

COST's 48<sup>th</sup> ANNUAL MEETING  
October 22 - 25, 2017  
Orlando, Florida  
(10-18-2017)

Please note that all attendees are welcome to attend any session except for the Audit Sessions. These sessions, as always, are open to COST industry member professionals only.

Event App Password - HMBLAW

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SUNDAY, OCTOBER 22<sup>nd</sup>

5:00 – 8:00 p.m.

**Registration – *BC West Foyer***

6:00 – 8:00 p.m.

**Welcome Reception – *Sponsored by Ernst and Young – Signature Island***MONDAY, OCTOBER 23<sup>rd</sup>

8:00 – 10:00 a.m.

**COST Board of Directors Meeting – *Flagler/Gilchrist Room***

9:30 a.m. – 5:20 p.m.

**Registration – *BC West Foyer***

9:30 – 10:30 a.m.

**Snacks & Networking – *BC West Foyer***

10:30 – 11:00 a.m.

**Welcome & Opening Remarks: COST's 48<sup>th</sup> Annual Meeting of the Membership: Election of New Directors – *BC IV-VI***

Douglas Lindholm, COST, President &amp; Executive Director, Washington, DC

Amy Thomas Laub, COST Chair, Nationwide Insurance Company, Columbus, OH

Charles Drury, COST, Vice President &amp; Chief Operating Officer, Washington, DC

11:00 a.m. – 12:00 p.m.

**Fixing the Broken Tax Code: An Insider's View of Congressional Efforts to Reform the IRC, and how Such Reform May Impact States – *BC IV-VI***

Few tasks in Congress are as difficult as enacting comprehensive and effective tax reform to satisfy common goals: simplification, job creation, economic growth, fiscal stability. Our opening speaker, former Chair of the U.S. House Ways & Means Committee, authored such legislation (the Tax Reform Act of 2014) long before shifting political winds brought comprehensive tax reform within the realm of political reality. Please join us for a fascinating insider's discussion of the current debate on tax reform – the competing proposals, political pitfalls, competing interests, and the emerging consensus that our nation's economic ability to compete globally is at stake in the outcome, at both the federal and state levels.

Speaker:

Dave Camp, PwC, Washington, DC

12:00 – 1:30 p.m.

Lunch/Networking – *BC X - XII***- Announcement of COST Directors & Officers for 2017/2018****Welcome to Florida – Lloyd Looram, Looram Consulting, Palm Beach Gardens, FL**

1:00 – 2:25 p.m.

**Legislative/Government Relations Meeting – *BC IV-VI***

1:30 – 2:25 p.m.

**The SALT Academy Awards – *BC VII-IX***

Presenters from the Northeast, South, Midwest and West will present their candidates for the Best SALT Decision, The Worst SALT Decision and the Most Interesting SALT Decision in their various regions. The audience will play the role of the Academy and vote for the winner.

Speakers:

Jordan Goodman, Horwood Marcus &amp; Berk, Chicago, IL

**Accounting Issues for Both Direct and Indirect Tax Professionals – *BC II-III***

The speakers in this session will discuss FASB and IASB standards on revenue recognition in ASC 606 and IFRS 15 and will provide a comprehensive revenue recognition model for contracts with customers. The speakers will then discuss FIN 48 (ASC 740-10) including: 1) the continuing impact of FIN 48 on the management of the tax department; 2) its impact on settlement and litigation of tax controversy; 3) the five biggest issues related to FIN 48 today; and 4) whether

State Chamber of Commerce Executives and COST Member Government Affairs and Policy Representatives will discuss and share information regarding COST tax priorities for the new 2018 legislative cycle as well as receive COST advocacy materials.

Panel:

