Big Beautiful Bill Act, H.R. 1 – 119th Congress (2025-2026): Part V – Qualified Small Business Stock Exclusion / Code Section 1202

Larry's Tax Law, 7.22.25

One Big Beautiful Bill Act, H.R. 1 – 119th Congress (2025-2026): Part IV – The Qualified Business Income Deduction / Code Section 199A

Larry's Tax Law, 7.17.25

One Big Beautiful Bill Act, H.R. 1 – 119th Congress (2025-2026): Part III – Gambling / Code Section 165(d)

Larry's Tax Law, 7.15.25

One Big Beautiful Bill Act, H.R. 1 – 119th Congress (2025-2026): Part II – Estate and Gift Tax

Larry's Tax Law, 7.10.25

One Big Beautiful Bill Act, H.R. 1 – 119th Congress (2025-2026): Part I – The SALT Deduction

Larry's Tax Law, 7.8.25

The House Passes a Tax Bill Containing a SALT Cap Compromise That Is Slightly Better Than Its Prior Proposal

Larry's Tax Law, 5.27.25

It Is Raining Tax Increases in Washington State – When It Rains It Pours

Larry's Tax Law, 5.23.25

An Interesting New Law Passed by the Oregon Legislature Impacts the State Taxation of Lottery Winnings

Larry's Tax Law, 5.21.25

The State and Local Tax Deduction Is in Peril – The Cavalry Does Not Appear to Be on Its Way to Rescue It

Larry's Tax Law, 5.16.25

Taxes in Washington State May Be Rising

Larry's Tax Law, 5.13.25

Hobby Loss Rules Revisited

Larry's Tax Law, 4.22.25

A Journey Through Subchapter S / A Review of The Not So Obvious & The Many Traps That Exist For The Unwary: Part XVI – Changes in Ownership During the Taxable Year

Larry's Tax Law, 4.3.25

March Madness Is Usually All About College Basketball, But It Turns Out That the Corporate Transparency Act Is Taking Center Stage This Month

Larry's Tax Law, 3.23.25

The Corporate Transparency Act May Be on Life Support, But It Is Not Dead

Larry's Tax Law, 3.14.25

Updates to the Corporate Transparency Act Are Coming in at a Rapid Fire – Treasury Issued a Huge Change in the Trajectory of the New Law

Larry's Tax Law, 3.4.25

FinCEN Delivers Some Good News About Its Enforcement of the Corporate Transparency Act

Larry's Tax Law, 3.3.25

Oh Geez! The Corporate Transparency Act's Turbulent Rollercoaster Ride Continues

Larry's Tax Law, 2.19.25

A Journey Through Subchapter S / A Review of The Not So Obvious & The Many Traps That Exist For The Unwary: Part XV – Being an Active Participant in the Trade or Business of an S Corporation Has Its Advantages

Larry's Tax Law, 2.12.25

The Crazy Rollercoaster Ride of the Corporate Transparency Act Continues – FinCEN Issues a Reporting Update

Larry's Tax Law, 1.24.25

The Drama Surrounding the Corporate Transparency Act Has Now Reached the U.S. Supreme Court

Larry's Tax Law, 1.23.25

A Journey Through Subchapter S / A Review of The Not So Obvious & The Many Traps That Exist For The Unwary: Part XIV – An S Corporation Is Not Always a Mere Extension of Its Shareholders

Larry's Tax Law, 1.22.25

The Drama Surrounding the Corporate Transparency Act Continues – Not Only Were Santa Claus and His Elves Busy This Holiday Season, So Were the Court and the Litigants in the *Texas Top Cop Shop* Case
Larry's Tax Law, 12.27.24

Holiday Greetings from Larry's Tax Law
Larry's Tax Law, 12.18.24

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

Larry's Tax Law, 4.4.24

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

Larry's Tax Law, 3.6.24

Corporate Transparency Act Mini-Update – The Obvious Exemptions May Not Be So Obvious

Larry's Tax Law, 2.27.24

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)

Larry's Tax Law, 2.8.24

A Journey Through Subchapter S / A Review of The Not So Obvious & The Many Traps That Exist For The Unwary: Part II – Code Sections 1375 and 1362(d)(3)

