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May 27, 2015 | Joint Committee on Finance | Paper #324

Reduce the Supplement to the Federal Historic Rehabilitation Tax Credit (General Fund Taxes -- Income and Franchise Taxes)

[LFB 2015-17 Budget Summary: Page 179, #10, and Page 180, #11]

CURRENT LAW

The federal government provides an individual and corporate income tax credit for a portion of qualified expenditures used to rehabilitate certified historic structures and qualified rehabilitated buildings. The federal credit is 20% of qualified expenditures for certified historic structures and 10% of qualified expenditures for qualified rehabilitated buildings. The rehabilitated buildings must be used for commercial purposes.

Under state law, an individual or corporation may claim a credit against the state individual income tax, including the alternative minimum tax, or the corporate income/franchise tax for up to 20% of qualified rehabilitation expenditures for certified historic structures and for qualified rehabilitated buildings for taxable years beginning after December 31, 2013 (tax year 2014). The state credit for certified historic structures has been provided for a number of years. Prior to tax year 2013, the state credit was 5% of qualified rehabilitation expenditures. The credit percentage was increased to 10% for tax year 2013 and to 20% for tax year 2014 and thereafter. The 20% state credit for qualified rehabilitated buildings was first offered in tax year 2014. For purposes of this paper, the credits offered for these two types of buildings are jointly referred to as the "historic tax credits."

The state credits act as supplements to the federal credits, which results in a total credit of 40% for certified historic structures and 30% for qualified rehabilitated buildings.

Qualified rehabilitation expenditures are specified under federal law. A certified historic structure is a building that is listed in the National Register of Historic Places or that is determined to be historic and will be listed in the National Register. Qualified rehabilitated buildings are generally buildings that were constructed prior to 1936, but do not include certified historic structures or nonresidential property converted into housing if the property had previously been used for housing.

For both credits, qualified rehabilitation expenditures are eligible if the rehabilitated structure is located in this state and the cost of the qualified rehabilitation expenditures is at least $50,000. Also, the Wisconsin adjusted basis of the building must be reduced by the amount of the credit awarded.

Unused credit amounts can be carried forward up to 15 years to offset future tax liabilities. As an alternative to carrying forward unused credits, a claimant, including a nonprofit entity, may sell or otherwise transfer a historic tax credit to another person.

For taxable years beginning after December 31, 2013, no person may claim either of the historic tax credits without being certified by the Wisconsin Economic Development Corporation (WEDC). WEDC may (but is not required to) certify a claimant to claim a tax credit if the Corporation determines that the claimant is conducting an eligible activity, as described above. WEDC must notify DOR no later than January 15 of each year of the amount of credits certified and the name, address, and tax identification number of each claimant certified to claim the credits. WEDC must notify DOR of any revoked certification within two months of the revocation.

The state credit must be claimed at the same time that the federal credit is claimed. In order to claim the credit, a claimant must include with the return a copy of the certification by WEDC. For the credit for certified historic structures, the claimant must provide WEDC with evidence that the rehabilitation was recommended by the state historic preservation officer for approval by the U.S. Secretary of the Interior prior to beginning the physical work of construction, or destruction in preparation for construction, and that the rehabilitation was approved by the state historic preservation officer. The claimant must include evidence that the taxpayer had obtained written certification from the state historic preservation officer regarding the historical significance of the property and the proposed preservation or rehabilitation plan and expenditures.

GOVERNOR

The bill would sunset the supplement to the federal historic rehabilitation tax credit for qualified rehabilitated buildings on January 1, 2015. As drafted, the bill would allow persons who have incurred qualified rehabilitation expenditures prior to that date to claim the credit in later years even if the property is not placed in service until after December 31, 2014. However, the administration has requested that the bill be amended to, instead, allow continued eligibility for persons who, prior to January 1, 2015, have received a letter of intent from WEDC to enter into a rehabilitation credit contract with the Corporation under which the person could subsequently incur qualified rehabilitation expenditures [Alternative 1(a)].

In addition, the bill would make the following changes for taxable years beginning on

January 1, 2016:

Annual Limit. Limit the amount of tax credits that may be certified by WEDC in any calendar year to no more than $10 million.

