

(10/20/22)



COST's 53<sup>rd</sup> Annual Meeting  
October 24-27, 2022  
Orlando, FL

Special Thanks To COST'S Annual Meeting Sponsors



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

MONDAY, OCTOBER 24 <sup>th</sup>	
	<b>Meeting Room Internet</b> – Sponsored by <b>BDO*</b>
	<b>COST Event App</b> – Sponsored by <b>HMB Legal Counsel *</b>
	<b>Charging Station</b> – Sponsored by <b>KPMG*</b>
	<b>Coffee</b> – Sponsored by <b>Bradley*</b>
	<b>Room Key</b> – Sponsored by <b>Ryan*</b>
	<b>Lanyards</b> – Sponsored by <b>Dentons*</b>
1:00 – 5:00 p.m.	<b>Massage Chair</b> Sponsored by <b>Andersen*</b> ( <i>National Ballroom Foyer</i> )
1:00 – 7:00 p.m.	<b>Registration</b> ( <i>National Ballroom Foyer</i> )
2:00 – 5:00 p.m.	<b>Legislative/Government Relations</b> ( <i>National Ballroom AB</i> ) - State Chamber of Commerce Executives and COST Member Government Affairs/Tax Policy Professionals will discuss and share information regarding COST tax priorities for the upcoming 2022/2023 legislative cycle. COST advocacy materials will also be discussed and shared.  Speakers: Susan Courson-Smith, Pfizer Kelli Murphy, Ford Motor Company COST Advocacy Team
5:30 – 7:00 p.m.	<b>Welcome Reception</b> – Sponsored by <b>Crowe*</b> and <b>EY*</b> ( <i>Ballroom Commons</i> )
TUESDAY, OCTOBER 25 <sup>th</sup>	
	<b>Meeting Room Internet</b> – Sponsored by <b>Baker &amp; McKenzie*</b>
	<b>COST Event App</b> – Sponsored by <b>HMB Legal Counsel *</b>
	<b>Charging Station</b> – Sponsored by <b>KPMG*</b>
	<b>Coffee</b> – Sponsored by <b>Bradley*</b>
	<b>Room Key</b> – Sponsored by <b>Ryan*</b>
	<b>Lanyards</b> – Sponsored by <b>Dentons*</b>
7:30 a.m. – 5:10 p.m.	<b>Registration</b> ( <i>National Ballroom Foyer</i> )
7:30 – 8:30 a.m.	<b>Continental Breakfast &amp; Networking</b> ( <i>National Ballroom CD</i> )
8:30 a.m. 9:00 a.m.	<b>Welcome &amp; Opening Remarks – COST’s 53<sup>rd</sup> Annual Meeting of the Membership: Election of New Directors</b> ( <i>National Ballroom AB</i> ) Douglas Lindholm, COST Robert Tuinstra, COST Chair, Corteva Agriscience Michael Carchia, COST Vice-Chair, Capital One Charles Drury, COST
9:00 a.m. – 3:00 p.m.	<b>Massage Chair</b> Sponsored by <b>Blank Rome*</b> ( <i>National Ballroom Foyer</i> )
9:00 – 10:00 a.m.	<b>The Impact of OECD Global and Federal Income Tax Reforms on State Taxation</b> ( <i>National Ballroom AB</i> ) This session will provide an overview of the key elements of the OECD/G20’s global tax reform that could radically transform the landscape of international income taxation, with significant implications for U.S. federal and state taxation. The panelists will discuss the similarities and differences between the OECD/G20’s Pillar One proposal and U.S. federal and state approaches to taxing digital income. The session will also discuss the similarities and differences between the OECD/G20’s Pillar Two proposal and U.S. federal and state approaches to taxing foreign

