

# STEPHEN HOPKINS

Attorney, Shareholder

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## SERVICES

Estate, Trust and Probate

- Business Succession Planning
- Estate and Trust Administration
- Estate Planning
- Gift and Estate Tax

Tax

- Executive Compensation and Employee Benefits
- Tax Controversy and Dispute Resolution
- Tax Opinions
- Tax Planning and Compliance
- Tax-Exempt Organizations

## CREDENTIALS

EDUCATION

- LL.M., New York University, 1981
- J.D., cum laude, William Mitchell College of Law, 1980
- B.A., University of Minnesota, 1975

BAR ADMISSIONS

- Minnesota
- United States District Court for the District of Minnesota
- United States Tax Court
- Eighth Circuit Court of Appeals
- Federal Court of Claims

HONORS

- Listed in The Best Lawyers in America® 2019-2020, Trusts & Estates
- Selected for inclusion in Minnesota Super Lawyers®, 2006-2019
- Featured in Minnesota Monthly Magazine as The Best Lawyers in America® 2019



“The complexity of tax law requires understanding and interpreting how tax rules apply to various situations. It’s essential to know the forest for a big-picture look at the situation, but seeing the trees is equally important, to detect related or underlying issues critical to an effective resolution.”

## ABOUT ME

**As a tax lawyer with more than 30 years of experience, I bring abstract thinking and critical analysis to uniquely solve problems. Keenly understanding the intricacies of tax law, I advise clients on what is possible and develop a game plan to tackle their issues.**

I represent individuals, businesses, and nonprofit organizations on all major areas of tax. I am proactive to help you avoid problems and costly mistakes, or mitigate damages when you are involved in a conflict. My expertise includes:

- advising about tax structure and identifying tax risks when starting, buying, selling, merging, or acquiring a business;
- helping with contracts and matters related to domestic and foreign tax planning;
- reviewing your case or representing you during and after an IRS audit;
- working with executives on compensation planning and compliance; and
- counseling on estate-planning strategies and tax obligations associated with wealth transfer.

My experience includes tax litigation in federal and state courts and administrative appeals before the Internal Revenue Service and state tax authorities.

Having worked for the Internal Revenue Service, I bring the unique experience and comprehension of the inner workings of tax examinations and assessments from a services perspective. Clients say they can rely on me to answer seemingly unanswerable tax questions. I am always ready for the challenge of complex and technical tax issues.

## RESULTS

- Handling several large state tax refund claims dealing with the sourcing of goodwill gain
- Representing buyers and sellers on tax and employee benefits issues in sale transfers ranging from small to billion-dollar deals
- Making private ruling requests to the Internal Revenue Service on income and estate tax matters
- Litigating in federal court and advising on tax accounting and inventory issues
- Handling and advising on administrative appeals and audits by the IRS and State tax agencies

## ASSOCIATIONS

PROFESSIONAL

- Hennepin County Bar Association
- Minnesota State Bar Association, Tax Law and Employee Benefits Law Sections
- American Bar Association, Tax Section

## THOUGHT LEADERSHIP

ARTICLES & PRESENTATIONS

- Co-Author, “Understanding the New Tax Law Changes: Considerations for Estate Planning,” Henson Efron Thought Leadership, February 13, 2018
- Presenter, Hennepin County Bar Association’s CLE course, “2007 Federal and State Tax Law Updates,” discussed Nadler v. Commissioner decision
- Presenter and Speaker, 49th Annual MNCPA Tax Conference, “Considerations in Choosing a Business Entity”
- Presenter and Speaker, Sponsored by National Business Institute, “Employee Benefits Impacted by the Tax Reform Act of 1986

STEPHEN L. HOPKINS

2020

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