Larry's Tax Law, 1.25.24

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

Larry's Tax Law, 1.10.24

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

Larry's Tax Law, 6.7.23

IRS Commissioner Werfel Issues the 2023-2031 Strategic Plan

Larry's Tax Law, 4.10.23

Holiday Greetings from Larry's Tax Law

Larry's Tax Law, 12.21.22

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

Larry's Tax Law, 10.4.22

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

Larry's Tax Law, 7.15.22

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

Larry's Tax Law, 6.24.22

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

Larry's Tax Law, 6.16.22

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

Larry's Tax Law, 5.12.22

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

Larry's Tax Law, 1.5.22

Season's Greetings from Larry's Tax Law

Larry's Tax Law, 12.22.21

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

Larry's Tax Law, 12.9.21

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

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

Larry's Tax Law, 4.29.21

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

Larry's Tax Law, 4.13.21

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

Larry's Tax Law, 4.7.21

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

Larry's Tax Law, 3.3.21

Tax Planning Out of Fear Usually Doesn't End Well

Larry's Tax Law, 2.24.21

Holiday Greetings from Larry's Tax Law

Larry's Tax Law, 12.23.20

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

Larry's Tax Law, 12.22.20

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

Larry's Tax Law, 9.18.20

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

Larry's Tax Law, 9.1.20

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

Larry's Tax Law, 7.28.20

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

Larry's Tax Law, 7.8.20

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

Larry's Tax Law, 7.2.20

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

Larry's Tax Law, 6.25.20

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

Larry's Tax Law, 6.23.20

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

Larry's Tax Law, 6.19.20

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

Larry's Tax Law, 6.10.20

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

Larry's Tax Law, 6.9.20

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

Larry's Tax Law, 5.28.20

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

Larry's Tax Law, 5.28.20

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

Larry's Tax Law, 5.26.20

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

Larry's Tax Law, 5.18.20

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

Larry's Tax Law, 5.15.20

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

Larry's Tax Law, 5.13.20

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

Larry's Tax Law, 5.6.20

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

Larry's Tax Law, 5.1.20

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

Larry's Tax Law, 4.16.20

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

Larry's Tax Law, 4.13.20

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

Larry's Tax Law, 3.27.20

Important Update: Families First Coronavirus Response Act

Larry's Tax Law, 3.25.20

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

Larry's Tax Law, 3.25.20

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

Larry's Tax Law, 3.25.20

Tax Aspects of the Families First Coronavirus Response Act

Larry's Tax Law, 3.24.20

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

Larry's Tax Law, 3.19.20

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

Larry's Tax Law, 3.18.20

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

Larry's Tax Law, 2.26.20

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

Larry's Tax Law, 1.28.20

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

Larry's Tax Law, 1.21.20

Holiday Greetings from Larry's Tax Law

Larry's Tax Law, 12.20.19

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

Larry's Tax Law, 12.19.19

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

Larry's Tax Law, 11.20.19

The CAT Has Gone Telephonic

Larry's Tax Law, 10.22.19

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

Larry's Tax Law, 10.16.19

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

Larry's Tax Law, 10.1.19

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

Larry's Tax Law, 9.17.19

IRS Cleaning House at the Office of Professional Responsibility

Larry's Tax Law, 9.5.19

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

Larry's Tax Law, 8.22.19

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

Larry's Tax Law, 7.25.19

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

Larry's Tax Law, 7.11.19

Announcement About Garvey Schubert Barer

Larry's Tax Law, 6.19.19

Oregon's New Corporate Activity Tax

Larry's Tax Law, 6.4.19

Opportunity Zone Funds – Part IV: The Second Round of Proposed Regulations

Larry's Tax Law, 4.23.19

Opportunity Zone Funds – Part III: Lots of Questions But Few Answers

Larry's Tax Law, 3.14.19

Opportunity Zone Funds – Part II: Due Diligence Required

Larry's Tax Law, 2.5.19

Opportunity Zone Funds – Part I: Overview of the Law

Larry's Tax Law, 1.7.19

Holiday Greetings from Larry's Tax Law

Larry's Tax Law, 12.18.18

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 Accuracy-Related Penalties

Larry's Tax Law, 12.6.18

Taxpayers Can Have Their Cake and Eat It at an Entertainment Event, and the Cost of the Cake May Be 50% Deductible

Larry's Tax Law, 10.8.18

Newly Proposed IRS Regulations Put a Monkey Wrench in Plans by Service Businesses

Seeking IRC § 199A Deduction

Larry's Tax Law, 8.8.18

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

Larry's Tax Law, 7.17.18

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

Larry's Tax Law, 6.22.18

Decoding the Tax Cuts and Jobs Act – Part X: Oregon Disconnects from IRC Section 199A

