

**STATE INCOME TAX WEBINAR**  
**April 26 – 29, 2021**  
**Schedule of Events**

4/25/21

*Thanks to our Sponsors*



**Monday, April 26, 2021**

<b>11:00 – 11:05 am (ET)</b>	<p><b>Welcome &amp; Introductions</b>                  Douglas Lindholm, COST, Washington, DC                  Robert Tuinstra, Corteva Agriscience, Wilmington, DE                  Charles Drury, COST, Washington, DC</p>
<b>11:05 am– 1:15 pm (ET)</b>	<p><b>State Tax Legislative Update for 2021</b>                  This session will focus on state income/franchise tax legislative trends and hotspots in 2021. COST panelists will discuss state conformity and regulatory guidance relating to recent federal tax legislation and anticipated Biden administration federal tax reform (including potential changes to GILTI). Additional topics include state actions relating to combined reporting, corporate and payroll tax rate increases, transfer pricing, and digital services taxes. Active participation by attendees is encouraged. The discussion will also cover key 2021 COST priorities and initiatives relating to corporate income taxes and state tax administration.</p> <p>Moderators:                  Stephanie Do, COST, Washington, DC                  Karl Frieden, COST, Washington, DC</p> <p>Panel:                  Aziza Farooki, COST, Washington DC                  Erica Kenney, COST, Denver, CO                  Priya Nair, COST, Washington DC                  Fred Nicely, COST, Washington, DC                  Patrick Reynolds, COST, Washington, DC</p>
<b>1:15 – 2:15 pm (ET)</b>	<p><b>Ethics Talk: Ethics and Professional Responsibilities for Attorneys and Other Tax Professionals</b>                  Enjoy an entertaining, informative hour on the latest ethics developments relevant to state tax professionals. And 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. <b>(PLEASE NOTE – ATTENDEES WILL NEED TO LOG IN TO THIS SESSION BY NO LATER THAN 1:15 TO OBTAIN CPE IN THOSE STATES THAT PERMIT ETHICS CREDIT FOR A VIRTUAL SESSION. PLEASE CHECK YOUR STATE FOR ETHICS CPE AVAILABILITY FOR VIRTUAL SESSIONS.)</b></p> <p>Speakers:                  Terry Frederick, Barnwell Consulting*, Overland Park, KS                  Lance Jacobs, Crowe*, Washington, DC</p>

<b>3:00 – 3:05 pm (ET)</b>	<b>Introductions</b>
<b>3:05 – 4:10 pm (ET)</b>	<p><b>Top 10 Significant Income/Franchise Tax Cases and What to Watch for in the Remainder of 2021</b></p> <p>The speakers in this session will cover the most important income/franchise tax cases in the last twelve months and their impact on taxpayers. The session will include a discussion of state income tax cases to watch out for in 2021.</p> <p>Speakers:          Josh Grossman, Grant Thornton*, San Francisco, CA          Matt Hedstrom, Alston &amp; Bird*, New York, NY          Christopher Sullivan, Rath, Young &amp; Pignatelli*, Concord, NH          Andres Vallejo, Vallejo Antolin Agarwal Kanter*, Walnut Creek, CA</p>
<b>4:10 – 5:15 pm (ET)</b>	<p><b>COVID-19 Has Elevated Mobile Workforce Issues – What To Do?</b></p> <p>The shift of employees working from remote home locations rather than offices has profound implications on a wide range of state tax issues including income tax nexus, apportionment (<i>e.g.</i>, sales and payroll factor considerations), and employee/payroll withholding. The panelists will examine these issues as well as the impact of this trend on federal (and state) mobile workforce legislation.</p> <p>Moderator:          Erica Kenney, COST, Denver, CO</p> <p>Speakers:          Bill Backstrom, Jones Walker*, New Orleans, LA          David Nagle, Sullivan &amp; Worcester*, Boston, MA          Brian Pedersen, Alvarez &amp; Marsal Taxand*, Houston, TX          Drew VandenBrul, Grant Thornton*, Philadelphia, PA</p>
<b>5:30 – 7:00 pm (ET)</b>	<b>COST Board of Directors Meeting</b>
<b>Tuesday, April 27, 2021</b>	
<b>11:00 – 11:05 am (ET)</b>	<b>Introductions</b>
<b>11:05 am – 12:10 pm (ET)</b>	<p><b>Federal Tax Reform under the Biden Administration and Its Implication for State Taxation</b></p> <p>The Biden administration has signaled its support for significant federal tax reform, much of it aimed at reversing key provisions in the Tax Cuts and Jobs Act. This session will examine some of the anticipated Biden administration proposals including corporate tax rate increases, expanded inclusion of foreign source income, capital gains tax increases, and estate tax changes. In particular, the panelists will focus on state tax conformity (or lack thereof) with the Biden federal tax reform proposals.</p> <p>Moderator:          Karl Frieden, COST, Washington, DC</p> <p>Speakers:          Eric Anderson, Andersen Tax*, San Francisco, CA          Alysse McLoughlin, McDermott Will and Emery*, New York, NY          Glenn Newman, Greenberg Traurig*, New York, NY          John Paek, Deloitte*, Atlanta, GA</p>
<b>12:10 – 1:15 pm (ET)</b>	<p><b>Local Taxes – How Best to Navigate Them</b></p> <p>The federal government and states are not the only jurisdictions that are trying to recoup lost revenue from the COVID-19 pandemic—local jurisdictions also saw their revenue sources dry up as the economy slowed and businesses stopped operating or disappeared. Focusing on income type taxes first, but covering all aspects, the speakers in this session will cover what localities have done to shore up their finances and what actions are expected through the remainder of 2021.</p> <p>Speakers:          David Froling, Vorys, Sater, Seymour and Pease*, Columbus, OH          Mark Loyd, Dentons*, Louisville, KY          Timothy Noonan, Hodgson Russ*, Buffalo, NY          Timothy Wagner, Baker Donelson*, Baltimore, MD</p>
<b>3:00 – 3:05 pm (ET)</b>	<b>Introductions</b>
<b>3:05 – 4:10 pm (ET)</b>	<p><b>Qualifying To Do Business In A State – How Does That Impact an Entity’s Tax Status?</b></p> <p>Have you been faced with the question of whether a corporation or LLC (and even a partnership) need to qualify to do business in another state? Does it need to seek foreign qualification in order to operate in that additional state? And if so, once qualified in the new state, what are the ramifications of that qualification from a tax standpoint? Does merely holding an ownership</p>

