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Milwaukee 833 East Michigan Street Suite 1800 Milwaukee, WI 53202

Practice Areas

Bankruptcy & Financial Restructuring

Tax

Admissions

Wisconsin

Education

Juris Doctor, University of Wisconsin Law School, 2002, *summa cum laude*

Bachelor of Science, University of Wisconsin-Madison, 1999, Political Science Sarah McNally is a member of the Tax practice in the Milwaukee office.

In addition to general tax planning, Sarah focuses her practice on the tax (federal and international) and corporate law aspects of complex business transactions such as private equity financings, hedge funds and other joint investment pools, acquisitions, tax-free reorganizations of corporations, like-kind exchanges, and acquisitive partnership transactions. Sarah has significant experience in assisting our mutual fund clients on a wide variety of tax issues including tax-free in-kind contributions, operational matters related to maintaining status as a regulated investment company, tax-free reorganizations, and liquidations. Sarah also assists clients with related tax reporting and disclosure issues associated with foreign assets including FATCA compliance and with respect to organizing and operating interest charge – domestic international sales corporations ("IC DISCs") to obtain federal tax benefits from exports of U.S.-made products.

Sarah has also successfully represented taxpayers in several tax controversy matters. Most notably, Sarah has worked on two United States Tax Court cases with national significance, one for C corporation bank holding companies, *PSB Holdings, Inc. v. Commissioner*, and another for S corporation banks, *Schams v. Commissioner*.

Sarah speaks frequently on a variety of topics including various tax aspects of partnership transactions.

Professional Association Memberships

Milwaukee Bar Association

Honors

Recognized by Super Lawyers as a Wisconsin Rising Star (2009) Listed in Best Lawyers in America (Tax Law, 2024)

www.gklaw.com/mcnally