Certification Criteria. Require WEDC to consider all of the following with respect to the activity for which the tax credit is claimed in determining whether to certify a person for a tax credit: (a) the number of full-time jobs that may be created; (b) the anticipated benefit to the state of the activity relative to the cost to the state of the tax credit; (c) the projected impact of the activity on the local economy; (d) whether the activity or investments associated with the activity would occur without the credit; and (e) the number of credits that have been certified in the same county or municipality in prior years.

Clawback Provisions. Require that, for four years following receipt of a credit, the original claimant would have to report to WEDC the total number of full-time jobs created by the activity for which the credit was claimed. Require WEDC to report to DOR, at least once each calendar quarter, any claimant whose activity created fewer full-time jobs than projected. In addition, require WEDC to report to DOR the name, address, and tax identification number of the claimant, and the number of full-time jobs projected and created. Require WEDC to adopt policies and procedures for the administration of the credit, including all of the following: (a) a process by which applicants may apply for certification; (b) certification of the tax credit; (c) reporting requirements for certified claimants; and (d) a process and criteria for revocation of certification.

Under the bill, if the activity for which a person claims a supplement to the credit creates fewer jobs than projected, the person who claimed the credit would have to repay DOR any amount claimed, as determined by the Department, in proportion to the number of full-time jobs created as compared to the projected number. A person who transfers a credit would be responsible for any required repayment.

The bill would also specify that if a person who claims the credit under both state and federal law for the same expenditures is required to repay the <u>full amount</u> of the federal credit, that person would also have to repay the full amount of the state credit. The administration has requested an amendment to specify that if all or any portion of the federal credit must be repaid, the same portion of the corresponding state credit would also have to be repaid [Alternative 1(b)]. Federal repayment requirements are triggered when the rehabilitated property is disposed of or otherwise ceases to be eligible investment property of the claimant within five years.

Non-Profit Claimants. Clarify that only nonprofit entities under Section 501 (c) (3) of the Internal Revenue Code may claim the credit and then sell or otherwise transfer the credit to other taxable entities.

Fiscal Effect. The administration estimates that these provisions would increase state tax revenues by $7,800,000 in 2016-17, $15,600,000 in 2017-18, $28,200,000 in 2018-19, and $31,000,000 in 2019-20 and annually thereafter. The fiscal effect is entirely caused by the $10 million annual limit on the amount of credits that WEDC may certify.

DISCUSSION POINTS

Background

1. During the last legislative session, 2013 Wisconsin Acts 20 and 62 made several changes to expand the state historic tax credit program. Act 20 increased the credit percentage for certified historic structures from 5% to 10% for tax year 2013. Act 62 further increased the credit percentage to 20% beginning in tax year 2014 and: (a) created the 20% credit for qualified rehabilitated buildings, beginning in tax year 2014; (b) required WEDC certification for both credits; (c) allowed the credits to be claimed against the alternative minimum tax under the individual income tax; (d) allowed the credits to be claimed by nonprofit entities and to be transferred; (e) created the reporting requirements and Joint Finance Committee (JFC) review of the tax credit program; and (f) modified the types of evidence that must be provided in order to claim the credits.

2. As noted above, prior to tax year 2013, state law allowed only a credit for 5% of qualified expenditures on certified historic structures. The following table shows that the amount of credits claimed ranged from $0.4 million in tax year 2010 to $3.2 million in tax year 2008. Used credits ranged from $0.3 million in tax year 2010 to $1.9 million in tax year 2012. [2012 data is preliminary.]

Claimed and Used Credits for Certified Historic Structures
Tax Years 2005 Through 2012

	Credits Claimed		Credits Used	
Tax Year	Number of Claimants	Total Amount Claimed	Number of Claimants	Total Amount Used
2005	70	$1,772,000	70	$478,000
2006	80	1,565,000	80	1,422,000
2007	80	648,000	80	399,000
2008	90	3,195,000	80	1,886,000
2009	90	2,586,000	80	1,609,000
2010	120	397,000	100	268,000
2011	70	784,000	70	608,000
2012	70	2,743,000	70	1,935,000

3. Based primarily on the historical data shown in table, the combined revenue loss associated with the Act 20 and Act 62 changes was estimated at $2.7 million in 2013-14 and $5.5 in 2014-15 and annually thereafter. However, utilization of the historic tax credits was significantly higher than had been anticipated under those acts. In response to the higher tax credit utilization, WEDC placed a moratorium on certifying persons as eligible for the historic tax credits for applications received after June 23, 2014. At that time, the state revenue reduction associated with the historic tax credits had been reestimated significantly higher at $41.7 million in 2014-15, $47.2 million in 2015-16, $57.5 million in 2016-17, and $64.2 million in 2017-18 and annually thereafter.

