

# Steven D. Nofziger

Principal | Portland

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## Overview

Steve helps his clients understand and navigate complex tax and business matters to allow them to further their goals.

Steve assists businesses, individuals and nonprofit organizations with a variety of business and tax matters.

Steve's business practice includes business entity formation, governance, ownership transfers, business transactions, tax and compensation planning (including executive compensation matters).

Steve's tax practice includes advising and assisting businesses, business owners and individuals with a variety of federal, state and local tax matters, including issues relating to choice of entity, tax planning for business transactions (mergers, acquisitions and business sales), worker classification, nexus and residency matters, equity compensation and IRC § 409A issues, IRC § 1031 exchanges and taxation of corporations and partnerships (including LLCs). He typically works closely with his clients' CPAs and other advisors when undertaking tax planning matters and assisting with tax controversies (i.e., audits and appeals).

He also assists nonprofit organizations (including public charities, private foundations and other tax-exempt organizations) with various corporate governance and tax matters, including assisting with entity formation and applying for tax-exempt status, advising on corporate governance and fiduciary issues, advising on donation and endowment matters, preparing and reviewing contracts, and assisting with federal and state tax compliance matters (including issues relating to tax-exempt status, unrelated business income tax (UBIT) matters and IRC chapter 42 excise taxes).

He is a frequent speaker and author. Prior to pursuing a law degree, Steve worked as an underwriter of life and disability insurance for employee benefit plans. During this time, he also earned his certification as a

Certified Employee Benefit Specialist.

## Areas of Focus

- [Tax](#)
- [Business](#)
- [Charitable & Tax-Exempt Organizations](#)
- [Employee Benefits & Executive Compensation](#)
- [Family-Owned & Closely Held Businesses](#)
- [Federal Tax](#)
- [Mergers & Acquisitions](#)
- [State & Local Tax](#)

## Admissions

- Oregon, 2006
- Washington, 2025
- U.S. Tax Court, 2010

## Education

- J.D., University of Oregon School of Law, 2006
  - Order of the Coif
  - *Oregon Law Review*, Systems Editor and Managing Board Member
  - Fredric R. Merrill Award for Best Student Work
- B.S., Linfield College, Economics (*summa cum laude*) 1996

## Honors & Recognition

- *The Best Lawyers in America*®
  - Business Organizations, 2019-present
  - Employee Benefits (ERISA) Law, 2021-present
  - Tax Law, 2021-present
- Rising Star, Oregon Super Lawyers, 2009-2012, 2016
- Notable Newcomer, Exceptional Tax Law Professional, LexisNexis Tax Law Center, 2009
- Legal 500 City Elite
  - Portland - Corporate and M&A, 2026

## Professional Activities

- Eugene-Springfield Tax Association, Past President

- Oregon State Bar Association, Nonprofit Section, Member
- Oregon State Bar Association, Tax Section, Member
  - Newsletter Committee, 2008-2013
- Western Pension & Benefits Conference, Portland Chapter, Member, 2008-present
  - Significant Issues Chair, 2014-2016

## Community Activities

- Junior Achievement USA, Volunteer, 2018-2019
- Mainspring Portland (fka Fish Emergency Service), Board of Directors, 2007-2015
- St. Rose School, Advisory Council, 2018-2022

## News & Insights

### Blog Posts

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

[07.22.25](#)

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

[07.17.25](#)

[Corporate Transparency Act Mini-Update - The Obvious Exemptions May Not Be So Obvious](#)

[02.27.24](#)

[Potential Payroll Tax Deferral Is Available - Employers Must Understand the Program and Use Extreme Caution Before Blindly Jumping Into the Deferral Pool](#)

[09.01.20](#)

[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](#)

[07.14.20](#)

[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](#)

[07.02.20](#)

[Taxpayers May Want to Wait to File Their PPP Loan Forgiveness Applications](#)

[06.19.20](#)

[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](#)

[05.28.20](#)

