HansonBridgett



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Areas of Focus

- Employee Benefits
- Corporate
- Tax
- Emerging Companies

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Nancy is a tax attorney focused on tax planning, counseling and transactional matters. Her practice includes advising founders, investors, and companies on specialty tax incentives. She has also helped clients successfully resolve federal tax audits and controversies in the appeals process.

Publications

"Timing is Everything for QSBS After the One Big Beautiful Bill Act," author, Tax Legal Alert (July2025)

"Will QSBS Become even Bigger and More Beautiful?," co-author, Tax Legal Alert (June 2025)

"United States Tax Planning for Foreign Founders Moving to the US: Planning for Qualified Small Business Stock Benefits," co-author, Tax Insight & Analysis (March 2025)

"Conversions for QSBS Status: Best practices for restructuring LLCs taxed as S-Corporations," co-author, Carta (November 2024)

"QSBS Holding Period and $50 Million Test in Ju vs. United States: A Patent Oversight," Tax Legal Alert (April 2024)

"IRS Clarifies Clean Energy Credits for Low-Income Communities," *Bloomberg Tax* (August 2023)

"Preserving QSBS in the Midst of the Silicon Valley Bank Crisis," co-author, Tax Law Legal Alert (March 2023)

"Leveling Up With IRS Guidance on Bonus Clean Energy Credits," *Bloomberg Tax* (March 2023)

"IRS Guidance on New Research & Experimental Cost Capitalization: At What Expense?,"Tax Law Legal Alert (December 2022)

"Taxpayers in Jarrett Case Still Seek an Answer on Crypto Staking," *Bloomberg Tax* (April 2022)

"Something to Prove on Proof of Stake: Plaintiffs in Jarrett Reject IRS Refund on Taxed Tokens," *Tax Law Alert* (February 2022)

"Raising the Stakes on Crypto Compliance: Congress Passes Infrastructure Bill With Felony Charges for Digital Asset Reporting Failures," Tax Law Alert (November 2021)

"From Coders to Brokers: New Proposed 1099-B Reporting for Crypto Miners and Software Developers," Tax Law Alert (August 2021)

"Main Street Lending Program Now Open for Nonprofits," co-author, *Tax + Health Care Law Alert* (July 2020)

"Last Chance for ACA-Related Protective Refund Claims for 2016," co-author, *Tax Law Alert* (July 2020)

"IRS Clarifies Eligible Like-Kind Property under Proposed Section 1031 Regulations," co-author, *Tax Law Alert* (June 2020)

"Business Realities in the Age of COVID-19," co-author, *Seniors Housing Business* (June 2020)

"IRS Allows Amended Partnership Returns for Bonus Depreciation and Other CARES Act Changes," co-author, *Tax Law Alert* (April 2020)

"IRS Form Released for Advance Payments of COVID-19 Payroll Tax Credits," co-author, *Employee Benefits Law Alert* (April 2020)

"Additional Payroll Tax Credits for Small and Large Employers Under the CARES Act," co-author, *Employee Benefits Law Alert* (March 2020)

"Modifications of the Tax Cuts and Jobs Act of 2017 in the CARES Act," co-author, *Tax Law Alert* (March 2020)

"IRS and DOL Issue COVID-19 Related Tax Credit Guidance," co-author, *Employee Benefits Law Alert* (March 2020)

"San Francisco Offers Relief to Local Small Businesses in Response to COVID-19," co-author, *Tax Law Alert* (March 2020)

"Insight: IRS Form 1099-K in the Technology Platform Defense to California AB 5," co-author, *Bloomberg Tax* (December 2019)

"IRS Form 1099-K Payment Reporting Under California AB 5," co-author, *Tax Law Alert* (October 2019)

"Recent Increase in IRS Enforcement of ACA Reporting Penalties," co-author, *Employee Benefits and Tax Law Alert* (September 2019)

"Court Upholds Plan Administrator's Interpretation in Recent ERISA Case," co-author, *Employee Benefits Law Alert* (September 2019)

"CalSavers State-Sponsored Retirement Plan Has Officially Launched," co-author, *Employee Benefits Law Alert* (September 2019)

"CalPERS Announces New Fees for Section 218 Agreements," co-author, *Employee Benefits Law Alert* (August 2019)

Presentations

"Qualified Small Business Stock (QSBS) Webinar," UBS UHNW Advisory (May 2026)

"Planning the Excellent Exit," Morgan Stanley Wealth Management (February 2026)

"Founders' Playbook: What to Know About QSBS," co-presenter, Whittier Trust (October 2025)

"The Tax Landscape Just Shifted — Are You Prepared to Exit Under the New Rules?" panelist, Morgan Stanley Webinar (August 2025)

"Tax Considerations in M&A Transactions: Navigating Federal Rules and Strategic Pitfalls," co-presenter, My Law CLE and Federal Bar Association Webinar (June 2025)

"QSBS: Planning, Stacking, Tracking," co-presenter, Estate Planning Council of Northern Nevada Annual May Event (May 2025)

"Tax Wise Investing Strategies for Savvy Investors," panelist, Morgan Stanley Tax Wise Investing Series (February 2025)

"The 2025 Window of Opportunity for Business Owners Looking to Exit," panelist, Morgan Stanley Webinar (November 2024)

"QSBS Planning for Shareholders: Trusts, Stacking, Rollovers, and More," panelist, 2024 Annual Meeting of the California Tax Bar and California Tax Policy Conference (November 2024)

"Women Founders Network 2024 Fast Pitch Event" judge, Women Founders Network (October 2024)

"Tax Planning Strategies and Structures for Today's M&A Market," Celesq Webinar (March 2024)

"Advanced Tax Considerations for M&A Transactions," Strafford Webinar (January 2024)

"Hot Topics in Income Tax Planning: Case Studies," 2023 Ralph Grant Institute CPA Conference (December 2023)

"Corporate Transparency Act," 2023 Ralph Grant Institute CPA Conference (December 2023)

"Taking Care of Your People, From Compliance to Culture," co-presenter, Werqwise and Insperity (March 2023)

"Smart Tax Strategies for Maximizing Your Income Post-Exit," co-presenter, Morgan Stanley's Women & Wealth Series (February 2023)

"Reopening Your Workplace Part II - Tax and Wage & Hour Issues for Remote Workers; CAL/OSHA Compliance" and "Tax Issues for Remote Workers," 2021 Labor & Employment Mid-Year Update (June 2021)

"Business Realities in the Age of COVID-19," co-presenter, LeadingAge Webinar (December 2020)

Press

"Week in Insights: A Place Where the Drinks Are Creative and Free," *Bloomberg Tax* (March 2023)

"Week in Insights: Putting in the Work and Showing Up to Win," *Bloomberg Tax* (April 2022)

"Made a killing in crypto? Your tax bill is coming due," *InvestmentNews* (April 2022)

"US Private Companies Must Report Leases Starting Next Year," *North Bay Business Journal* (September 2021)

Honors & Awards

Leadership Council on Legal Diversity, Pathfinders (2022)

California Lawyers Association, Wiley W. Manuel Pro Bono Legal Services Award (2021)

Professional Affiliations

Leadership Council on Legal Diversity, City Lead

Women's Founder Network, Board Member

Professional Licenses

Certified Taxation Specialist

Education

LL.M., Tax, Boston University School of Law (2016)

J.D., *cum laude* Boston University School of Law (2014)

B.A., *magna cum laude* Kenyon College (2008)

Admissions and Courts

California

Massachusetts

U.S. Tax Court