4. On July 14, 2014, the Governor announced that WEDC would partially lift the moratorium on the historic tax credits. The moratorium was lifted for the credit for certified historic structures; however, the moratorium was not lifted for the credit for qualified rehabilitated buildings.

Credit for Qualified Rehabilitated Buildings

5. Once the moratorium was imposed on qualified rehabilitated buildings, a person was only eligible to receive the credit for qualified rehabilitation expenditures on qualified rehabilitated buildings if that person: (a) was certified by WEDC, provided the person submitted an application prior to June 23, 2014; and (b) had incurred qualified rehabilitation expenditures of at least $50,000 in a calendar year. As of May 1, 2015, nine persons had been certified by WEDC as eligible to receive up to $15.6 million of credits. In addition, three other persons had received a letter of intent from WEDC, but had not yet entered into a contract, for up to $145,000 of credits.

6. As noted, the administration has requested an amendment to allow continued eligibility for persons who, prior to January 1, 2015, have received a letter of intent from WEDC to enter into a rehabilitation credit contract with the Corporation under which the person could subsequently incur qualified rehabilitation expenditures. Absent the requested change, the 12 projects referenced above would not be eligible for a credit.

7. The 20% credit for qualified rehabilitated buildings was passed into law late in 2013, and first became available in tax year 2014. Therefore, the new credit was in effect for slightly more than six months before the moratorium was imposed. It could be argued that the moratorium and proposed repeal of the credit contradict the intent of the Legislature, given the recent enactment of the legislation. Current law authorizes, but does not require, WEDC to certify qualified claimants. The Committee could choose to maintain current law and not sunset the credit [Alternative 2a]. Because of the state's difficult financial situation, it is anticipated that WEDC would maintain the moratorium through the 2015-17 biennium if this provision were adopted. However, this option would provide WEDC with flexibility to resume certification of potential claimants when the state fiscal condition improves.

Annual Limit on the Credit for Certified Historic Structures

8. The bill would limit the amount of tax credits that could be certified by WEDC to $10 million per year. The administration estimates that this provision would result in increased revenues of $7.8 million in 2016-17, $15.6 million in 2017-18, $28.2 million in 2018-19, and $31.0 million in 2019-20 and annually thereafter.

9. Attachment 1 presents information on rehabilitation tax credits for certified historic structures in other states. As shown, 16 states and the District of Columbia do not provide a supplement to the federal historic rehabilitation tax credit. However, eight of those states do not have a broad-based income tax. Texas provides a transferrable historic rehabilitation tax credit beginning in 2015, even though it does not have a broad-based income tax. Most of the 34 states that provide a credit impose an annual cap on the total amount of credits that may be authorized or claimed and/or a per-project limit.

10. Attachment 2 provides a list of the 42 projects for which WEDC has entered into contracts for rehabilitations to certified historic structures since the 20% rate took effect on January 1, 2014, through May 1, 2015. The average credit award per project over this period of time was approximately $1.2 million for a total of almost $50.1 million. According to the Corporation, the contracted credit amounts represent approximately 16% of the total project funding, with nearly $260 million of non-WEDC funding provided for these projects.

11. The Historic Preservation Institute of UW-Milwaukee studied 31 rehabilitation projects that were approved by WEDC in 2014 to determine how long the buildings had been vacant prior to the proposed improvements. The Institute reports that 15 had been completely vacant, 14 had been partially vacant, and two were fully used prior to applying for credits. Of the 15 buildings that were completely vacant, seven had been vacant for between one and 10 years, five had been vacant for between 10 and 20 years, two had been vacant for between 20 and 30 years, and one had been vacant for over 30 years. It could be argued that, absent the availability of state credits, those buildings that were completely vacant would likely not have been rehabilitated and would have remained vacant. However, it could also be argued that buildings are not built to exist in perpetuity, and that demolition of a building that is unused and in disrepair may be a more economically efficient option than rehabilitating a historic building.

