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# Larry is client centric. He is driven to provide clients with timely, practical and effective guidance on tax and business legal matters.

Larry is Chair of the Foster Garvey Tax & Benefits practice group. He is licensed to practice in Oregon and Washington. Larry's practice focuses on assisting public and private companies, partnerships, and high-net-worth individuals with tax planning and advice, tax controversy, and business transactions. He regularly advises clients in entity selection and formation, structuring mergers and acquisitions, joint ventures and other business transactions.

Larry represents a number of professional services clients in accounting, law, healthcare, behavioral health, dentistry, engineering and architecture. Additionally, he represents a large array of clients straddling several industries, including logistics, manufacturing, high tech, recycling, construction, real estate and maritime.

Larry is a past Chair of the Oregon State Bar Taxation Section. He was the long term Chair of the Oregon Tax Institute and is currently a member of the Board of Directors of the Portland Tax Forum. Larry is an Expert Contributor to Thomson Reuters Checkpoint Catalyst. He is a Fellow in the American College of Tax Counsel.

Larry publishes articles on numerous income tax issues, including Taxation of S Corporations, Reasonable Compensation, Circular 230, Worker Classification, § 1031 Exchanges, Choice of Services

Tax Federal Tax State & Local Tax Business & Corporate Finance Mergers & Acquisitions Luxury Law Real Estate Funds & Syndications

#### Admissions

Oregon, 1984 Washington, 1985 U.S. District Court, District of Oregon, 1984 U.S. Tax Court, 1991



Entity, Entity Tax Classification, and State and Local Taxation. In addition, he regularly speaks at national, regional and local tax institutes, including the NYU Tax Institute, the Notre Dame Tax & Estate Planning Institute, the Florida Tax Institute, the NYU Tax Conferences in July, the Portland Tax Forum, the OSCPA Annual State and Local Tax Conference, the OSCPA Annual Real Estate Conference, the OSCPA Annual Forest Products Conference, the IRS Tax Practitioners Forum, the Northwest Federal Tax Conference and the Oregon Tax Institute.

Larry was the 2015 Recipient of the Oregon State Bar Tax Section Award of Merit, recognizing him for professionalism, reputation, leadership, and service to the tax community and the community at large.

He is the Editor and an author for Larry's Tax Law, a blog dedicated to providing technical support to tax and accounting professionals.

## Education

LL.M., Taxation, University of Florida College of Law, 1987

- Research Fellow, 1986-1987
- J.D., Willamette University College of Law (cum laude), 1984
- B.S., Portland State University, Business Administration (cum laude), 1981

#### **Honors & Recognition**

JD Supra Readers' Choice Awards, "Top Author" for Tax, 2019-2022

The Best Lawyers in America<sup>©</sup> Tax Law, 2009-present

Best Lawyers<sup>®</sup> "Lawyer of the Year," Tax, 2024, 2022

Oregon Super Lawyers list, 2006-present

Top 50 Lawyers, 2018

Oregon State Bar Tax Section Award of Merit, Recipient, 2015

"Best of the Bar" Award in Taxation, Portland Business Journal, 2005

American Institute of Certified Public Accountants Outstanding Instructor for courses on 1031 Exchanges, 1994-1995

Martindale-Hubbell AV Preeminent rating

#### **Professional Activities**

American Bar Association, Tax Section, Member, 1987-present American College of Tax Counsel, Fellow, 2015-present



Northwestern School of Law of Lewis & Clark College, Adjunct Professor, Corporate Taxation, 2005-present

Oregon State Bar, Tax Section, Member 1987-present

- Chair, 2011-2012
- Executive Committee Member, 2005-2012
- Vice Chair, 2010-2011
- Secretary, 2009
- Treasurer, 2008

Oregon Tax Institute, Chair, 2013-2014; 2012-2013; 2011-2012; 2008-2009 Portland Tax Forum, Board of Directors, Member, 2010-present Thomson Reuters Checkpoint Catalyst, Expert Contributor Washington State Bar Association, Tax Section, Member, 1987-present

#### **Community Activities**

Albertina Kerr Centers for Children, Board of Directors, Member, 1987-1992

Maayan Torah Day School

 Pro Bono Honors (assistance with securing multi-year lease for a new campus and schoolhouse), 2019

Oregon Business for Oregon Kids, Board of Directors, Member, 1990-1996

Portland State University

Viking Merit Award for Outstanding and Dedicated Service, 1993

Robison Jewish Home

- Board of Directors, Member, 1990-1994
- Recognition for Outstanding Service as a Member of the Board of Trustees of Robison Jewish Home, 1994

