



# Bryce Parkllan Associate

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- @millernashllp

"To provide creative and practical solutions for complicated tax issues, I start by learning about the client's business and goals. I strive to distill complex tax concepts into understandable bites that allow my clients to make the best decision and achieve their goals in a tax-efficient manner."

Bryce advises clients of all sizes on the federal tax consequences of a broad range of internal and third-party transactions. In particular, he assists with the international tax planning and structuring of domestic clients' investments and operations abroad; the cross-border merger, acquisition, disposition, and restructuring transactions of both domestic and international clients; and the structuring of foreign investment in the U.S., including under the Foreign Investment of Real Property Tax Act (FIRPTA).

Bryce also has experience with complex real estate transactions. He has counseled fund sponsors and developers with respect to the opportunity zone program; assisted clients through the completion of 1031 and 1033 exchanges; and helped developers complete low-income housing tax credit transactions.

Prior to joining the firm, Bryce was an international tax associate at KPMG, where he focused on international tax consulting and compliance for Fortune 500 companies and high net-worth individuals with international holdings. He is a frequent speaker on a variety of federal income tax topics at various bar association and client-facing industry events and other CLE programs.

### **Professional Activities**

- Multnomah Bar Association, Member
- Oregon State Bar, Member
  - Taxation Section
  - Business Law Section
- American Bar Association, Member
  - Tax Section

## **Education**

LL.M., New York University School of Law, taxation, 2019

J.D., University of Oregon School of Law, 2018

Order of the Coif

B.S., University of Phoenix, business, 2015

 Delta Mu Delta International Honor Society

#### **Bar Admissions**

Arizona, 2023 Washington, 2022 Oregon, 2019



#### **Publications**

Bryce is a regular contributor to *Today in Tax*, Miller Nash's ongoing series of articles analyzing weekly updates and publications from the IRS.

- "A Non-U.S. Company's Guide to Doing Business in the U.S.: A Playbook for Accessing the U.S. Market," Miller Nash, coauthor (July 2022)
- "A Non-U.S. Company's Guide To Doing Business in the U.S.: Understanding Federal Taxes," Miller Nash, coauthor (Apr. 2022)
- "When Worlds Collide: How Tangible Tax Burdens Attach to Digital Commerce in the United States (Part 2),"
  Miller Nash, coauthor (Nov. 2021)
- "When Worlds Collide: How Tangible Tax Burdens Attach to Digital Commerce across the Globe (Part 1)," Miller Nash, coauthor (Nov. 2021)
- "New Reporting Requirements for Deposit Interest Paid to Residents of Chile," Miller Nash, Bank Law Monitor, coauthor (Oct. 2021)

## **Presentations**

- "Untangling the Tax Web: Exploring U.S. Federal Tax Concerns for Real Estate Investors," Eugene Springfield, Tax Association (Oct. 2023)
- "Representing Real Estate Developers: Navigating the Federal Tax Landscape," Oregon State Bar, Taxation Section (Sep. 2023)
- "Phantom Equity as an Incentive," Master Pools Guild (Oct. 2022)
- "Digital Assets and Blockchain in M&A: Due Diligence, Key Provisions, Structuring Issues," Strafford Publications, CLE webinar (July 2022)
- "Taxation of Cryptocurrencies and Other Digital Assets," Oregon State Bar, Taxation Section (June 2022)
- "Your Tax Law Career: Perspectives on Different Pathways in the Tax Profession," American Bar Association, Tax Section, moderator (Mar. 2022)

## **Recognition & Honors**

- Selected for inclusion in Best Lawyers: Ones to Watch® (Portland, OR)
  - Tax Law, 2024-present
- Selected for inclusion as an Oregon Super Lawyer—Rising Star, 2023-present

#### **Personal Activities**

Bryce enjoys traveling and exploring the Pacific Northwest with his wife and son. He also enjoys cooking, reading, and playing golf.