

2019 INTERMEDIATE/ADVANCED STATE INCOME TAX SCHOOL

May 19 – 23, 2019

Hilton DFW Executive Conference Center
Grapevine, Texas

Sunday, May 19, 2019	
6:00 – 8:00	Registration, Dinner and Evening Fun – <i>Meritage</i>
7:30 – 8:00	Tablet Orientation – <i>Meritage</i>
Monday, May 20, 2019	
7:45 – 8:30	<p>Welcome & Introduction (joint session with Sales Tax School) - Val Verde</p> <p>Douglas Lindholm, COST Executive Director, Washington, DC Arthur Parham, COST Chair, Entergy Services, LLC., Woodlands, TX Charles Drury, COST VP/Chief Operating Officer, Washington, DC</p>
8:30 – 12:00 8:30 – 10:15 Lecture 10:15 – 10:30 Break 10:30 – 12:00 Facilitated Breakout	<p>Jurisdictional Nexus - Val Verde</p> <p>The ability of a state to impose a corporate income tax is limited in a number of different ways. This session will explore limits on state taxation that are imposed by the Due Process Clause, the Commerce Clause, P.L. 86-272, and specific state statutory and constitutional restrictions. Students will test and build on the key concepts learned in this class by breaking into small groups to discuss a case study.</p> <p>Instructors: Zach Gladney, Alston & Bird*, New York, NY Fred Marcus, Horwood Marcus & Berk*, Chicago, IL</p>
12:00 – 1:30	Lunch/Networking – <i>Windfall</i>
1:30 – 5:00 1:30 – 3:15 Lecture 3:15 – 3:30 Break 3:30 – 4:00 Lecture 4:00 – 5:00 Facilitated Breakout	<p>Determining the Corporate Income Tax Base – Val Verde</p> <p>While most states start their taxable income computation with some reference to federal taxable income, every state makes adjustments. This session will explore the advanced nuances of state adjustments such as expense disallowance, depreciation, state taxes, tax exempt income and others. Students will test and build on the key concepts learned in this class by breaking into small groups to discuss a case study.</p> <p>Instructors: Todd Lard, Eversheds Sutherland (US)*, Washington, DC Chris Lee, Eversheds Sutherland (US)*, Atlanta, GA</p>
6:15 – 8:45	Vegas Night with COST at the Hilton DFW Lakes Executive Conference Center – <i>International III-IV</i>
Tuesday, May 21, 2019	
8:30 – 11:45 8:30 – 10:00 Lecture 10:00 – 10:15 Break 10:15 – 11:45 Facilitated Breakout	<p>Special Issues in Apportionment and Allocation – Val Verde</p> <p>Numerous states have adopted varied apportionment rules in recent years and, as a result, there is now little uniformity in state tax apportionment. This session will guide students through the maze of different apportionment schemes so that the students learn how to best apply the rules to their companies and clients. Students will test and build on the key concepts learned in this class by breaking into small groups to discuss a case study.</p> <p>Instructors: Richard Call, McDermott Will & Emery*, Boston, MA Matthew Mantle, Jones Walker*, New Orleans, LA</p>
11:45 – 12:15	<p>Emerging Issues Associated With Unclaimed Property (joint session with Sales Tax School) – Val Verde</p> <p>States are getting more aggressive in the unclaimed property area. They are shortening their dormancy periods, asserting claims to new types of obligations, and hiring contingent fee auditors. Some states use unclaimed property as a source of revenue rather than acting as trustee for the true owners. While unclaimed property is not a tax, a company's tax function frequently owns the audit. Just when you thought dealing</p>