University Club of Portland Membership Committee, Member, 2005-2006

#### News

Larry Brant Quoted in Tax Notes on Santa Fe Natural Tobacco Co. v. Department of Revenue Foster Garvey Newsroom, 6.24.24

Larry Brant Quoted in *Law360 Tax Authority* on Santa Fe Natural Tobacco Co. Ruling *Foster Garvey Newsroom*, 6.24.24



Larry Brant Quoted in *Fortune* About the Exodus of the Ultrawealthy to Lower-Tax States *Fortune*, 2.16.24

Larry Brant Quoted in *Law360 Tax Authority* About Santa Fe Natural Tobacco Co. Case in Oregon Supreme Court *Foster Garvey Newsroom*, 11.10.23

57 Foster Garvey Attorneys Recognized Among the 2024 Best Lawyers in America; Two Portland Attorneys Named 'Lawyer of the Year' *Foster Garvey Newsroom*, 8.17.23

Six Portland Attorneys Named to 2023 Oregon Super Lawyers Lists *Foster Garvey Newsroom*, 7.24.23

Larry Brant Comments on Oregon Tax Court Decision Involving Public Law 86-272 Protections in *Tax Notes State Tax Notes State*, 9.5.22

45 Foster Garvey Attorneys Recognized Among *The Best Lawyers In America®* Foster Garvey Newsroom, 8.18.22

Four Attorneys Recognized in Oregon Super Lawyers for 2022 Foster Garvey Newsroom, 7.1.22

Larry Brant, Greg Duff and Josh Bloomgarden Named 'Top Authors' in 2022 JD Supra Readers' Choice Awards *Foster Garvey Newsroom*, 3.7.22

Larry Brant Quoted in *Tax Notes* Regarding Impact of Biden's Tax Proposals on Choice of Entity Analysis *Tax Notes*, 9.9.21

38 Attorneys Named 2022 Best Lawyers in America; 11 Named Best Lawyers: Ones to Watch *Foster Garvey Newsroom*, 8.19.21

Six Attorneys Recognized in Oregon Super Lawyers for 2021 Foster Garvey Newsroom, 7.12.21

Foster Garvey Named 'Top Firm' in 2021 JD Supra Readers' Choice Awards; Greg Duff, Larry Brant and Peter Evalds Selected as 'Top Authors' 3.31.21

43 Attorneys Named 2021 *Best Lawyers in America*; 10 Named Best Lawyers: Ones to Watch *Foster Garvey Newsroom*, 8.20.20



Seven Attorneys Named to Oregon Super Lawyers List *Foster Garvey Newsroom*, 7.6.20

Larry Brant Quoted in *Outside* About Tax Implications of Found Treasure Trove *Outside Magazine*, 6.9.20

Foster Garvey Recognized as 'Top Firm' in 2020 JD Supra Readers' Choice Awards; Greg Duff and Larry Brant Named 'Top Authors' *Foster Garvey Newsroom*, 4.29.20

50 Foster Garvey Attorneys Named 2020 *Best Lawyers in America Foster Garvey Newsroom*, 8.15.19

32 Attorneys Named Super Lawyers and Eight Named Rising Stars *Foster Garvey Newsroom*, 6.10.19

Greg Duff and Larry Brant Recognized for Thought Leadership Achievement; Named 'Top Authors' in 2019 JD Supra Readers' Choice Awards *Foster Garvey Newsroom*, 4.2.19

Larry Brant Recognized for His Commitment to the Community *Foster Garvey Newsroom*, 2.20.19

Larry Brant Quoted in the *Portland Business Journal* About Importance of Proper Due Diligence in Qualified Opportunity Fund Investments *Portland Business Journal*, 2.8.19

Larry Brant Was Featured in the Thomson Reuters Checkpoint 2017 Lookbook Thomson Reuters Checkpoint 2017 Lookbook: The Impact of Technology on Tax and Accounting, 1.18

#### **Speaking Engagements**

"A Journey Through Subchapter S / A Review of the Not So Obvious & The Many Traps That Exist for the Unwary," Hawaii Association of Public Accountants Speaking Engagement Las Vegas, NV, 6.21.24

"A Journey Through Subchapter S / A Review of the Not So Obvious & The Many Traps That Exist for the Unwary," New York University 82nd Institute on Federal Taxation (California) Speaking Engagement Berkeley, CA, 11.16.23



