



COST 2014 SALT Basics School
January 26 – 31, 2014
Georgia Tech Hotel and Conference Center
Atlanta, Georgia

Sunday, January 26, 2014

5:00 – 8:00 p.m. Registration, Dinner & Networking

Monday, January 27, 2014

PLENARY SESSION:

8:00 – 9:00 **Introductions of Staff, Facilities and Format**
Speakers: Douglas Lindholm, COST President & Executive Director, Washington, DC
Ted Ghiz, COST Chair, The Coca-Cola Company, Atlanta, GA
Charles Drury, COST Vice President, Programs, Washington, DC

9:00 – 12:00 **State and Local Practice Overview**
10:15 – 10:30 Refreshment & Networking Break
11:00 – 12:00 Facilitated Breakout Session
Speakers: Gerard Amoroso, General Electric Company, Atlanta, GA
Richard Bell, Richard W. Bell, LLC, Boise, ID
Lucas Hankins, KPMG*, Atlanta, GA
Robert “Bo” White, E.I. DuPont de Nemours, Wilmington, DE

Curriculum: Overview of major state taxes and state revenue programs, including: income/franchise, sales/use, property and employment taxes; credits, incentives and unclaimed property.

12:00 – 1:00 Lunch & Networking
12:00 – 12:10 Optional Tablet Tricks and Shortcuts Training

1:00 – 3:00 **Constitutional Restrictions**
Speakers: Karl Frieden, COST, Washington, DC
Jeffrey Saviano, Ernst & Young*, New York, NY
Andres Vallejo, Morrison & Foerster*, San Francisco, CA

Curriculum: Examine Due Process, Commerce, Supremacy and Equal Protection Clauses and other Constitutional restrictions on the rights of states to levy taxes.

3:00 – 3:15 Refreshment & Networking Break

3:15 – 5:15 **State Tax Research Tools**
Speakers: Matthew Mantle, Jones Walker*, New Orleans, LA
Gregg Perry, Perry Law & Assistant Professor at St. Edwards University School of Management & Business, Austin, TX

Curriculum: Practical tips on conducting basic SALT research, including online databases and hardcopy text, with a brief assessment of select commercial resources; and preparing an effective file memo.

6:15 – 8:30 Vegas Night (Georgia Tech Hotel)

Tuesday, January 28, 2014

PLENARY SESSION:

8:00 – 10:45 **Jurisdiction to Tax**
10:00 – 10:45 Facilitated Breakout Session

Speakers: Maureen Pechacek, PricewaterhouseCoopers*, Minneapolis, MN
Eric Tresh, Sutherland Asbill & Brennan*, Atlanta, GA

Curriculum: Analyze P.L. 86-272 and explore the parameters of nexus for income-based and sales/use taxes; review authorities for protected vs. unprotected activities; survey state-specific and administrative exemptions.

10:45 – 11:00 Refreshment & Networking Break

11:00 – 12:15 **Pass-Through or Disregarded Entities**
Speakers: David Greaves, KPMG*, Atlanta, GA
Alison Tilson, KPMG*, Atlanta, GA

Curriculum: Recognize the income and sales/use tax significance of various pass-through or disregarded entities, including federal treatment of the entity, state tax base implications, and impact on income allocation & apportionment.

12:15 – 1:15 Lunch & Networking
 12:15 – 12:25 Optional Tablet Tricks and Shortcuts Training
 1:15 – 2:00 **Pass-Through or Disregarded Entities (continued)** – Facilitated Breakout Session
 2:00 – 5:30 **Financial Statements/Federal Tax Issues for the State Tax Professional**
 3:30 – 3:45 Refreshment & Networking Break
 4:30 – 5:30 Facilitated Breakout Session

Speakers: Bobby Burgner, General Electric Company, Atlanta, GA
 Donna Fiammetta, GE Capital, Stamford, CT
 Kelly Smith, PricewaterhouseCoopers*, Atlanta, GA

Curriculum: Overview of tax accounting for above and below the line financial statement presentations; federal tax concepts that affect computation of state income/franchise tax base; federal transactions that may trigger state income or sales tax consequences; international tax concepts affecting state tax calculation.