COST Advocacy Team &amp; Legislative Steering Committee

	<p>Kendall Houghton, Alston &amp; Bird, Washington, DC  Carly Roberts, Eversheds Sutherland US, San Francisco, CA  Chris Sullivan, Rath Young &amp; Pignatelli, Concord, NH</p>	<p>the resulting financial statements have truly offered better information for investors.</p> <p>Moderator:  Terrence Frederick, Barnwell Consulting, Overland Park, KS  Speakers:  Jeffrey Burns, KPMG, Chicago, IL  Stephen LaRosa, Alexion Pharmaceuticals, New Haven, CT  Chris Oatis, Grant Thornton, Orlando, FL</p>	
2:30 – 3:20 p.m.	<p><b>Report from the Front Lines: Southeast States Chamber Roundtable Discussion on Business Taxes – 2017 Recap &amp; 2018 Predictions – <i>BC IV-VI</i></b></p> <p>Tax policy professionals from key state business associations will prognosticate on significant tax policy issues in the southeast states’ upcoming legislative sessions, viewed through the prism of this year’s accomplishments and setbacks.</p> <p>Moderators:  Ferdinand Hogroian, COST  David Sawyer, COST  Panelists:  Matt Boch, Dover Dixon Horne  Chris Grissom, Bradley  James Patterson, Louisiana Association of Business and Industry  Gary Salamido, North Carolina Chamber of Commerce</p>	<p><b>Nexus Theories for Taxation of Transactions Beyond a State or Municipal Border – <i>BC II-III</i></b></p> <p>The speakers in this session will focus on the limits on states and municipalities seeking to impose sales and use taxes on activities and transactions that occur outside their borders. Presenters will discuss the recent cases of <i>Hertz v. City of Chicago</i> and <i>Florida Department of Revenue v. American Business USA Corp</i> as illustrations of this issue.</p> <p>Speakers:  Scott Edwards, Lane Powell, Seattle, WA  Stanley Kaminski, Duane Morris, Chicago, IL  Michael Kelley, Microsoft, Redmond, WA</p>	<p><b>Comprehensive Federal Tax Reform and What It Means for the States – <i>BC VII-IX</i></b></p> <p>This session will take a deeper dive into the evolving economic and political landscape surrounding comprehensive federal tax reform and will venture predictions on a variety of potential outcomes. Among the issues to be covered are the likelihood of deep corporate / individual tax rate cuts and base broadening; the possible elimination of the state and local tax deduction; the state tax impact of territorial taxation and deemed repatriation; and the diminishing fortunes of full expensing and border adjustment. The panel will also explore the options for state conformity and non-conformity with federal tax reform provisions, and the warning signals ahead for future state budgets.</p> <p>Moderator:  Karl Frieden, COST, Washington, DC  Speakers:  Harley Duncan, KPMG, Washington, DC  Brian Pedersen, Alvarez &amp; Marsal Taxand, San Francisco, CA</p>
3:20 – 3:35 p.m.	<b>Refreshment Break &amp; Networking – <i>BC West Foyer</i></b>		
3:35 – 4:25 p.m.	<p><b>Audit Session: Southeast Region and Puerto Rico SALT Developments &amp; Audit Reports</b></p>	<p><b>Gross Receipts Taxation - Why It's Hot (with States) and Why It's Not (with Taxpayers) – <i>BC VII-IX</i></b></p>	<p><b>Top 10 Things to Always Do In A Property Tax Dispute Proceeding – <i>BC II-III</i></b></p>

	<p><b>(COST Industry Members Only) – BC IV-VI</b></p> <p>The ever-popular COST industry-member-only audit session during which participants share recent audit and litigation experiences involving all types of state and local taxes in the states of: Alabama, Arkansas, Florida, Georgia, Mississippi, North Carolina, South Carolina, Tennessee, Virginia, West Virginia and Puerto Rico Audits.</p> <p>Moderators: Doug Lindholm, COST, Washington, DC Robert Tuinstra, DuPont, Wilmington, DE</p> <p>Facilitators: Jeff Langer, The Home Depot, Atlanta, GA Michael Raley, VF Corporation, Greensboro, NC Susan Courson-Smith, Pfizer Inc., Memphis, TN</p>	<p>States are increasingly considering imposing gross receipts taxes because selling these types of "hidden" taxes are easier than raising the tax rate on voters. Gross receipts taxes, however, violate many principles of sound tax policy and may have a negative impact on economic development. Multistate businesses should understand how these taxes work and the pitfalls and planning opportunities available when doing business with residents of gross receipts tax states or conducting business in such states.</p> <p>Moderators: Nikki Dobay, COST, Washington, DC Fred Nicely, COST, Washington, DC</p> <p>Speakers: Jaye Calhoun, Kean Miller, New Orleans, LA Michelle DeLappe, Garvey Schubert Barer, Seattle, WA Kelvin Lawrence, Baker Hostetler, Columbus, OH</p>	<p>When you're prosecuting a property tax dispute, "Uh oh! "Why did I do that?" is not what you want to be asking yourself. The speakers in this session will do their best to make sure that doesn't happen. Hear about trouble spots that can arise, and leave this session with guidance on how to deal with them and ways to help avoid them.</p> <p>Speakers: Charles Mercer, Nelson Mullins Riley &amp; Scarborough, Raleigh, NC Mark Sommer, Frost Brown Todd, Louisville, KY</p>
4:30 – 5:20 p.m.		<p><b>Administrative Authority – Due Deference? Is it Worth What You Paid for It? – BC VII-IX</b></p> <p>States often take the position that their positions are entitled to deference before the courts. Taxpayers often face the question of whether to seek guidance from the state. In this session, the speakers will explore these issues and evaluate under what circumstances deference should be granted or guidance should be sought.</p> <p>Speakers: Jackie Cook, CMS Energy Corporation, Jackson, MI Karen Currie, EY, Dallas, TX Lynn Gandhi, Honigman Miller Schwartz and Cohn, Detroit, MI</p>	<p><b>Trending Issues and Updates for Abandoned and Unclaimed Property – BC II-III</b></p> <p>The speakers in this session will cover the latest developments in the Unclaimed Property area, including litigation, legislation, and the latest on the Revised Uniform Unclaimed Property Act.</p> <p>Moderator: Patrick Reynolds, COST, Washington, DC</p> <p>Speakers: Joseph Carr, BDO USA, Chicago, IL Diane Green-Kelly, Reed Smith, Chicago, IL</p>