"A Journey Through Subchapter S / A Review of the Not So Obvious & The Many Traps That Exist for the Unwary," 2023 OSCPA Northwest Federal Tax Conference Speaking Engagement Beaverton, OR, 11.14.23

"A Journey Through Subchapter S / A Review of the Not So Obvious & The Many Traps That Exist for the Unwary," New York University 82nd Institute on Federal Taxation (New York) Speaking Engagement New York, NY, 10.26.23

"Entity Classification – The Check-The-Box Regulations Revisited," 49th Annual University of Notre Dame Tax & Estate Planning Institute Speaking Engagement South Bend, IN, 9.22.23

"Worker's Classification," Willamette University College of Law Speaking Engagement Salem, OR, 3.9.23

"Entity Classification – The Check-The-Box Regulations Revisited," New York University 81st Institute on Federal Taxation Speaking Engagement San Diego, CA, 11.17.22

"Entity Classification – The Check-The-Box Regulations Revisited," New York University 81st Institute on Federal Taxation Speaking Engagement New York, NY, 10.27.22

"The Intersection of Code Sections 1031 and 1400Z," 2022 OSCPA Northwest Federal Tax Conference Speaking Engagement 10.24.22

"Entity Classification – The Check-The-Box Regulations Revisited," New York University Advanced Conference on Subchapter S Speaking Engagement New York, NY, 7.21.22

"Oregon Real Estate Tax Update – A Review of Recent Income Tax Developments in Oregon Impacting Real Estate Investors," 2022 OSCPA Annual Real Estate Conference Speaking Engagement In-Person/Virtual Event, 6.8.22



"Revisiting Choice of Entity in Light of Tax Changes on the Horizon," 2022 OSCPA Farming, Ranching & Agribusiness Conference Speaking Engagement Bend, OR, 6.3.22

"The Road Between Subchapter C and Subchapter S – It May Be a Well-Traveled Two-Way Thoroughfare, But It Isn't Free of Potholes," 2022 Oregon Tax Institute Speaking Engagement Portland, OR, 6.2.22

"Section 1031 Exchanges: A Look at Recent Developments and Other Tax Deferral Alternatives," Oregon State Bar Taxation Section CLE Speaking Engagement Virtual Event, 2.16.22

"Revisiting Choice of Entity in Light of Tax Changes on the Horizon," OSCPA 2021 Northwest Federal Tax Conference Speaking Engagement Virtual Event, 10.25.21

"The Road Between Subchapter C and Subchapter S – It May Be a Well-Traveled Two-Way Thoroughfare, But It Isn't Free Of Potholes," New York University Advanced Conference on Subchapter S Speaking Engagement Virtual Event, 7.30.21

"A Good Look At The Limitations to Code Section 1031 and Other Possible Deferral Alternatives," OSCPA 2021 Annual Real Estate Conference Speaking Engagement Virtual Event, 6.9.21

"The Road Between Subchapter C and Subchapter S – It May Be a Well-Traveled Two-Way Thoroughfare, But It Isn't Free of Potholes and Obstacles," Oregon Association of Tax Consultants Speaking Engagement Virtual Event, 10.26.20

"The Road Between Subchapter C and Subchapter S – It May Be a Well-Traveled Two-Way Thoroughfare, But It Isn't Free of Potholes and Obstacles," Portland Tax Forum Speaking Engagement Virtual Event, 9.24.20



"The Oregon Corporate Activity Tax," Oregon Society of Certified Public Accountants (OSCPA) 2020 OSCPA State & Local Tax Conference Speaking Engagement Portland, OR, 1.6.20

"The Road Between Subchapter C and Subchapter S – It May Be a Well-Traveled Two-Way Thoroughfare, but It Isn't Free of Potholes and Obstacles," New York University 78th Institute on Federal Taxation Speaking Engagement San Francisco, CA, 11.14.19

"The Road Between Subchapter C and Subchapter S – It May Be a Well-Traveled Two-Way Thoroughfare, but It Isn't Free of Potholes and Obstacles," Oregon Society of Certified Public Accountants (OSCPA) 2019 Northwest Federal Tax Conference Speaking Engagement Portland, OR, 10.28.19

"The Road Between Subchapter C and Subchapter S – It May Be a Well-Traveled Two-Way Thoroughfare, but It Isn't Free of Potholes and Obstacles," New York University 78th Institute on Federal Taxation Speaking Engagement New York, NY, 10.24.19

"Tax Law Update for Family Law Practitioners," Oregon State Bar - Family Law Section 2019 Annual Conference Speaking Engagement Sunriver, OR, 10.11.19

