

Income/Franchise:

Illinois: Proposed Rule Changes Reflect Financial Institution Apportionment Revisions

Proposed Amended 86 Ill. Adm. Code 100.3405 and 86 Ill. Adm. Code 100.9710, Ill. Dept. of Rev. (5/30/25). The Illinois Department of Revenue proposed changes to two administrative rules to reflect legislation enacted in 2024 [see H.B. 4951 (2024), and previously issued Multistate Tax Alert for more details on this 2024 legislation], which for taxable years ending on or after December 31, 2024, modifies the Illinois apportionment factor calculation for financial institutions regarding how certain receipts from trading assets and activities are treated – specifically, receipts from investment assets and activities and trading assets and activities. The proposed rulemaking also updates the limit for a small loan company and various other references and citations. Comments on these proposed rule changes are due no later than 45 days after their May 30, 2025 publication. Please contact us with any questions.

URL: https://www.ilsos.gov/departments/index/register/volume49/register_volume49_22.pdf

URL: <https://www.ilga.gov/legislation/BillStatus.asp?DocNum=4951&GAID=17&DocTypeID=HB&LegId=152864&SessionID=112&GA=103>

URL: <https://www2.deloitte.com/content/dam/Deloitte/us/Documents/Tax/us-tax-multistate-tax-alert-illinois-fiscal-year-2025-state-budget-tax-highlights.pdf>

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