12. An argument for providing historic tax credits is to preserve buildings that have been recognized as having historical significance in a local area. Absent the credits, it is possible that a vacant building of historical significance could fall into disrepair, remain vacant, and become a blighted part of a municipality. It is possible that investors may require the combined state and federal 40% tax credit to make renovation of an older building economically feasible. Local units of government may find it preferable to rehabilitate existing buildings in order to enhance downtown areas, mitigate urban sprawl, and lessen landfill waste from demolition. Local units of government may not have the financial tools available to achieve these desired outcomes.

13. As noted, Attachment 2 shows the amount of credits that have been certified since January, 2014. Several of those credits exceed $4 million and one credit (Milwaukee Fortress LLC) exceeds $9 million. The Historic Preservation Institute has raised concerns that the $10 million cap proposed by the Governor could preclude smaller projects from being certified if just a few large projects receive certification.

14. Among other states, 17 have caps on the amount of credits that can be allocated for a specific project, 10 of which also impose an aggregate annual limit on the amount of credits that can be issued in a year. Of states that have an annual limit, seven limit credit awards to no more than $5 million per project, four have a limit of between $1 million and $5 million per project, and six have a cap of less than $1 million per project. The Committee could choose to impose a similar limit on the amount of credits that a project could receive. For instance, a cap of $5 million per project [Alternative 2b] could provide the full 20% credit for qualified rehabilitation expenditures for a project of up to $25 million. This alternative would allow for the potential of some larger scale projects while ensuring that no more than half of the annual allocation could be used on one large project in a year. A $1 million cap per project [Alternative 2c] could support the full 20% credit for rehabilitation expenditures of up to $5 million per project. As shown in Attachment 2, of the 42

projects that were contracted by WEDC since the beginning of 2014, 28 were eligible for credits of less than $1 million, and all but one project was eligible for credits of less than $5 million. An alternative to limit the amount of credits available per project would not be expected to have a significant fiscal effect.

Certification Criteria and Clawback Provisions

15. The Governor's recommendation would require WEDC to consider certain criteria when determining whether to certify credits, including the number of full-time jobs that would be created, what the anticipated economic benefit would be to the state and the local economy, whether the activity would have occurred absent the credit, and the number of credits that have been certified in the same municipality. Current law does not provide any statutory criteria that WEDC must consider when certifying the credits; however, WEDC's Board has the authority to develop policies and procedures to determine how the Corporation awards credits. If the Committee chose to delete the proposed statutory certification criteria, the WEDC Board could still adopt those requirements under its policies and procedures.

16. The bill creates two clawback provisions. One provision would specify that the state could reclaim a portion of the credit if the rehabilitated property ceases to be income-producing property eligible for the federal credit. The other clawback provision is related to whether the project resulted in the projected increase in full-time jobs. In addition, WEDC would be required to report to DOR every three months any claimant whose activities created fewer full-time jobs than projected. The person who claimed the credit would have to repay DOR the credit amount in proportion to the number of full-time jobs created as compared to the number projected.

17. It could be argued that the clawback provision could jeopardize the viability of certain projects if private lenders or investors view reliance on a state credit that could be subject to repayment to be a risky financing mechanism. Private parties that underwrite financing for such projects could be concerned that their loan or investment dollars would be less secure if the owner of the building was potentially subject to a large financial penalty because projected job increases did not occur. As a result, Wisconsin projects may be considered less attractive financial opportunities.

18. It is unclear how the full-time job projections and reporting would be administered. The bill does not specify a minimum number of jobs that must be created for credits to be certified by WEDC. As a result, it is unknown how many jobs would be associated with a project for rehabilitation of a historic building. For a building that is rehabilitated, persons are employed in the construction of the building. Following the rehabilitation, any full-time jobs that might be directly created following the rehabilitation would vary by end use of the restored building. If the rehabilitated building was primarily used as residential rental property, it would be difficult to argue that any full-time jobs were created following completion of the rehabilitation period because the persons in the building could be entirely renters, rather than retail or office employees. Conversely, if a historic building were restored for end use as office space or retail purposes, a number of full-time employees could work primarily in that restored structure. However, it is arguable that similar office space or retail establishments would have been created in another building in that municipality, or in an adjoining municipality, that would have generated a similar number of jobs

absent the credit.

