Tax

Our tax attorneys dedicate their practice to the complete array of ever-changing tax issues. Our attorneys have advanced legal and Certified Public Accountant (CPA) qualifications for advising individuals and businesses, and offering extensive tax planning and tax controversy services.

We have immediate access to subject matter legal professionals practicing in virtually any area of business law or litigation.

Areas of Practice

- Controversy and Collection
- Payment Arrangements
- Choice of Entity
- Corporate Reorganizations
- Exempt Organizations
- Aerospace Planning and Compliance
- State and Local Income and Sales/Use Tax
- Preparation of Income, Gift, Estate and Fiduciary Tax Returns
- Due Diligence Review for Mergers and Acquisitions
- Like-Kind Exchanges
- Tax Opinions
- Tax Allocation Agreements
- Ruling Requests

Our work includes planning tax strategies for businesses and individuals, transaction support, applying for rulings and determination letters, and representing clients in tax disputes with various government agencies. Our representation of business clients also includes providing advice during all phases of the business life-cycle. We represent tax-exempt organizations and foundations addressing issues of formation and operation. We also represent clients in disputes with various state and local revenue departments in cases involving income, franchise, property, sales/use taxes, and unclaimed property.

Experience

Counseled a University on Unrelated Business Taxable Income Considerations

PROFESSIONALS

Lee R. Augustine Certified Public Accountant

Joe Demko Partner

Lisa M. Kellermann Paralegal

Mark G. Kmiecik Partner

Alice A. Lin Partner

Gregory J. Sell Partner

Debra Theine Paralegal

Peggy A. Thompson Paralegal

Joseph E. Tierney IV Partner



Acted as General Counsel for a Contract School for Seven Years

Counseled-Tax Sensitive Investors in Joint Ventures Unrelated Taxable Income Matters

Counseled a Nonprofit University on Donor Reporting Issues and Employment Reimbursement Tax Matters

Counseled a Luxury Goods and Services Conglomerate on Tax Issues in its Acquisition of a Whiskey Company

Represented a Bank Holding Company in a Merger Valued at Approximately \$473 Million

Counseled a Bank on Tax Issues During its Acquisition of Another Bank and its Subsidiary

Represented a NYSE-Listed Industrial REIT with Respect to Several Public Offerings Utilizing Diverse Structures

Served as Legal Counsel to a Health Care Real Estate Company in its Acquisition of Several Senior Living Properties

Represented One of the Largest Privately Owned Commercial Banks in the Milwaukee Region During an Acquisition

Provided Counsel to a Bank Holding Company and its Subsidiary in M&A, Subordinated Debt and Other Transactions

Successfully Represented a Bank Holding Company in Tax Matters During its Acquisition of Another Bank Holding Company

Served as Tax Advisor in a Banking Merger on the East Coast

Represented a \$9.5 Billion Dollar Financial Holding Company in its Acquisition of a Florida Based Investment Management Company

Served as Counsel to an HVAC Company Resolving its Employment Tax Liability

Serves as Counsel to an Amateur Sports Organization and its Establishment of a Scholarship Program

Serves as Counsel to an Individual in the Sale of his Biotech Company

Prosecuted Over \$5 Million Commercial Property Tax Refund Through the Missouri State Tax Commission

Firm News

Amundsen Davis Named in the 2024 Edition of Best Law Firms® Firm News, November 2, 2023



91 Amundsen Davis Attorneys Recognized by Best Lawyers ${\bf @}$ in 2024 in America Firm News, August 17, 2023

Attorney Alice Lin Joins Amundsen Davis's Chicago Office Firm News, July 10, 2023

U.S. News & World Report – Best Lawyers® "Best Law Firms" 2023 Firm News, November 3, 2022

U.S. News & World Report – Best Lawyers® "Best Law Firms" 2022 November 4, 2021

34 Amundsen Davis Attorneys Recognized by *Best Lawyers in America*© 2022 August 19, 2021

U.S. News & World Report – Best Lawyers® "Best Law Firms" 2021 November 5, 2020

30 Amundsen Davis Attorneys Recognized in *Best Lawyers in America*© *2021* August 20, 2020

U.S. News & World Report – Best Lawyers® "Best Law Firms" 2020 November 1, 2019

19 Amundsen Davis Attorneys Named to *Best Lawyers in America*© 2020 August 15, 2019

U.S. News & World Report – Best Lawyers® "Best Law Firms" 2019 November 1, 2018

Amundsen Davis Ranks on Crain's Chicago Business' 2018 Largest Law Firms List *Crain's Chicago Business*, October 25, 2018

15 Amundsen Davis Attorneys Included in Best Lawyers in America© 2019 August 15, 2018

U.S. News & World Report – Best Lawyers® "Best Law Firms" 2018 November 1, 2017

Amundsen Davis Ranks on Crain's Chicago Business' Largest Law Firms List *Crain's Chicago Business*, September 15, 2017

12 Amundsen Davis Attorneys Included in Best Lawyers in America© 2018 August 15, 2017

U.S. News – Best Lawyers® "Best Law Firms" 2017 Firm News

Amundsen Davis Ranks on Crain's Chicago Business' Chicago Largest Law Firms List

Firm News, Crain's Chicago Business, September 10, 2016



Seven Amundsen Davis Attorneys Included in Best Lawyers in America© 2017 August 15, 2016

U.S. News – Best Lawyers® "Best Law Firms" 2016

Alerts

IRS Provides Tax Inflation Adjustments for Tax Year 2022 Article, November 12, 2021