	<p>source income. Finally, the panelists will analyze the very different outcomes in the United States, depending on whether the federal government conforms with Pillars One and Two, and how the federal Inflation Reduction Act affects that calculation.</p> <p>Moderator: Karl Frieden, COST</p> <p>Panelists: Barbara Angus, EY* Stewart Brant, PwC* Mitchell Newmark, Blank Rome*</p>		
10:00 – 10:15 a.m.	<p><b>Refreshment Break &amp; Networking</b> (<i>National Ballroom Foyer</i>)</p>		
10:15 – 11:05 a.m.	<p><b>Politics + Fiscal Conditions = Tax Policy: 2023 Forecast</b> (<i>National Ballroom AB</i>)</p> <p>This presentation will 1) highlight states where partisan control is likely to change as a result of the upcoming elections; 2) interpret the economic tea leaves to forecast if/when state revenues are likely to falter and the potential impacts of inflation; and 3) identify specific tax policies that are likely to be considered in light of shifting political and fiscal winds.</p> <p>Speakers: Erica Kenney, Nextera Energy Scott Roberti, EY* Morgan Scarboro, MultiState Associates*</p>	<p><b>State Taxation of Foreign Income/Dividends</b> (<i>International Ballroom II</i>)</p> <p>States continue to utilize varying approaches in the taxation of foreign income from complete exclusion to efforts for complete inclusion. In this session, the speakers will discuss these variations, including the varied treatments of IRC 965 dividends (including Wisconsin, Nebraska, and West Virginia), GILTI, and other types of foreign income.</p> <p>Speakers: Lynn Gandhi, Foley Lardner* Samir Ramakrishna, Deloitte* Marilyn Wethekam, HMB Legal Counsel*</p>	<p><b>Resale Exemptions: Best Practices</b> (<i>International Ballroom III</i>)</p> <p>The speakers in this session will discuss the various alternatives for handling the very important but time-consuming responsibility of resale exemption certificates. Some taxpayers handle these in-house while others outsource the task. What are the advantages and disadvantages of each approach? Join this session and find out which process is best for your situation.</p> <p>Moderator: Patrick Reynolds, COST</p> <p>Speakers: Silvia Aguirre, Avalara* Trisha Fortune, Ryan*</p>
11:10 a.m. – 12:00 p.m.	<p><b>The New Federal Corporate Alternative Minimum Tax</b> (<i>National Ballroom AB</i>)</p> <p>The federal Inflation Reduction Act of 2022 includes an expansive new corporate book-income alternative minimum tax (AMT). This session will provide an overview of how the AMT works at the federal level and analyze any potential state tax implications. The panelists will also discuss differences between the AMT and the OECD Pillar 2 qualified domestic minimum top-up tax.</p> <p>Moderator: Karl Frieden, COST</p> <p>Speakers: Adam Bean, EY* Ellen McElroy, Eversheds Sutherland (US)* Robert Ozmun, PwC*</p>	<p><b>Fiddling with Funny Fiscal Notes – A Key Tool in Your Legislative Toolbox</b> (<i>International Ballroom II</i>)</p> <p>Fiscal notes prepared by legislative fiscal offices can make or break legislation. Your greatest legislative work can be abruptly derailed if the fiscal note is unfavorable. A fiscal note can work both for you and against you. With all the moving parts that go into handling a piece of legislation all the way through the legislative process, you need to understand the “art of the fiscal note” and make sure you address any funny fiscal notes early to avoid a fiscal fiasco. The presenters will discuss the various ways state fiscal offices research and prepare fiscal notes, what you can do to make sure a fiscal note does not derail “your” legislation and best practices you can implement with your Government Relations Team to fiddle with those funny fiscal notes.</p> <p>Speakers: Bill Backstrom, Jones Walker* Deborah Bierbaum, MultiState Associates* Chris Emigholz, New Jersey Business and Industry Association</p>	