Wednesday, January 29, 2014

Income Tax and SALT Concepts Tracks:

8:00 – 10:15 **State Income Tax Base I**
 9:00 – 10:00 Facilitated Breakout Session

Speakers: Bridget Foster, Deloitte Tax*, Atlanta, GA
 Richard Smith, Deloitte Tax*, Atlanta, GA

Curriculum: Review concepts involved in computing state income tax base, including tie-in to federal return, modifications to federal tax base, multi-corporate group filing options, business/non-business determination and allocation/apportionment.

10:00 – 10:15 Refreshment & Networking Break

10:15 – 12:15 **Unitary Business Principle & Apportionment**

Speakers: Ben Muilenburg, PricewaterhouseCoopers*, Sacramento, CA
 Kelly Smith, PricewaterhouseCoopers*, Atlanta, GA

Curriculum: Examine the unitary business principle and its implications for formulary apportionment of multi-corporate groups; computation of factors: sales, property and payroll.

12:15 – 1:15 Lunch & Networking

1:15 – 2:00 **Unitary Business Principle & Apportionment (cont.)** – Facilitated Breakout Session

2:00 – 4:30 **State Income Tax Base II**
 3:30 – 3:45 Refreshment & Networking Break
 3:45 – 4:30 Facilitated Breakout Session

Speakers: Brian Pedersen, Alvarez & Marsal*, Seattle, WA
 Donald Roveto, Alvarez & Marsal*, NY, NY

Curriculum: In-depth focus on apportionment formula variations, special issues in apportionment, sourcing services & intangible income; detailed analysis of tax base additions & subtractions, multinational issues & credits.

4:30 – 5:30 **Net Worth/Capital Taxes**

Speakers: James Adams, Ernst & Young*, Atlanta, GA
 Tim Dalton, Ernst & Young*, Atlanta, GA

Curriculum: Explore alternative tax bases computed on net worth and capital, with the state tax planning implications these taxes create.

Sales & Use Tax Track:

8:00 – 10:15 **Introduction to Sales Tax Theory/Definition of Key Terms**

9:30 – 9:45 Refreshment & Networking Break

Speakers: Doug Nagode, Deloitte Tax*, Atlanta, GA
 Kathy Saxton, Deloitte Tax*, Atlanta, GA

Curriculum: Review history, theory and policy underlying sales taxation; define key terms and concepts used to implement the tax.

10:15 – 12:15 **Sales Tax Imposition Statutes**

11:15 – 12:15 Facilitated Breakout Session

Speakers: Benjamin Cella, KPMG*, Atlanta, GA
 Marc Grossman, KPMG*, Atlanta, GA

Curriculum: Analyze nature of sales vs. use taxes, including typical statutes and other authorities; explore application of form over substance doctrine and presumption for taxing tangible personal property.

12:15 – 1:15 Lunch & Networking

1:15 – 4:00 **Sales Tax Exempt & Non-Taxable Transactions**

3:00 – 3:15 Refreshment & Networking Break

Speakers: Donna Daday, PricewaterhouseCoopers*, Philadelphia, PA
 Jeff Lemmons, PricewaterhouseCoopers*, Atlanta, GA

Curriculum: Examine entity-level and activity-related exemptions; use of exemption certificates, and transactions outside scope of the statute.

4:00 – 5:30 **Sales Taxation of Services**

4:45 – 5:30 Facilitated Breakout Session

Speakers: Matt Davidson, Ernst & Young*, Atlanta, GA
 Jeff McGhehey, The Home Depot, Atlanta, GA

Curriculum: Explore the degree to which states tax services, including bundled or mixed transactions, investigate the evolving doctrines and authorities used to justify taxing services.

