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May 30, 2013 Joint Committee on Finance Paper #281

Angel Investment Tax Credit -- Eliminate Maximum Credit Limit (General Fund Taxes -- Income and Franchise Taxes)

[LFB 2013-15 Budget Summary: Page 172, #6]

CURRENT LAW

The angel investment tax credit equals 25% of the claimant's bona fide angel investment made directly in a qualified new business venture (QNBV) certified by the Wisconsin Economic Development Corporation (WEDC). The maximum aggregate amount of angel investment tax credits that can be claimed for a tax year is $20.0 million, plus an additional $250,000 for tax credits claimed for investments in nanotechnology businesses. The maximum total amount of tax credits that can be claimed for all tax years is $47.5 million.

GOVERNOR

Eliminate the $47.5 million limit on the maximum amount of angel investment tax credits that the WEDC can allocate. This provision would reduce general fund tax revenues by an estimated $5,000,000 in 2014-15.

DISCUSSION POINTS

1. The early stage business investment program includes the angel investment tax credit, which can be claimed under the state individual income tax, and the early stage seed investment tax credit, which can be claimed under the state individual income and corporate income and franchise taxes, and the insurance premiums tax.

Angel Investment Tax Credit. The angel investment tax credit equals 25% of the claimant's bona fide angel investment made directly in a qualified new business venture certified by WEDC. As noted, the maximum aggregate amount of angel investment tax credits that can be claimed for a tax year is $20 million, plus an additional $250,000 for tax credits claimed for investments in nanotechnology businesses. The maximum total amount of tax credits that can be claimed for all tax years is $47.5 million.

Early Stage Seed Investment Tax Credit. The early stage seed investment tax credit is equal to 25% of the claimant's investment paid in the tax year to a certified fund manager that the fund manager invests in a QNBV certified by WEDC. The maximum aggregate amount of early stage seed investment tax credits that can be claimed for a tax year is $20.5 million, plus an additional $250,000 for tax credits claimed for investments in nanotechnology businesses.

The aggregate amount of investment in any one QNBV that may qualify for angel investment or early stage seed investment tax credits is $8.0 million. Investments in a QNBV must be maintained in the business by an angel investor, angel investment network, or certified fund manager for at least three years. There is no limit on the aggregate amount of early stage seed credits that may be claimed.

2. WEDC is required to certify QNBVs and fund managers and to perform other administrative functions related to the allocation and transfer of credits, revocation of certifications, verification of investments and credits, and processing and compiling reports. Businesses and fund managers must apply to WEDC to be certified. Attachment I provides a description of QNBVs and WEDC certification and administrative functions.

3. The angel investment tax credit was created by 2003 Wisconsin Act 255. The credit could be claimed under the individual income tax, and was equal to 12.5% of the claimant's bonafide angel investment made directly in a QNBV. The 12.5% credit could be claimed for two years. The maximum aggregate amount of angel investment tax credits that could be claimed for a tax year was $3.0 million, and the maximum total amount of angel credits that could be claimed was $30.0 million. The early stage seed credit was also created by Act 255. The maximum amount of early stage seed investment tax credits was set at $3.5 million for each tax year, and $35 million in total.

4. Since being enacted, both credits have been modified and increased several times, most recently under 2009 Act 265. Effective for tax year 2011, that legislation increased the maximum amount of angel investment tax credits that could be claimed in a tax year to $20 million, plus an additional $250,000 for credits on investments in nanotechnology businesses, and also increased the maximum amount of early stage seed investment tax credits that could be claimed in a year to $20.5 million, plus an additional $250,000 for investments in nanotechnology businesses. In addition, the cap on the total amount of early stage seed investment tax credits was eliminated. The current $47.5 million cap on aggregate angel investment credits was established in 2007 Act 20, and 2009 Act 2 changed the angel credit to 25% in the year of investment, rather than 12.5% over two years.

5. Table 1 shows that almost $35.9 million in angel investment tax credits have been issued since 2005, leaving approximately $11.6 million in unallocated credits before the maximum limit will be reached. Since 2009, the annual allocation of angel credits has averaged about $6.3 million. Since the annual limit was increased to $20 million in 2011, the average annual allocation has been almost $7.4 million. At these recent rates, the $47.5 maximum limit on angel investment

tax credits will be reached in 2014. Attachment 2 provides a listing of the of the number and amount of angel investments and the related angel investment tax credits for QNBV investments since the beginning of the program. The table shows that there have been over 4,500 angel investments totaling $143.5 million under the angel investment tax credit program.

TABLE 1

Angel Investment Tax Credits Issued

Year	Amount
2005	$2,989,800
2006	2,418,200
2007	2,050,500
2008	3,105,900
2009	5,529,200
2010	5,032,200
2011	6,700,700
2012	8,053,700
Total	$35,880,200

6. A firm with an established financial record and tangible assets has access to financial markets with an extensive number of financing instruments. The owner can decide the financial structure of the business based on the cost of capital. However, for the high growth entrepreneurial firm, the supply of capital is not so easily accessed, causing systemic market mismatches at some stages of development. At the inception of an entrepreneurial venture, the business is owner/inventor financed through a variety of bootstrapping methods. Bootstrapping involves creative methods of acquiring the use of resources without raising equity from traditional sources, and can involve both acquisitions of capital and reducing expenses. As the venture begins to develop, but is still in the pre-seed stage of growth, small pools of capital are provided by the owner/inventor, family, friends, debt, and grants, such as Small Business Innovation Research (SBIR) grants. These initial sources of capital are often insufficient for any significant expansion of the business. Start-up business ventures need additional funding in order to achieve positive cash flows or to raise a venture round of equity.