Larry's Tax Law, 4.26.18

Decoding the Tax Cuts and Jobs Act – Part IX: Impact on M&A Transactions

Larry's Tax Law, 4.6.18

Oregon's Short-Term Rental Tax Expands its Reach

Duff on Hospitality Law, 4.5.18

Convention Center Tax Expands to Small Hotels/Motels and Short-Term Rentals

Duff on Hospitality Law, 4.2.18

Decoding the Tax Cuts and Jobs Act – Part VIII: Charitable and Tax-Exempt Organizations / Estate and Gift Taxes

Larry's Tax Law, 3.27.18

Decoding the Tax Cuts and Jobs Act – Part V: Changes to IRC §163(j) and the Business Interest Deduction Rules

Larry's Tax Law, 2.6.18

Decoding the Tax Cuts and Jobs Act – Part IV: The IRC § 199A Deduction for Qualified Business Income—the Devil Is in the Details and the Definitions!

Larry's Tax Law, 1.29.18

Decoding the Tax Cuts and Jobs Act – Part III: IRC § 708 and the Partnership Termination Rules Have Changed

Larry's Tax Law, 1.22.18

Decoding the Tax Cuts and Jobs Act – Part II: IRC § 1031 and Tax Deferred Exchanges Take a Haircut

Larry's Tax Law, 1.10.18

Decoding the Tax Cuts and Jobs Act – Part I: Obscure Provision in New Tax Law Denies Deductions for Sexual Harassment Settlements Subject to Nondisclosure Agreements

Larry's Tax Law, 1.4.18

Holiday Greetings from Larry's Tax Law

Larry's Tax Law, 12.27.17

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!

Larry's Tax Law, 10.11.17

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

Larry's Tax Law, 9.26.17

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!

Larry's Tax Law, 8.29.17

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

Larry's Tax Law, 7.25.17

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!

Larry's Tax Law, 7.5.17

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

Larry's Tax Law, 6.23.17

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

Larry's Tax Law, 6.22.17

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

Larry's Tax Law, 6.16.17

2017 NYU Summer Institute in Taxation

Larry's Tax Law, 6.15.17

The Dream of a Gross Receipts Tax Is Alive in Oregon

Larry's Tax Law, 5.26.17

IRS Budget Cuts Continue to Worsen

Larry's Tax Law, 5.19.17

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

Larry's Tax Law, 5.18.17

Tackling Tax Reform – Part III: The Timing of Tax Reform

Larry's Tax Law, 5.3.17

Tackling Tax Reform – Part II: The Legislative Process

Larry's Tax Law, 4.26.17

Tackling Tax Reform – Where We Are and Where We’re Headed

Larry's Tax Law, 4.11.17

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

Larry's Tax Law, 3.8.17

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

Larry's Tax Law, 2.17.17

Holiday Greetings from Larry’s Tax Law

Larry's Tax Law, 12.29.16

Measure 97 Goes Down in Flames – The Aftermath

Larry's Tax Law, 11.9.16

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

Larry's Tax Law, 11.8.16

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

Larry's Tax Law, 10.27.16

Be Aware – The Venue for IRS Appeals Conferences Has Changed

Larry's Tax Law, 10.25.16

Former Tax Court Judge Kroupa Is Back in the News

Larry's Tax Law, 10.3.16

The Qualified Subchapter S Subsidiary Election – A Primer and Beyond

Larry's Tax Law, 9.19.16

You’re Invited – NYU’s 75th Institute on Federal Taxation

Larry's Tax Law, 9.12.16

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

Larry's Tax Law, 8.12.16

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

Larry's Tax Law, 6.29.16

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

Larry's Tax Law, 6.15.16

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

Larry's Tax Law, 6.9.16

NYU Summer Institute In Taxation

Larry's Tax Law, 5.27.16

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

Larry's Tax Law, 5.20.16

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

Larry's Tax Law, 4.29.16

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

Larry's Tax Law, 4.7.16

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

Larry's Tax Law, 3.17.16

Oregon Tax Compliance Alert - Reduced Tax Rates May Be Available to Taxpayers for Non-Passive Income That Flows Through From Certain LLCs or S Corporations

Larry's Tax Law, 3.8.16

Lawmakers May Be Revisiting the Tax Gap

Larry's Tax Law, 2.12.16

Season's Greetings

Larry's Tax Law, 12.23.15

The Cheer of the Holidays May Have Arrived in Washington—a Bit Earlier Than Expected

Larry's Tax Law, 12.18.15

Legislation Alert: Tax Extenders Legislation Signed into Law

Larry's Tax Law, 12.18.15

The IRS Continues to Face Significant Budgetary Constraints—What Does It Mean To Taxpayers?