19. If the primary purpose of the supplement to the federal historic rehabilitation tax credit is to restore buildings that are of historic value to the state, the creation of full-time jobs associated with a restored historic structure could be considered extraneous to the purpose of the credit. It could be argued that a clawback provision related to full-time job creation could jeopardize private sector financing to restore the building, which would be contrary to the purpose of the credit. The Committee could choose to delete the clawback provisions related to full-time job creation and associated WEDC quarterly reporting provisions to DOR [Alternative 2d].

Non-profit Claimants

20. The bill would limit the type of nonprofit entities that could be certified to claim and then transfer historic tax credits. According to the administration, this change is intended to ensure that governmental entities do not claim the credit, and then transfer it to a taxable entity.

21. As shown in Attachment 2, the Oshkosh Housing Authority was certified as eligible to receive a historic rehabilitation tax credit of up to $1.2 million. According to DOR, a housing authority such as the Oshkosh Housing Authority appears to be structured as a body of the Winnebago County Board. For such authorities that are extensions of a county board, the governmental entity is considered to be a nonprofit organization; however, governmental entities are not considered 501 (c) (3) organizations under the Internal Revenue Code. Federal law generally defines a 501 (c) (3) organization as a corporation, community chest, fund, or foundation organized and operated exclusively for religious, charitable, scientific, testing for public safety, literary, or educational purposes. Because governmental entities are primarily funded through state or local tax dollars, and because local units of government are generally an extension of the state government, the administration does not think that providing tax credits to governmental organizations is an appropriate use of state resources. The administration intends for the credits to become more directed toward job creation. As noted, residential projects typically involve few, if any, permanent jobs following the construction period. If the Committee deleted this provision, it is estimated that this alternative would reduce state tax revenues by a minimal amount [Alternative 2e].

Baker Tilly Study

22. A recently published impact analysis prepared by Baker Tilly on behalf of the Historic Preservation Institute analyzed 25 projects that have been contracted with WEDC for $34.8 million in credits since the credit percentage was increased to 20% in January of 2014. The report identifies a number of positive economic effects of these projects. For example, the report estimates that the projects will involve 2,800 jobs in construction and ongoing operations in the rehabilitated structures. The report also notes that these projects will involve direct and indirect spending of over $400 million in the first year of operations. In addition, the report indicates that the $34.8 million of tax credits will be completely offset by increased state income and sales taxes by year seven of stabilized operations and that by the 10th year of operations the state would realize a return of 133%. Advocates of the credits cite these projections as evidence that the credit for certified historic structures represents a sound investment of tax dollars and should not be limited as recommended by the Governor.

22. In considering the Baker Tilly report, it should be noted that the analysis does not account for the possibilities that: (a) at least some of the rehabilitation projects may have occurred without the state credit; (b) if the credit was not available, the business investment associated with the project may have occurred at another location in the same, or in an adjoining, municipality; and (c) in the absence of the credit, the state could have used the $34.8 million for other types of tax relief or expenditures, which also would have a positive economic impact.

20. Based on information provided by WEDC, a majority of the credits were provided to support developing residential rental property. Approximately one-third of the credits awarded were for developments that were for mixed-use property (a combination of retail establishment, residential rental property, and/or office space), and the remaining projects were for developments exclusively as office space, retail establishments, restaurants, or other businesses. Unlike manufacturing plants, distribution centers, or large research facilities, these types of projects are largely based on local demand. Therefore, it is reasonable to believe that alternative projects, with similar economic impacts, would have occurred if the state credit were not available.

23. On balance, it seems reasonable to conclude that the credits are important in directing investment dollars to specific projects at the local level, but much less significant when viewed from the perspective of the entire state economy. However, to the extent persons are certified for, claim, and use the historic tax credits, state tax dollars would not be available to the Legislature for use in other types of tax relief or expenditures, which could also have a positive economic impact to the state.