Income Tax Track:

8:00 – 12:15 **State Income Tax Administration & Compliance**

10:00 – 10:15 Refreshment & Networking Break

Speakers:

Susan Courson-Smith, Pfizer, Memphis, TN
 Jim Jay, Mondelez International, Deerfield, IL
 Amy Thomas Laub, Tempur Sealy International, Inc., Lexington, KY
 Frances Sewell, Tyco International, Boca Raton, FL
 Steve Spaletto, Deloitte Tax*, Indianapolis, IN
 Michael Woo, Bank of the West, San Ramon, CA

Curriculum: Review of income tax filing requirements, including software, form instructions vs. law, estimated payments, RARs, amended returns, mailing requirements.

12:15 – 1:15 Lunch / Networking

1:15 – 5:30 **State Income Tax Administration & Compliance (continued)**

3:30 – 3:45 Refreshment & Networking Break

Same Panel as Morning

Curriculum: Best practices review of making files audit ready, organizing and filing workpapers, performing research, documenting positions, and responding to notices.

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Sales & Use Tax Track:

8:00 – 12:00 **Sales & Use Tax Administration & Compliance**

9:40 – 9:55 Refreshment & Networking Break

Speakers:

Tony Chirico, Covidien, Mansfield, MA
 Carolynn Kranz, Industry Sales Tax Solutions*, Washington, DC
 Diane Yetter, YETTER*, Chicago, IL

Curriculum: Review of vital issues associated with administration of the sales/use tax function, including: registration, exemption certificates, taxability decisions, software, return preparation claims for refund.

12:00 – 1:00 Lunch / Networking

1:00 – 5:30 **Sales & Use Tax Administration & Compliance (continued)**

2:45 – 3:00 Refreshment & Networking Break

Same Panel as Morning

Curriculum: Focus on sales/use function compliance issues including use tax accrual, record retention, data analysis for preparation for returns, filing amended returns, responding to notices, tips for audit defense and tax automation.

- 8:00 – 8:45 **Streamlined Sales Tax Project – Changing the Landscape**
Speakers: Ferdinand Hogroian, COST, Washington, DC
 Fredrick Nicely, COST, Washington, DC
- Curriculum: Overview of what the SSTP is and what are its future prospects.
- 8:45 – 9:45 **Local Taxes**
Speakers: Nicole Crighton Vescio, KPMG LLP*, New York, NY
 Frank Gallo, Reed Smith LLP*, Philadelphia, PA
- Curriculum: Survey of various local taxes, including gross receipts, sales/use, and business operating taxes, with discussion of best practices for compliance.
- 9:45 – 10:15 Refreshment & Networking Break and Hotel Check Out
- 10:15 – 11:30 **Evolving Unclaimed Property, Property Tax, VAT Issues**
Speakers: Gerard Amoroso, General Electric Company, Atlanta, GA
 Harley Duncan, KPMG*, Washington, DC
 Michael Giovannini, Alston & Bird*, Atlanta, GA
 Fredrick Nicely, COST, Washington, DC
- Curriculum: Overview of emerging issues associated with unclaimed property; evolving property tax issues including approaches to value, intangibles, split rolls/cap, inventory tax & third party audits; and review of operation of a VAT and is a national state based VAT in the U.S. future?
- 11:30 – 12:30 **Preparing for Audit Challenge & Controversy**
Speakers: Kelly Butler, Ryan, LLC*, Houston, TX
 John Murphy, Kolesar & Associates, Reno, NV
 Patrick Van Tiflin, Honigman Miller Schwartz & Cohn LLP*, Lansing, MI
- Curriculum: Practical tips on dealing with auditor proposed changes, including best practices for responding to notices of proposed assessments and preparing for informal and formal hearings with the state department of revenues.
- 12:30 – 12:45 SALT Basics School Closing Remarks and Self-Test of Key SALT Concepts.
- 12:45 – 1:45 Lunch & Networking
- 1:45 School Adjourns