[More Good News for Oregon Taxpayers - The Oregon Department of Revenue Got It Right](#)

[05.07.20](#)

[The IRS Has Determined That Taxpayers Who Obtain PPP Loan Forgiveness Cannot Have Their Cake and Eat It Too](#)

[05.01.20](#)

[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](#)

[04.16.20](#)

[The IRS and Treasury Are Working Overtime to Provide Taxpayers with Joy, Hope and Optimism During These Trying Times](#)

[04.13.20](#)

[Some Clarity to the Murky: Temporary Rules Relative to the Families First Coronavirus Response Act Have Been Issued](#)

[04.07.20](#)

[The Cavalry Has Arrived - Congress Passed and President Trump Signed Into Law the CARES Act](#)

[03.30.20](#)

[Important Update: Families First Coronavirus Response Act](#)

[03.25.20](#)

[Tax Aspects of the Families First Coronavirus Response Act](#)

[03.24.20](#)

[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](#)

[07.11.19](#)

[Oregon's New Corporate Activity Tax](#)

[06.04.19](#)

[Opportunity Zone Funds - Part I: Overview of the Law](#)

[01.07.19](#)

[Newly Proposed IRS Regulations Put a Monkey Wrench in Plans by Service Businesses Seeking IRC § 199A Deduction](#)

[08.08.18](#)

[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](#)

[06.22.18](#)

[Decoding the Tax Cuts and Jobs Act - Part X: Oregon Disconnects from IRC Section 199A](#)

[04.26.18](#)

[Decoding the Tax Cuts and Jobs Act - Part IX: Impact on M&A Transactions](#)

[04.06.18](#)

[Decoding the Tax Cuts and Jobs Act - Part VIII: Charitable and Tax-Exempt Organizations / Estate and Gift Taxes](#)

[03.27.18](#)

[Decoding the Tax Cuts and Jobs Act - Part VII: Family Matters and Major Events in the Lives of Individuals](#)

[03.08.18](#)

[Decoding the Tax Cuts and Jobs Act - Part VI: Employment and Fringe Benefit Related Provisions](#)

[02.27.18](#)

[Decoding the Tax Cuts and Jobs Act - Part V: Changes to IRC §163\(j\) and the Business Interest Deduction Rules](#)

[02.06.18](#)

[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!](#)

[01.29.18](#)

[Decoding the Tax Cuts and Jobs Act - Part III: IRC § 708 and the Partnership Termination Rules Have Changed](#)

[01.22.18](#)

[Decoding the Tax Cuts and Jobs Act - Part II: IRC § 1031 and Tax Deferred Exchanges Take a Haircut](#)

[01.10.18](#)

[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](#)

[01.04.18](#)

## News

[18 Foster Garvey Attorneys Named to 2026 Legal 500 City Elite Lists](#)

[01.21.26](#)

[71 Foster Garvey Attorneys Recognized Among the 2026 Best Lawyers in America; Paul Trincherro Named 'Lawyer of the Year'](#)

[08.21.25](#)

[65 Foster Garvey Attorneys Selected to The Best Lawyers in America® 2025, Three Named 'Lawyer of the Year'](#)

[08.15.24](#)

[57 Foster Garvey Attorneys Recognized Among the 2024 Best Lawyers in America; Two Portland Attorneys Named 'Lawyer of the Year'](#)

[08.17.23](#)

[45 Foster Garvey Attorneys Recognized Among The Best Lawyers In America®](#)

[08.18.22](#)

[38 Attorneys Named 2022 Best Lawyers in America; 11 Named Best Lawyers: Ones to Watch](#)

[08.19.21](#)

[43 Attorneys Named 2021 Best Lawyers in America; 10 Named Best Lawyers: Ones to Watch](#)

[08.20.20](#)

[50 Foster Garvey Attorneys Named 2020 Best Lawyers in America](#)

[08.15.19](#)

## Events

[“Tax Traps for the Unwary,” American Academy of Matrimonial Lawyers CLE Program](#)