"The Road Between Subchapter C and Subchapter S – It May Be a Well-Traveled Two-Way Thoroughfare, but It Isn't Free of Potholes and Obstacles," New York University Tax Conferences in July – Advanced Conference on Subchapter S Speaking Engagement New York NY, 7.25.19

"Subchapter S After the Tax Cuts and Jobs Act – the Good, the Bad and the Ugly," 64th Annual Hawaii Association of Public Accountants State Convention Speaking Engagement Las Vegas, NV, 6.14.19

"Subchapter S After the Tax Cuts and Jobs Act – the Good, the Bad and the Ugly," New York University 77th Institute on Federal Taxation Speaking Engagement San Diego, CA, 11.15.18



"What a Family Law Practitioner Needs to Know About the Tax Cuts and Jobs Act," Clackamas County Bar Association Fall Conference Speaking Engagement Oregon City, OR, 11.8.18

"The Tax Cuts and Jobs Act – What It May Mean to Your Clients," Estate Planning Council of Portland Mini-Seminar Speaking Engagement Portland, OR, 11.7.18

"Navigating the Built In Gains Tax for C to S Conversions After the Tax Cuts and Jobs Act," Oregon Society of Certified Public Accountants (OSCPA) 2018 Northwest Federal Tax Conference Speaking Engagement Portland, OR, 11.5.18

"Developments in the World of IRC Section 1031 Exchanges, Including the Impact of the Tax Cuts and Jobs Act," 2018 IRS/Practitioners Forum Speaking Engagement Wilsonville, OR, 10.31.18

"Subchapter S After the Tax Cuts and Jobs Act – the Good, the Bad and the Ugly," New York University 77th Institute on Federal Taxation Speaking engagement New York, NY, 10.25.18

"Evaluating the Built-in Gains Tax for C to S Conversions After TCJA," New York University Tax Conferences in July – Advanced Conference on Subchapter S Speaking Engagement New York, NY, 7.26.18

"Developments in the World of IRC Section 1031 Exchanges Including the TCJA," Oregon Society of Certified Public Accountants (OSCPA) Forest Products Conference Speaking Engagement Eugene, OR, 6.22.18

"What Family Law Practitioners Need to Know About the New Tax Laws," American Academy of Matrimonial Lawyers 9th Bi-Annual Continuing Legal Education Program Speaking Engagement Portland, OR, 4.20.18



"Tax Reform and What It May Mean for You & Your Business," Multi-housing Laundry Association (MLA) 2018 Spring Educational Conference Speaking Engagement Palm Beach, FL, 4.14.18

"Worker Classification: Looking Through the Lens of Federal, State and Local Law," Willamette Law Review Tax Symposium Speaking Engagement Salem, OR, 2.2.18

"Dean's Student Circle - Leadership Presentation," Portland State University, School of Business Administration Speaking Engagement Portland, OR, 1.19.18

"The Built-in Gains Tax Revisited," New York University 76th Institute on Federal Taxation Speaking Engagement San Francisco, CA, 11.16.17

"The Built-in Gains Tax Revisited," New York University 76th Institute on Federal Taxation Speaking Engagement New York, NY, 10.26.17

"Tax Policy Under the Current Administration," Portland State University Speaking Engagement Portland, OR, 9.8.17

"Entity Classification – Another Look at the Check-the-Box Regulations," New York University Summer Institute in Taxation Speaking Engagement New York, NY, 7.27.17

"Developments in the World of IRC § 1031 Exchanges," 2017 Oregon Society of Certified Public Accountants Annual Real Estate Conference Speaking Engagement Portland, OR, 6.14.17

"Oregon Legislative Concept 3548 – Just When You Thought Measure 97 Was Dead, It May Be Back!" Washington State Bar Association Taxation Section SALT Committee Meeting Speaking Engagement Seattle, WA, 3.23.17



"Measure 97 – The Aftermath," Bank of America Speaking Engagement Portland, OR, 12.21.16

"Entity Classification - Another Look At the Check-The-Box Regulations," New York University 75th Institute on Federal Taxation Speaking Engagement San Diego, CA, 11.17.16

"Entity Classification - Another Look At the Check-The-Box Regulations," New York University 75th Institute on Federal Taxation Speaking Engagement New York, NY, 10.27.16

"Another Look at Worker Classification - Employee vs. Independent Contractor," IRS Tax Practitioners Forum Speaking Engagement Portland, OR, 10.24.16

"Another Look At Worker Classification - Employee vs. Independent Contractor," Oregon Society of Certified Public Accountants, Business & Industries Annual Seminar Speaking Engagement Portland, OR, 10.14.16