5:30 – 6:00 p.m.	<b>Special Reception - First Time Attendees, New Members &amp; Non-Members (Invited) – <i>Signature Island</i></b>
6:00 – 7:30 p.m.	<b>Reception – <i>Sponsored by: Bass Berry &amp; Sims, Industry Sales Tax Solutions, Mayer Brown, McDermott Will &amp; Emery and Rath Young &amp; Pignatelli – Signature Island</i></b>
7:30 p.m.	<b>Group Dinner – El Patron</b> Everyone is invited to a “dutch treat” group dinner with members of the COST Staff to discuss the Conference, COST opportunities or anything else that comes to mind. Please stop by the Registration Desk to let us know that you will be there or contact Judy Slotnik!

**TUESDAY, OCTOBER 24<sup>th</sup>**

6:30 – 7:15 a.m.	<b>Walk with Judy Slotnik (COST's Membership Coordinator) and Other Early Risers</b> Get your day off to a great start sharing an early morning stroll with other attendees. Group will leave from the hotel lobby at 6:30 a.m.		
6:45 a.m. – 5:10 p.m.	<b>Registration – <i>BC West Foyer</i></b>		
6:45 – 8:00 a.m.	<b>Continental Breakfast &amp; Networking – <i>BC West Foyer</i></b>		
7:00 – 8:00 a.m.	<b>Early Morning Ethics Coffee Talk - Ethical &amp; Professional Challenges Facing State Tax Professionals – <i>BC II-III</i></b> Rise and shine and enjoy an entertaining, informative hour on the latest ethics developments relevant to state tax professionals. This presentation will serve as your “wake up” for Tuesday morning. However, there’s much more to this session than getting an hour of Ethics CPE/CLE. Tax professionals and government affairs professionals must navigate a host of ethical issues on a daily basis. Some issues are obvious, others may not be. The speakers will discuss how to spot ethical issues and deal with them in a thoughtful and effective manner.  Speakers: Jim Ervin, Holland & Knight, Tallahassee, FL Sean Evans, DuCharme, McMillen, & Associates, Shawnee Mission, KS		
8:00 – 9:00 a.m.	<b>Report from the Front Lines: Rocky Mountain States Chamber Roundtable Discussion on Business Taxes – 2017 Recap &amp; 2018 Predictions – <i>BC IV-VI</i></b> Tax policy professionals from key state business associations will prognosticate on significant tax policy issues in the Rocky Mountain states’ upcoming legislative sessions, viewed through the prism of this year’s accomplishments and setbacks.  Moderators: Nikki Dobay, COST Patrick Reynolds, COST Panelists: Richard Anklam, New Mexico Tax Research Institute	<b>Use Tax Issues with Cloud Transactions: - There's No App for That – <i>BC VII-IX</i></b> As more companies move data to the cloud, purchasers are facing critical issues in determining taxability and situsing. This session will focus on hot issues and trends in this area, including IFTA pre-exemption, limitations on the use of exemption certificates, concerns regarding Qui Tam and Class Action suits, and best practices for dealing with these ever- challenging issues.  Speakers: Loren Chumley, KPMG, Nashville, TN Carolynn Kranz, Industry Sales Tax Solutions, Washington, DC	<b>If It's Broken, Fix It: Changing Unfavorable or Antiquated State Tax Laws Through Lobbying and Litigation – <i>BC II-III</i></b> When current or proposed state tax rules are harmful to your company, or when the audit process breaks down, it may be time to consider strategic alternatives. This session explores the ways companies can use lobbying and litigation to effectuate change and promote taxpayer-friendly policies and principles.  Speakers: David Gutowski, Reed Smith, Philadelphia, PA Beth Sosidka, AT&T, Bedminster, NJ



