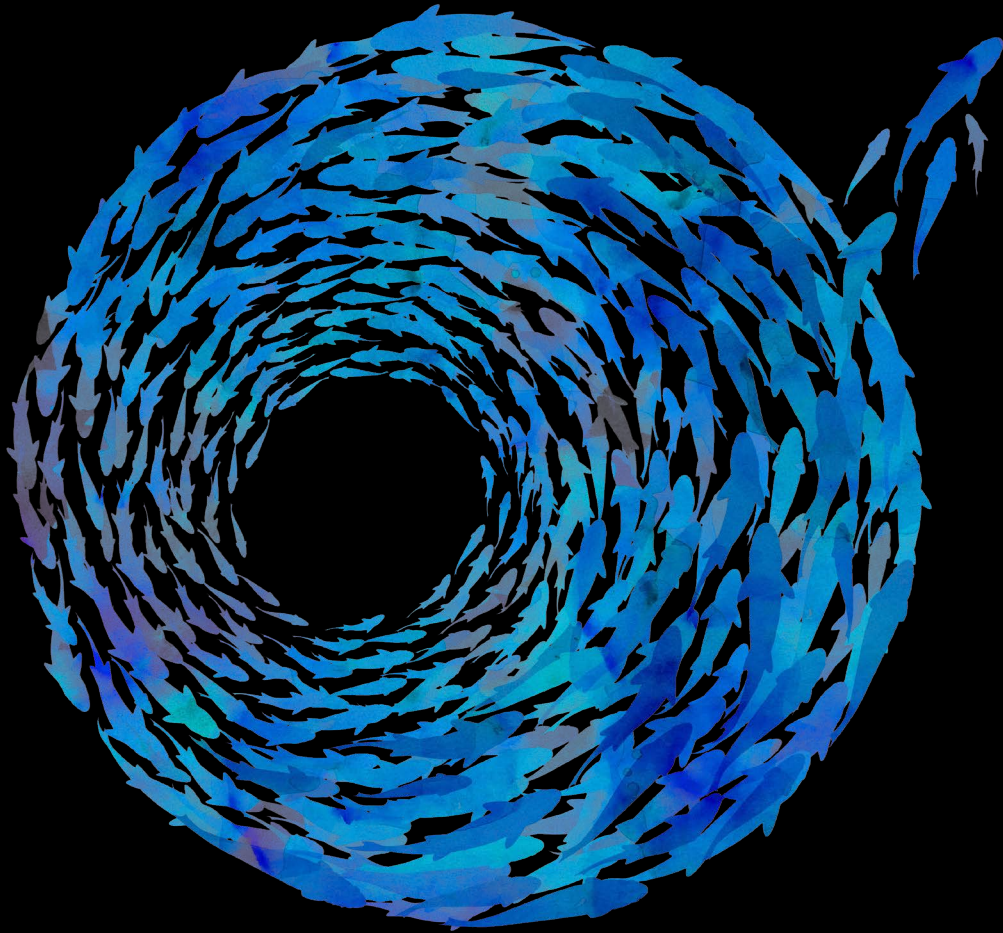


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**The 2018 National
Multistate Tax Symposium**

Take the lead—Tax reform and
fortifying state positions

February 7-9, 2018

Disney's Grand Floridian
Resort & Spa

[Click here to
register online](#)

The 2018 National Multistate Tax Symposium

BONUS SESSIONS

Wednesday, February 7

2:00 p.m.–3:30 p.m. Accounting for state taxes

Chris Barton, Managing Director, Deloitte Tax LLP

Kent Clay, Managing Director, Deloitte Tax LLP

Shanna Steed, Lead Tax Principal, Tax Operations, The Walt Disney Company

Tax department professionals continue to face challenges in properly accounting for various state tax law changes that may have an impact on their business's overall tax rate and financial statements. Listen in as industry and accounting firm panelists address these issues—including implications for current state income tax expense, state deferred income tax, and unrecognized tax benefit positions. The panel will also tackle ongoing complexities in identifying and measuring deferred taxes, assessing needs for valuation allowances, reviewing practical implications of common state uncertain tax positions, and financial accounting for indirect taxes.

