Matthew P. Hedstrom

Partner

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Matt offers clients both technical and practical advice in navigating complex state and local tax issues. His breadth of experience handling multistate tax planning, controversies and unclaimed property matters has established Matt as a skilled tactician providing nuanced counsel on an array of state and local tax matters.

Matthew P. Hedstrom is a partner and leads the firm's State & Local Tax Practice. He focuses his practice on state and local tax planning and controversy and addresses clients' multistate tax issues, including state income tax apportionment, tax base, business/nonbusiness income determinations, telecommunications and sales/use tax nexus, sourcing and taxability issues and unclaimed property matters. Matthew also advises clients on the state and local tax implications of restructuring, mergers, acquisitions and dispositions, including multistate compliance, voluntary disclosure, planning, audit defense and legal opinions. He also has tax controversy experience at the audit, administrative and appeals level in several jurisdictions.

Matthew has been published on a wide variety of state tax topics in different journals, including *State Tax Notes* and *Journal of Multistate Taxation and Incentives*. He regularly speaks on state and local tax matters and has spoken at events hosted by Council On State Taxation (COST), the Tax Executives Institute (TEI), New York University's Summer Institute in State and Local Taxation and Bloomberg BNA, and the Unclaimed Property Professionals Organization. Matthew is also the editor of the State and Local Tax Edition of the American Bar Association's *Tax Lawyer*.

Publications & Presentations

Publications

- "Unclaimed Property Issues in Mergers & Acquisitions," *Practical Guidance*, LexisNexis, 2022.
- "FAQs on Unclaimed Property Aspects of Retirement Assets," *Bloomberg Tax,* January 25, 2021.
- "What's on the Horizon for Unclaimed Property in 2021," *Law360,* January 15, 2021.
- "Challenges with Escheatment of Tax-Deferred Retirement Assets, Part 2," *Tax Notes*, July 6, 2020.
- "Special Challenges with Escheating Tax-Deferred Retirement Assets," *Tax Notes State*, Vol. 96, No. 4, April 27, 2020
- "Constructive Possession – What Does It Mean," *Tax Notes State*, October 28, 2019.
- "Bundled Consideration: The Right Way to Approach Rewards Programs," *Tax Notes*, Vol. 102, No. 151, August 6, 2019.
- "Unclaimed Property Challenges in the Health Care Industry," *AHLA Connections*, December 2018.
- "Practical Insights for Combatting New York's Expansion of Sales Tax Law," *Tax Executive,* May 31, 2018.
- "Measuring the Worth of Advisory Opinions: A New York Cloud Computing Illustration," *Bloomberg BNA*, November 2, 2017.
- "A Tale of Two Sourcing Cases," *IPT Insider,* October 2017.

- “How Will Gorsuch Field State and Local Tax Issues?“ *Today's General Counsel,* June/July 2017.
- “Target Brands: Both the Best and the Worst Alternative Apportionment Analysis Yet,” *Bloomberg BNA*, April 19, 2017.
- “A New Focus on Unclaimed Property in Health Care,” *Law360*, February 3, 2017.
- “Carlton: The U.S. Supreme Court's Jekyll and Hyde Decision Still Raises Questions in State Tax Retroactivity Cases,” *Bloomberg BNA*, January 27, 2017.
- “The More Things Change,” *State Tax Notes*, December 19, 2016.
- “*Crutchfield v. Testa* and Its Implications for Nexus,” *IPT Insider*, December 2016.
- “Dealing with Unclaimed Property Issues in Mergers & Acquisitions,” Lexis Practice Advisor Service, November 22, 2016.
- “The Proliferation of Abandoned Property Litigation,” *New York University Institute on State and Local Taxation*, 2016.
- “Unclaimed Property: The Nontax Tax,” *Journal of Multistate Taxation and Incentives*, Vol. 26, No. 5, August 2016.
- “Losing the Forest for the Trees: Is It Really All About Physical Presence?” *IPT Insider*, July 2016.
- “Financial Advisors Are Key to Preventing State Escheatment of Assets,” WealthManagement.com, May 16, 2016.
- “Is a Sourcing Rule by Another Name Just as Sweet?” *State Tax Notes*, February 22, 2016.
- “Knee-Deep in Escheat? How to Protect Your Bottom Line,” CFO.com, February 1, 2016.
- “Sales Taxation of Loyalty and Reward Programs – Navigating the Current Landscape,” *IPT Insider*, Institute for Professionals in Taxation, January 2016.
- “C Is for Cookie – That’s Good Enough for Ohio,” *IPT Insider*, December 2015.
- “The Fairly Related Prong: Back from the Dead or Flash in the Pan?” *State Tax Notes*, October 12, 2015.
- “Ask and Ye Shall Receive, Justice Kennedy: The Alabama DOR Has Proposed a Regulation to Challenge Quill,” *IPT Insider*, September 2015.
- “Bloomberg BNA Q&A with the Authors of the New Third Edition of Bloomberg BNA’s Portfolio 1600 – Unclaimed Property,” *Bloomberg BNA*, August 7, 2015.
- “Sales and Use Taxation of Loyalty Programs,” *Journal of Taxation*, Vol. 123, No. 2, August 2015.
- “Delaware Unclaimed Property Law: Recent Developments and the 2014 Unclaimed Property Task Force,” *Bloomberg BNA*, February 27, 2015.
- “Data Collection Rule Repeal Will Help NJ Businesses,” *Law360*, February 25, 2015.
- “The MTC’s Transfer Pricing Program Is Fast Approaching,” *State Tax Notes*, February 16, 2015.
- “A Tax by Another Name: Estimated Unclaimed Property Assessments,” *Journal of Multistate Taxation and Incentives*, January 2015.
- *Bloomberg BNA’s Unclaimed Property* (Portfolio 1600), 3rd ed., Bloomberg BNA, 2015.
- “Five Unclaimed Property Issues That Resist Easy Answers,” *Tax Report*, Institute for Professionals in Taxation, November 2013.

- "Navigating the Tax Considerations of 'Deal-of-the-Day' Social Media Coupon Programs," Social Media Law & Policy Report, *Bloomberg BNA*, October 8, 2013.
- "*Qui Tam* Lawsuits: Recommendations for Meaningful Reform - Part 2," *Tax Analysts*, May 6, 2013.
- "*Qui Tam* Lawsuits: Recommendations for Meaningful Reform - Part 1," *Tax Analysts*, February 25, 2013.

Presentations

- "Sales, Exchanges & Basis: Part 2: § 1202 Economics and Policy," ABA Virtual 2021 Fall Tax Meeting, webinar, September 20-24, 2021.

Professional & Community Engagement

- State and Local Tax Committee, executive board
- American Bar Association Tax Section, Unclaimed Property Subcommittee co-chair
- NYU Institute on State Taxation, advisory board
- New England State & Local Tax Forum, advisory board

Education

- New York University (LL.M., 2008)
- Emory University (J.D., 2007)
- Boston College (B.A., 2004)

Admitted to Practice

- New York

Related Services

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