12:00 – 1:25 p.m.	Lunch & Networking <i>(National Ballroom CD)</i> <b>Announcement of COST Directors &amp; Officers for 2022/2023</b>		
1:25 – 2:15 p.m.	<p><b>Report from the Front Lines: West Coast States Roundtable Discussion on Business Taxes – 2022 Recap &amp; 2023 Predictions</b> <i>(National Ballroom AB)</i></p> <p>Tax policy professionals from key state business associations will prognosticate on significant tax policy issues in West Coast States’ upcoming legislative sessions, viewed through the prism of this year’s accomplishments and setbacks.</p> <p>Moderators: Stephanie Do, COST Erica Kenney, Nextera Energy</p> <p>Speakers: Tommy Gantz, Association of Washington Business Robert Gutierrez, California Tax Policy Tom Yamachika, Tax Foundation of Hawaii</p>	<p><b>Limitations on State Corporate Income Tax Attributes</b> <i>(International Ballroom II)</i></p> <p>The speakers in this session will discuss current limitations on state income tax attributes, including recently enacted statutes affecting net operating loss utilization. They will also discuss the limitations of attributes following corporate mergers and acquisitions, such as under IRC Sec. 382 and related ordering rules for claiming tax attributes.</p> <p>Speakers: Jodie Scott, KPMG* Ron Tambasco, True Partners Consulting*</p>	<p><b>Top 10 Cases - Sales Tax</b> <i>(International Ballroom III)</i></p> <p>A lot has happened in the various states over the past year. In this session the speakers will cover the most significant sales tax cases of 2022 and will offer their predictions of how they will impact taxpayers going forward as well as what cases to watch for in 2023.</p> <p>Speakers: S. Lucky DeFries, Morris Laing Evans Brock &amp; Kennedy* Jeremy Hayden, Taft Stettinius &amp; Hollister* Curtis Osterloh, Scott Douglass &amp; McConnico*</p>
2:20 – 3:10 p.m.	<p><b>Report from the Front Lines: Western States Chamber Roundtable Discussion on Business Taxes – 2022 Recap &amp; 2023 Predictions</b> <i>(National Ballroom AB)</i></p> <p>Tax policy professionals from key state business associations will prognosticate on significant tax policy issues in the western states’ upcoming legislative sessions, viewed through the prism of this year’s accomplishments and setbacks.</p> <p>Moderators: Stephanie Do, COST Erica Kenney, Nextera Energy</p> <p>Speakers: Richard Anklam, New Mexico Tax Research Institute Rusty Cannon, Utah Taxpayers Association Cindy Creighton, Nevada Taxpayers Association</p>	<p><b>State and Local Actions and Reactions to Covid-19</b> <i>(International Ballroom II)</i></p> <p>Ever since Covid-19 hit, states have been taking actions to increase what was anticipated to be a severe decline in revenue and to deal with the remote workforce. The speakers in this session will provide planning ideas to minimize any unnecessary increase in tax burden and will discuss the states’ conflicting positions on sourcing remote workers’ payroll and the taxation of that payroll, among other items.</p> <p>Moderator: Aziza Farooki, COST</p> <p>Speakers: Eugene Gibilaro, Blank Rome* DeAndre Morrow, Greenberg Traurig* Daniel Ryan, Sullivan &amp; Worcester*</p>	<p><b>States Keep Jumping on the Marketplace Bandwagon: Sales and Use Tax Obligations of Online Marketplace Operators</b> <i>(International Ballroom III)</i></p> <p>Most states have enacted legislation that imposes sales and use tax obligations on marketplace operators who facilitate retail sales on behalf of out-of-state vendors, and several states have proposed similar measures this year. This session will examine the legal framework surrounding the proliferation of marketplace operator legislation, the state and local compliance burden these laws impose on online marketplaces, and the legal challenges taxpayers and marketplace operators are contemplating regarding enforcement of these laws. Marketplace statutes are often so broadly written as to potentially impact many apps and digital startups offering local services. This session provides an overview</p>

	<p>Ashley Harpstreith, Wyoming Taxpayers Associates  Miguel Legarreta, Associated Taxpayers of Idaho  Kevin McCarthy, Arizona Tax Research Association</p>		<p>of potentially impacted services and useful strategies for navigating this new legal landscape.</p> <p>Moderator: Fredrick Nicely, COST</p> <p>Speakers:  Angela Acosta, BDO*  Carolynn Kranz, Industry Sales Tax Solutions*  Mark Yopp, Baker &amp; McKenzie*</p>
3:10 – 3:25 p.m.	<b>Refreshment Break &amp; Networking</b> ( <i>National Ballroom Foyer</i> )		
3:25 – 4:15 p.m.	<p><b>Audit Session: West Region SALT Developments &amp; Audit Reports (COST Industry Members Only)</b> (<i>National Ballroom AB</i>)  Alaska, Arizona, California, Colorado, Hawaii, Idaho, Kansas, Montana, Nebraska, Nevada, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington &amp; Wyoming</p>	<p><b>Litigating Sourcing and Apportionment of Services and Intangibles</b> (<i>International Ballroom II</i>)  Sourcing and apportionment of services and intangibles is an area that fuels a constant supply of case law developments. Tax authorities, taxpayers, and courts continue to wrangle with rules on where to source services and intangibles for purposes of income tax, gross receipts tax, and sales tax. This session will highlight important recent cases on sourcing across the country as applied to various fact scenarios, with a special emphasis on the particular challenges of market-based sourcing rules.</p> <p>Speakers:  Michelle DeLappe, Fox Rothschild*  Jennifer Karpchuk, Chamberlain Hrdlicka White Williams &amp; Aughtry*</p>	<p><b>The Rise of False Claims Acts Across States - The States' Monetary Incentive</b> (<i>International Ballroom III</i>)  The recent trend of whistleblower lawsuits related to under/over collection of sales &amp; use tax puts retailers in a no-win situation when it comes to uncertain and/or complex compliance issues. Many states have adopted FCA laws applicable to tax compliance or proposed to adopt such laws. This session will explore this trend, its impact on sales tax compliance, and what companies can do to reduce their risk/exposure in this area.</p> <p>Moderator: Stephanie Do, COST</p> <p>Speakers:  Michael Lurie, Reed Smith*  Trevor Mauck, Baker &amp; McKenzie*</p>
4:20 – 5:10 p.m.		<p><b>How to do SALT in 2022 and Beyond</b> (<i>International Ballroom II</i>)  As businesses continue to emerge from an unprecedented two years, many have changed the way they manage their tax function while navigating hybrid or flexible work arrangements. This session will explore best practices to ensure effective communication and document management and retention, and strategies for proactively planning and monitoring state and federal law and policy changes.</p>	<p><b>Suupa-Duupa RUUPA - Unclaimed Property in the 2020s</b> (<i>International Ballroom III</i>)  The Revised Uniform Unclaimed Property Act is an attempt to clarify certain areas of escheat that were left unclear in the prior model law. But questions remain! How do we handle continued uncertainties? What about new property like NFTs and cryptocurrencies? This session will explore these topics and provide a practical perspective.</p>

