

State Tax Matters

The power of knowing. September 9, 2022

Multistate Tax Alerts

Throughout the week, we highlight selected developments involving state tax legislative, judicial, and administrative matters. The alerts provide a brief summary of specific multistate developments relevant to taxpayers, tax professionals, and other interested persons. Read the recent alerts below or visit the archive. **Archive:** https://www2.deloitte.com/us/en/pages/tax/articles/multistate-tax-alert-archive.html?id=us:2em:3na:stm:awa:tax

Alabama Opinion Allows Intercompany Interest Expense Exception under Income Tax Addback Statute
On July 28, 2022 the Alabama Tax Tribunal (Tribunal) issued an opinion overturning an Alabama Department of
Revenue audit adjustment to a taxpayer's net operating losses related to the add back of intercompany
interest expenses paid to a related party based in a foreign country.

This Multistate Tax Alert summarizes the Tribunal's opinion and provides some taxpayer considerations. [Issued September 6, 2022]

URL: https://www2.deloitte.com/content/dam/Deloitte/us/Documents/Tax/us-tax-multistate-tax-alert-alabama-opinion-allows-intercompany-interest-expense-exception-under-income-tax-addback-statute.pdf

This document contains general information only and Deloitte is not, by means of this document, rendering accounting, business, financial, investment, legal, tax, or other professional advice or services. This document is not a substitute for such professional advice or services, nor should it be used as a basis for any decision or action that may affect your business. Before making any decision or taking any action that may affect your business, you should consult a qualified professional advisor. Deloitte shall not be responsible for any loss sustained by any person who relies on this document.

About Deloitte

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms, and their related entities (collectively, the "Deloitte organization"). DTTL (also referred to as "Deloitte Global") and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see www.deloitte.com/about to learn more.