



2022 COST State Income Tax/Audit Virtual Sessions

Agenda

(5-20-22)

Special thanks to our sponsors.










MONDAY MAY 23, 2022

12:30 – 12:40 ET	<p>Welcome and Opening Remarks</p> <p>Douglas Lindholm, COST President & Executive Director, Washington, DC Charles Drury, COST Vice-President & Chief Operating Officer, Washington, DC</p>
12:40 – 1:40 ET	<p>Restructuring with Purpose: A Business Purpose Master Class</p> <p>Business restructurings are a common occurrence and the need for a business purpose is stronger than ever. This panel will discuss how to establish a business purpose and, most importantly, how to appropriately document that purpose.</p> <p>Speakers: Nicole Johnson, Blank Rome*, New York, NY Paul Thomas, Deloitte*, Charlotte, NC</p>
1:50 – 2:50 ET	<p>The TCJA and CARES Act – Where Are We Now?</p> <p>The speakers in this session will explore some state corporate income tax compliance issues and potential planning considerations in light of select provisions of the federal Tax Cuts and Jobs Act (TCJA) and accompanying administrative guidance. The discussion will focus on GILTI, interest expense deduction limitations (section 163j), and FDII. The speakers will address nuanced state coupling, decoupling and other tax-base related issues, and state filing groups and other methodologies relating to federal tax reform.</p> <p>Speakers: John Fletcher, Jones Walker*, Jackson, MS Scott Smith, BDO*, Nashville, TN</p>
3:00 – 4:00 ET	<p>Local Taxes and Constitutional Constraints</p> <p>Just as state taxation is subject to federal constitutional limitations, local level taxes are subject to the same federal limitations as well as to state constitutional and statutory limitations. This session explores the application of federal constitutional limitations to local taxes and reviews related controversies.</p> <p>Moderator: Fred Nicely, COST, Washington, DC</p> <p>Speakers: Mark Kaye, Grant Thornton*, Denver, CO Maria Todorova, Eversheds Sutherland (US)*, Washington, DC</p>
4:10 – 5:10 ET	<p>A Deep Dive into the OECD's Pillar One and Two Project</p>

	<p>The OECD’s Pillar One and Two project will transform global income taxes more than any other changes over the last 100 years. This session will take a deep dive into the details and timing of the Pillar One and Two reforms including a discussion of the potential impact of global minimum taxes, international market sourcing rules, and relaxation of PE rules. The speakers will also discuss some of the far-reaching implications of the greater focus on book income, special tax regimes for large corporations, above routine profits, and multilateral instruments.</p> <p>Moderator: Karl Frieden, COST, Washington, DC</p> <p>Speakers: Jessica Morgan, EY*, Cleveland, OH Marc Simonetti, Pillsbury Winthrop Shaw Pittman*, New York, NY</p>
TUESDAY, MAY 24, 2022	
1:00 – 3:00 ET	<p>COST Members-Only Audit Session – TRANSFER PRICING ISSUES</p> <p>This is your chance to participate in a lively discussion of audit issues related to Transfer Pricing that you have experienced and get audit strategies on resolving those issues from your fellow COST members.</p> <p>Facilitators: Laura James, Kimberly Clark, Neenah, WI Darren Lebiecki, Kraft Heinz, Glenview, IL Roberta Podrug, Best Buy, Minneapolis, MN</p>
3:15 – 5:15 ET	<p>COST Members-Only Audit Session –ALL TAX TYPES – Western States</p> <p>This is your chance to participate in a lively discussion of audit issues on all types of taxes in the Western states along with the ability to provide suggestions and audit strategies for dealing with them. (States Covered in this session: Alaska, Arizona, California, Colorado, Hawaii, Idaho, Montana, Nevada, New Mexico, Oregon, Utah, Washington, Wyoming)</p> <p>Facilitators: Steve Cooper, Fresenius Medical Care, Waltham, MA Erica Kenney, COST, Denver, CO Jonathan Mieritz, Corteva Agriscience, Wilmington, DE</p>
WEDNESDAY, MAY 25, 2022	
1:00 – 3:00 ET	<p>COST Members-Only Audit Session –ALL TAX TYPES – Eastern States</p> <p>This is your chance to participate in a lively discussion of audit issues on all types of taxes in the Eastern states along with the ability to provide suggestions and audit strategies for dealing with them. (States Covered in this session: Alabama, Connecticut, Delaware, District of Columbia, Florida, Georgia, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, North Carolina, Pennsylvania, Rhode Island, South Carolina, Vermont, Virginia, West Virginia, Canada, Puerto Rico and MTC Audits)</p> <p>Facilitators: Stephanie Do, COST, Santa Barbara, CA Jesse Hereford, WalMart, Bentonville, AR Frances Sewell, Pfizer, Memphis, TN</p>
3:15 – 5:15 PM	<p>COST Members-Only Audit Session –ALL TAX TYPES – Central States</p> <p>This is your chance to participate in a lively discussion of audit issues on all types of taxes in the Central States along with the ability to provide suggestions and audit strategies for dealing with them. (States Covered in this session: Arkansas, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Michigan, Minnesota, Mississippi, Missouri, Nebraska, North Dakota, Ohio, Oklahoma, South Dakota, Tennessee, Texas and Wisconsin)</p> <p>Facilitators: Doug Lindholm, COST, Washington, DC Arthur Parham, retired from Entergy, Winter Park, FL Robert Tuinstra, Corteva Agriscience, Wilmington, DE</p>