7. To develop a positive cash flow or to raise venture capital, the entrepreneurial venture must access the early-stage capital market. Early-stage capital is a critical link in the development of such businesses and common sources of this capital are angel investors, angel groups, early-stage investment funds, and some early-stage venture capital funds. Angel investors are often viewed as very wealthy individuals, who are active investors in entrepreneurial ventures in business sectors in which they have experience. However, recent research (Shane 2008, 2009, 2012) based on literature review and on statistical evaluation of various data sets (including Federal Reserve, Kauffman Foundation, and Angel Capital Association data), found that there is more heterogeneity among angel investors. Some are accredited investors (based on the U.S. Securities and Exchange Commission definition), while others are not. Some angels are early-stage capital

providers, while others invest in businesses that are cash flow positive when they invest. Some angels are passive and conduct little due diligence, while others undertake detailed investigation of and get actively involved in the business in which they invest. Some angels are knowledgeable about investments and others may be naïve about entrepreneurship. Some angels take high risks to earn high returns, while others seek lower risks and lower returns. Some angels invest alone while others are part of groups. Specific findings included: (a) the median angel investment was $10,000, the average $77,000, and the range of individual investments was $600 to $500,000; (b) debt accounted for 40.2% of the money angels provided to start-ups; (c) between 0.17% and 0.2% of the companies financed go public, and between 0.8% and 1.3% are acquired; (d) the rate of return, net of opportunity cost, of certain angels affiliated with groups was 19.2%; (e) 25% of angel investments were in retail businesses, and 12.5% went into personal service businesses; (f) the typical business of any age (the average was 13.3 years) that received an equity investment had sales of $435,000, employment of seven, and profits of $7,500. In general, an angel investor is a person who provides capital, in the form of debt or equity, from his or her own funds to a private business owned and operated by someone else who is neither a friend nor a family member

8. Economic research has identified certain linkages between entrepreneurship and economic growth. Entrepreneurial enterprises are viewed as significant factors for increasing employment and productivity. One econometric study using a Census Bureau database (Acs, Armington, 2004) found that higher rates of entrepreneurial activity were strongly associated with faster growth of local economies. New organizations were able to take advantage of information useful to business produced through economic activity in the area (knowledge externalities). The research suggests that start-ups have an important role in job creation, but have a more limited effect on net job creation over time, because about one-third of all start-ups close by the second year of their existence. Net job creation is concentrated among relatively small groups of surviving "high-impact" businesses that are younger and smaller than the typical business, yet have been operating for 25 years. "High-impact" businesses are generally defined as firms with sales that have doubled over the most recent four-year period and that have an employment growth quantifier (product of the absolute change and percent change in employment) of at least two over the same period (Dilger, 2013). The Marion Ewing Kauffman Foundation estimates that angel investors support up to 90% of the outside equity raised by business start-ups, after personal resources and those of friends and family have been exhausted.

9. Government intervention, in the form of tax credits or other subsidies, is intended to address inefficiencies in the private equity financing market. Angel investments in start-up companies are substantially more risky than normal business investments, such as the purchase of corporate equity or debt. A 2007 study found that more than 50% of angel group investments lost money, and just 7% of investments accounted for 75% of positive returns (Wiltbank and Broeker) Some studies indicate that a funding gap exists between the needs of early-stage ventures and suppliers of early stage capital, where the demand for financing is greater than the available supply (Rodriguez, 2011). In addition, there is a problem of asymmetric or incomplete information for market participants. Finding angels is difficult for most entrepreneurs and there are limited vehicles, such as the Wisconsin Angel Network, for linking angels with entrepreneurs. Moreover, angel and other investors who might serve as funding sources to entrepreneurial ventures often find it difficult to identify and evaluate the potential of such ventures, particularly high-tech businesses that are built on intellectual capital, rather than physical assets.

10. Conventional financial theory asserts that, in perfect financial markets, investment decisions are based on the expected return of the investment relative to its risk. Higher rates of return are required for riskier ventures. Typically, the investor will allocate funds to the projects with the highest relative present value or internal rate of return based on an evaluation of each project. By increasing the rate of return or present value of the investment, the tax credits reduce some of the risk of the investment. The credits provide an incentive for angel investors and venture capital funds to invest in Wisconsin entrepreneurial ventures. To the extent the incentive is effective, the proposed tax credit expansion would increase the amount of potential funding available for Wisconsin entrepreneurs. In turn, this would increase the number of ventures that were undertaken and that successfully grow into mature businesses.

11. Information provided by the National Conference of State Legislatures indicates that 22 states, including Wisconsin, provide tax credits for angel or similar type investments in start-up and early-stage businesses. Attachment 3 provides a summary of this information.

12. Minnesota and Nebraska offer refundable angel investment tax credits. Under a refundable credit, the taxpayer receives a cash payment for the amount of credit in excess of the tax liability for the tax year. Refundable credits could attract out-of-state investment in Wisconsin start-up companies. Minnesota indicates that, in 2011, non-Minnesotan investors accounted for 27% of total investments under their angel investment tax credit program. As an alternative, the Committee may wish to make the Wisconsin angel investment tax credit refundable, beginning with tax year 2014. Because the credit would be refundable, with refunds paid from an appropriation, the fiscal effect would include an increase in state GPR expenditures. However, there would also be an increase in income tax revenues to reflect the change in accounting for the credit. If the angel investment tax credit was made refundable, with tax year 2014 (Alternative 2), there would be an estimated increase in income tax revenues of $6,700,000 in 2014-15. There would also be an increase in GPR expenditures of $9,800,000 in 2014-15. The fiscal effect reflects differences in reconciling tax year and fiscal year liabilities under nonrefundable and refundable tax credits.

13. The angel investment and early stage seed investment tax credits are supported because, given the risk associated with angel and venture capital investments, individual angel and venture capitalists will invest less capital and in fewer projects than would be optimal for the state. However, there are several potential problems with angel tax credits (identified by Scott Shane an angel investor with the North Coast Angel Fund in Ohio, and professor of entrepreneurship at Case Western Reserve University) :

a. As described in a 2008 national Governors Association issue brief, a tax credit may simply reward angels for the investments they would make without the credit.

b. An angel credit may increase the amount of investments and not the number of companies receiving angel funds. Because the tax credits do not improve the quality of unfunded deals, angels may remain focused on deals they were willing to make without the credit. It should be noted, that under the Wisconsin angel credit, total angel investments in a QNBV that qualify for an angel investment tax credit are limited to $8 million.

c. Although some angels claim they would make more investments if they could claim the credits, there is no solid evidence that angels increase the number of start-ups they fund in response to tax credits. In fact, in surveys, business angels indicate they do not make specific investments to obtain the tax credits

d. A tax credit may attract more investors to the same deals, resulting in more competition for those deals rather than causing more deals getting funded. Such competition would increase valuations and reduce returns.

ALTERNATIVES

1. Approve the Governor's recommendation.

2. Modify the recommendation to make the angel investment tax credit refundable, for tax years beginning after December 31, 2013.