"Measure 97 – What Does It Mean to You?" U.S. Trust Luncheon Presentation Speaking Engagement Portland, OR, 9.20.16

"The Complete Anatomy of a Qualified Subchapter S Subsidiary Election – Not Just the Nuts and Bolts", NYU Summer Institute In Taxation – Wealth Planning For High Net-Worth Individuals and Owners of Closely-Held Businesses Speaking Engagement New York, NY, 7.28.16

"The Complete Anatomy of a Q Sub Election – Not Just the Nuts and Bolts", OSB Taxation Section Speaking Engagement Portland, OR, 6.23.16

"The Complete Anatomy of a Qualified Subchapter S Election – Not Just the Nuts and Bolts", Oregon Society of Certified Public Accountants Annual Real Estate Tax Conference Speaking Engagement Portland, OR, 6.15.16



"Employee vs. Independent Contractor – Worker Classification", Florida Tax Institute Speaking Engagement Tampa, FL, 3.30.16

"The Continuing Evolution of Circular 230," Washington State Bar Association Tax Section Annual Conference Speaking Engagement Seattle, WA, 12.15.15

"Current Developments in Tax Law," Portland State Tax Practitioners Institute Speaking Engagement Portland, OR, 11.17.15

"The Complete Anatomy of a Q Sub Election - Not Just the Nuts and Bolts," 74th Institute on Federal Taxation Speaking Engagement San Francisco, CA, 11.15.15

"The Complete Anatomy of a Q Sub Election - Not Just the Nuts and Bolts," 74th Institute on Federal Taxation Speaking Engagement New York, NY, 10.25.15

"The Continuing Evolution of Circular 230," Annual Meeting, National Society of Accountants Speaking Engagement Vancouver, B.C., 8.20.15

"1031 Exchanges," 2015 Oregon Society of Certified Public Accountants Annual Real Estate Conference Speaking Engagement Portland, OR, 6.17.15

"How Tax Lawyers Can Work With CPAs & Other Tax Advisors," Oregon State Bar Tax Section (New Tax Lawyer Committee) Speaking Engagement Portland, OR, 5.20.15

"What A Business Lawyer Needs to Know About Drafting Partnership Agreements/Choice of Entity," Northwestern School of Law, Lewis & Clark College Speaking Engagement Portland, OR, 4.10.15



"Circular 230," Oregon State Bar Speaking Engagement Portland, OR, 1.15.15

"Recent Cases and Rulings," Portland State University Tax Practitioners Institute Speaking Engagement Wilsonville, OR, 12.3.14

"Developments in the World of S Corporations," 73rd Institute on Federal Taxation, New York Tax Institute Speaking Engagement San Diego, CA, 11.16.14

"Circular 230," Mid Valley Tax Forum Speaking Engagement Salem, OR, 11.4.14

"Developments in the World of S Corporations," 73rd Institute on Federal Taxation, New York Tax Institute Speaking Engagement New York, NY, 10.19.14

"Recent Developments in the World of IRC Section 1031 Exchanges," Oregon Society of Certified Public Accountants Annual Real Estate Tax Conference Speaking Engagement Portland, OR, 6.18.14

"Recent Developments in the World of S Corporations" and "Reasonable Compensation," Hawaii Association of Public Accountants, Annual Conference Speaking Engagement Maui, HI, 6.12.14

"Recent Developments in the World of 1031 Exchanges" and "Worker Classification," National Association of Public Accountants, Annual Conference on Emerging Tax Issues Speaking Engagement Las Vegas, NV, 5.5.14

"Recent Developments, including Cases, Rulings and Legislation," Portland State University Tax Institute Speaking Engagement Wilsonville, OR, 12.11.13



"Reasonable Compensation," Portland Tax Forum Speaking Engagement Multnomah Athletic Club, Portland, OR, 12.5.13

"Recent Developments, including Cases, Rulings and Legislation," Portland State University Tax Institute Speaking Engagement Portland, OR, 12.3.13

"Unreasonable Compensation," NYU 72nd Institute on Federal Taxation Speaking Engagement San Francisco, CA, 11.20.13

"Recent Developments, including Cases, Rulings and Legislation," Portland State University Tax Institute Speaking Engagement Eugene, OR, 11.13.13

"Unreasonable Compensation," NYU 72nd Institute on Federal Taxation Speaking Engagement New York, NY, 10.23.13