	Dale Craymer, Texas Taxpayers and Research Association Kevin McCarthy, Arizona Tax Research Association		Jamie Yesnowitz, Grant Thornton, Washington, DC
9:05 – 9:55 a.m.	<p><b>Report from the Front Lines: Pacific Coast States Chamber Roundtable Discussion on Business Taxes – 2017 Recap &amp; 2018 Predictions – BC IV-VI</b></p> <p>Tax policy professionals from key state business associations will prognosticate on significant tax policy issues in the Pacific coast states' upcoming legislative sessions, viewed through the prism of this year's accomplishments and setbacks.</p> <p>Moderator: Nikki Dobay, COST</p> <p>Panelists: Peter Blocker, California Tax Foundation Eric Lohnes, Association of Washington Business Jeremy Rogers, Oregon Business Council</p>	<p><b>How to Reform the Outdated and Poorly Designed State and Local Sales Tax – BC II-III</b></p> <p>The state and local sales and use tax is widely acknowledged to be outdated and poorly designed. It serves neither the purpose of state and local governments seeking to broaden the base; nor businesses seeking to eliminate taxation of business inputs and promote uniformity and simplification in administrative rules. The panelists will discuss what is wrong with the sales tax and how it can be fixed – highlighting the new COST Sales Tax Scorecard that will grade the states on the design and administration of their state and local sales taxes.</p> <p>Speakers: Edward Ben, Altus Group US, Sparks, MD Karl Frieden, COST, Washington DC Fred Nicely, COST, Washington DC</p>	<p><b>Are You Prepared? MTC and States to Finally Begin Transfer Pricing Effort – BC VII-IX</b></p> <p>After years of discussing and designing a transfer pricing component for its existing audit program, the MTC is finally moving forward with the program. Several states have signed on to the program, and the MTC is working to secure additional participation. What can taxpayers do to (1) address these issues under audit and (2) proactively minimize exposure when drafting intercompany pricing agreements moving forward?</p> <p>Speakers: Jonathan Feldman, Eversheds Sutherland US, Atlanta, GA Bruce Fort, Multistate Tax Commission, Santa Fe, NM Jon Maddison, Reed Smith, Philadelphia, PA</p>
9:55 – 10:10 a.m.	<b>Refreshment Break &amp; Networking – BC West Foyer</b>		
10:10 – 11:00 a.m.	<p><b>Audit Session: West Region SALT Developments &amp; Audit Reports (COST Industry Members Only) – Part 1 – BC IV-VI</b></p> <p>The ever-popular COST industry-member-only audit session during which participants share recent audit and litigation experiences involving all types of state and local taxes in the states of: Alaska, Arizona, California, Colorado, Hawaii, Idaho, Kansas, Montana, Nebraska, Nevada, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington &amp; Wyoming</p> <p>Moderators:</p>	<p><b>The Use of Data Analytics and Automation in State Tax Compliance, Planning and Audits – BC II-III</b></p> <p>Computers and advanced technology continue to make significant inroads into the state tax practice by facilitating the analysis of mountains of data. They provide benefits in everything from compliance to planning to audit defense. This session will focus on emerging trends and best practices in the use of technology to enhance state tax department operations.</p> <p>Speakers: Russell Fincher, EY, Atlanta, GA</p>	<p><b>Unitary Analysis: Looking Beyond Combined Reporting – BC VII-IX</b></p> <p>The speakers in this session will discuss how the unitary theory applies beyond the issue of which entities or business units are included in a combined filing. These issues will include the impact of unitary analysis on the business/ nonbusiness determination, the right to apportion, throwback/throwout, and pre- and post-apportionment flow-up of income and factors of pass-through entities.</p> <p>Speakers: Harlan Kwiatek, RSM, New York, NY</p>

	Paul Broman, BP America, Houston, TX Mollie Miller, Fresenius Medical Care North America, Waltham, MA Facilitators: Patrick Shrake, Cargill, Minneapolis, MN Kyle Snedaker, Conagra Brands, Omaha, NE	Chad Straube, DuCharme, McMillen, & Associates, Phoenix, AZ Amy Thomas Laub, Nationwide Insurance Company, Columbus, OH	Diane Tinney, Bloomberg BNA, Washington, DC
11:05 a.m. – 12:00 p.m.	<b>The Great “Debate”: Views on Significant State Tax Issues and A Salute to Paul Frankel – BC IV-VI</b> Moderator: Charles Drury, COST, Washington, DC Panelists: Douglas Lindholm, COST, Washington, DC Maureen Pechacek, PwC, Minneapolis, MN Arthur Rosen, McDermott Will & Emery, New York, NY Marilyn Wethekam, Horwood Marcus and Berk, Chicago, IL		
12:00 p.m. – 12:25 p.m.	<b>Presentation to Bruce Ely (Bradley) of the Ninth Annual COST/ Paul Frankel Excellence in State Taxation Award – BC IV-VI</b> Presenters: Charles Drury, COST, Washington, DC Craig Fields, Morrison Foerster, New York, NY Chris Grissom, Bradley Arant Boult & Cummings, Birmingham, AL Doug Lindholm, COST, Washington, DC Judge Bill Thompson, Retired, Alabama Tax Tribunal, Alexander City, AL		
12:25 – 1:25 p.m.	Lunch and Networking – <b>BC X - XII</b>		
1:25 – 2:15 p.m.	<b>Audit Session: West Region SALT Developments &amp; Audit Reports (COST Industry Members Only) - Part 2 – BC IV-VI</b> The ever-popular COST industry-member-only audit session during which participants share recent audit and litigation experiences involving all types of state and local taxes in the states of: Alaska, Arizona, California, Colorado, Hawaii, Idaho, Kansas, Montana, Nebraska, Nevada, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington & Wyoming  Moderators: Paul Broman, BP America, Houston, TX	<b>Handling Tax Issues in a Non-Tax Forum or Private Parties Pursuing Tax Claims – BC VII-IX</b> More state and local tax issues are being raised outside normal tax audit and adjudication proceedings under False Claims Act and class action complaints. Claims of over or under collection of sales and use taxes, failure to comply with unclaimed property statutes and other tax issues are being raised by individuals and non-governmental entities outside ordinary tax audit and adjudication channels. SALT practitioners must become aware of the potential for these claims, how to handle such litigation, and how to protect clients in transactions.	<b>The Rise of Pass-Through Entities and Their Unique State Tax Issues – BC II-III</b> Pass-through businesses continue their inexorable march - now accounting for over 55 percent of all business income in the U.S. This session will provide an overview of the unique state tax issues that impact pass through businesses including preferential tax treatment as compared to C Corporations; due process and nexus concerns; and the recently enacted federal partnership audit rules.  Speakers: Drew Lyon, PwC, Washington DC