		Moderator: Michael Carchia, Capital One Speakers: Evan Hamme, Pillsbury* Peter Larsen, Akerman*	Moderator: Pat Reynolds, COST Speakers: Jeff Henshall, Ryan* Tom Wrocklage, Andersen*
5:15 – 5:45 p.m.	<b>Pre-Reception – COST Mentoring Program Introduction (COST Industry Members Only)</b> ( <i>Ballroom Commons</i> ) COST is introducing a new mentoring program for its members. Join us at this kick-off event to find out how you can join the program as a mentor or to be mentored on any difficulties you are having or on developing a career plan. Take advantage of the experience and expertise of your fellow members in smoothing your career path.		
5:45 – 7:15 p.m.	<b>Reception</b> – Sponsored by <b>Pillsbury Winthrop Shaw Pittman*</b> and <b>Reed Smith*</b> ( <i>Ballroom Commons</i> )		
7:30 p.m.	<b>Group Dinner</b> – Everyone is invited to join other COST members for dinner at Osteria Italian Kitchen (a quick 10-minute walk from the hotel)! Don't miss this opportunity to mingle with fellow tax professionals and expand your professional network! Please stop by the Registration Desk to let us know you will be there, or contact Judy Slotnik! (Folks will pay their own way.)		
<b>WEDNESDAY, OCTOBER 26<sup>th</sup></b>			
	<b>Meeting Room Internet</b> – Sponsored by <b>Blank Rome*</b>		
	<b>COST Event App</b> – Sponsored by <b>HMB Legal Counsel *</b>		
	<b>Charging Station</b> – Sponsored by <b>KPMG*</b>		
	<b>Coffee</b> – Sponsored by <b>Bradley*</b>		
	<b>Lanyards</b> – Sponsored by <b>Dentons*</b>		
	<b>Room Key</b> – Sponsored by <b>Ryan*</b>		
6:45 a.m. – 5:25 p.m.	<b>Registration</b> ( <i>National Ballroom Foyer</i> )		
9:00 a.m. – 3:00 p.m.	<b>Massage Chair Sponsorship</b> – <b>Jones Walker*</b> ( <i>National Ballroom CD</i> )		
6:30 – 7:15 a.m.	<b>Early Morning 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. The group will leave from the hotel lobby at 6:30 a.m.		
6:45 – 8:00 a.m.	<b>Breakfast &amp; Networking</b> ( <i>National Ballroom CD</i> )		
7:00 – 8:00 a.m.	<p><b>Early Morning Ethics Coffee Talk - Ethical &amp; Professional Challenges Facing State Tax Professionals</b> (<i>International Ballroom II</i>) 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. <b>(PLEASE NOTE – THERE WILL BE A SEPARATE REGISTRATION SIGN IN SHEET FOR THIS SESSION AND ATTENDEES MUST ARRIVE AND SIGN IN BY 7:00 AM TO OBTAIN CPE/CLE.)</b></p> <p>Speakers: Sara Arvold, Crowe* Jordan Goodman, HMB Legal Counsel*</p>		

