

06/05/23

**Sponsored by:**



**All times are Eastern Time Zone**

**Tuesday June 6, 2023**

3:00 – 4:05 p.m. ET	<p><b>The Top State Corporate Income Tax Issues in 2023</b> - Do you want to know what to watch out for in 2023? Join our panelists as they survey the clear favorites and dark-horse candidates for the top state corporate income and franchise tax issues in 2023. The panel will highlight must-know key trends including important court cases, legislation and regulations.</p> <p>Speakers:  Eugene Gibilaro, Blank Rome*  Chris Oatis, Grant Thornton*  Greg Rottjakob, Ryan*  Jeff Vesely, Pillsbury*</p>
4:10 – 5:10 p.m. ET	<p><b>Bad Facts Makes for Ugly Apportionment and Allocation Sourcing Rules</b> - With inconsistent sourcing, apportionment and allocation rules, taxpayers are often stuck fitting the bill paying corporate income taxes on more than 100% of their income. This session will discuss the current challenges with sourcing, apportionment, and allocation of large gains from the sale of a business. The speakers will provide tips and best practices to avoid creating ugly apportionment factors and allocations.</p> <p>Moderator:  Stephanie Do, COST</p> <p>Speakers:  Brian Kirkell RSM*  Diann Smith, McDermott Will &amp; Emery*</p>

**Thursday, June 8, 2023**

3:00 - 4:05 p.m. ET	<p><b>Mergers and Acquisitions: An Income Tax Story</b> - Companies buying and selling businesses have a lot on their plate and state income/franchise tax may not be the first thing on their mind. This session addresses common income/franchise tax concerns in a stock versus asset purchase, including NOL limitations, successor liability, nexus, and federal conformity.</p> <p>Speakers:  Jaye Calhoun, Kean Miller*  Tom Leonardo, BDO*  Mark Loyd, Dentons*</p>
4:10 – 5:10 p.m. ET	<p><b>Hot Topics in Transfer Pricing and Intercompany Transactions</b> - As transfer pricing challenges, assessments and court decisions continue to become more and more frequent, states' methods, practices, and use of third-party consultants should be scrutinized. This session will discuss transfer pricing methodologies employed, how to counter aggressive assertions of profit shifting, and risks and opportunities around intercompany transactions and transfer pricing.</p> <p>Speakers:  Drew Hemmings, Baker &amp; McKenzie*  Scott Susko, EY*  Eric Tresh, Eversheds Sutherland (US)*</p>