	<p>Mollie Miller, Fresenius Medical Care North America, Waltham, MA</p> <p>Facilitators: Patrick Shrake, Cargill, Minneapolis, MN</p> <p>Kyle Snedaker, Conagra Brands, Omaha, NE</p>	<p>Speakers: William Gorrod, Greenberg Traurig, San Francisco, CA</p> <p>David Pope, Baker McKenzie, New York, NY</p>	<p>Arthur Parham, Entergy Services, The Woodlands, TX</p> <p>Jennifer Young, Moss Adams, Portland, OR</p>
2:20 – 3:10 p.m.	<p><b>Report from the Front Lines: Northeast States Chamber Roundtable Discussion on Business Taxes – 2017 &amp; 2018 Predictions – <i>BC IV-VI</i></b></p> <p>Tax policy professionals from key state business associations will prognosticate on significant tax policy issues in the northeast states' upcoming legislative sessions, viewed through the prism of this year's accomplishments and setbacks.</p> <p>Moderator: Karl Frieden, COST</p> <p>Panelists: Gene Burner, Manufacturers' Alliance of Maryland</p> <p>Carl Marrara, Pennsylvania Manufacturers' Association</p> <p>Eileen McAnneny, Massachusetts Taxpayers Foundation</p> <p>Andrew Musick, New Jersey Business Industry</p> <p>Kenneth Pokalsky, Business Council of New York State</p>	<p><b>Pursuing Indirect Tax Refund Claims – <i>BC VII-IX</i></b></p> <p>This session will explore the challenges and strategies of pursuing refund claims of indirect taxes. The processes, procedures, policies and tax positions related to refund claims will be covered. AT&amp;T's nationwide refund claim pursuit on behalf of its customers in the wake of a class action settlement for over-collected tax provides a case study of the myriad state responses -- and how best to counter them.</p> <p>Speakers: Daniel Thompson, Thompson Tax, Waverly, KS</p> <p>Margaret Wilson, Wilson Law Group, Somerville, NJ</p>	<p><b>Possibilities and Pitfalls in Acquisitions, Dispositions and Internal Reorganizations – <i>BC II-III</i></b></p> <p>Acquisitions, dispositions and reorganizations of businesses can take many different forms, and each has unique income tax implications. This session explores the various types of transactions through which acquisitions and dispositions are effected and analyzes the state and local income tax implications of each such transaction, including due diligence and structuring issues.</p> <p>Speakers: Mitchell Newmark, Morrison Foerster, New York, NY</p> <p>Dennis Rimkunas, Jones Day, New York, NY</p>
3:10 – 3:25 p.m.	<b>Refreshment Break &amp; Networking – <i>BC West Foyer</i></b>		
3:25 – 4:15 p.m.	<p><b>Audit Session: SALT Developments &amp; Audit Reports from the Northeast Region, Canada and the MTC (COST Industry Members Only) – <i>BC IV-VI</i></b></p> <p>The ever-popular COST industry-member-only audit session during which participants share recent audit and litigation experiences involving all types of state and local taxes in the states of: Connecticut, Delaware, District of Columbia, Maine, Maryland,</p>	<p><b>Planning and Pitfalls of Net Operating Losses – <i>BC II-III</i></b></p> <p>The speakers in this session will provide guidance on maximizing NOL use by navigating the different states' different rules. Subtopics will include voluntary disclosures for non-filing loss companies, NY's new dual loss tracts, depreciation recapture and other federal adjustments that impact state NOLs.</p>	<p><b>Alternative Apportionment and Internal Consistency – <i>BC VII-IX</i></b></p> <p>Every state has adopted by statute or practice some form of alternative apportionment that may be invoked when the statutory formula does not adequately reflect the taxpayer's business activity in the state. In this session, the speakers will examine the change to market-based sourcing and revisit alternative apportionment and</p>