3:30 p.m.–5:00 p.m. Florida tax developments

Moderator: Chris Snider, Managing Director, Deloitte Tax LLP

Tony Hamm, Deputy General Counsel, Florida Department of Revenue

Kevin Herzberg, Partner in charge, Tampa office, Grant Thornton LLP

Mark E. Holcomb, Of Counsel, Dean, Mead & Dunbar

Maria Johnson, General Tax Administration Program Director, Florida Department of Revenue

Rex D. Ware, Of Counsel, Radey Law Firm

Join Florida tax specialists as they provide updates and discuss the latest tax legislative developments and policy in Florida, including what you may need to know about the upcoming 2018 Florida legislative session. The panelists will also highlight some recently decided and pending tax cases and rulings in the Florida court system, noteworthy Florida tax technical rulings, and select administrative issues and news from the Florida Department of Revenue.

6:00 p.m.–8:00 p.m. Welcome reception

Join The National Multistate Tax Symposium speakers and Advisory Board members at the Summerhouse Patio and Beach Bar for appetizers and cocktails. Network with fellow tax executives and prepare to enjoy the next two days.

DAY ONE: Thursday, February 8

BONUS SESSION

7:30 a.m.–8:25 a.m. Ethics for state tax industry executives—Complex situations

Tom Cornett, Senior Manager, Deloitte Tax LLP

Lynn A. Gandhi, Partner, Honigman Miller Schwartz and Cohn LLP

Heidi Gollinger, Senior Vice President/Senior Manager State Tax Planning, Bank of America

Mitchell I. Horowitz, Shareholder, Buchanan Ingersoll & Rooney PC

Start the day early with this practical and interactive session on ethics for state tax industry executives as the panel explores real-world dilemmas facing today's tax department professionals. Help weigh in on various courses of action and listen in as the panel considers viable options. Also, if you have been facing an ethical tight spot of your own, submit your concern on site through the Symposium App for the panel to address anonymously in class.

8:30 a.m.–8:45 a.m. Welcome and opening remarks

Valerie Dickerson, Partner, Deloitte Tax LLP

Mark Holcomb, Of Counsel, Dean, Mead & Dunbar

Joseph B. Schimmel, Chair, Tax Section of the Florida Bar

William D. Townsend, Of Counsel, Dean, Mead & Dunbar

8:45 a.m.–9:45 a.m. Take the lead—Planning with tax reform and controversy in mind

Moderator: Valerie Dickerson, Partner, Deloitte Tax LLP

Paul Broman, Assistant Tax Director & Senior Managing Tax Counsel, BP

Douglas L. Lindholm, President, Council On State Taxation

Alysse McLoughlin, Partner, McDermott Will & Emery LLP

Jack Trachtenberg, Principal, Deloitte Tax LLP

Eminent state tax practitioners will discuss today's reality of federal tax reforms and assertive state tax agencies and further-reaching state taxation schemes overall, to help set the stage to proactively prepare for the inevitable controversy issues at stake. This session will prepare you for the day's in-depth look at positioning your businesses for greater certainty in this state tax environment.

9:45 a.m.–10:45 a.m. Engaging with the settlement functions to resolve state tax disputes

Moderator: Brian Toman, Senior Advisor, Deloitte Tax LLP

Karey W. Barton, Associate Deputy Comptroller for Tax, Texas Comptroller of Public Accounts

Brian Fliflet, Deputy General Counsel, Income Tax Policy and Acting Administrator of the Informal Conference Board, Illinois Department of Revenue

William Gardner, Assistant Chief Counsel, Settlement Bureau, California Franchise Tax Board

Moderated by a former Chief Counsel of the California Franchise Tax Board, this panel of state tax agency officials will provide you with their insights and perspectives on the administrative tax settlement, mediation, and conciliation processes and procedures from their respective states. Join us as these prominent state tax officials share their thoughts on what they would like to see from taxpayers, and how businesses may successfully utilize the tax settlement functions.

11:00 a.m.–12:00 p.m. “Take the lead—Tax reform and fortifying state positions” breakout session

(Breakout descriptions are on page 4)

12:00 p.m.–1:30 p.m. Lunch and luncheon address: Tax policy and politics in the age of Trump—A look at the first year

Jonathan Traub, Principal, Deloitte Tax LLP

Federal tax reform took center stage in Washington D.C. at the close of 2017, eventually becoming the largest legislative accomplishment to date for President Trump. This luncheon session will provide an overview of the recently enacted law, what it means for taxpayers, and what to watch for going forward, particularly as the 2018 mid-term elections get closer every day.