ALTERNATIVES

1. Approve the Governor's recommendation. In addition, accept the administration's request to modify the proposal to: (a) allow continued eligibility for persons who, prior to January 1, 2015, have received a letter of intent from WEDC to enter into a rehabilitation credit contract with the Corporation under which the person could subsequently incur qualified rehabilitation expenditures; and (b) specify that if all or any portion of the federal credit must be repaid, the same portion of the corresponding state credit would also have to be repaid.

2. In addition to Alternative 1, modify the Governor's recommendation to do one or more of the following.

a. Eliminate the provision that would sunset the supplement to the federal historic rehabilitation tax credit for qualified rehabilitated buildings. This alternative is not anticipated to have a fiscal impact because it is assumed that WEDC would maintain the current moratorium on certifying such credits through the 2015-17 biennium.

b. Specify that a person could not receive an award for the historic tax credits of more than $5 million per project.

c. Specify that a person could not receive an award for the historic tax credits of more than $1 million per project.

d. Delete the proposed statutory requirement that WEDC must consider when determining whether to certify a person for a tax credit: (a) the number of full-time jobs that may be created; (b) the anticipated benefit to the state of the activity relative to the cost to the state of the tax credit; (c) the projected impact of the activity on the local economy; (d) whether the activity or investments associated with the activity would occur without the credit; and (e) the number of credits that have been certified in the same county or municipality in prior years. In addition, delete the proposed statutory clawback provisions and associated reporting requirements from the claimant to WEDC, and from the Corporation to DOR, related to whether a claimant maintained the number of full-time jobs as was agreed to in the claimant's contract. However, retain the provision under the bill that if a person is required to repay all or part of the federal credit, that person must repay to DOR the related amount of the credit that was claimed.

e. Delete the Governor's recommendation to limit the type of nonprofit entities that can be certified to claim historic tax credits.

3. Delete provisions.

ALT 3	**Change to Bill**
GPR-REV (Tax)	- $7,800,000

Prepared by: Sean Moran
Attachments

ATTACHMENT 1

Tax Credits for Certified Historic Structures in Other States

State	State Credit Rate (%)	State Cap ($M)	Project Cap ($M)
Alabama	25%	$20	$5
Alaska	N/A	N/A	N/A
Arizona	None	None	None
Arkansas	25	4	0.500
California	None	None	None
Colorado	20 - 30	15	2
Connecticut	25	31.7	4.5
Delaware	20	5	N/A
District of Columbia	None	None	None
Florida	N/A	N/A	N/A
Georgia	25	None	0.3
Hawaii	None	None	None
Idaho	None	None	None
Illinois	None[1]	None	None
Indiana	20	0.45	0.100
Iowa	25	45	None
Kansas	25 - 30[2]	3.75	None
Kentucky	20	5	0.4
Louisiana	25	None	5
Maine	25	10	5.00
Maryland	20	None	3
Massachusetts	20	50	None
Michigan	25	None	None
Minnesota	20	None	None
Mississippi	25	60	None
Missouri	25	140	None
Montana	5	None	None
Nebraska	20	15	1
Nevada	N/A	N/A	N/A
New Hampshire	N/A	N/A	N/A
New Jersey	None	None	None
New Mexico	50		0.025 - 0.05
New York	20[3]	None	5
North Carolina	20	None	None
North Dakota	[4]	N/A	N/A

State	State Credit Rate (%)	State Cap ($M)	Project Cap ($M)
Ohio	25%	$60	$5
Oklahoma	20	None	None
Oregon	N/A	N/A	N/A
Pennsylvania	25	3	0.5
Rhode Island	20 - 25	[5]	5
South Carolina	10	None	5
South Dakota	None	None	None
Tennessee	N/A	N/A	N/A
Texas	25	None	None
Utah	20	None	None
Vermont	10	1.5	[6]
Virginia	25	None	None
Washington	N/A	N/A	N/A
West Virginia	10	None	None
Wisconsin	20	None	None
Wyoming	N/A	N/A	N/A

[1] Illinois has a 25% credit in specific areas of the state
[2] 30% rate applies to nonprofits
[3] Credit only available for projects located in a certain low-income areas
[4] 25% credit for a project that is part of a renaissance zone project
[5] Limited to the aggregate amount available in the historic preservation tax credit fund
[6] Credit capped at 10% on the first $500,000 and half the costs exceeding $500,000
Note: Alaska, Florida, Nevada, New Hampshire, South Dakota, Tennessee, Texas, Washington, and Wyoming do not have broad based income taxes.