	<p>Massachusetts, New Hampshire, New Jersey, NY, Pennsylvania, Rhode Island, Vermont and Canada &amp; MTC Audits</p> <p>Moderators: Pat Reynolds, COST, Washington, DC Amy Thomas Laub, Nationwide Insurance, Columbus, OH</p> <p>Facilitators:</p>	<p>Speakers: Dana Lance, Grant Thornton, San Jose, CA Leah Robinson, Mayer Brown, New York, NY</p>	<p>distortion cases overlaying the internal consistency doctrine.</p> <p>Speakers: Eric Anderson, Andersen Tax, San Francisco, CA Craig Fields, Morrison Foerster, New York, NY Mark Loyd, Bingham Greenebaum Doll, Louisville, KY</p>
4:20 – 5:10 p.m.	<p>Frances Sewell, NextEra Energy, Juno Beach, FL Andy Solomon, L3 Technologies, New York, NY Beth Sosidka, AT&amp;T, Bedminster, NJ</p>	<p><b>State and Local Tax Issues for Mobile Employees – BC VII-IX</b> Learn best practices and share experiences with other companies struggling to handle the administrative nightmare associated with employees who transfer, travel and telecommute. Learn how local and state jurisdictions audit this complex area and where pending Federal legislation may offer some assistance.</p> <p>Speakers: Hollis Hyans, Morrison Foerster, New York, NY Masha Yevzelman, Fredrikson &amp; Byron, Minneapolis, MN</p>	<p><b>Incentive Transactions and Legal Constraints that Impact Businesses and Governments – BC II-III</b> This session will address tax incentives and their continuing availability and viability. The session will also focus on legal constraints that impact businesses and governments in tax incentives contexts. Such constraints related to government entities include appropriation authority, certification of funds, indemnification, arbitration, choice of law, confidentiality/public records, sovereign immunity, and legal representation and settlement authority. Presenters will also describe agreement issues concerning assignment, audits, reporting requirements, representations and warranties, breach, and others.</p> <p>Speakers: James Busby, The Cavanagh Law Firm, Phoenix, AZ Scott Ziance, Vorys, Sater, Seymour and Pease, Columbus, OH</p>
5:30 – 7:30 p.m.	<p><b>Vendor Fair Reception – COST At The Movies - <i>Sponsored by PwC – BC X-XII</i></b> Drink, food, prizes and fun await you as select vendors showcase their SALT services and products. Be sure to stay for the drawing at the end of the reception (must be present to win). The theme for the night will be “at the movies”. All are welcome to come as a person/character from their favorite movie.</p>		
<b>WEDNESDAY, OCTOBER 25<sup>th</sup></b>			
6:30 – 7:15 a.m.	<p><b>Early Morning Run with Nikki Dobay (COST’s West Coast Tax Counsel) and Other Early Risers</b> Join COST’s West Coast Counsel, Nikki Dobay, and fellow early-risers for a 2.5 -3.5 mile run. Get a jump on your day and enjoy an opportunity to meet other attendees and see some beautiful, early-morning sites. The group will leave the hotel lobby at 6:30 a.m.</p>		

