

# Tax

## COMPREHENSIVE TAX SOLUTIONS

Our tax attorneys provide strategic guidance on complex and evolving tax matters. Our team includes attorneys with a master of laws (LLM) in taxation as well as a certified public accountant (CPA), ensuring a well-rounded approach to tax planning, compliance, and dispute resolution.

We help **businesses and individuals** with:

- Structuring tax-efficient transactions and business operations
- Planning for mergers, acquisitions, and cross-border investments
- Drafting shareholder, joint venture, and operating agreements
- Regulatory compliance, including rulings and determination letters
- Resolving tax disputes at the international, federal, state, and local levels
- Supporting tax-exempt organizations from formation through operational compliance

Our experienced team regularly navigates complex tax laws, simplifying the process for our clients while delivering practical, business-focused solutions. We often represent clients in federal, state, and local tax matters, including income, franchise, property, sales/use tax, and unclaimed property disputes.

## M&A AND TRANSACTIONAL TAX SUPPORT

Mergers and acquisitions (M&A) transactions and cross-border investments require thoughtful tax planning, but with the right guidance, they can be navigated with confidence. We structure every aspect of a transaction to minimize risk and maximize value. From due diligence through post-closing integration, we help you address challenges and implement tax strategies aligned with your business goals.

## MERGERS & ACQUISITIONS TAX PLANNING

We help clients structure transactions that reduce tax exposure and support strategic growth.

- Structuring tax-efficient transactions for buyers and sellers
- Conducting due diligence to identify tax risks and opportunities
- Evaluating purchase structures for optimal tax outcomes
- Advising on taxable and tax-free reorganizations

## PROFESSIONALS

Lee R. Augustine  
Certified Public Accountant

Anne K. Connolly  
Paralegal

Luke A. Fedlam  
Partner

Gini L. Hendrickson  
Senior Counsel

Mark G. Kmiecik  
Partner

Alice A. Lin  
Partner

Peggy A. Thompson  
Paralegal

Joseph E. Tierney IV  
Partner

## CORPORATE & TRANSACTION STRUCTURING

Our team provides practical guidance on structuring and documenting business operations.

- Advising on corporate reorganizations and entity restructuring
- Developing and reviewing operating agreements for all business structures
- Drafting and negotiating private equity fund agreements
- Advising on REIT tax structuring, compliance, and opinions
- Structuring joint ventures with tax-sensitive investors
- Reviewing S-Corporation shareholder agreements
- Guiding entity selection for tax efficiency

## INBOUND INVESTMENT & INTERNATIONAL TAX

We support foreign investors and multinational clients with cross-border tax strategy and compliance.

- Developing U.S. tax strategies for foreign investors
- Ensuring compliance with tax treaties and regulations
- Advising on transfer pricing and profit repatriation strategies

## TAX CONTROVERSY & DISPUTE RESOLUTION

Our team has extensive experience helping clients navigate tax audits, negotiate settlements, secure penalty and interest relief, and address collection efforts.

We offer strategic guidance on:

- Resolving state, local, and IRS tax disputes
- Managing cross-border tax compliance
- Addressing post-transaction tax disputes
- Defending challenges to tax-exempt status

## ADDITIONAL TAX SERVICES

Beyond transaction-focused services, we offer a full range of tax planning, compliance, and advisory support, including:

- Preparing tax opinions and ruling requests
- Drafting choice of entity and tax allocation agreements
- Structuring like-kind exchanges and tax payment arrangements

## Tax

- Ensuring state and local tax compliance (income, sales/use tax)
- Providing aerospace tax planning and compliance
- Preparing income, gift, estate, and fiduciary tax returns

Our tax professionals work seamlessly with other service groups to deliver clear, practical solutions to even the most nuanced issues, allowing you to focus on protecting your assets, growing your business, and planning for the future.

### Experience

\$2.57 Million Division Asset Sale for Engineering Company

Represented Real Estate Investors in Joint Ventures

Counseled a University on Unrelated Business Taxable Income Considerations

Acted as General Counsel for a Contract School

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

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

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

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

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

Successful Audit Defense Against State Department of Revenue

IRS Tax Liability Reduction and Innocent Spouse Relief

## Tax

### Firm News

Several Amundsen Davis Service Groups Named in the 2025 Edition of Best Law Firms®  
Firm News, November 7, 2024

100 Amundsen Davis Attorneys Recognized by Best Lawyers® in 2025 in America  
Firm News, August 15, 2024

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

82 Amundsen Davis Attorneys Recognized by Best Lawyers® 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

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

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

25 Amundsen Davis Attorneys Recognized in *Best Lawyers in America*© 2021  
Firm News, August 20, 2020

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

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

## Tax

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

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

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

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

9 Amundsen Davis Attorneys Included in Best Lawyers in America© 2018  
Firm News, 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

Six Amundsen Davis Attorneys Included in Best Lawyers in America© 2017  
Firm News, August 15, 2016

U.S. News – Best Lawyers® “Best Law Firms” 2016

### In the Media

Joe Tierney Interviewed by *Milwaukee Business Journal* on Tax Changes After the  
Election  
Media Mention, *Milwaukee Business Journal*, December 13, 2024

### Alerts

Missouri Eliminates Income Tax on Capital Gains for Individuals  
Article, *Amundsen Davis Real Estate, Zoning & Public Finance Alert*, July 30, 2025

No Tax on Tips—But What About Overtime and Social Security?  
Article, *Amundsen Davis Tax Alert*, June 20, 2025

Does My Company Qualify for Wisconsin's Voluntary Disclosure Program?  
Article, *Amundsen Davis Tax Alert*, June 4, 2025

No Tax on Tips Act: How Taxpayers Can Prepare  
Article, *Amundsen Davis Tax Alert*, March 13, 2025

Losing Land to Eminent Domain? Plan for Tax Consequences Using an Internal Revenue Code Section 1033 Exchange

Article, *Amundsen Davis Eminent Domain Alert*, October 18, 2024

Eligibility for Significant Savings From the Sale of Qualified Small Business Stock Under Internal Revenue Code Section 1202

Article, *Amundsen Davis Tax Alert*, October 11, 2024

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

## Tax

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

Speaking Engagement, Connor & Gallagher OneSource, Webcast, August 29, 2024

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

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

### 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

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