<p>8:10 – 9:00 a.m.</p>	<p><b>Report from the Front Lines: Northeast States Chamber Roundtable Discussion on Business Taxes – 2022 Recap &amp; 2023 Predictions</b> (<i>National Ballroom AB</i>)  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: Stephanie Do, COST</p> <p>Speakers:  Linda Caprara, Maine State Chamber of Commerce  Chris Emigholz, New Jersey Business and Industry Association  Andrew Griffin, Maryland Chamber of Commerce  David Juvet, Business and Industry Association of New Hampshire  Sam Larson, Associated Industries of Massachusetts  Carl Marrara, Pennsylvania Manufacturers’ Association  Ken Pokalsky, Business Council On New York State  Bonnie Stewart, Connecticut CPA Society</p>	<p><b>A State Perspective on ASC 740 and ASC 450 – Top Five Issues</b> (<i>International Ballroom II</i>)  The speakers in this session will provide insights into and interpretations of the income tax accounting guidance in ASC 740 and ASC 450 as they apply to the provision process, UTPs, remediation strategies, update of quarterly tax provisions, intercompany transactions, rapidly developing state administrative practices, and consideration of audit posture.</p> <p>Speakers:  Veronica Caputo, Grant Thornton*  Richard Spengler, BDO*</p>	<p><b>Locally Administered Sales and Accommodation Taxes: Compliance Burdens and Constitutional Concerns</b> (<i>International Ballroom III</i>)  Taxation by local jurisdictions has become an increasingly significant component of the SALT landscape. This session will discuss the spread of locally administered taxes, particularly in the lodging industry, and some of the onerous compliance burdens. The panelists will also analyze the limitations of the Wayfair decision with respect to decentralized local taxes.</p> <p>Speakers:  Nikki Dobay, Eversheds Sutherland (US)*  Leslie Lao, AirBnB  Sarah McGahan, KPMG*  Rhonda Sparlin, Rubin Brown*</p>
<p>9:05 – 9:55 a.m.</p>	<p><b>Audit Session: Northeast Region, Canada and MTC SALT Developments &amp; Audit Reports (COST Industry Members Only)</b> (<i>National Ballroom AB</i>)  Connecticut, Delaware, District of Columbia, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont and Canada &amp; MTC Audits</p>	<p><b>Top 10 Cases - Income Tax</b> (<i>International Ballroom II</i>)  A lot has happened in the various states over the past year. In this session the speakers will cover the most significant income tax cases of 2022 and will offer predictions of what to look out for in 2023.</p> <p>Speakers:  Greg Abbott, Moss Adams*  Scott Edwards, Lane Powell*  John Gadon, Lane Powell*  Masha Yevzelman, Fredrikson &amp; Byron*</p>	<p><b>How Artificial Intelligence is Changing Indirect Tax Pain Points</b> (<i>International Ballroom III</i>)  Artificial intelligence used to be a technology that was built for technology firms and in manufacturing but over the course of the last five years this has dramatically changed. As technology has become more accessible and easier to leverage, there is a growing trend of applying this technology to solve modern day pain points for indirect tax activities that have never had access to solutions. Join our session to discover and</p>

			see examples for how AI is solving these problems.  Speakers: Sam Guevara, Ryan* Jeff York, Deloitte*
9:55 – 10:10 a.m.	<b>Refreshment Break &amp; Networking</b> ( <i>National Ballroom Foyer</i> )		
10:10 – 11:00 a.m.	<b>Audit Session: Northeast Region, Canada and MTC SALT Developments &amp; Audit Reports (COST Industry Members Only)</b> (cont...) ( <i>National Ballroom AB</i> )	<b>How to Leash and Unleash the Benefits of Outside Counsel</b> ( <i>International Ballroom II</i> ) Tax Departments routinely struggle with the question of when to involve outside counsel in a tax dispute, and once involved, how to best leverage their involvement and protect communications. All these issues are magnified in this era of “outsourcing of functions” and “rebadging of employees”. The speakers in this session will cover the issues surrounding outside counsel both for in-house and outsourced tax departments. All of the parties have the same goal -- resolution. Get the best advice on how to accomplish that.  Speakers: Nicole Johnson, Blank Rome* Lee Zoeller, Reed Smith*	<b>Top 10 Legislative Events - Sales Tax</b> ( <i>International Ballroom III</i> ) A lot has happened in the various states over the past year. In this session the speakers will cover the most significant legislative changes made in 2022 that relate to sales tax and will offer predictions of what to look out for in 2023.  Speakers: Eric Fader, Duane Morris* David Wells, RSM*
11:05 – 11:55 a.m.	<b>Everything You Always Wanted to Know About the Metaverse, NFTs, Crypto, Block Chain and More, but were Afraid to Ask – (And How They May Impact State and Local Taxes)</b> ( <i>National Ballroom AB</i> ) The Metaverse, NFTs, Cryptocurrency, and other developing platforms are starting to create unique state and local tax issues for state legislators and administrators attempting to fill the gaps with current (often outdated) tax laws. This session will cover these issues, including recent state actions to address the impact of these technologies ( <i>e.g.</i> , Washington with NFTs).  Moderator: Fred Nicely, COST  Speakers: Matt Hedstrom, Alston & Bird* Mike O’Brien, EY* Kathy Saxton, Deloitte*		
11:55 a.m. – 12:40 p.m.	<b>Presentation to Lynn Gandhi of the Annual COST/ Paul Frankel Excellence in State Taxation Award</b> ( <i>National Ballroom AB</i> )		
12:40 – 1:40 p.m.	Lunch & Networking ( <i>National Ballroom CD</i> )		
1:40 – 2:30 p.m.	<b>Should State and Local Tax Burdens Be Considered as One for Purposes of the Commerce Clause?</b> ( <i>National Ballroom AB</i> )	<b>Pass-Through Entities: SALT Planning and Pitfalls</b> ( <i>International Ballroom II</i> )	<b>Tax Policy Implications: Income Tax vs. Sales Tax vs. Excise Taxes</b> ( <i>International Ballroom III</i> )