7:00 a.m. – 2:30 p.m.	<b>Registration – <i>BC West Foyer</i></b>		
7:00 – 8:00 a.m.	<b>Continental Breakfast &amp; Networking – <i>BC West Foyer</i></b>		
7:15 – 7:50 a.m.	<b>COST Membership Task Force Meeting – Open to all COST Industry Members – <i>BC II-III</i></b>		
8:00 – 8:50 a.m.	<p><b>Taxation of Foreign Income: Navigating the Maze – <i>BC VII-IX</i></b> The “world is shrinking”: foreign operations increasingly contribute a larger portion of a corporation’s taxable income and create numerous challenging issues. The speakers in this session will cover these issues, the diverse ways that states deal with these issues and the best ways to deal with the states.</p> <p>Speakers: Bill Backstrom, Jones Walker, New Orleans, LA Chris Hopkins, Crowe Horwath, New York, NY John Paraskevas, Exxon Mobil, Spring, TX M</p>	<p><b>Sales Taxes, Product Classification and the Internet of Things – <i>BC IV-VI</i></b> We’ve all heard about it, but what exactly is the “Internet of Things” (IoT) and why does it matter to state tax professionals? The speakers in this session will answer these questions and more. As the world changes, the classification of what is “bought” gets more challenging. The true object of a transaction may no longer be the tangible good, but what can be done with that good. This session will discuss how states are dealing with these issues, recent decisions in the area’ and other practical considerations for taxpayers.</p> <p>Speakers: James Nason, Deloitte, Parsippany, NJ Diane Yetter, Yetter, Chicago, IL</p>	<p><b>Interplay of Property Values and Characterizations between Income, Sales and Property Taxes – <i>BC II-III</i></b> The characterization of property for state and local tax purposes can vary based on the type of tax imposed by the state. Property characterized as real property for property tax purposes is often treated differently by the same state under construction contracts for sales tax purposes or income tax purposes. The speakers in this session will cover these similarities and differences and will note the nuances in states’ definitions of real property and tangible personal property.</p> <p>Speakers: Clark Calhoun, Alston &amp; Bird, Los Angeles, CA John Fletcher, Jones Walker, Jackson, MS Robert Wollfarth, Baker, Donelson, Bearman, Caldwell &amp; Berkowitz, New Orleans, LA</p>
8:50 – 9:00 a.m.	<b>Coffee Break/Networking – <i>BC West Foyer</i></b>		
9:00 – 10:15 a.m.	<p><b>Tax Administrators Roundtable – <i>BC IV-VI</i></b> This roundtable discussion will feature key state tax administrators discussing the latest news, developments, and outlook from a tax perspective. These administrators will provide insights on what happened in their states during 2017 and what is planned for 2018 and beyond. Moderated by an experienced advisor, this session will provide an opportunity to ask those important questions we all seem to have, either confidentially or face-to-face.</p> <p>Moderator: James Eads, Ryan, Austin, TX</p> <p>Panelists: Adam Krupp, Indiana Department of Revenue, Indianapolis, IN - Commissioner Ron Penny, North Carolina Department of Revenue, Raleigh, NC - Secretary Mike Reissig, Texas Comptroller of Public Accounts, Austin, TX – Deputy Comptroller Matthew Scott, Colorado Department of Revenue Denver, CO – Director of Taxation Kevin Sullivan, Connecticut Department of Revenue, Hartford, CT - Commissioner</p>		

10:20 – 11:15 a.m.	<p><b>Report from the Front Lines: Midwest States Chamber Roundtable Discussion on Business Taxes – 2017 Recap &amp; 2018 Predictions – <i>BC IV-VI</i></b> Tax policy professionals from key state business associations will prognosticate on significant tax policy issues in the midwest states' upcoming legislative sessions, viewed through the prism of this year's accomplishments and setbacks.</p> <p>Moderator: Fredrick Nicely, COST</p> <p>Panelists: Brent Bogar, North Dakota Chamber of Commerce Jill Larson, Minnesota Business Partnership Jeff McClain, Ohio Chamber of Commerce Carol Portman, Taxpayers' Federation of Illinois Keith Staats, Illinois Chamber of Commerce Eric Stafford, Kansas Chamber of Commerce Bill Waltz, Indiana Chamber of Commerce</p>	<p><b>What's New with Global VAT, Including a Discussion of the House Blueprint's Border Adjustment Proposal – <i>BC II-III</i></b> The VAT is the dominant form of consumption tax in virtually every country other than the US. This session will explore the differences in the application of VAT in the Americas, Europe and Asia. It will also examine the Republican House leadership's interest in a border adjustment tax and its similarities and differences with a conventional VAT.</p> <p>Moderator: Karl Frieden, COST, Washington DC</p> <p>Speakers: Ronnie Dassen, Deloitte, New York, NY Gino Dossche, EY, New York, NY</p>	<p><b>Best Practices in Handling Audits and Appeals – <i>BC VII-IX</i></b> SALT tax audits are a part of doing business, but no company wants to be audited. This session will explore the tricks of the trade for dealing with all types of auditors. The session will also detail settlement and resolution tactics for immediate use in current and upcoming audits.</p> <p>Speakers: Mark Holcomb, Dean Mead, Tallahassee, FL Curtis Osterloh, Scott, Douglass &amp; McConnico, Austin, TX John Trippier, Zaino Hall &amp; Farrin, Columbus, OH</p>
11:15 – 11:35 a.m.	<b>Refreshment Break, Networking and Hotel Check Out – <i>BC West Foyer</i></b>		
11:35 a.m.–12:25 p.m.	<p><b>Audit Session: Central /Midwest Region SALT Developments &amp; Audit Reports (COST Industry Members Only) - Part 1 – <i>BC IV-VI</i></b> The ever-popular COST industry-member-only audit session during which participants share recent audit and litigation experiences involving all types of state and local taxes in the states of: Illinois, Indiana, Iowa, Kentucky, Louisiana, Michigan, Minnesota, Missouri, Ohio, Oklahoma, Texas &amp; Wisconsin</p> <p>Moderators: Hugh McKinnon, Raytheon, Waltham, MA</p>	<p><b>A Peek Behind the Curtain: Insider Tips, Advice, and Best Practices for Taxpayers from Former State Tax Commissioners – <i>BC VII-IX</i></b> Former State Tax Commissioners will provide a unique, colorful, interesting, and helpful look behind the curtains of state departments of revenue.</p> <p>Moderator: Fred Nicely, COST, Washington, DC</p> <p>Speakers: Michael Bryan, Deloitte, Philadelphia, PA Mary Peterson, Rath Young Pignatelli, Concord, NH Rick Reames, Nexsen Pruet, Columbia, SC</p>	<p><b>Financial Services Hot Topics – <i>BC II-III</i></b> This session provides insights on new and developing issues of particular import to the financial services industry. Topics for the session were solicited from COST Financial Services Tax Force members. Sharing of experiences and ideas by attendees is encouraged.</p> <p>Speaker: Lynn Dender, Bank of America, Charlotte, NC Alysse McLoughlin, McDermott Will &amp; Emery, New York, NY</p>