ALT 2	**Change to Bill** Revenue	Funding
GPR		$8,900,000
GPR-Tax	$6,100,000	

3. Delete provision.

ALT 3	**Change to Bill** Revenue
GPR-Tax	$5,000,000

Prepared by: Ron Shanovich
Attachments

ATTACHMENT 1

Administrative Provisions for Angel and Early Stage Seed Investment Tax Credits

Qualified New Business Venture. A business may be certified as a QNBV by WEDC only if it meets all of the following conditions:

a. It has its headquarters in Wisconsin (principal administrative offices and 80% of payroll for Wisconsin employees).

b. At least 51% of its employees are employed in the state.

c. It has the potential for increasing jobs and/or capital investment in Wisconsin and the business is engaged in, or has committed to engage in, innovation in any of the following: (1) manufacturing, biotechnology, nanotechnology, communications, agriculture, or clean energy creation or storage technology; (2) processing or assembling products, including medical devices, pharmaceuticals, computer software, computer hardware, semiconductors, any other innovative technology products, or other products that are produced using manufacturing methods that are enabled by applying proprietary technology; or (3) services that are enabled by applying proprietary technology.

d. It is undertaking pre-commercialization activity related to proprietary technology that includes conducting research, developing a new product or business process, or developing a service that is principally reliant on applying proprietary technology.

e. The business is not primarily engaged in real estate development; insurance; banking; lending; lobbying; political consulting; professional services provided by attorneys, accountants, business consultants, physicians, or health care consultants; wholesale or retail trade; leisure; hospitality; transportation; or construction (except construction of power plants that derive energy from a renewable resource).

f. It has fewer than 100 employees, at the time of initial certification.

g. The business has not been operating in Wisconsin for more than 10 consecutive years, at the time of initial certification.

h. It has not received aggregate private equity investments of more than $10.0 million, at the time of initial certification.

i. It has not received more than $8.0 million in investments that have qualified for tax credits under the program.

In addition, in determining whether to certify a business, WEDC will consider at least the following factors: (a) the business is in one of Wisconsin's targeted industries; (b) high growth potential of the business; (c) management team experience; (d) financial need; (e) percentage of funds that will be spent in Wisconsin; (f) barriers to entry; and (g) innovative or novel product or process.

Certified Fund Manager. In order to be eligible for investments that qualify for early stage seed investment tax credits, the fund manager must be certified by WEDC. In determining whether to certify an investment fund manager, WEDC is required to consider: (a) the applicant's experience in managing venture capital funds; (b) the past performance of funds managed by the applicant; (c) the expected level of investment in the fund to be managed by the applicant; and (d) other relevant factors determined by WEDC. In addition, WEDC evaluates the following factors when determining whether to certify a fund manager: (a) the applicant's experience in investing in high growth, early stage businesses; (b) the past performance of businesses assisted by the applicant; (c) the portion of the investment fund's capital the fund manager expects to invest in QNBVs; (d) geographic distribution of the funds; (e) focus on targeted industries or target group members as determined by WEDC; (e) ability to access follow-on funding; (f) services provided; (g) commitment to Wisconsin; and (h) administrative and management fees.

WEDC is required to notify DOR of every certification issued, and the date on which any certification is revoked or expires. WEDC is required to revoke the certification of a business or fund manager, if the business or fund manager: (a) supplies false or misleading information to obtain the certification; (b) fails to continue to meet the required conditions or qualifications for obtaining the certification; (c) has violated state, federal, or local laws or regulations related to the conduct of the activities of the business or fund; (d) has had an officer or director arrested or convicted of a crime substantially related to the activities of the fund; or (e) is not using investment funds for a legitimate business purpose. WEDC must notify DOR of any revocation.

Angel investors, angel investor networks, and venture capital funds must follow a verification process in order to receive tax credits based on eligible investments. For each investment in the qualified new business venture, the angel investor, angel investment network, or certified fund manager is required to provide WEDC with a copy of its investor agreement and proof of investment. The investment must be a clearly identifiable cash investment in the form of common stock, preferred stock, a partnership, membership, or equivalent ownership interest. The qualified new business venture must provide an attestation to the investment. Cash exchanged for debt is not eligible for credits, unless the debt is later converted into an ownership interest, and only the original cash investment is eligible for credits. IRAs, Roth IRAs, 401 (k)s, or similar tax deferred or tax advantaged accounts are not eligible investment vehicles for tax credits. Investments made by certified fund managers, with principal offices based outside Wisconsin, must be made side-by-side with equity investors based in Wisconsin with a minimum participation of Wisconsin investors determined by WEDC.

Based on a review of submitted materials, WEDC issues a verification form to the angel investor, angel investment network, or certified fund manager stating the amount of credits that may be claimed. Investors must submit a copy of the certification for tax benefits issued for the business and/or fund manager and the verification form, including the amount of tax benefits that may be claimed and the date and amount of the investment, with the investor's tax return.

WEDC can revoke verification of tax credits if the investment in the QNBV by an angel investor, angel investment network, or certified fund manager is not maintained for a minimum of three years. However, the three-year requirement does not apply in cases where: (a) the investment becomes worthless prior to the end of the three-year period; or (b) the angel, angel investment network, or certified fund manager has held an investment for at least 12 months and there is a bona fide liquidity event, as determined by WEDC, prior to the end of the holding period.

If the demand for angel or early stage seed investment tax credits exceeds the annual aggregate limit, WEDC may reserve tax credits from the following year for qualifying investments. Conversely, the Corporation, in consultation with DOR, is authorized to carry forward unclaimed angel and early stage investment tax credits to future tax years. Carryforward recommendations must be submitted to DOR by July 1.

WEDC can reallocate unused angel and early stage seed investment tax credits amounts to increase the credit amounts that may be claimed under the refundable jobs tax credit. The proposed reallocation is subject to a 14-day passive review by the Joint Committee on Finance.

A person that makes an investment in a certified fund and who is eligible to claim an early stage seed investment tax credit may sell or otherwise transfer the credit to another person to offset that person's income, franchise, or insurance premiums tax liability. A certified fund manager is required to notify both WEDC and DOR of the transfer and submit a copy of transfer documents that show the transfer of credits from the seller to the buyer. The fund manager must pay WEDC a fee of 1% of the amount of tax credit that is sold or transferred.

"Accredited investor" means an individual who invests his or her own funds in a qualified new business venture and satisfies the U.S. Securities and Exchange Commission accredited investor definition at the time of investment. "Angel investment network" is defined as an entity comprised of accredited investors organized for the sole purpose of making investments in qualified new business ventures. "Angel investor" means an accredited investor who makes a bona fide angel investment.