	<p>In <i>Controller of the Treasury of Maryland v. Wynne</i>, the U.S. Supreme Court concluded that Maryland’s failure to grant a full credit against both its state and county personal income taxes for personal income taxes paid to other states violated the dormant Commerce Clause. Since then, the West Virginia Supreme Court in <i>CSX Transportation</i> held that for a credit for sales taxes paid to other states to be constitutional, it must be interpreted to mean taxes paid to other states <i>and their political subdivisions</i>. Despite these cases, issues continue to arise. Should a state tax and the taxes of its political subdivisions be considered as one for purposes of the Commerce Clause?</p> <p>Speakers:  Gregg Barton, Perkins Coie*  Joe Bishop Henchman, National Taxpayers Union Foundation*  Mark Loyd, Dentons*</p>	<p>The speakers in this session will discuss issues surrounding pass-through entities that are impacting their operations in the various states. As taxpayers rely on these entities more often, more and more states are reacting. Be informed. Be prepared.</p> <p>Speakers:  Brian Myers, Crowe*  Will Thistle, Bradley*  Bradley Wilhelmson, KPMG*</p>	<p>How states obtain revenue has come under more intense scrutiny due to the COVID-19 pandemic. State governments are evaluating the trade-offs associated with different tax revenue sources to decide how to best fund growing expenses while limiting taxpayer burdens in a difficult economy. Individual income tax and sales tax remain heavily relied on while excise taxes, such as taxes on recreational marijuana, sports betting, and sweetened beverages, may have a growing allure since they are narrowly imposed and often on products generally considered harmful. In this panel discussion, the speakers will “hash” out the merits of different revenue sources, give state examples that have succeeded as well as those that have failed, and share the latest state policy proposals.</p> <p>Speakers:  John Fletcher, Jones Walker*  David Hughes, HMB Legal Counsel*  Carol Portman, Taxpayers Federation of Illinois  Diane Yetter, YETTER*</p>
2:35 – 3:25 p.m.	<p><b>Report from the Front Lines: Southeast States Chamber Roundtable Discussion on Business Taxes – 2022 Recap &amp; 2023 Predictions</b>  <i>(National Ballroom AB)</i></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>Moderator: Patrick Reynolds, COST</p> <p>Speakers:  Justin Allen, Arkansas Chamber of Commerce/Wright, Lindsey &amp; Jennings  Charles Aull, Kentucky Chamber of Commerce</p>	<p><b>Taking a Deeper Dive into Sales Factor Sourcing</b>  <i>(International Ballroom II)</i></p> <p>The speakers in this session will look at trends and opportunities in sales factor apportionment sourcing. Topics will include sourcing issues when a customer intermediary is used; look-through sourcing; requirements to petition for alternative sourcing; and planning for business unit sales. The speakers will also discuss recent state guidance regarding sourcing.</p> <p>Speakers:  Zach Gladney, Alston &amp; Bird*  Priscilla Parrett, Vallejo, Antolin, Agarwal &amp; Kanter*  Diann Smith, McDermott Will &amp; Emery*</p>	<p><b>Using Technology for Indirect Tax Compliance and So Much More</b>  <i>(International Ballroom III)</i></p> <p>Effectively employing tax technology is critical to mitigating risk and lowering costs for indirect tax compliance. However, business tax departments also gain valuable data insights from indirect tax technology and compliance process improvement that can be applied throughout the indirect tax “lifecycle” - including sales and use tax and VAT controversy, refunds, and planning. As a result of this session, business tax professionals will be able to describe the benefits of tax technology to internal</p>