	<p>interest in an operating company require qualification? The speakers in this session will discuss these implications and how to go about navigating the often contradictory regulatory regimes between foreign qualification and tax registration, and the impact on business entities.</p> <p>Speakers: Joseph Cerise, Entergy Corporation, New Orleans, LA Lynn Gandhi, Foley &amp; Lardner*, Detroit, MI Matthew Landwehr, Thompson Coburn*, Saint Louis, MO Mitchell Newmark, Blank Rome* New York, NY</p>
<b>4:10 – 5:15 pm (ET)</b>	<p><b>After the Pandemic: Potential “Big Ticket” State Tax Increase Proposals</b></p> <p>After the pandemic, revenue shortfalls and increased demands for government spending for economic recovery, climate change, infrastructure and social programs will ensure a steady stream of state tax increase proposals. This session will explore some of the more traditional and more novel “big ticket” tax increase legislation that are surfacing including corporate tax rate increases, digital services taxes, limits on corporate tax deductions and incentives, financial transaction taxes, payroll taxes, CEO pay ratio taxes, and mark-to-market on securities.</p> <p>Moderator: Stephanie Do, COST</p> <p>Speakers: Jaye Calhoun, Kean Miller*, New Orleans, LA Barbara Coulter, PwC*, Atlanta, GA Scott Roberti, EY*, New York, NY Jonathan Saviet, Deloitte*, Seattle, WA</p>
<b>Wednesday, April 28, 2021</b>	
<b>11:00 – 11:05 am (ET)</b>	<b>Introductions</b>
<b>11:05 am – 12:10 pm (ET)</b>	<p><b>States Going All in on State Transfer Pricing Audits</b></p> <p>States have doubled down on their efforts to audit intercompany transactions through transfer pricing enforcements and are armed with transfer pricing economists and professionals. The Multistate Tax Commission recently renewed its support of its member states by revitalizing its State Intercompany Transactions Advisory Service (SITAS). Come learn from our speakers about the current transfer pricing audit landscape, including what to expect and how to defend your transactions.</p> <p>Moderator: Kate Pascuzzi, ConocoPhillips, Bartlesville, OK</p> <p>Speakers: Jeremy Abrams, Reed Smith*, Washington, DC David Brunori, RSM*, Washington, DC Maria Eberle, Baker McKenzie*, New York, NY Jonathan Feldman, Eversheds Sutherland (US)*, Atlanta, GA</p>
<b>12:10 – 1:15 pm (ET)</b>	<p><b>The Impact of the OECD Global Income Tax Reforms on State Taxation</b></p> <p>The OECD Pillar One and Two proposals could radically transform the landscape of international income taxation. This session will focus on similarities and differences between the OECD Pillar One and Two proposals, TCJA provisions on foreign source income, and evolving state corporate income tax rules. The panelists will explore the federal and state tax antecedents of some of the OECD solutions and the potential convergence of international, federal and state approaches to corporate income taxation.</p> <p>Moderator: Karl Frieden, COST, Washington, DC</p> <p>Speakers: Barbara Angus, EY*, Washington, DC Todd Roberts, PwC*, Denver, CO Shirley Sicilian, KPMG*, Washington, DC Marc Simonetti, Pillsbury Winthrop Shaw Pittman*, New York, NY</p>
<b>3:00 – 3:05 pm (ET)</b>	<b>Introductions</b>
<b>3:05 – 4:10 pm (ET)</b>	<p><b>Audit Process Issues During the Pandemic</b></p> <p>Navigating the nuances of state tax audits and challenging assessments has a new added hurdle – doing it all remotely. The panelists will help navigate remote audits and controversies, from strategies on communication, documentation (issues related to submitting and submitted workpapers), delayed timelines, audit plans, to statute of limitations strategies. This session will help keep your audits and controversies on target.</p>