Inflation is Back, Should You Consider Consumer Price Index (CPI) Rent Increases in Your Leases?
Article, September 30, 2021

How Might Joe Biden's Tax Proposals Affect You? Article, May 14, 2021

Section 1031 Tax Deferred Exchanges: Implications of the Biden Proposal Article, April 29, 2021

Year-End Corporate Tax Considerations: The Essentials Article, December 3, 2020

Individual Tax Planning Following the November 2020 Elections Article, November 30, 2020

Family Business Succession Planning in the Era of Tax Uncertainty: Use Available Tax Advantages or *Perhaps* Lose Them Article, October 22, 2020

City of Milwaukee Property Tax Notice of Assessment Objection/Appeal Deadline – May 18, 2020 Article, May 5, 2020

Missouri State Tax Relief – Filing Deadline Now July 15, 2020 Amundsen Davis Tax Alert, March 27, 2020

CARES Act: Historic Senate Legislation to Provide Individuals with Personal Tax Rebates Among Other Tax Advantages (Updated March 27, 2020) Article, March 26, 2020

Claiming Tax Credits For Paid Leave Under The Emergency Family And Medical Leave Act And The Emergency Paid Sick Leave Act Article, March 26, 2020

CARES Act: Robust Tax Benefits for Businesses Article, March 26, 2020

Gift Tax Returns and COVID-19

Amundsen Davis Tax Alert, March 24, 2020



Legislative Tax Relief for Employers and Their Employees Affected by the Coronavirus Pandemic Amundsen Davis Tax Alert, March 22, 2020

Tax Filing Update

Amundsen Davis Tax Alert, March 21, 2020

IRS Relief for Taxpayers Affected by the Coronavirus Pandemic *Amundsen Davis Tax Alert*, March 19, 2020

Due Date for Payment of Certain Taxes Due April 15, 2020 Postponed to July 15, 2020 Pursuant to IRS Notice 2020-17 Article, March 18, 2020

Stage Is Set for Significant Retirement Bill to Pass by Year End (SECURE Act) Article, December 18, 2019

Business Succession Opportunities after Tax Reform Amundsen Davis Corporate Alert, March 2, 2018

New Partnership Audit Rules for 2018 Article, November 6, 2017

IRS Announces 2018 Estate and Gift Tax Limits Article, November 6, 2017

Tax Reform Update Article, November 3, 2017

Modern Commercial Financing: Your Guide to Regulation A+ Article, September 25, 2017

Tax Reform In the Making: A Comparison of the Potential Revisions Article, March 2, 2017

Events

Managing New Legal Mandates for Multi-State Employers Event, Amundsen Davis, Webcast, June 11, 2024

Your Employee Asked to Work Remotely Indefinitely (or Short Term): Important Legal Considerations Before You Say Yes Event, Amundsen Davis, Webcast, June 23, 2021

Tax Changes on the Horizon with the Biden Administration Event, Amundsen Davis, Webcast, April 14, 2021

It's Time To Thrive – Getting Your Business Back On Track in 2020 Speaking Engagement, BizTimes Media's Family & Closely Held Business Summit 2020, Webcast, July 22, 2020



Paycheck Protection Program: Factors for Considering a Loan

Event, Webcast, April 2, 2020

Doing Business with CANNABIS

Rockwell Beer Co.; St. Louis, MO, June 26, 2019

Gifting Techniques Using Trusts and The Use of Family Limited Partnerships/LLCs in Estate Planning

Speaking Engagement, Radisson Milwaukee West Hotel; Milwaukee, WI, February 28, 2019

Reconciling State and Federal Audits After New IRS Partnership Audit

Regulations: Tax Reporting Challenges

Speaking Engagement, Strafford; Webcast, November 13, 2018

New Partnership Representative Final Regulations Under Section 6223

Centralized Audit Regime

Speaking Engagement, Strafford; Webcast, October 25, 2018

Estate Planning and New IRS Centralized Partnership Audit Rules: Impact on

Trusts Holding Partnership Interest

Event, Stafford; Webcast, May 30, 2018

Step-by-Step Estate Planning II

Event, State Bar of Wisconsin Seminar Series; Milwaukee, WI, February 23, 2018

What Does Tax Reform Mean for You and Your Business?

Event, Northern Trust Economic Trends 2018; Milwaukee, WI, January 19, 2018

Gifting Techniques Using Trusts and The Use of Family Limited Partnerships/LLCs in Estate Planning

Speaking Engagement, State Bar Center; Madison, WI, February 23, 2017

Fundamentals of Buying and Operating Business Aircraft

Amundsen Davis, Seminar, Chicago, IL, September 20, 2016

2016 Tax Changes Update

Webinar, Illinois Chamber of Commerce, March 1, 2016

Blog Posts

REGISTER NOW - Managing New Legal Mandates for Multi-State Employers -Webcast on June 11

Labor & Employment Law Update, May 21, 2024

What the Show Succession Teaches Us About Planning for a Family Business Corporate News: A Legal Update, September 7, 2023



IRS Issues Final Section 162(m) Regulations on Companies' Ability to Deduct Executive Pay

Labor & Employment Law Update, March 2, 2021

IRS Issues Limited Guidance on Payroll Tax Deferral Option *Labor & Employment Law Update*, August 31, 2020

New Guidance: A Reminder the Cadillac Tax is Still Looming Labor & Employment Law Update, August 31, 2015

