Reinhart

Heidi M. Gabriel

Senior Counsel

MADISON

OFFICE:
414.298.8355

hgabriel@reinhartlaw.com

LinkedIn:
https://www.linkedin.com/in/heidi-gabriel-jd-mba-cpa-00b13910/

Heidi Gabriel's accounting and business background gives her a very practical foundation as senior counsel in the firm's Corporate Law and Tax practices. She advises on general corporate transactions and tax issues and is the firm's authority on the employee retention credit created by the CARES Act of 2020. She helps clients evaluate whether they qualify for the credit, if it makes sense for their business and, when appropriate, guides them through the claim process.

Heidi closely monitors changes to the tax code while alerting clients to new tax benefits that may affect their businesses. She works extensively with S corporations, assists nonprofits with operational concerns and applications for federal tax-exemption, analyzes the tax consequences of deal structures and designs compensation arrangements for clients' key employees. Heidi also has significant experience in multistate sales and use tax law, and counsels clients through various state tax controversies.

Heidi can effectively communicate complex issues in an accessible way and point out risks that impact decision-making. Before becoming an attorney, she worked as a Certified Public Accountant and managed successful restaurants, giving her first-hand experience in the challenges that come with running a business.

She's thorough, detail-oriented and not afraid to give her clients straight answers to difficult questions. The common thread that marks her career is her desire to help others and contribute to solutions.

When Heidi is not practicing law, she enjoys indoor cycling, traveling, dining out and adventuring with her family. Her favorite destination so far has been Taiwan, where she frequented hot pot restaurants and night markets for adventurous eating opportunities.

Education

- J.D., cum laude, Marquette University Law School
- M.B.A., Marquette University
- B.A., University of Wisconsin-Madison

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Bar Admissions

Wisconsin

Languages

Spanish

Practices

- Corporate Law
- Tax

Services

- Tax-Exempt Organizations
- Financial Institutions

Matters

- Structure and draft employee compensation arrangements to comply with complicated tax rules (e.g., Code sections 409A, 162(m), and 280G) while meeting client incentive compensation goals including:
  - Phantom Stock, Stock Appreciation Rights and Restricted Stock Units
  - Incentive Stock Options and Employee Stock Purchase Plans
  - Nonqualified Stock Options and Restricted Stock
  - LLC Equity Incentive Plans and Profits Interests
  - Long-term Bonus Plans
  - Change of Control Agreements
- Structure and form several types of exempt entities including under code sections 501(c)(3), (c)(4), (c)(5), (c)(6) and obtain IRS recognition or reinstatement of exempt status.
- Assist with negotiation and analysis on behalf of business taxpayers in Wisconsin to reach settlement for sales and use tax assessments.

Honors & Affiliations

Honors

- "Ones to Watch" by *Best Lawyers in America* (2024, 2023, 2022)

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Affiliations

- Waukesha County Technical College (WCTC) Foundation Board
- State Bar of Wisconsin
- Association of Women Lawyers

Presentations

- “Becoming a 501c3," co-presenter, LeadingAge Wisconsin | September 26, 2024.

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