[05.02.25](#)

[“Tax Issues for Artists,” Washington Lawyers for the Arts \(WLA\) Artist Workshop Series](#)

[05.24.22](#)

[“What Non-Tax Lawyers Need to Know About the Tax Aspects of the Families First Coronavirus Response Act and the CARES Act,” Multnomah Bar Association COVID-19 CLE Series](#)

[04.28.20](#)

[“Audits of Farming Businesses: ‘Hobby Loss’ Audits and What Taxpayers Can Do to Protect Themselves,” Oregon Farm Bureau Tax Symposium](#)

[10.17.19](#)

[The Affordable Care Act: Current Issues, Recent Changes, and an Uncertain Future](#)

[01.26.17](#)

[“Affordable Care Act Update and Issues for Health Care Employers”, Healthcare Financial Management Association \(Washington-Alaska Chapter\), Annual Conference & Trade Fair](#)

[02.25.16](#)

[“Health And Welfare Plans: Significant Issues Update,” Western Pension & Benefits Conference’s Health, Welfare & Benefits Symposium](#)

[01.28.15](#)

[“Worker Classification,” Eugene-Springfield Tax Association](#)

[10.26.10](#)

["A Few of the Latest Tax Issues for Non-tax Attorneys," Oregon State Bar Broadbrush Taxation Seminar](#)

[11.13.09](#)

## Legal Alerts

[It Pays to be Small: New Guidance Gives PPP Loans under \\$2 Million a Safe Harbor](#)

[05.13.20](#)

[New Government Guidance Clarifies PPP Loan Eligibility, Promises Enforcement](#)

[05.01.20](#)

[IRS Extends Affordable Care Act Reporting Deadlines](#)

[01.01.16](#)

## Publications

[Tax Aspects of Divorce](#)

[08.30.21](#)

[There and Back Again: A Tax-Focused Tale of COVID Relief for Businesses](#)

[03.01.21](#)

[Tax Aspects of the Families First Coronavirus Response Act](#)

[04.06.20](#)

[The TCJA and Family Tax Matters Under Federal and Oregon Law](#)

[07.30.18](#)

[Portland Experts' Take: Five Ways the Tax Cuts and Jobs Act Will Upend M&A](#)

[04.06.18](#)

[A Summary of the Oregon Tax Changes Passed During the Recent Special Legislative Session](#)

[10.16.13](#)

[Employee Benefits in a Post-DOMA World](#)

[07.14.13](#)

[Upcoming Health Care Reform Compliance and Planning Issues for 2013 and 2014](#)

[07.02.13](#)

[Navigating the Department of Labor's New Disclosure Regulations: Action Items for Plan Sponsors and Fiduciaries](#)

[04.06.13](#)

[Highlights of Tax Law Changes Under the American Taxpayer Relief Act of 2012](#)

[02.14.13](#)

[Expanded Roth Conversion Opportunity Available to Retirement Plan Participants; Fiduciary Update](#)

[01.24.13](#)

[Failures of IRC §1031 Exchange Qualified Intermediaries Highlight Risks and the Importance of Due Diligence When Selecting a Qualified Intermediary](#)

[03.14.09](#)

[Due Diligence in Selecting a 1031 Qualified Intermediary](#)

[02.01.09](#)

[Employer-Owned Life Insurance Rules May Unintentionally 'Clean Up' More Than Just Wal-Mart 'Janitor Policies'](#)

[01.01.09](#)

[Lane County Mass Transit Tax](#)

[01.07.08](#)

[Washington County's Real Property Transfer Tax](#)

[01.06.08](#)

[A Review of Oregon Affiliate Nexus](#)

[01.05.08](#)

[IRC Section 1031 Exchange Issues in Oregon](#)

[01.04.08](#)

[EGTRRA and the Past, Present, and Future of Oregon's Inheritance Tax System](#)

01.01.05

## Connect with Steve

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