

Income/Franchise:

New Jersey: Three Updated Bulletins Reflect Revised CBT Policy on Combined Groups and P.L. 86-272

TB-86(R) – Included and Excluded Business Entities in a Combined Group and the Minimum Tax of a Taxpayer That is a Member of a Combined Group; TB-89(R) Combined Group Filing Methods; TB-100(R) The Combined Group as a Taxpayer under the Corporation Business Tax Act, N.J. Div. of Tax. (rev. 4/20/22). The New Jersey Division of Taxation posted three updated state corporation business tax (CBT) bulletins reflecting its recently announced policy change on the treatment of members of a combined group that are claiming P.L. 86-272 for certain purposes, generally providing that P.L. 86-272 protection for a member will be determined on an entity-by-entity basis even though a combined group is otherwise considered a taxpayer and taxed as one taxpayer under New Jersey CBT law [see Revision to Division Policy on Combined Groups and P.L. 86-272, N.J. Div. of Tax. (4/20/22) and *State Tax Matters*, Issue 2022-15, for more details on this recent policy change]. Please contact us with any questions.

URL: <https://www.state.nj.us/treasury/taxation/pdf/pubs/tb/tb86r.pdf>

URL: <https://www.state.nj.us/treasury/taxation/pdf/pubs/tb/tb89.pdf>

URL: <https://www.state.nj.us/treasury/taxation/pdf/pubs/tb/tb100.pdf>

URL: <https://www.state.nj.us/treasury/taxation/cbt/combinedgroupsrevision.shtml>

URL: https://dhub.blob.core.windows.net/dhub/Newsletters/Tax/2022/STM/220415_8.html

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