	<p>Speakers: Taryn Goldstein, BDO*, West Palm Beach, FL David Machemer, HMB Law*, Chicago, IL Mark Nachbar, Ryan*, Downers Grove, IL Christopher Wilson, Waller Lansden Dortch &amp; Davis*, Nashville, TN</p>
<b>4:10 – 5:15 pm (ET)</b>	<p><b>Credits in the Time of COVID-19 – What Are Jurisdictions Doing and How to React</b> Taxpayers have always faced challenges in pursuing tax credits, first with qualifying, then in substantiating them. Now COVID-19's impact on the fiscal health of jurisdictions promises to make it even more of a challenge. How have jurisdictions responded so far to already granted credits and to making additional credits available? Also, what are the implications of the federal "Made in America" movement – will this be mirrored by the states in their attempts for preferential in-state provisions?</p> <p>Speakers: Christopher Grissom, Bradley Arant Boult Cummings*, Birmingham, AL Craig Lammlin, Moss Adams*, Dallas, TX Julia Owen, C&amp;S Wholesale Grocers, Keene, NH Joseph Stachnik, Ryan*, Chicago, IL</p>
<b>Thursday, April 29, 2021</b>	
<b>11:00 – 11:05 am (ET)</b>	<b>Introductions</b>
<b>11:05 am – 12:40 pm (ET)</b>	<p><b>State Tax Administrators' Roundtable - Get the Gospel from Key Income Tax Administrators - Plenty of Time Will Be Allotted for Q&amp;A</b> This roundtable discussion will feature key state corporate income tax administrators discussing the latest news, developments, and outlook from a corporate income tax perspective in their respective states. These administrators will also provide insights on what their states are planning in the corporate income tax arena for 2021 and beyond. This session will provide an opportunity to ask important questions, either confidentially or face-to-face, directly to the corporate income tax administrators.</p> <p>Moderator: Scott Brandman, Baker McKenzie*, New York, NY</p> <p>Panelists: Rebecca Forter, Massachusetts Department of Revenue, Boston, MA William Gardner, California Franchise Tax Board, Sacramento, CA Rebecca Kermes, Minnesota Department of Revenue, St. Paul, MN Katie Lolley, Oregon Department of Revenue, Salem, OR John Seibert, North Carolina Department of Revenue, Raleigh, NC</p>
<b>12:40 pm – 12:50 pm</b>	<p><b>COST Website Update</b> – The COST website, <a href="http://www.cost.org">www.cost.org</a>, recently received some much-needed maintenance, upgrades and embellishments. Significant improvements include an enhanced members forum, new directory, and improved personal profiles pages. This session will give you a look into the upgrades and how they foster a greater sense of community among the membership.</p> <p>Speaker: Caroline Galleher, COST, Washington, DC</p>
<b>3:00 – 3:05 pm (ET)</b>	<b>Introductions</b>
<b>3:05 – 4:10 pm (ET)</b>	<p><b>Tax Planning for Rapidly Changing Supply Chains and Business Models</b> Many companies have recently encountered significant supply chain changes, shifted to a remote workforce operating model, and/or are still grappling with the state income tax impact of the TCJA and CARES Act. This session will discuss common operating models and organizational structures with a focus on state income tax issues resulting from repatriation and supply chain variations as well as nexus considerations in a remote workforce setting and offer practical ways to maintain a tax efficient structure in the current environment.</p> <p>Speakers: Justin Hill, KPMG*, Dallas, TX Nicole Johnson, Blank Rome*, New York, NY Andrew Solomon, Grant McCarthy*, White Plains, NY Maria Todorova, Eversheds Sutherland (US)*, Atlanta, GA</p>
<b>4:10 – 5:15 pm (ET)</b>	<p><b>Untangling the Challenges with Market-Based Sourcing</b> Capturing the contributions of the market to a taxpayer's income is complex - from the variants among market-based sourcing rules, cascading sets of sourcing rules, the lack of uniformity in sourcing safe-harbors, and identifying a reasonable approximation. The panelists will explore the multitude of challenges associated with market-based sourcing and identify the problems and the corresponding strategies and solutions to these market-based sourcing problems.</p>

	Speakers: Stanley R. Kaminski, Duane Morris*, Chicago, IL Jennifer Karpchuk, Chamberlain Hrdlicka White Williams & Aughttry*, Conshohocken, PA Peter Larsen, Akerman*, Jacksonville, FL Leighanne Scott, Caplin & Drysdale*, Washington, DC
<b>5:15 pm (ET)</b>	<b>COST STATE INCOME TAX WEBINAR ADJOURNS</b>