"Bona fide angel investment" means a purchase of an equity interest, or any other expenditure, as determined under state law, that is made by any of the following: (a) a person who reviews new businesses or proposed new businesses for potential investment of the person's money; or (b) a network of persons who review new businesses or proposed new businesses for potential investment of the persons' money. "Bona fide liquidity event" means either: (a) the sale of a certified company, or the majority of its assets which results in a payout to shareholders; or (b) the company's shares begin trading in a public exchange.

"Investment" is defined as the investment of cash in a QNBV that is used for legitimate business purposes in exchange for any one of the following: (a) common stock; (b) partnership or membership interest; (c) preferred stock; or (d) an equivalent ownership interest in the QNBV approved by WEDC. "Legitimate business purposes" means investment proceeds used for normal operations of the business, and are not used for activities including refinancing any prior investments, paying dividends to shareholders, stock repurchase, or other uses as determined by WEDC.

ATTACHMENT 2

Angel Investments in QNBVs and Related Angel Investment Tax Credits

Company Name	Municipality	County	Number of Angel Investments	Angel Investment	Angel Tax Credits
Alice.com, Inc.	Middleton	Dane	235	$5,695,600	$1,423,900
aOva Technologies, Inc.	Madison	Dane	33	1,965,500	491,400
AquaMOST, INC	Fitchburg	Dane	195	3,689,800	922,400
AquaSensors LLC	Brookfield	Waukesha	12	385,200	96,300
Aurizon Ultrasonics	Appleton	Outagamie	2	100,000	25,000
Aurora Spectral Technologies LLC	Milwaukee	Milwaukee	17	1,767,500	441,900
Aver Informatics, Inc.	De Pere	Brown	43	1,220,000	305,000
Babbleware, LLC	Cedarburg	Ozaukee	1	100,000	25,000
BellBrook Labs, LLC	Madison	Dane	18	1,000,000	250,000
BEST Biodiesel Cashton, LLC	Cashton	Monroe	3	1,500,000	375,000
BEST Energies, Inc.	Madison	Dane	6	567,300	141,800
Bill-Ray Home Mobility, LLC	Appleton	Outagamie	4	400,000	100,000
BioIonix, Inc.	McFarland	Dane	171	6,195,000	1,548,700
BioSystem Development, LLC	Middleton	Dane	67	2,872,800	718,200
Botanic Oil Innovations, Inc.	Spooner	Washburn	1	60,000	15,000
Brazen Careerist, Inc.	Madison	Dane	4	445,000	111,300
C5-6 Technologies	Middleton	Dane	18	636,300	159,100
Cellular Dynamics International, Inc.	Madison	Dane	5	1,086,700	271,700
Centrose LLC	Madison	Dane	26	1,475,000	368,800
Compact Particle Acceleration Corporation	Madison	Dane	109	2,650,000	662,500
ConjuGon, Inc.	Madison	Dane	13	260,000	65,000
CRS Medical Diagnostics, Inc.	New Berlin	Waukesha	4	75,000	18,800
Cytometix	Milwaukee	Milwaukee	57	1,757,500	439,400
Cytophil, Inc.	Milwaukee	Milwaukee	3	351,000	87,800
DeltaHawk Engines, Inc.	Racine	Racine	13	773,300	193,300
Dimensional Technology International, Inc.	Amherst	Portage	33	930,500	232,600
Door 6, Inc.	Madison	Dane	4	62,500	15,600
Dynamis Software Corporation	Franklin	Milwaukee	36	940,000	235,000
Echometrix LLC	Madison	Dane	26	675,000	168,800
Embedtek	Hartland	Waukesha	3	1,200,000	300,000
eMetagen Corporation	Madison	Dane	20	515,000	128,800
Engineered Propulsion Systems, Inc.	New Richmond	St. Croix	134	2,078,700	519,700
Enhancement Medical, LLC	Wauwatosa	Milwaukee	7	350,000	87,500
Esker Technologies, LLC	Milwaukee	Milwaukee	5	500,000	125,000
Eso-Technologies, Inc.	Hartland	Waukesha	8	43,300	10,800
Evrisko Systems, LLC	Chippewa Falls	Chippewa	2	220,000	55,000
Flatsix, LLC	Milwaukee	Milwaukee	2	250,000	62,500
Flex Biomedical, Inc.	Madison	Dane	149	1,452,800	363,200
FluGen Inc.	Madison	Dane	142	2,893,600	723,400
Frozen Codebase LLC	Green Bay	Brown	3	40,000	10,000
GenTel BioSciences, Inc.	Madison	Dane	47	1,333,900	333,500
GreenStone Technologies, LLC	Madison	Dane	4	72,500	18,100
GWC Technologies, Inc.	Madison	Dane	7	110,000	27,500
HarQen, Inc.	Milwaukee	Milwaukee	110	3,504,800	876,200
Helios USA, LLC	Burlington	Racine	20	955,000	238,800