	Art Parham, Entergy Services Inc., The Woodlands, TX Facilitators: Tracy George, The Coca-Cola Co., Atlanta, GA Dave Hengesh, Discover Financial, Riverwoods, IL	June Summers Haas, Honigman Miller Schwartz and Cohn, Lansing, MI	
12:25 – 12:40 p.m.	<b>Lunch – selection of boxed lunches</b> Please select your box lunch and drink and go to the next session (or return to the Audit Session)		
12:40 – 1:30 p.m.	<p><b>Audit Session: Central /Midwest Region SALT Developments &amp; Audit Reports (COST Industry Members Only) – Part 2 – BC IV-VI</b></p> <p>The ever-popular COST industry-member-only audit session during which participants share recent audit and litigation experiences involving all types of state and local taxes in the states of: Illinois, Indiana, Iowa, Kentucky, Louisiana, Michigan, Minnesota, Missouri, Ohio, Oklahoma, Texas &amp; Wisconsin</p> <p>Moderators: Hugh McKinnon, Raytheon, Waltham, MA Art Parham, Entergy Services Inc., The Woodlands, TX</p> <p>Facilitators: Tracy George, The Coca-Cola Co., Atlanta, GA Dave Hengesh, Discover Financial, Riverwoods, IL</p>	<p><b>Time for a New RAR Model Statute? – BC II-III</b></p> <p>COST, along with other interested parties, has been working on a model statute for taxpayers to report federal tax changes to the states, including the new federal partnership audit procedure. This session will cover the status of the Interested Parties' work, including their interactions with a Multistate Tax Commission group, to improve the reporting and payment of tax when taxpayers have federal tax changes to report.</p> <p>Moderator: Nikki Dobay, COST, Portland, OR</p> <p>Speakers: Bruce Ely, Bradley, Birmingham, AL Jonathan Horn, AICPA, Washington, DC Fredrick Nicely, COST, Washington, DC</p>	<p><b>Sales and Use Tax Audit Sampling Estimation Based on Confidence Bounds: The Magical Mystery Tour Begins Here! – BC VII-IX</b></p> <p>This session describes the concept and application of the confidence bound estimate in sample audits in terms that taxpayers can comprehend. Examples based on sample audits are used to illustrate how the confidence bound estimates are applied in practice. In addition, the session describes the six estimation methods used in sales and use tax audits. A few states (e.g., Washington, Illinois) use more than one estimation method in reporting the results of sample audits, a further source of confusion for taxpayers. The six estimation methods are applied to a sample audit to contrast and compare the methods.</p> <p>Speakers: Peter Larsen, Akerman, Jacksonville, FL Roger Pfaffenberger, Ryan, Dallas, TX</p>
1:35 - 2:30 p.m.	<p><b>California's State Board of Equalization is Being Substantially Replaced – BC IV-VI</b></p> <p>As a result of a scathing report from the California Department of Finance, the role of the State Board of Equalization in sales and use taxation and administrative hearings is being substantially reduced. These changes will have major implications for all taxpayers doing business in California. The speakers in this session will provide an overview of the breadth and timing of the changes, and what those changes will mean for taxpayers.</p> <p>Moderator: Nikki Dobay, COST, Portland, OR</p> <p>Speakers: Eric Coffill, Eversheds Sutherland (US), Sacramento, CA</p>		

	Marty Dakessian, Dakessian Law, Los Angeles, CA Jeffrey Vesely, Pillsbury Winthrop Shaw Pittman, San Francisco, CA
2:30 p.m.	<b>Annual Meeting Adjourns</b>