

## COST Forum on U.S. State and Local Taxes for European Companies March 19, 2024 London, United Kingdom

This Forum is sponsored by:		
akerman DENTONS GI GreenbergTraurig pwc Ryan)		
Tuesday – March 19, 2024		
9:00 – 9:45 a.m.	Registration / Sign In / Continental Breakfast & Networking	
9:45 – 10:00 a.m.	Welcome & Introductions Speakers: Patrick Reynolds, COST Robert Ozmun, PwC* Charles Drury, COST	
10:00 – 11:00 a.m.	Overview of U.S. Taxes – Federal, State Income, Sales and Other State Taxes: Comparison to European Tax Systems and Their Impact on the Competitiveness of European Companies - In this session, the speakers will provide attendees with a basic understanding of the decentralized U.S. tax system, with a focus on state and local taxes. The speakers will discuss the relatively greater reliance in the U.S. on income and property taxes as compared to consumption taxes. The panel will also focus on the larger share of taxes imposed at the state and local level in the U.S. as compared with Europe. The speakers will highlight key differences between taxes imposed in the U.S. at the federal level and the state and local level, as well as important linkage between the two systems. Moderator: Patrick, Reynolds, COST Speakers: David Blum, Akerman* Mark Loyd, Dentons* Alex Tostevin, Dentons (London)*	
11:00 – 11:45 a.m.	Current SALT Update - Discuss current US state legislative and regulatory trends and significant cases.   Moderator:   Fred Nicely, COST   Speakers:   Nikki Dobay, Greenberg Traurig*   Mark Nachbar, Ryan*	
11:45 a.m. – 12:15 p.m.	Lunch and Networking	
12:15 – 1:30 p.m.	<b>Global Tax and Political Trends and the Intersection of State and Local Taxation</b> – <i>This session will be of particular interest to high-level executives that oversee global tax departments.</i> <i>The speaker(s) in this session will focus on international and US technical tax issues and the intersection of politics on achieving the OECD proposals. Finally, the speakers will explore, from a</i>	

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	<i>tax policy perspective, today's environment in the United States and how it impacts the competitiveness of European companies.</i>
	Moderator: Karl Frieden, COST
	Speakers: Giorgia Maffini, PwC (London)* Rob Ozmun, PwC* Tom Patten, PwC (London)*
1:30 – 2:15 p.m.	<b>Deep Dive into State Taxation of Foreign Source Income and Other State Corporate Income</b> <b>Tax Issues for Multinational Companies</b> – In this advanced session the speakers will cover the numerous unique issues that multinational corporations face related to the US state taxation of non-US income. The speakers will discuss the many disputes and the various ways that the states have developed to deal with these issues.
	Moderator: Marilyn Wethekam, COST
	Speakers: Rob Ozmun, PwC* Mark Nachbar, Ryan*
2:15 - 2:45 p.m.	Refreshment Break & Networking
2:45 – 3:30 p.m.	<i>Wayfair</i> at Six – In this advanced session the speakers will focus on sales and use tax issues impacting European companies doing business in the US. Among many other topics and issues, the speakers will cover the changes they've seen in the sales tax landscape following the 2018 Wayfair decision.
	Moderator: Fred Nicely, COST
	Speakers: Lorie Fale, Akerman* Dorothy Lo, PwC* DeAndre Morrow, Greenberg Traurig*
3:30 – 4:30 p.m.	<b>Speed Round/Ask the Experts</b> - This session will provide attendees with the opportunity to ask the presenters questions related to the prior session as well as any other questions related to any US state and local tax issues they may have or any other US tax issues that they are dealing with. There are no limits, so please feel free to ask anything of concern.
	Moderator: Patrick Reynolds, COST
	Panel of Experts: David Blum, Akerman* Nikki Dobay, Greenberg Traurig* Dorothy Lo, PwC* Mark Loyd, Dentons* Mark Nachbar, Ryan*
4:30 – 5:30 p.m.	<b>Reception &amp; Networking -</b> Now that your brain is filled with the most current information on the tax requirements and risks of doing business in the U.S., reward your hard work with cocktails, lots of delicious food and good conversation. Share your thoughts and experiences from the Forum with others and gain new perspectives.

\*Denotes COST Practitioner Partners As of 3-12-24