Company Name	Municipality	County	Number of Angel Investments	Angel Investment	Angel Tax Credits
HMA Fire LLC	Middleton	Dane	1	$50,000	$12,500
Hopster, Inc	Middleton	Dane	38	600,000	150,000
HSM, LLC	Milwaukee	Milwaukee	5	200,800	50,200
Idle Free Systems, Inc.	Watertown	Jefferson	40	600,000	150,000
Imagination Trends	De Forest	Dane	6	830,200	207,500
InControl Medical, LLC	Brookfield	Waukesha	30	1,955,400	488,900
Innosoft, Inc.	Cleveland, Village of	Manitowoc	5	180,000	45,000
Innovative Sports Strategies, Inc.	Milwaukee	Milwaukee	13	76,000	19,000
Invenra, Inc.	Madison	Dane	22	900,000	225,000
ioGenetics, LLC	Madison	Dane	21	605,100	151,300
Isomark LLC	Madison	Dane	23	325,300	81,300
JellyFish, Inc.	Madison	Dane	17	1,000,000	250,000
Kayo Technology, Inc	Madison	Dane	25	465,500	116,400
Kenergy, Inc.	Thiensville	Ozaukee	10	325,000	81,200
Liveyearbook, Inc.	Greenville	Outagamie	27	1,860,000	465,000
Lucigen Corporation	Middleton	Dane	71	2,428,000	607,000
MBRP, LLC	Madison	Dane	3	780,000	195,000
Medical Engineering Innovations, LLC	Madison	Dane	1	50,000	12,500
Medtrak Holding Company LLC	Wauwatosa	Milwaukee	1	100,000	25,000
Microscopy Innovations, LLC	Marshfield	Wood	3	350,000	87,500
Mithridion, Inc.	Madison	Dane	25	461,000	115,200
Montage Talent, Inc.	Pewaukee	Waukesha	41	1,738,300	434,600
Morgan Aircraft, LLC	Oostburg	Sheboygan	15	981,700	245,400
Murfie Inc.	Madison	Dane	43	1,561,500	390,400
My Health Direct, Inc.	Delafield	Waukesha	1	500,000	125,000
NanoMedex Pharmaceuticals, Inc.	Madison	Dane	6	94,800	23,700
NCD Technologies, LLC	Madison	Dane	2	20,000	5,000
Nemean Networks, LLC	Madison	Dane	9	181,800	45,500
NeoClone Biotechnology International LLC	Madison	Dane	102	1,611,500	402,900
Nerites Corporation	Madison	Dane	95	2,000,000	500,000
NetPeak Energy Group, LLC	Appleton	Outagamie	1	151,000	37,800
Networked Insights, Inc.	Madison	Dane	73	2,961,000	740,200
NeuroGnostics, Inc.	Milwaukee	Milwaukee	23	1,000,000	250,000
NeuWave Medical, Inc.	Middleton	Dane	48	3,003,500	750,900
Nextt, Inc	Madison	Dane	2	90,000	22,500
Northstar Medical Radioisotopes, LLC	Madison	Dane	17	1,514,800	378,700
NovaScan LLC	Milwaukee	Milwaukee	5	350,000	87,500
NovaShield, Inc.	Madison	Dane	63	3,600,000	900,000
Novelos	Madison	Dane	55	995,500	248,900
Ohigo, Inc.	Fitchburg	Dane	27	640,600	160,100
Okanjo Partners, Inc.	Milwaukee	Milwaukee	17	1,550,000	387,500
Paradigm Sensors, LLC	Milwaukee	Milwaukee	17	705,000	176,300
PDM Solar, Inc.	Wausau	Marathon	111	872,100	218,000
PerBlue, Inc.	Waunakee	Dane	30	525,000	131,300
Perscitus Biosciences, LLC	Madison	Dane	3	90,000	22,500
Phoenix Nuclear Labs	Middleton	Dane	29	540,500	135,100
Pinpoint Software, Inc.	Onalaska	La Crosse	36	303,000	75,800
Platypus Technologies, LLC	Madison	Dane	31	999,600	249,900
Praesto, Inc.	Fitchburg	Dane	9	108,500	27,100
Primorigen Biosciences, LLC	Madison	Dane	5	250,000	62,500
ProCertus BioPharm, Inc.	Madison	Dane	8	250,300	62,600
Promentis Pharmaceuticals, Inc.	Milwaukee	Milwaukee	43	1,949,500	487,400

Company Name	Municipality	County	Number of Angel Investments	Angel Investment	Angel Tax Credits
Quincy Bioscience Holding Company, Inc.	Madison	Dane	78	$2,208,900	$552,200
Quintessence Biosciences, Inc.	Madison	Dane	135	4,212,900	1,053,200
Quter, Inc.	Neenah	Winnebago	1	10,000	2,500
Ratio, Inc.	Madison	Dane	39	348,000	87,000
Reciprocal Labs Corporation	Madison	Dane	5	670,000	167,500
Renovar, Inc.	Madison	Dane	17	820,900	205,200
Rowheels, Inc	NA	Dane	9	315,000	78,800
Semba Biosciences, Inc.	Fitchburg	Dane	66	796,200	199,000
Seven Marine, LLC	NA	Washington	9	1,924,700	481,200
Shamrock Energy Corporation	Oshkosh	Winnebago	14	745,000	186,300
Shindigs Inc.	Milwaukee	Milwaukee	2	100,000	25,000
SHINE Medical Technologies, Inc.	Middleton	Dane	84	1,400,900	350,200
Silatronix, Inc.	Madison	Dane	21	1,158,000	289,500
SnowShoeFood Inc.	Madison	Dane	19	144,000	36,000
SoLoMo Identity, LLC	Madison	Dane	30	458,800	114,700
Somna Therapeutics, LLC	Thiensville	Ozaukee	16	950,000	237,500
Sonoplot, Inc.	Middleton	Dane	12	304,300	76,100
Stealth Therapeutics, Inc.	Oneida	Brown	67	708,000	177,000
Stemina Biomarker Discovery, Inc.	Madison	Dane	103	2,969,900	742,500
StrandVision, LLC	Eau Claire	Eau Claire	18	425,000	106,300
Stratatech Corporation	Madison	Dane	14	2,300,000	575,000
StudyBlue, Inc.	Middleton	Dane	119	3,099,800	774,900
Surgical Site Solutions, Inc.	Sheboygan Falls	Sheboygan	20	500,000	125,000
Swallow Solutions, LLC	Madison	Dane	11	115,000	28,800
SymbiontWeb, Inc.	Madison	Dane	6	485,000	121,300
Tascet, Inc.	Madison	Dane	92	5,487,000	1,371,800
TermSync, Inc.	Madison	Dane	35	2,653,000	663,300
The Art Commission, LLC	NA	Dane	17	410,000	102,500
The Good Jobs, Inc	NA	Milwaukee	6	168,000	42,000
TrafficCast International, Inc.	Madison	Dane	62	1,673,700	418,400
U.S. Pride Products, LLC	Hammond	St. Croix	12	130,000	32,500
U.S. Trail Maps, Inc.	Wausau	Marathon	7	210,700	52,700
Vatrix Medical, Inc.	Madison	Dane	3	45,000	11,300
Vibetech, Inc.	Sheboygan	Sheboygan	2	55,000	13,800
Virent, Inc.	Madison	Dane	56	1,697,500	424,400
Visonex, LLC	Green Bay	Brown	17	315,100	78,800
VitalMedix, Inc.	Hudson	St. Croix	23	514,000	128,500
Wellbe, Inc.	NA	Dane	1	200,000	50,000
Wicab, Inc.	Middleton	Dane	48	1,000,000	250,000
Xela Innovation, LLC	Milwaukee	Milwaukee	2	63,800	15,900
Xolve, Inc.	Platteville	Grant	15	270,000	67,500
Zurex Pharma, Inc.	Madison	Dane	27	820,000	205,000
Zurex PharmAgra, LLC	Madison	Dane	3	200,000	50,000
Total			4,519	$143,520,800	$35,880,200