	<p>French Brown, Florida Chamber of Commerce/Dean Mead  Leanna Brown, Metro Atlanta Chamber  Jason DeCuir, Louisiana Association of Business &amp; Industry/Advantous Consulting  Derek Easley, Business and Industry Political Education Committee (Mississippi)  Christopher Grissom, Alabama Business Council/Bradley*  Marshall Guest, Metro Atlanta Chamber  Carl Walker, Texas Taxpayers and Research Association</p>		<p>stakeholders, improve compliance, mitigate risk, and unlock cash.</p> <p>Speakers:  Suneeta Davi, PwC*  Courtney Meyers, Alvarez &amp; Marsal*</p>
3:25 – 3:40 p.m.	<b>Refreshment Break &amp; Networking</b> – Sponsored by <b>Morris Laing*</b> ( <i>National Ballroom Foyer</i> )		
3:40 – 4:30 p.m.	<p><b>Audit Session: Southeast Region and Puerto Rico SALT Developments &amp; Audit Reports (COST Industry Members Only)</b> (<i>National Ballroom AB</i>)  Alabama, Arkansas, Florida, Georgia, Mississippi, North Carolina, South Carolina, Tennessee, Virginia, West Virginia and Puerto Rico Audits.</p>	<p><b>The Next Chapter in Transfer Pricing</b> (<i>International Ballroom II</i>)  States have doubled down on their efforts to audit intercompany transactions through transfer pricing enforcement and are arming themselves with transfer pricing economists and other professional experts. The Multistate Tax Commission recently renewed its support of its member states by revitalizing its State Intercompany Transactions Advisory Service (SITAS). This session will explore the current transfer pricing audit landscape, including what to expect and how to defend your transactions.</p> <p>Moderator: Doug Lindholm, COST</p> <p>Speakers:  Michele Borens, Eversheds Sutherland (US)*  Samit Shah, Grant Thornton*</p>	<p><b>Taxing the Digital Economy - Practical and Constitutional Complexities Abound</b> (<i>International Ballroom III</i>)  States have recently adopted, or attempted to adopt, gross-receipts-based taxes on digital advertising and other aspects of the digital economy. Maryland, Massachusetts, Nebraska, New York, New Mexico, Texas, and West Virginia have all been active in this space over the past year. Other states are likely to join, or try to join, the movement. This session addresses these new digital economy taxes, how they are implemented, the interplay with <i>Wayfair</i>, and potential challenges, including Constitutional and Internet Tax Freedom Act issues.</p> <p>Speakers:  Steve Kranz, McDermott Will &amp; Emery*  Michael Shaikh, Baker McKenzie*  Michael Wynne, Jones Day*, Chicago, IL</p>
4:35 – 5:25 p.m.		<p><b>Top 10 Legislative Events - Income Tax</b> (<i>International Ballroom II</i>)  A lot has happened in the various states over the past year. In this session the speakers will cover the most significant legislative changes made in 2022 that relate to income tax and give their predictions of what to look out for in 2023.</p>	<p><b>Property Tax Valuations During and After a Pandemic</b> (<i>International Ballroom III</i>)  The speakers in this session will provide an understanding of the long-term effect of the pandemic on property tax valuations including reductions of assessed values on commercial properties in major cities, with simultaneous increases in certain</p>

		Speakers: Joe Garrett, Deloitte* David Gutowski, Reed Smith* R. Greg Roberts, Roberts Law Group*	residential areas; the impact of state-mandated caps on valuation; and recent judicial developments challenging valuations.  Speakers: Gerry Amoroso, Grant Thornton* Fred Nicely, COST
5:30 – 7:30 p.m.	<b>Vendor Fair (National Ballroom CD)</b> - Come join the fun as various service and product providers host our Annual Meeting Vendor Fair. There will be lots of giveaway's, food, and activities. And at the end of the Vendor Fair there will be several drawings for some fantastic prizes. But you must stay to the end to win the prize!!! So come join us for a lot of fun!! Special Note: Halloween is the theme so come as a fun/scary character.		
8:00 – 9:30 p.m.	<b>Sips and s'mores</b> – Sponsored by <b>Eversheds Sutherland*</b> ( <i>Outdoor Patio Firepit</i> )		
<b>THURSDAY, OCTOBER 27<sup>TH</sup></b>			
	<b>Meeting Room Internet</b> – Sponsored by <b>BDO*</b>		
	<b>COST Event App</b> – Sponsored by <b>HMB Legal Counsel*</b>		
	<b>Charging Station</b> – Sponsored by <b>KPMG*</b>		
	<b>Coffee</b> – Sponsored by <b>Bradley*</b>		
	<b>Room Key</b> – Sponsored by <b>Ryan*</b>		
	<b>Lanyards</b> – Sponsored by <b>Dentons*</b>		
7:00 am – 12:30 pm	<b>Registration (National Ballroom Foyer)</b>		
7:00 – 8:00 a.m.	<b>Continental Breakfast &amp; Networking (National Ballroom CD)</b>		
9:00 a.m. – 12:30 p.m.	<b>Massage Chair</b> – Sponsored by <b>Andersen*</b> ( <i>National Ballroom Foyer</i> )		
8:00 – 9:25 a.m.	<p><b>Tax Administrators Roundtable (National Ballroom AB)</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 2021 and what is planned for 2022 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: Jim Eads, Ryan*</p> <p>Panelists:  Chris Graham, Commissioner, Mississippi Department of Revenue  David Harris, Director, Illinois Department of Revenue  Ronald Penny, Secretary, North Carolina Department of Revenue  John Valentine, Chairman, Utah State Tax Commission</p>		