"S Corporations", Mid Valley Tax Forum Speaking Engagement Salem, OR, 9.24.13

"Recent Developments In The World Of S Corporations," Oregon State Bar Tax Section Speaking Engagement Portland, OR, 5.16.13

"Recent Tax Cases & Rulings," PSU Tax Practitioner Institute Speaking Engagement Wilsonville, OR, 12.11.12

"Recent Tax Cases & Rulings," PSU Tax Practitioner Institute Speaking Engagement Portland, OR, 12.4.12

"Recent Tax Cases & Rulings," PSU Tax Practitioner Institute Speaking Engagement Eugene, OR, 11.13.12

"S Corporations Update," IRS Tax Practitioners Forum Speaking Engagement Portland, OR, 11.2.12



"Taxation of S Corporations," OSCPA IRS/Practitioners Tax Forum Speaking Engagement Portland, OR, 11.2.12

"Recent Developments in the World of S Corporations," Eugene Springfield Tax Association Speaking Engagement Eugene, OR, 4.24.12

"Recent Development in the World of S Corporations," 2011 Portland State University Tax Practitioners Institute Speaking Engagement Wilsonville, OR, 12.13.11

"Recent Development in the World of S Corporations," 2011 Portland State University Tax Practitioners Institute Speaking Engagement Portland, OR, 12.6.11

"Recent Development in the World of S Corporations," 2011 Portland State University Tax Practitioners Institute Speaking Engagement Eugene, OR, 11.8.11

"What Makes LL.M Programs Different From Each Other?" Oregon State Bar Taxation Section Speaking Engagement Portland, OR, 10.29.11

"Development of a Tax Lawyer," University of Florida Tax Forum Speaking Engagement Gainesville, FL, 9.16.11

"Developments in the World of S Corporations," Tax Section, Oregon State Bar Salem, Mid-Valley Tax Forum Speaking Engagement Salem, OR, 7.19.11

"State Residency-Planning Opportunities," Garvey Schubert Barer Tax Roundtable Seminar Garvey Schubert Barer, Portland, OR, 5.17.11

"Employee vs. Independent Contractor: Another Look at Worker Classification," 33rd Annual Convention, Transportation Intermediaries Association Speaking Engagement Orlando, FL, 4.7.11



"Employee vs. Independent Contractor: Another Look at Worker Classification," Oregon Society of Enrolled Agents Speaking Engagement Portland, OR, 2.15.11

"2011 Tax Update," Garvey Schubert Barer Tax Roundtable Seminar Garvey Schubert Barer, Portland, OR, 2.15.11

"Employee v. Independent Contractor: Another Look at Worker Classification," Oregon Society of Certified Public Accountants (OSCPA) State & Local Tax Conference Speaking Engagement Portland, OR, 1.7.11

"Recent Rulings and Cases," Portland State University Tax Institute Speaking Engagement Wilsonville, OR, 12.13.10

"Developments in the World of S Corporations," Garvey Schubert Barer Tax Roundtable Speaking Engagement Garvey Schubert Barer, Portland, OR, 12.7.10

"Recent Rulings and Cases," Portland State University Tax Institute Speaking Engagement Portland, OR, 12.1.10

"Recent Rulings and Cases," Portland State University Tax Institute Speaking Engagement Eugene, OR, 11.15.10

"Taxation of S Corporations," Oregon Society of Certified Public Accountants (OSCPA) Speaking Engagement Portland, OR, 11.1.10

"Development in the World of S Corporations," Tax Section, Oregon State Bar Speaking Engagement Portland, OR, 10.14.10

"Health Care Reform: Understanding the Impact on Your Client's Bottom Line," Garvey Schubert Barer Tax Roundtable Seminar Garvey Schubert Barer, Portland, OR, 9.21.10



"Recent Developments in the World of IRC 1031 Exchanges," Oregon Society of Certified Public Accountants (OSCPA) Real Estate Tax Conference Speaking Engagement Portland, OR, 6.11.10

"What's New in the World of 1031 Exchanges – 1031 Exchange Update," 2010 Oregon Society of Certified Public Accountants (OSCPA) Real Estate Conference Speaking Engagement Embassy Suites Hotel Portland Airport, Portland, Oregon, 6.11.10

"Employee v. Independent Contractor – Worker Classification," Garvey Schubert Barer Tax Roundtable Seminar Garvey Schubert Barer, Portland, OR, 5.17.10

"Interesting 2009 Income Tax Cases and Rulings," Portland State University Tax Institute Speaking Engagement Wilsonville, OR, 12.8.09