1:45 p.m.–2:45 p.m. Second “Take the lead—Tax reform and fortifying state positions” breakout session

3:00 p.m.–4:00 p.m. Third “Take the lead—Tax reform and fortifying state positions” breakout session

(Breakout descriptions are on page 4)

4:15 p.m.–5:15 p.m. Take the lead—Tax reform and fortifying state positions

Moderators: Valerie Dickerson, Partner, Deloitte Tax LLP and **Robert R. Vonick**, Tax Counsel—State Taxes, The Walt Disney Company

William M. Backstrom, Jr., Practice Group Leader for the Tax, Trusts and Estates Practice Group, Jones Walker LLP

Kristen Cove, Partner, Deloitte Tax LLP

Stephen J. LaRosa, Senior Director, State & Local Tax, Alexion

William Lasher, Senior Director, Indirect Taxes, eBay Inc.

Douglas L. Lindholm, President, Council On State Taxation

Archana Warner, Director, State and Local Tax, Exelon Corporation

Capping off the day's deeper dive on tax reform and planning with state controversy in mind, an experienced panel of state tax specialists will add their observations and suggestions on these increasingly relevant subjects. Hear their opinions on some pressing concerns and potential opportunities with respect to tax reform and state tax controversies today, and how businesses may position for more favorable outcomes in this everchanging and often tenuous environment.

5:30 p.m.–6:15 p.m. Inclusion in a box

Parrish Ivy, Principal, Deloitte Tax LLP

Gen X, Gen Y, Millennials...We live in a time where we quickly put people in boxes, but we have more in common than what we think! Please join us for cocktails before dinner and an interactive event to learn about “All that we share.”

6:30 p.m. Dinner and fireworks

Join us for a relaxed dinner with your fellow conference colleagues, guests, and families. Enjoy great food with a few surprises for the kids, as well as an outdoor reception featuring drinks, dessert, and spectacular fireworks over the water.

DAY TWO: Friday, February 9

8:00 a.m.–9:00 a.m. General breakout: Session 1

(Breakout descriptions are on page 5)

9:15 a.m.–10:15 a.m. State tax twists and turns: What's happened that surprised us

Moderator: Valerie Dickerson, Partner, Deloitte Tax LLP

Christopher Campbell, Principal, Deloitte Tax LLP

Douglas L. Lindholm, President, Council On State Taxation

Andres Vallejo, Partner, Reed Smith, LLP

This panel of multistate tax specialists will share their thoughts on recent legislative, administrative, and judicial trends in state taxation—focusing on select developments that may have been unanticipated. Topics will run the gamut, including economic nexus, transfer pricing, combined reporting/unitary group member inclusion, credits and incentives, apportionment and market-targeted sourcing mechanisms, pass-through entity structures, gross receipts-based taxation, false claims actions, and tax law retroactivity—with insight on how such changes, rulings, and trends may impact state tax policy and your business, today and in the coming years.

10:30 a.m.–11:30 a.m. **Dollars and sense—A ringside conversation**

Moderator: Richard D. Pomp, Esq., Alva P. Loiselle Professor of Law, University of Connecticut

Michael Bryan, Managing Director, Deloitte Tax LLP

Brian Toman, Senior Advisor, Deloitte Tax LLP

Linda A. Klang, Senior Vice President, Lehman Brothers Holdings Inc.

Sit back and enjoy this spirited discussion between our moderator and panelists representing central parties involved with a possible state tax settlement proceeding. Hear their respective points of view and thoughts—both public and private, tax related and nontax related—at various stages of the process as they voice their unique, and often competing, cost-versus-benefit concerns. By examining these viewpoints from both within and outside of the corporate tax department, this panel of leading industry and state tax specialists will provide perspective into and commentary on the various issues that arise and should be deliberated prior to, during, and even after a state tax settlement proceeding.