	<p>with a state income or transactional tax audit can be burdensome, wait until you wrestle with an unclaimed property audit with no statute of limitations or uniform procedures, limited protest rights, and very little guidance. This session will provide an overview of the states' unclaimed property practices and cover recent unclaimed property legislation and litigation. It will bring you up to date on the latest unclaimed property issues.</p> <p>Instructor: Michael Giovannini, Alston & Bird*, Charlotte, NC</p>
12:15 – 1:15	Lunch/Networking – <i>Windfall</i>
1:15 – 3:00 1:15 – 2:15 Lecture 2:15 – 3:00 Facilitated Breakout	<p>Return Filing Methods – <i>Val Verde</i></p> <p>The lack of uniform return filing language and the adoption of varied filing methodologies has created a confusing landscape for taxpayers. This session will explore the key differences between the different filing methods (separate, combined, and consolidated) and examine the important variations within each filing method. Students will test and build on the key concepts learned in this class by breaking into small groups to discuss a case study.</p> <p>Instructors: Erin Eakes, PwC*, Sacramento, CA John Nicholson, PwC*, Dallas, TX</p>
3:00 – 3:15	Refreshment Break/Networking
3:15 – 5:30 3:15 – 4:45 Lecture 4:45 – 5:30 Facilitated Breakout	<p>Pass-Through Entities and Their Corporate Owners – <i>Val Verde</i></p> <p>Multistate businesses routinely utilize pass-through entities in their businesses. Pass-through entities are subject to a number of unique base, apportionment, and withholding rules that will be thoroughly discussed in this session. Students will test and build on the key concepts learned in this class by breaking into small groups to discuss a case study.</p> <p>Instructors: Scott Bedunah, Deloitte*, Dallas, TX Will Thistle, Bradley Arant Boult Cummings*, Birmingham, AL</p>
6:15 – 10:00	Optional Evening Outing – Tour of AT&T Stadium – Sponsored by Ryan
Wednesday, May 22, 2019	
8:00 – 9:15	<p>Other Business Activity Taxes: Cases & Trends - <i>Val Verde</i></p> <p>Several key states like Ohio, Texas, and Washington impose unique taxes on business that differ significantly from a traditional corporate income tax. This session will study how these taxes work and will also discuss the challenges and controversies that have emerged since their enactment.</p> <p>Instructors: William Nolan, EY*, Akron, OH John Trippier, Zaino Hall & Farrin*, Columbus, OH</p>
9:15 – 12:15 9:15 – 10:15 Lecture 10:15 – 10:30 Break 10:30 – 12:15 Lecture	<p>Mergers and Acquisitions – <i>Val Verde</i></p> <p>Issues with mergers and acquisitions routinely arise with all corporate taxpayers, especially those who restructure their operations. This session will closely examine the numerous complications that can arise from M&A activity and offer possible solutions. Students will test and build on key concepts learned in this class by breaking into small groups to discuss a case study.</p> <p>Instructors: Diane Mimmo, PwC*, Boston, MA Troy Stelzer, PwC*, New York, NY</p>
12:15 – 1:45	Lunch/Networking – <i>Windfall</i>
1:45 – 5:30 1:45 – 2:30 Lecture 2:30 – 3:45 Facilitated Breakout 3:45 – 4:00 Break 4:00 – 5:30 Lecture	<p>Mergers and Acquisitions (<i>continued</i>) – <i>Val Verde</i></p>

6:00 – 8:00	Game Night With COST
Thursday, May 23, 2019	
9:00 – 10:00	<p>Federal Tax Reform – Deciphering the State Tax Implications (<i>joint session with Sales Tax School</i>) – Val Verde</p> <p>It's been almost a year and a half since the TCJA was passed. In this session, the panel will first briefly cover the provisions of the TCJA and then examine the states' actions in adopting the TCJA provisions, or not adopting them. The panelists will highlight the primary policy, regulatory and compliance issues that have emerged in relation to key provisions such as the repatriation transition tax, GILTI and 163j. Finally, the panelists will look ahead and give their predictions on how conformity/non-conformity with TCJA will change the state tax landscape in the future.</p> <p>Instructors: Harley Duncan, KPMG*, Washington, DC Karl Frieden, COST, Washington, DC</p>
10:00 – 10:45	<p>Tax Legislative Activism (<i>joint session with Sales Tax School</i>) – Val Verde</p> <p>Many taxpayers complement their traditional tax planning and compliance functions by incorporating legislative advocacy. This session will discuss how tax legislative activism can help your company, and how to best sell its importance and value within your company.</p> <p>Instructors: Nikki Dobay, COST, Portland, OR Fred Nicely, COST, Washington, DC</p>
10:45 – 11:00	Refreshment Break/Networking & Check Out
11:00 – 12:15	<p>Preparing for Audit Challenge and Controversy (<i>joint session with Sales Tax School</i>) – Val Verde</p> <p>Handling a state tax audit requires that a taxpayer not only know the substantive state tax law, but that they also know procedures and auditor personalities. This session will help students prepare for those audits and offer helpful tips to efficiently deal with audits that become difficult.</p> <p>Instructors: Doug Sigel, Ryan Law Firm*, Austin, TX Daniel Stanley, Honigman Miller Schwartz and Cohn*, Lansing, MI</p>
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