ATTACHMENT 3

Angel Investment Tax Credits

State	Program	Credit Amount	Requirements
Arizona	Angel Investment Credit	Up to 30% with an annual cap of $20 million. Effective for tax years 2007 to 2014.	At least $25,000 investment in qualified small business not involved in retail, restaurants, real estate, professional services or health care. Total of all qualified investments for any individual investor in any calendar year may not exceed $250,000. Maximum amount of investment in a single business may not exceed an aggregate of $2 million in investments for all taxable years. Not available to those who hold more than 30 percent equity.
Arkansas	Venture Capital Investment (Equity Investment Tax Credit)	Equal to 33 1/3% of the actual purchase price paid for the equity interest to the business. Credit is limited to 50% of state income tax or premium tax liability of the taxpayer after all other credits and reductions in tax have been calculated. Unused credits may be carried forward for nine years. Effective for calendar years 2007 through 2019.	Limited to targeted businesses as defined in Arkansas Code; or a business that receives assistance in the form of equity investments from capital investment funds that target early-stage businesses and start-up businesses, if the business: (a) pays at least 150% of the lesser of the county average wage or the state average wage; and (b) meets at least two of the following conditions: (1) the business is in a specified business sector; (2) the business is identified in a local or regional economic development plan as the type of business targeted for recruitment or growth within the community or region; (3) the business is supported by a resolution of the city council or quorum court in the municipality or county in which the business is located or plans to locate; (4) the business is supported by business incubators certified state law; (5) the business is supported by federal small business innovation research grants; or (6) the business is supported by technology development or seed capital investments made by instrumentalities of the state.
Connecticut	Angel Investor Tax Credit	Income tax credit equals 25% of the cash investment, up to a maximum credit of $250,000.	Investments must be at least $25,000. Businesses must have: (a) gross revenues under $1 million in its most recent income year; (b) fewer than 25 employees, at least 75% of whom are from Connecticut; (c) operated in Connecticut for less than seven consecutive years; and (d) received less than $2 million in eligible investments from angel investors. Eligible participants must be considered “accredited investors” as defined under Connecticut law, or a network of such investors.

State	Program	Credit Amount	Requirements
Georgia	Angel Investor Tax Credit	Equal to 35% of the amount invested and is available for investments made in 2011, 2012 and 2013. However, the credit cannot be used until the second year following the year the investment is made. The aggregate amount of credit allowed against taxable income for any number of qualified investments is $50,000 at the individual level annually. If the taxpayer does not have a large enough tax liability to use the entire credit, it may be carried forward for five years.	Angel investors must be “accredited investors” as defined by the SEC. Qualifying businesses must be a corporation, LLC or partnership located in Georgia. Cannot be engaged in retail sales, real estate and construction, professional services, gambling, natural resource extraction, investment activities and insurance or activities where admission or membership is charged. Headquarters must be in Georgia from the time the investment is made through the entire duration that an investor benefits from the credit. Must employ 20 or fewer people at the time of registration. Gross revenues must not exceed $500,000 in any prior fiscal year. Cannot have obtained more than $1 million in gross cash proceeds from issuing debt or equity instruments (not including commercial loans). Investments can be made by individuals or pass-through entities that have no business operations and manage less than $5 million in capital.
Hawaii	High Technology Business Investment Tax Credit	Credit of 35% in the year the investment was made, up to a maximum of $700,000. 25% in the first year following the investment, up to a maximum of $500,000. 20% in the second year following the investment, up to a maximum of $400,000. 10% in the third year following the investment, up to a maximum of $200,000. 10% in the fourth year following the investment, up to a maximum of $200,000.	More than 50% of total business activities must be in qualified research, and business must conduct more than 75% of qualified research in the state, or more than 75% of gross income must be derived from qualified research and this income is derived from products sold, manufactured in or produced in the state or services performed in the state.
Illinois	Angel Investment Credit	Equal to 25% of the investment, up to $2,000,000.	Qualified ventures must be principally engaged in innovation. Fewer than 100 employees at time of certification. Operating in Illinois for not more than 10 consecutive years prior to certification. Headquartered in Illinois, and 51% of employees must be employed in Illinois.

State	Program	Credit Amount	Requirements
			Business must not have received more than $10,000,000 in aggregate private equity investment in cash or $4,000,000 in investments that qualified for tax credits. Applicant investments must be kept in a program qualified new business venture for no less than three years.
Indiana	Venture Capital Investment Tax Credit	Maximum amount of the credit is the lesser of the total amount of qualified investment capital provided to the qualified Indiana business in the calendar year, multiplied by 20% or $1,000,000.	Credit is available to any taxpayer who is an individual or entity that has any state tax liability. Pass through entities whose shareholders have Indiana income tax liabilities are also eligible for the credit. The total amount of tax credits certified by the Indiana Economic Development Corporation (IEDC) in any year may not exceed $12.5 million.
Iowa	Venture Capital Tax Credit	Equal to 20% of the equity investment. Maximum amount of a tax credit for an investor in any one qualifying business is $50,000. Each year, an investor and all affiliates of an investor shall not claim tax credits for more than five different investments in five different qualifying businesses. Aggregate amount of tax credits issued for all years cannot exceed $10 million.	Principal business operations must be located in Iowa. Business must have been in operation for six years or less. Owner of the business must have completed one of the following: (a) an entrepreneurial venture development curriculum; (b) three years of relevant business experience; (c) a four-year college degree in business management, business administration or a related field; or (d) other training or experience specified by rule or order as sufficient to increase the probability of success of the qualifying business. The business is not engaged primarily in retail sales, real estate or the provision of health care or other professional services. The business shall not have a net worth that exceeds ten million dollars. Within 24 months after the first date on which the equity investments qualifying for tax credits have been made, the business shall have secured total equity or near equity financing equal to at least $250,000. For investments made on or after January 1, 2004, the tax credit for an equity investment in a qualifying business can be claimed by a partnership, limited liability company, S corporation or other estates or trusts electing to have income tax directly to the individual, based upon the pro rata share of the individual’s earnings from the partnership, limited liability company, S corporation, estate or trust.
Kansas	Angel Investor Tax Credit	A $50,000 tax credit limit, per company, per year. Accredited angel investors can receive a total of $250,000 tax credits per	Companies must meet the following criteria to be certified as a Qualified Kansas Business: (a) the business has a reasonable chance of success and