"Interesting 2009 Income Tax Cases and Rulings," Portland State University Tax Institute Speaking Engagement Portland, OR, 12.4.09

"Interesting 2009 Income Tax Cases and Rulings," Portland State University Tax Institute Speaking Engagement Eugene, OR, 11.17.09

"Taxation of S Corporations," Oregon Society of Certified Public Accountants Speaking Engagement Portland, OR, 9.23.09

"Recent Developments in the World of IRC §1031 Exchanges," Oregon State Bar Real Estate and Land Use Section Speaking Engagement Portland, OR, 6.11.09

"Recent Developments in the World of IRC §1031 Exchanges," Oregon Society of Certified Public Accountants Speaking Engagement Portland, OR, 5.27.09



"Recent Developments in the World of IRC §1031 Exchanges," Oregon Society of Enrolled Agents Speaking Engagement Portland, OR, 4.21.09

"1031 Exchanges," Oregon Society of Certified Public Accountants, IRS Tax Practitioners Forum Speaking Engagement Embassy Suites Hotel Portland Airport, Portland, OR, 10.31.08

"What Non-Tax Attorneys Need to Know: Tax Implications of Using LLCs," Oregon State Bar Annual Business Law Section Conference Speaking Engagement Oregon Convention Center, Portland, OR, 10.24.08

"Circular 230," Oregon Society of Enrolled Agents Annual Meeting Speaking Engagement Kennedy School, Portland, OR, 10.21.08

"Taxation of S Corporations - Not Just the Nuts and Bolts," Oregon Society of Certified Public Accountants Speaking Engagement OSCPA Center, Beaverton, OR, 9.17.08

"Tax Savings Through 1031 Exchanges," Oregon Society of Certified Public Accountants Speaking Engagement Crowne Plaza, Lake Oswego, OR, 6.25.08

"1031 Exchanges and Timber Transactions," Forest Products Conference Speaking Engagement Hilton Eugene & Conference Center, Eugene, OR, 6.9.08

"Recent Developments in the World of 1031 Exchanges," Oregon and Washington Tax Institute Speaking Engagement W Hotel, Seattle, WA, 5.1.08

"Recent Developments in 1031 Exchanges," Northwest Tax Institute Speaking Engagement Grand Wailea Hotel, Maui, HI, 10.22.07

"What is New in the World of IRC Section 1031 Exchanges," Multnomah Bar Association Young Lawyers Section Speaking Engagement Standard Insurance Center, Portland, OR, 10.9.07



Tax Savings Through 1031 Exchanges Speaking Engagement Downtown Athletic Club, Eugene, OR, 9.26.07

Taxation of S Corporations - Not Just the Nuts and Bolts Speaking Engagement Embassy Suites Hotel Portland Airport, Portland, OR, 9.20.07

Tax Savings Through 1031 Exchanges Speaking Engagement Crowne Plaza, Lake Oswego, OR, 6.25.07

"Recent Developments in the World of IRC Section 1031 Exchanges," Oregon Society of Certified Public Accountants Real Estate Conference Speaking Engagement Embassy Suites Hotel Portland Airport, Portland, OR, 6.8.07

"New Developments in the World of 1031 Exchanges," Federal Exchange Accommodators Regional Conference Speaking Engagement Seattle, WA, 2.10.07

#### **Legal Alerts**

Do Olympians Owe Taxes on the Value of Their Medals? 2.24.14

Consolidated Appropriations Act, 2014, Signed Into Law by President Barack Obama 1.23.14

My Dog Ate the S Election, Now What? 8.26.13

I Sold the Ferrari but Failed to pay the IRS - Oops! 6.28.13

The Section 336(e) Election: An Important New Tool in Corporate Acquisitions 6.3.13

The Affordable Care Act Creates A Trap For The Unwary-- Worker Misclassification 4.9.13

IRS Expands its Voluntary Worker Classification Settlement Program 3.13.13



U.S. Royalties vs. Services Income for Non-U.S. Citizens: A Hole-in-One or a Bogey? 7.19.11

Preparing for FATCA Compliance 4.22.11

The Husband-Wife Qualified Joint Venture Filing Option: Proper Social Security and Medicare Crediting and Simplified Tax Reporting 9.2.10

New Administrative Rule Clarifies Gray Areas of Oregon's Tax Amnesty Program 11.16.09

Oregon's Corporate Excise Tax Substantial Nexus Rule 'Substantially' Applies to All Tax Periods Open To Examination 11.16.09

Employer-Owned Life Insurance Rules May Unintentionally 'Clean Up' More Than Just Wal-Mart 'Janitor Policies'

