

State and Local Tax (SALT)

Michael Best has extensive experience advising national and regional clients on local and multistate tax issues. Whether your organization is based solely in Wisconsin or operates in many different states, we can assist with tax planning strategies and provide counsel on the state tax impacts of mergers, acquisitions, restructurings, and ongoing business operations.

For decades, we have also had a robust practice with respect to audit and contested matters in the state and local tax arena, representing clients on an ongoing basis before the Wisconsin Department of Revenue, the Wisconsin Tax Appeals Commission, and Wisconsin appellate courts.

We advise clients on a wide variety of issues related to state corporate income, franchise, personal income, excise, property, and sales and use taxes, such as:

- Combined reporting and apportionment, including exclusions from combined reporting involving insurance companies, “80/20” companies, and “non-unitary” affiliates, as well as intercompany transactions
- Sales factor apportionment sourcing for royalties, services, software, and other receipts, for taxpayers in a wide variety of industries, as well as the application of “throwback” and “throw out” rules in these contexts
- Sales and use taxes on digital products
- State tax requirements for out-of-state businesses that have a “nexus” with Wisconsin or another state
- Specialized industry taxes
- Tax credits, including historic tax credits and research and development credits
- Transfer pricing for products sold between affiliates

The potential application of state income tax “add back” statutes for certain types of related-party expenses, as well as state versions of “economic substance” and “business purpose” doctrines

We also have a deep understanding of the tax implications of unemployment and disability compensation, as well as unclaimed property escheats, in Wisconsin and across the United States. No matter what the tax law involved, our attorneys not only keep up with the latest state tax cases and legislative changes, but also assist clients with planning and policymaking efforts. We frequently speak on multistate tax issues, have authored comprehensive treatises on significant Wisconsin tax matters, and publish articles in national publications on multistate tax matters.