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a Commonly controlled

A unitary business may consist of a single entity or a group of two or more related entities including corporations tax option corporations partnerships limited liability companies sole proprietorships estates and trusts Tax 2.62 8 b b Any business conducted directly or indirectly by one corporation is unitary with that portion of a business conducted by another corporation through its director indirect interest in a pass through entity if the requirements of s

71.255 1 n Stats

are otherwise met with respect to the corporation's interests in the Apr 14 2015 For example Wisconsin states in its regulations that a passive parent holding company that directly or indirectly controls one or more operating company subsidiaries engaged in a unitary business Therefore a unitary business may consist of part of a corporation one corporation or many corporations

If the unitary business consists of more than one corporation the corporations comprising the unitary business shall file a combined return apportioning the business income of the corporations using a single apportionment formula A Corporation means a subchapter S corporation any other incorporated entity or any entity defined or treated as a corporation including but not limited to a limited liability company

B Person means an individual a trust an estate a qualified employee benefit plan a limited partnership or a corporation Feb 21 2024 Partnership income is subject to apportionment as business income of the unitary business when a unitary business relationship exists between the corporation and the partnership If a unitary business includes income from a pass through entity the pass through entity income to be included in the total income of the combined group shall be the member of the combined group's direct and indirect distributive share of the pass through entity's unitary business income.

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