Larry's Tax Law, 11.24.15

Another Thought on the Tax Treatment of the Marijuana Industry—Oregon Taxation

Larry's Tax Law, 11.13.15

A Real Bummer for The Marijuana Industry

Larry's Tax Law, 10.23.15

YOU'RE INVITED TO NYU (SCHOOL OF PROFESSIONAL STUDIES) 74TH INSTITUTE ON
FEDERAL TAXATION

Larry's Tax Law, 10.1.15

STRONG COMMENTARY FROM WASHINGTON REGARDING IRS BUDGET CUTS

Larry's Tax Law, 9.4.15

Actual or Constructive Receipt of Funds During a Code Section 1031 Deferred Exchange is
More Than a Bad Hair Day for the Taxpayer

Larry's Tax Law, 7.23.15

Farewell to Director Karen Hawkins of the Office of Professional Responsibility

Larry's Tax Law, 7.9.15

Code Section 1031 Exchanges – Held for Productive Use in a Trade or Business or for
Investment

Larry's Tax Law, 7.1.15

Larry's Tax Law Blog Now Features Top Posts

Larry's Tax Law, 6.26.15

Goodwill and Section 1031 Exchanges Do Not Mix Well

Larry's Tax Law, 6.18.15

You're Invited to the 15th Annual Oregon Tax Institute

Larry's Tax Law, 6.1.15

IRS No-Ruling Policy on Spin-Offs and Reorganizations May Be Changing

Larry's Tax Law, 5.21.15

Oregon Lawmakers Amend the Understatement of Taxable Income Penalty Regime (House Bill
2488)

Larry's Tax Law, 4.30.15

Will Tax Reform Include a Repeal of IRC § 1031?

Larry's Tax Law, 4.9.15

The IRS Announces that its Offshore Voluntary Disclosure Program Will Remain Available to
Taxpayers Indefinitely—Is This Good News?

Larry's Tax Law, 2.24.15

The IRS Will Benefit from President Obama's 2016 Budget Proposal

Larry's Tax Law, 2.17.15

What Does President Obama's 2016 Budget Proposal Mean to Taxpayers?

Larry's Tax Law, 2.10.15

President Obama Publishes His Administration's 2016 Budget Proposal—Are Charities Among the Biggest Losers?

Larry's Tax Law, 2.4.15

The IRS Continues to Face Severe Budget Cuts—What Does this Mean to Tax Advisors and Their Clients?

Larry's Tax Law, 1.20.15

How Did the Tax Increase Prevention Act of 2014 (“the Extender’s Bill”) Impact Subchapter S?

Larry's Tax Law, 12.22.14

Is Tax Reform Closer Than We Thought? A Continued Look At Tax Reform

Larry's Tax Law, 12.18.14

Season's Greetings

Larry's Tax Law, 12.11.14

Audit Risks Increasing for Subchapter S Corporations

Larry's Tax Law, 12.4.14

Will IRC § 1031 and A Taxpayer’s Ability to Conduct A Tax-Deferred Exchange of Qualifying Property Remain Intact After Tax Reform?

Larry's Tax Law, 11.25.14

A Taxpayer May Be Relieved Of The Pain And Suffering Caused By The Imposition Of An Accuracy-Related Penalty If Reasonable Cause Exists And The Taxpayer Acted In Good Faith

Larry's Tax Law, 11.6.14

Understanding the Basis Adjustment Rules is Paramount for S Corporations

Larry's Tax Law, 10.23.14

Avoid Owning Real Property In Closely-Held Corporations

Larry's Tax Law, 10.7.14

You are Invited - NYU's 73rd Institute on Federal Taxation

Larry's Tax Law, 9.15.14

Transactions Among Related Parties Are Subject To Heightened Scrutiny

Larry's Tax Law, 9.4.14

Shareholder/Employee Compensation From The Personal Service S Corporation (Like The Personal Service C Corporation) Must Be Reasonable

Larry's Tax Law, 8.21.14

IRAs, Absent Meeting A Narrow Exception, Are Not Eligible S Corporation Shareholders

Larry's Tax Law, 8.7.14

Another Tax Attorney Bites the Dust and Ends Up in Club Fed

Larry's Tax Law, 7.24.14

Failing to Report Income Lands California Tax Attorney in the Slammer!