State	Program	Credit Amount	Requirements
		calendar year. $6,000,000 allocation cap for each calendar year through 2016	potential to create measurable employment within Kansas; (b) in the most recent tax year of the business, annual gross revenue was less than $5,000,000; (c) businesses that are not bioscience businesses must have been in operation for less 5 years and bioscience businesses must have been in operation for less than 10 years; (d) the business has an innovative and proprietary technology, product, or service; (e) the existing owners of the business have made a substantial financial and time commitment to the business; (f) the securities to be issued and purchased are qualified securities; (g) the company agrees to adequate reporting of business information; and (h) the ability of investors in the business to receive tax credits for cash investments in qualified securities of the business is beneficial, because funding otherwise available for the business is not available on commercially reasonable terms.
Louisiana	Angel Investor Tax Credit	35% on investments by accredited investors $5 million annual program cap Program sunsets on July 1, 2015	The incentive is available to investors who invest in Louisiana businesses that are not involved in retail, real estate, professional services, gaming or gambling, natural resource extraction or exploration or financial services, including venture capital funds. Qualifying businesses must be based in Louisiana, with Louisiana as the primary place of employment. Business must have either gross annual sales of less than $10 million or a business net worth of less than $2 million. Business must employ 50 or fewer full-time employees. Business has a plan of progression through which more than 50% of its sales will be derived from outside of Louisiana. Investors can invest $1 million per business per year and $2 million per business over the life of the program.
Maine	Seed Capital Tax Credit	Credits to investors of up to 60% of the cash equity they provide. Program limit of $28 million was reached on January 28, 2013.	Business must be located in Maine Investors must own less than 50% of the business Annual gross salaries must be less than $3 million Business must either: (a) be a manufacturer; (b) provide goods or services with 60% of sales derived from outside the state or out-of-state residents; (c) develop or apply advanced technologies; (d) bring significant permanent capital into the state; or (e) be certified as a visual media production company.

State	Program	Credit Amount	Requirements
			Operating the business must be the professional, full-time activity of at least one of the principal owners
Maryland	Biotech Investment Tax Credit	Equal to 50% of an eligible investment for investors in qualified Maryland biotechnology companies.	Individual or any entity who invests at least $25,000 in a Qualified Maryland Biotechnology Company. Maximum investment of $250,000. Qualified Maryland Biotechnology Company: (a) headquarters and base of operations in Maryland; (b) fewer than 50 employees; (c) in active business no longer than 15 years; and (d) certified as a biotechnology company by DBED.
Michigan	Michigan Small Business Investment Tax Credit	25% tax credit over a two year period on qualified investments in qualified businesses. Qualified investments must have been made between December 31, 2010, and January 1, 2013.	Criteria for qualified investors: (a) must invest alongside or through a venture capital or angel group that is registered with the Michigan strategic Fund; (b) must be an individual taxpayer or an incorporated entity subject to Michigan income tax laws; (c) must not be related to the owner(s) or employee(s) of the qualified business; (d) must not have pre-existing fiduciary relationship with the qualified business; (e) must not have been convicted of a felony involving a fiduciary obligation or the conversion or misappropriation of funds or insurance accounts, theft, deceit, fraud, misrepresentation, or corruption; (f) must not have unpaid, or entered into an installment agreement regarding a final assessment of an unpaid liability for a Michigan state tax for which all rights of appeal have been exhausted; and (g) must not currently be in a bankruptcy proceeding. Criteria for qualified investments: (a) must be at least a $20,000 investment in a qualified business; (b) investment must be syndicated with or pass through a qualified investment group; (c) can be an equity or debt investment that meets other qualified investment eligibility criteria; (d) must maintain investment in qualified business for at least three years unless legitimate exit opportunity occurs; and (e) qualified investor must submit an annual report on the growth of the qualified business. Statutory criteria for qualified business: (a) is a seed or early stage business as defined in Michigan Early Stage Venture Investment Act of 2003; (b) must be domiciled and headquartered in Michigan; (c) has a majority of its employees working in Michigan; (d) has a pre-investment valuation of less than $10 million; (e) has fewer than 100 FTEs; (f) has been in existence less than five years, or 10 years if business activity is derived from research at an institution of higher education in Michigan; (g) not a retail establishment; (h) not a recipient of tax credits from MEGA and/or the

State	Program	Credit Amount	Requirements
			Michigan Film Office; (i) not engaged in life sciences technology unless those activities are included in the definition of life sciences.
Minnesota	Angel Tax Credit (Small Business Investment Tax Credit)	25% refundable individual income tax credit with a maximum credit of $125,000 per year per individual, or $250,000 for married couples filing jointly	A business must be certified by the Minnesota Department of Employment and Economic Development. The company must be headquartered in Minnesota and must maintain the headquarters in the state for at least five years. 51% of the company's employees must live in Minnesota and 51% of the company's payroll must be paid or incurred within Minnesota. The company must: (a) employee fewer than 25 employees; (b) be engaged in innovation in Minnesota; (c) have been in operation for fewer than 10 years; and (d) have raised $4 million or less in private equity prior to applying for certification. Total amount of qualified investments in each qualified small business must not be more than $4 million. This limitation is a lifetime maximum.
Nebraska	Nebraska Angel Investment Tax Credit Program	40% refundable tax credit in Distressed areas, 35% in non-distressed areas. Maximum credit of $350,000 for couples filing a joint return and $300,000 for single filers. Maximum amount of $1 million tax credit for investments in any one business. There are $3,000,000 available in total credits per year.	Individual investors must have a minimum investment of $25,000 per year. Businesses must be Nebraska based with more than 51% of the employees in Nebraska and fewer than 25 employees at the time of investment.
New Jersey	Small New Jersey-Based High-Technology Business Investment Tax Credit (The recently passed NJ Angel Investor Tax Credit Act appears to be	Tax credit equal to 10% of the qualified investment made by the taxpayer in a small New Jersey-based high technology business, for three years, up to a maximum allowed credit of $500,000 for the tax year for each qualified investment made by the taxpayer. An unused credit may be carried over for 15 years following a credit's tax year. However, a taxpayer may not carry over any amount of unused credit to a tax year during which a corporate acquisition, with respect to which a taxpayer was a target corporation, occurred or during which the taxpayer was a party to a merger or a consolidation.	The business must have fewer than 225 employees, 75% of whom are New Jersey- based. The credit allowable for any given tax year is limited to 50% of the taxpayer's total liability, not to exceed an amount which would reduce the total tax liability below the statutory minimum. A research and development tax credit shall not be allowed for expenses paid from funds for which a small New Jersey-based high-technology tax credit is allowed, or which are includable in the calculation of the allowed amount of this tax credit. Under the New Jersey Angel Investor Tax Credit Act, the company must be in one of the following industries: (a) advanced computing ; (b) Advanced