Source: Novogradac Historic Tax Credit Resource Center

ATTACHMENT 2

Historic Tax Credit Projects Contracted from January 1, 2014, through April 30, 2015

Project Name	County	Date of Contract Award	Investment from non-WEDC Sources	Amount of Credit Awarded
1818 MLK Drive LLC	Milwaukee	4/25/2014	$1,310,595	$262,119
207 E Michigan St, LLC	Milwaukee	6/23/2014	1,200,000	240,000
225 East Michigan Street LLC	Milwaukee	4/22/2015	10,000,000	2,000,000
407 N Grand Partnership	Waukesha	8/14/2014	90,000	18,000
Al Ringling Theatre Friends, Inc.	Sauk	10/22/2014	3,176,000	635,200
Artist Loft, LLC	Manitowoc	4/22/2015	8,082,000	1,616,400
Beilke, LLC	Brown	9/16/2014	65,000	13,000
Bob's Bitchin' BBQ	Iowa	1/20/2015	808,015	100,772
Brew City Redevelopment Group, LLC	Milwaukee	4/2/2015	1,000,000	100,000
Divall Nichols Station Associates A Wisconsin Limi	Dane	2/26/2015	4,101,107	820,203
Doerflinger's Second Century	La Crosse	9/19/2014	350,000	70,000
Eau Claire Limited Partnership	Eau Claire	12/10/2014	3,911,000	782,353
Elementary Apartments LLC	Marathon	2/16/2015	3,921,000	784,210
Florida Lofts LLC	Milwaukee	2/18/2015	22,074,091	4,414,818
Grand Kakalin, LLC	Outagamie	3/3/2015	6,616,572	1,323,314
HB Callahan Block	La Crosse	1/20/2015	180,000	36,000
Historic Lincoln School, LLC	Shawano	3/10/2015	2,780,530	556,106
Historic Third Ward Development LLC	Milwaukee	1/23/2015	2,500,000	500,000
Holy Name Heights, LLC	Dane	3/19/2015	15,867,970	3,173,594
Housing Authority of Oshkosh	Winnebago	7/17/2014	5,900,000	1,180,000
Iron Block Building Partners LLC	Milwaukee	11/12/2014	10,600,000	1,900,000
James and Suzanne Holton	Milwaukee	2/26/2015	600,000	63,600
Julie M. Halsne	Dodge	3/27/2014	68,000	13,600
Karen Baggot	Juneau	11/14/2014	75,000	15,000
Lehmkuhl Enterprises LLC	Racine	4/2/2014	62,469	12,493
Longfellow Historic, LLC	Dane	3/25/2014	7,715,000	1,543,000
Milwaukee Fortress LLC	Milwaukee	1/23/2015	52,734,049	9,146,810
Mitchell Street Group LLC	Milwaukee	6/23/2014	1,678,000	335,600
Mo Street Development LLC	Milwaukee	9/9/2014	21,800,000	4,360,000
O'Kroley/646 LLC	Dane	11/18/2014	50,000	10,000
Pance LLC	Dane	9/19/2014	300,000	60,000
Paper Box Lofts Limited Partnership	Milwaukee	9/3/2014	13,500,000	2,700,000
Pritzlaff Redevelopment LLC	Milwaukee	7/29/2014	20,658,000	4,131,600
Railway Exchange Building LLP	Milwaukee	11/20/2014	359,712	71,942
Ross Acquisition, LLC	La Crosse	3/3/2015	20,000,000	4,000,000
Steensland/Bethel LLC	Dane	2/16/2015	800,000	130,000
Stephen Green	Waukesha	4/9/2014	130,000	26,000
Tannery Remnants LLC	Milwaukee	7/29/2014	11,000,000	2,200,000
The Wedding Tree	La Crosse	4/27/2015	700,000	140,000
Theatre Building, LLC	Dane	8/8/2014	800,000	160,000
Toho Properties LLC	Brown	4/27/2015	2,031,000	406,200
West II Building Corporation	Ashland	4/9/2014	70,500	14,100
Total			$259,665,610	$50,066,034