1.1.09

Failure of IRC §1031 Exchange Qualified Intermediary Highlights Risks and Is a Reminder of the Importance of Due Diligence When Selecting a Qualified Intermediary 12.22.08

New 'Bailout' Law Bails Out More than Just Financial Institutions - More Likely Than Not Standard for Tax Return Preparers is Replaced by Substantial Authority Standard 10.7.08

New Federal Acquisition Regulation Rules Target Contractors with Delinquent Taxes 4.25.08

#### **Publications**

Remote Workforces: Tax Perils and Other Traps For Unwary Employers Practical Tax Strategies (Thomson Reuters) (Vol. 109 No. 1 July 2022), 71.22

Tax Aspects of Divorce Oregon State Bar, Family Law in Oregon, Volume 2, Chapter 15 (2021), 8.30.21

The Road Between Subchapter C and Subchapter S – It May Be A Well-Traveled Two-Way Thoroughfare, But It Isn't Free of Potholes and Obstacles *NYU School of Professional Studies (LexisNexis)*, 5.20



Tax Aspects of the Families First Coronavirus Response Act Tax Notes State (Virtual Voice), 4.6.20

The Oregon Corporate Activity Tax – You Can Run and You Can Hide, but This New Tax Is Effective January 1, 2020 January 2020

Subchapter S After the Tax Cuts and Jobs Act – The Good, The Bad and the Ugly *NYU School of Professional Studies (Matthew Bender)*, 5.19

Construction Companies Advised to Enjoy Benefits of Tax Act The Business Tribune, 9.4.18

The TCJA and Family Tax Matters Under Federal and Oregon Law *State Tax Notes (Volume 89, Number 5)*, 7.30.18

The Complete Anatomy of a Qualified Subchapter S Election Practising Law Institute, Corporate Tax Practice Series, Volume 9, Chapter 120C (2017), June 2018

Closely Held Businesses: *The Built-In Gains Tax Revisited* NYU School of Professional Studies (Matthew Bender 2018), 5.1.18

Portland Experts' Take: Five Ways the Tax Cuts and Jobs Act Will Upend M&A *Portland Business Journal*, 4.6.18

Closely Held Businesses: Entity Classification - Another Look At the Check-The-Box Regulations *NYU School of Professional Studies (Matthew Bender 2017)*, 5.20.17

The Qualified Subchapter S Subsidiary Election – A Primer and Beyond *Journal of Taxation*, September 2016

Closely Held Businesses: The Complete Anatomy Of The Qualified Subchapter S Subsidiary Election -- Not Just the Nuts And Bolts NYU School of Professional Studies (Matthew Bender 2016), 7.11.16

Closely Held Businesses: Developments in the World of S Corporations NYU School of Professional Studies (Matthew Bender 2015), 5.1.15

Treasury Finally Amends Circular 230 Oregon State Bar Estate Planning and Administration Section Newsletter, 3.1.15

Closely Held Corporations: Reasonable Compensation in a Rising Tax Rate Environment NYU School of Professional Studies (Matthew Bender 2014), 5.1.14



Section 336(e) Elections The Oregon Certified Public Accountant, 8.30.13

Treasury Proposes Necessary and Long-Awaited Amendments to Circular 230 – Written Advice Disclaimers May Be a Thing of the Past *Oregon State Bar Taxation Section newsletter*, 2.5.13

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#### Presentations

Larry is a frequent lecturer at local, regional and national tax and business conferences for CPAs and attorneys, including:

The NYU Tax Institute The Notre Dame Tax & Estate Planning Institute The Florida Tax Institute The Oregon Tax Institute The Northwest Tax Institute The Portland State University Tax Practitioner's Institute The Portland Tax Forum The Mid Valley Tax Forum The Oregon and Washington Tax Institute The Oregon State Bar Annual Broadbrush Taxation Conference The Eugene Springfield Tax Association The University of Florida Graduate Tax Program The Oregon State Bar Tax Section Meeting Transportation Intermediary Association Annual Conference



The Oregon Society of Certified Public Accountants Forest Products Conference

The Oregon Society of Certified Public Accountants Annual Real Estate Conference

The Northwest Federal Tax Conference

The NYU Tax Conferences in July

The IRS Tax Practitioners Forum

- The Oregon State Bar Annual Real Estate Conference
- The Federation of Exchange Accommodators National and Regional Conferences
- The Medical Group Management Association Annual Conference

The Oregon Society of Certified Public Accountants Annual State and Local Tax Conference