State	Program	Credit Amount	Requirements
	amending this tax credit as the amount of the credit and the requirements appear to be the same)	The New Jersey Angel Investor Tax Credit Act is capped at a maximum availability of $25 million in tax credits on an annual basis.	materials ; (c) biotechnology; (d) electronic device technology; (f) information technology Life sciences; (g) medical device technology; (h) mobile communications technology; or (i) renewable energy technology
New Mexico	Angel Investment Credit	A credit of 25% of an investment of not more than $100,000. Up to two qualified investments in a year are allowed. Credit may be claimed for up to two qualified investments in a taxable year as long as each investment is in a different qualified business. Any portion of the tax credit remaining at the end of the taxpayer's taxable year may be carried forward for three consecutive years.	A taxpayer must apply for a certificate of eligibility for the angel investment credit to the Economic Development Department. The taxpayer must be an accredited investor and the investment must be in a qualified investment. Investment must be made in a company that is engaging in high-technology research or manufacturing.
North Carolina	Qualified Business Investment Tax Credit	The lesser of 25% of the amount invested or $50,000 for individual owners per year. An aggregate credit of $750,000 for a corporation with one or more investments per year. Total credit allowable to all taxpayers for each year may not exceed $7,500,000. Unused credits can be carried forward for the next five years.	The credit is allowed in the tax year beginning during the calendar year following the calendar year in which you the investment was made.
North Dakota	Seed Capital Investment Tax Credit	Equal to 45% of the investment, up to $112,500. Only the first $500,000 of eligible investments in the business are eligible for the tax credit. The total amount of tax credits allowed for investments made in all certified businesses in any calendar year is limited to $3.5 million. The credit must be claimed first in the tax year in which the investment is made. If the total credit allowed cannot be used because it exceeds the lesser of $112,500 (annual usage limit) or the taxpayer's tax liability, the unused portion of the total allowable credit may be carried over and used on subsequent tax years' returns for up to 4 tax years. The maximum credit of $45,000 per tax year translates to a maximum investment of $100,000 per tax year. A taxpayer is allowed to invest over $100,000 but no credit is allowed.	The investment must be in a business that: (a) is a primary sector business that generates "new wealth," which generally means sales to customers outside North Dakota, or to customers in North Dakota if availability of the product is limited; (b) hires North Dakota residents to fill the majority of its employment positions in North Dakota; (c) has its principal office and conducts the majority of its business (except sales activity) in North Dakota, or has a significant operation in North Dakota; (d) has (or projects to have) more than 10 employees or $150,000 of annual sales; (e) relies on innovation, research, or the development of new products and processes in its plans for growth and profitability; (f) is not an agricultural commodity processing facility or a real estate investment trust. "New wealth" generally means revenues generated by sales to customers outside North Dakota or to customers in North Dakota if availability of the product, process, or service in North Dakota is limited. "Early-stage enterprise" means one with annual revenues of up to $2

State	Program	Credit Amount	Requirements
			million. "Mid-stage enterprise" means one with annual revenues between $2 million and $10 million.
Ohio	Technology Investment Tax Credit	25% credit (or 30% in some limited cases for distressed county enterprises) with a maximum credit of $62,500 (or $90,000 for distressed county enterprises). The program has reached its limit of $45,000,000 in credits on $180,000,000 in investments.	The entity's principal place of business must be in Ohio with at least 50% of its gross assets and 50% of its employees located within the state. The entity must be involved primarily in research and development, technology transfer, bio-technology information technology, the application of new technology developed through research and development or acquired through technology transfer. Qualified trades or businesses do not include any of the following: (a) businesses performing services in the fields of law, engineering, architecture, accounting, actuarial services, performing arts, consulting, athletics, financial services, brokerage services or any trade or business where its principal asset is the reputation or skill of one or more of its employees; (b) any banking, insurance, financing, leasing, rental, investment or similar business; (c) any farming business; and (d) any business involving the production or extraction of natural resources.
Rhode Island	Innovation Tax Credit	Credit of up to 50%, with a maximum credit of $100,000. The credit may be carried forward for a period not to exceed three years. The program sunsets on December 31, 2016.	A company must produce traded goods or services, have annual gross revenues of less than $1 million in the prior two calendar years and must be categorized as one of the following innovation industries: biotechnology and life sciences; communication and information technology; financial services; marine and defense manufacturing; professional, technical and educational services; industrial and consumer product manufacturing and design. Once an application is approved, the company has up to 12 months to make the investment and provide proof of investment back to the Economic Development Corporation's Board of Directors.
Virginia	Qualified Equity and Subordinated Debt Investments Tax Credit	Equal to 50% of the qualified business investments made during the taxable year. If total annual requests for the credit exceed $4 million, the Department of Taxation will prorate the credit for each taxpayer. The credit may not exceed the credit authorized by the Department of Taxation, $50,000, or the income tax liability on that year's return, whichever is less.	This credit is available to individual and fiduciary taxpayers making a qualified investment in the form of "equity" or "subordinated debt" in a pre-qualified small business venture. Investment must be made in a qualified business. A qualified business means a business which: (a) has annual gross revenues of no more than $3 million in its most recent fiscal year; (b) has its principal office or facility in the Commonwealth; (c) is engaged in business primarily in or does

State	Program	Credit Amount	Requirements
		Unused credits may be carried forward for up to 15 years. Total amount of credits allowed for a calendar year is $5 million.	substantially all of its production in the Commonwealth; (d) has not obtained during its existence more than $3 million in aggregate gross cash proceeds from the issuance of its equity or debt investments (not including commercial loans from chartered banking or savings and loan institutions); and (e) is primarily engaged, or is primarily organized to engage, in the fields of advanced computing, advanced materials, advanced manufacturing, agricultural technologies, biotechnology, electronic device technology, energy, environmental technology, information technology, medical device technology, nanotechnology, or any similar technology-related field determined by regulation by the Department of Taxation. No credit shall be allowed to any taxpayer that has committed capital under management in excess of $10 million and engages in the business of making debt or equity investments in private businesses, or to any taxpayer that is allocated a credit as a partner, shareholder, member or owner of an entity that engages in such business.
Wisconsin	Angel Investor Tax Credit (Program description in text and Attachment 1)	Credit equal to 25% of qualified investment. Aggregate credit amounts limited to $20 million per year and $47.5 million in total.	Must be headquartered in Wisconsin with at least 51% of the businesses located in the state. Investments must be in Qualified New Business Venture (QNBV).