O'NEIL CANNON HOLLMAN DEJONG & LAING S.C.

Wisconsin's Premier Lawyers & Litigators

TAX ADVICE, PLANNING AND CONTROVERSY

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At O'Neil Cannon, our tax team's expertise has helped clients effectively manage one of their most significant costs—taxes—by advising clients on a variety of federal, state, and local, employee benefit, real estate, exempt organization and controversy tax matters.

We pride ourselves on providing practical and technical advice in an efficient manner. Our attorneys also carefully guide clients through the complex and ever-changing web of tax laws and keep clients informed on interpretations of significant tax law changes.

Our tax team combines experience, technical proficiency, commitment to our clients, and service to the community. Our attorneys regularly lecture on tax issues at seminars and other programs and serve as tax committee chairs and officers of various tax organizations. Several of our professionals are certified public accountants as well.

From individuals to closely held businesses to large national companies, our clients benefit from our extensive experience in a wide range of areas, including:

Mergers and Acquisitions

Our tax team is experienced in structuring tax-free and tax-efficient plans for business acquisitions, mergers, reorganizations, liquidations, spin-offs and other combinations. We routinely work closely with our Corporate Practice Group to advise our clients on entity selection and the tax benefits of owning and operating pass-through entities, including S corporations, partnerships, limited liability companies, and joint ventures.

Individual Tax

Our tax team also works closely with individual clients to create and sustain sophisticated wealth-management and wealth-preservation strategies. We strive to carefully understand each client's needs and assist clients in achieving their planning objectives in a tax-efficient manner.

Employee Benefits and Executive Compensation

We work side by side with our Employment Law Practice Group to advise clients on important retirement and welfare benefit plan issues and regularly assist clients in avoiding any unfavorable tax consequences of such plans.

Real Estate

We work closely with the Real Estate Practice Group in structuring entities to own real estate, to comply with Section 1031 requirements for tax-deferred exchanges of real estate, to analyze the tax consequences of installment sales of real estate, and to advise on the utilization of tax credits and other incentives available to real estate projects.

Tax Controversy

Our tax team provides thoughtful and experienced advocacy on behalf of clients in federal, state, and local tax disputes involving a wide array of business and individual issues. We have significant experience representing clients in audits and appeals before the Internal Revenue Service and Wisconsin Department of Revenue. We apply our experience representing businesses and individuals before these agencies to provide sound advice and cost-effective resolutions of our clients' tax controversies. Our successes range from litigating individual tax appeals to securing large class-action victories for taxpayers disadvantaged by unconstitutional taxing schemes.

Tax-Exempt Organizations and Charitable Giving

Our tax team counsels tax-exempt organizations, including charitable and religious organizations, credit unions, and cooperatives. We understand the myriad of regulatory and compliance challenges and assist our clients on a wide range of matters, including forming and structuring tax-exempt organizations and obtaining exemption determinations from the Internal Revenue Service. Additionally, we work closely with the firm's Estate Planning Practice Group to assist clients in planning and making tax-deductible charitable gifts.

State and Local Taxation

Our experience with state and local taxation extends to income (both business and individual), sales and use, property (both real and personal), miscellaneous state and local taxes, and state and local tax incentives and credits. Our tax team provides a wide variety of services involving multi-state and local tax issues for both businesses and individuals, including guidance and planning advice on tax savings opportunities, alternate business structures, mergers, acquisitions, asset sales, record-keeping requirements, audit reviews and tax exemptions. We are all also experienced in all forms of state and local tax controversy work, including negotiations with auditors, participating in administrative hearings, representing taxpayers before state and local commissions and representing taxpayers in both the trial and appellate court.Lawyers

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