

2023 INTERMEDIATE/ADVANCED STATE INCOME TAX SCHOOL

May 7-11, 2023

Hyatt Regency DFW International Airport Dallas, TX

Sponsored by

BLANKROME



BLANKROME RYAND	
Sunday, May 7, 2023	
6:00 - 8:00	Registration, Dinner and Evening Fun
	Monday, May 8, 2023
7:45 – 8:30	Welcome & Introduction Douglas Lindholm, COST Executive Director Arthur Parham, Retired General Tax Advisor of Entergy Services LLC Charles Drury, COST VP/Chief Operating Officer
8:30 – 11:45	Jurisdictional Nexus and Constitutional Limitations
8:30 – 10:15 Lecture 10:15 – 10:30 Refreshment Break/ Networking 10:30 – 11:45 Facilitated Breakout	The ability of a state to impose a corporate income tax is limited in a number of different ways. This session will explore limits on state taxation imposed by the Due Process Clause, the Commerce Clause, P.L. 86-272, specific state statutory and constitutional restrictions and by the U.S. Supreme Court decision in <i>Wayfair</i> . Small group breakouts will reinforce the concepts learned in this session.
	Instructors: Kathleen Cornett, Alston & Bird Michael Jacobs, Reed Smith* Breen Schiller, EY*
11:45 – 1:00	Lunch/Networking
1:00 – 3:30 1:00 – 2:30 Lecture 2:30 – 2:45 Refreshment Break/ Networking 2:45 – 3:30 Facilitated Breakout	Filing Methodologies This session will cover the various income tax filing methodologies used by the states. Students will learn the differences between the methods and how to support favorable filing positions. Small group breakouts will reinforce the concepts learned in this session.
	Instructors: Evan Hamme, Pillsbury Winthrop Shaw Pittman* Trevor Mauck, Baker & McKenzie*
3:30 – 5:30 3:30 – 4:45 Lecture 4:45 – 5:30 Facilitated Breakout	Deeper Dive into the Unitary Filing Method(s) This session will explore the analysis used to determine whether a unitary reporting relationship exists. It will then review the alternative forms of unitary reporting used by unitary reporting states. Small group breakouts will reinforce the concepts learned in this session. Instructors:
	Ben Muilenburg, PwC* Kelly Smith, PwC*
6:30 – 8:30	Vegas Night with COST – Sponsored by Blank Rome*
	Tuesday, May 9, 2023
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	Instructors:
	Chelsea Marmor, Eversheds Sutherland (US)*
	Maria Todorova, Eversheds Sutherland (US)*
11:00 – 12:00	Advanced State Taxation Related to Foreign Income
	This session will further explore state adjustments with a focus on adjustments
	related to foreign operations and transactions.
	Instructors:
	Karl Frieden, COST
	Eugene Gibilaro, Blank Rome*
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12:00 – 1:00	Lunch/Networking
1:00 – 3:30	Special Issues in Apportionment and Allocation
1:00 – 2:30 Lecture	States have adopted a variety of different apportionment rules and, as a result, there
2:30 – 2:45 Refreshment Break/	is little uniformity in state tax apportionment. This session will guide students
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	rules to their companies and clients. Small group breakouts will reinforce the
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	Instructors:
	John Fletcher, Jones Walker*
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	Multistate businesses routinely utilize pass-through entities in their corporate
	structures. Pass-through entities and their owners are subject to a number of unique
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	identify planning opportunities to minimize these taxes.
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	legislative and tax policy success rather than simply react to legislative change
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	Instructors:
	Fredrick Nicely, COST
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8:30 – 9:45	Federal Tax Reform – Deciphering the State Tax Implications - (Joint Session with the
	Sales Tax School)
	In this session, the panel will first briefly cover the provisions of the TCJA and then
	examine the states' actions in adopting the TCJA provisions, or not adopting
	them. The panelists will highlight the primary policy, regulatory and compliance
	issues that have emerged in relation to key provisions such as the repatriation
	transition tax, GILTI and 163j. Finally, the panelists will look ahead and give their
	predictions on how conformity/non-conformity with TCJA will change the state tax
	landscape in the future. The panelists will also look at the proposed federal legislation
	by the Biden administration and their expectations of how that will impact the state
	tax landscape.
	Instructors:
	Harley Duncan, KPMG*
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9:50 – 11:00	A Taste of COST and Ask the Experts - (Joint Session with the Sales Tax School)
	The speakers in this session will discuss and demonstrate the Audit Sessions that are
	a unique feature of COST's conferences, the Forums available on the COST website,
	and how gray areas of state taxation provide opportunities for tax planners. The
	session will close with an Ask The Experts session to enable attendees to request
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11:00 – 11:15	Refreshment Break/Networking & Check Out
	Preparing for Audit Challenge and Controversy - (Joint Session with the Sales Tax
11:15 – 12:30	School)
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