Larry's Tax Law, 7.10.14

Treasury Finally Amends Circular 230 – The Crazy Disclaimers Are A Thing Of The Past

Larry's Tax Law, 6.24.14

Treasury issues long-awaited amendments to Circular 230! Stay Tuned!

Larry's Tax Law, 6.20.14

Failure to Report Foreign Financial Accounts Continues to be a Costly Proposition

Larry's Tax Law, 6.16.14

Neither A Guaranty By A Shareholder Nor An Unpaid Judgment Against A Shareholder For The S Corporation's Debt Creates Basis

Larry's Tax Law, 6.4.14

Establishing Reasonable Cause for Purposes of Avoiding the Penalty Imposed by IRC § 6656(a) May Not be a Slam Dunk

Larry's Tax Law, 5.21.14

IRS Disbars CPA/Attorney

Larry's Tax Law, 5.8.14

Oregon Amends Method of Apportionment for Interstate Broadcasters

Larry's Tax Law, 5.1.14

You're Invited to the 14th Annual Oregon Tax Institute

Larry's Tax Law, 4.23.14

Is Your Personal Information Safe with the Internal Revenue Service? Maybe Not!

Larry's Tax Law, 4.16.14

Per Capita Distributions from Trust Funds to Indian Tribes and Members - IRS Notice 2014-17

Larry's Tax Law, 4.9.14

Finders Keepers Losers Weepers

Larry's Tax Law, 4.2.14

Video Interview: Discussing Dave Camp's Tax Reform Proposal with LXBN TV

Larry's Tax Law, 3.28.14

The Stakes are High - Failure to Comply with Your Duties Under Circular 230 Could Place You on the Bench Indefinitely

Larry's Tax Law, 3.19.14

NBA Star Kevin Durant Files a Lawsuit Against His CPA

Larry's Tax Law, 3.14.14

Estate of Michael Jackson v. Commissioner of Internal Revenue

Larry's Tax Law, 3.5.14

Are We Going to See Tax Reform in 2014?

Larry's Tax Law, 2.27.14

Do Olympians Owe Taxes on the Value of Their Medals?

Larry's Tax Law, 2.19.14

Failure to Retain Adequate Business Records Will Lead to Disastrous Results

Larry's Tax Law, 2.12.14

Ignoring an IRS Notice of Levy May be a Costly Mistake

Larry's Tax Law, 2.6.14

U.S. Tax Court Petition Filed by a Professional Gambler

Larry's Tax Law, 1.29.14

Consolidated Appropriations Act, 2014, Signed Into Law by President Barack Obama

Larry's Tax Law, 1.21.14

Consolidated Appropriations Act, 2014, Passes the House and the Senate

Larry's Tax Law, 1.17.14

Court Ordered Sanctions Against an Attorney are Not Deductible Under Section 162 as Ordinary and Necessary Business Expenses

Larry's Tax Law, 1.15.14

Taxpayer Prevails in Refund Lawsuit and is Awarded Attorney Fees and Costs

Larry's Tax Law, 1.6.14

Reliance Upon a Tax Professional Will Not Save the Day if Your Tax Filing is Late

Larry's Tax Law, 12.20.13

The \$64,000 Tax Return Question

Larry's Tax Law, 12.16.13

Season's Greetings

Larry's Tax Law, 12.10.13

Worker Misclassification – The Stakes Just Got Higher

Larry's Tax Law, 12.9.13

Personal Goodwill Appears to be Alive and Well

Larry's Tax Law, 12.2.13

Taxpayer Prevails

Larry's Tax Law, 11.21.13

Pass-Through Entities be Aware – The IRS is Coming Your Way

Larry's Tax Law, 11.12.13

Oregon House Bill 3601

Larry's Tax Law, 11.5.13

Inadvertent S Election Termination

Larry's Tax Law, 10.29.13

The IRS is Back in Business

Larry's Tax Law, 10.22.13

What are my Obligations While the IRS is Closed Due to the Federal Shutdown?

Larry's Tax Law, 10.14.13

My Dog Ate the S Election, Now What?

Larry's Tax Law, 8.26.13

I Sold the Ferrari but Failed to Pay the IRS – Oops!

Larry's Tax Law, 6.28.13

The Section 336(e) Election: An Important New Tool in Corporate Acquisitions

Larry's Tax Law, 6.3.13

The Affordable Care Act Creates A Trap For The Unwary – Worker Misclassification

Larry's Tax Law, 4.9.13

IRS Expands its Voluntary Worker Classification Settlement Program

Larry's Tax Law, 3.11.13