9:25 – 9:40 a.m.	<b>Refreshment Break, Networking, and Hotel Check Out</b> ( <i>National Ballroom Foyer</i> )		
9:40 – 10:30 a.m.	<p><b>Report from the Front Lines: Midwest States Chamber Roundtable Discussion on Business Taxes – 2022 Recap &amp; 2023 Predictions</b> (<i>National Ballroom AB</i>)</p> <p>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>Speakers:          Tony Long, Ohio Chamber of Commerce          David Ober, Indiana Chamber of Commerce          Carol Portman, Taxpayers’ Federation of Illinois          Leah Robinson, Michigan Chamber of Commerce          Bryan Slone, Nebraska Chamber of Commerce &amp; Industry          Keith Staats, Illinois Chamber of Commerce Tax Institute          Eric Stafford, Kansas Chamber of Commerce          Evan Umpir, Wisconsin Manufacturers and Commerce</p>	<p><b>Taxation of Gain on the Sale of Flow-Through Entities</b> (<i>International Ballroom II</i>)</p> <p>States are adopting theories of "investee apportionment" as an end run around the Supreme Court requirement of a unitary relationship before a state may tax the gain on the sale of interest in a business. The idea has gained traction in a few states and has been shut down in others. Join this session for the latest updates</p> <p>Speakers:          Edward Bernert, Baker Hostetler*          Jaye Calhoun, Kean Miller*          Bruce Ely, Bradley*</p>	<p><b>Issues with Sales Taxation of Digital Business Inputs</b> (<i>International Ballroom III</i>)</p> <p>State sales and use taxes are intended to tax end-user consumption. However, many states are expanding their tax bases to incorporate the digital economy and are inadvertently (or intentionally) not exempting business-to-business digital transactions. The presenters will discuss the findings of COST’s recent study that documents that state taxation of digital business inputs is the norm, not an aberration. The panelists will discuss how this development makes a long-standing systemic flaw of state sales tax systems worse – the pyramiding of tax on business inputs.</p> <p>Moderators:          Karl Frieden, COST          Priya Nair, COST</p> <p>Speakers:          Robert Merten, Pillsbury Winthrop Shaw Pittman*          Leah Robinson, Mayer Brown*</p>
10:35 –11:25 a.m.	<p><b>Audit Session: Central /Midwest Region SALT Developments &amp; Audit Reports (COST Industry Members Only)</b> (<i>National Ballroom AB</i>)</p> <p>Illinois, Indiana, Iowa, Kentucky, Louisiana, Michigan, Minnesota, Missouri, Ohio, Oklahoma, Texas &amp; Wisconsin</p>	<p><b>Credits &amp; Incentives in the Post-COVID World: What has changed? What’s to come? How can you be prepared?</b> (<i>International Ballroom II</i>)</p> <p>The pandemic has changed the world of work and capital allocations, and as a result, how states are handling the taxes and incentives related to those changes. How do these changes impact traditional jobs credits where the rules require people to work in a particular state? How will it impact compliance reporting? The speakers in this session will</p>	<p><b>The Limits of Administrative Deference</b> (<i>International Ballroom III</i>)</p> <p>In court, state taxing authorities frequently assert that both their assessment and their interpretations of the law are entitled to deference. This presentation will focus on the sources and rationales for deference to administrative agencies in promulgating regulations and interpreting statutes and regulations. The panel will also focus on the different types of deference resulting from factual burdens of proof, the issuance of</p>

		<p>discuss all these changes and their experiences in dealing with them.</p> <p>Speakers: Garrett Fischer, Thompson Coburn* Christopher Grissom, Bradley*</p>	<p>regulations and other guidance, and resulting from the adoption of positions in audits and litigation. The speakers will also discuss how administrative deference regarding the interpretation of statutes is affected by the rules of statutory construction.</p> <p>Speakers: Jonathan Feldman, Eversheds Sutherland (US)* David Shipley, Stevens &amp; Lee*</p>
11:30 a.m. – 12:20 p.m.		<p><b>After the Dust Settles: What Should You Focus on Within the First 100 Days After the Transaction?</b> (<i>International Ballroom II</i>)</p> <p>Deal structuring and due diligence gain loads of attention, but do parties to a transaction pay attention after the deal is done? This session will explore what taxpayers should consider within the first 100 days of a transaction, from identifying tax positions, retaining relevant information (before it is gone), and executing on strategies. The session will cover both direct and indirect topics.</p> <p>Speakers: Eric Anderson, Andersen* Mark Sommer, Frost Brown Todd*</p>	
12:20 p.m.	<b>Annual Meeting Adjourns</b>		
12:30 – 2:30 p.m.	COST Board of Directors Meeting/STRI Board Meeting to immediately follow. ( <i>Royal Melbourne</i> )		

\* Denotes COST Practitioner Connection Subscriber