11:30 a.m.–1:00 p.m. **Lunch and luncheon address: Economic outlook—Thoughts on what to expect in 2018**

Ira Kalish, Chief Global Economist, Deloitte Touche Tohmatsu Limited

Although the US and global economies have performed well lately, there are a number of risks on the horizon. This luncheon presentation examines the current state of the economy as well as the likely outlook for the future—with focus on the potential risks as well as the potential opportunities—and offers thoughts on what to expect in the coming year.

1:15 p.m.–2:15 p.m. **General breakout: Session 2**

2:30 p.m.–3:30 p.m. **General breakout: Session 3**

(Breakout descriptions are on page 5, choose 3)

Take the lead—Tax reform and fortifying state positions

Positioning for more favorable outcomes: Income and franchise tax controversies

Erik J. Burgos, State and Local Tax Director, General Dynamics Corporation

Jordan M. Goodman, Partner, Horwood Marcus & Berk Chtd.

Jack Trachtenberg, Principal, Deloitte Tax LLP

In light of the many important state implications surrounding federal tax reform, this session will address how businesses may tactically position and manage their daily corporate operations in preparation for imminent state income tax audits and controversies to help avoid unnecessary costs, disruptions, and expensive litigation, as well as increase overall tax department efficiency. The panelists will discuss contemporaneous documentation policies to better substantiate your company's facts with respect to its state income tax filing positions. This session will also consider some potential opportunities available to businesses due to the recently enacted federal tax changes, as well as to those undergoing audit—including refunds and offsets—as well as effectively presenting the facts, handling requests for documents and interviews, negotiating settlements, and preparing for and managing post-assessment appeals.

Positioning for more favorable outcomes: Indirect tax controversies

Craig B. Fields, Partner, Morrison & Foerster LLP

Kirsten Gulotta, Managing Director, Deloitte Tax LLP

Stephen J. LaRosa, Senior Director, State & Local Tax, Alexion

As states increasingly implement far-reaching nexus policies and expanded tax bases, this session will discuss the practical aspects of proactively preparing for state indirect tax audits and assessments. The discussion will include leading practices for addressing day-to-day corporate operations and risk—including contemporaneous data collection and compliance responsibilities, technology considerations, sampling agreements, reverse audits, voluntary disclosure and/or amnesty agreements, and administrative ruling requests. The session will also focus on successfully managing ongoing indirect tax audits and the state-by-state nuances of administrative controversies—including how to better support and present your company's facts and circumstances—as well as potential opportunities for post-assessment refunds/offsets, and negotiating conciliation and settlement agreements.

Corporate governance perspectives on controversy

Scott Frishman, Principal, Deloitte Tax LLP

Chris Sullivan, Shareholder, Rath, Young and Pignatelli, PC

Archana Warner, Director, State and Local Tax, Exelon Corporation

In confronting many of the practicalities surrounding federal tax reform and state tax controversies, sometimes the underlying “non-tax issues” dwarf the tax-related concerns within a business organization—especially in terms of considering a company's costs, core principles, industry, shareholders, and public perception. Panelists in this session will focus on such corporate governance issues involving tax matters, including government and industry regulations and/or limitations, as well as potential opportunities to form and build taxpayer or trade-group coalitions in an era where state agencies are attempting to tax today's business concepts and realities with some arguably outdated tax statutes and regulations.

State tax implications of IRS controversies

Karen S. Dean, Senior Director, Tax Planning, Audit & Appeals, CenturyLink

Ken Jewell, Managing Director, Deloitte Tax LLP

Alyse McLoughlin, Partner, McDermott Will & Emery LLP

This session will discuss why state tax professionals should be involved with federal income tax audits, controversies, and settlements, and what these federal tax outcomes could mean from a state perspective. Presenters will review recent federal decisions and consider their implications for state tax cases. Moreover, learn how your organization may avail itself of potential opportunities to offset tax due or enhance refunds at the state level. The session will also consider some recent developments, such as how states are responding to the recently enacted federal tax reforms, as well as changes in the federal partnership audit and adjustment process.

General breakout sessions

Positioning with the C-Suite—Tips for Tax department professionals

John Mimplitz, Vice President, Tax, Express Scripts, Inc.

Marilyn A. Wethekam, Partner, Horwood Marcus & Berk Chtd.

Jason Wyman, Partner, Deloitte Tax LLP

The implications of tax may ultimately affect the financial and strategic decisions of many organizations—thus leaving the Tax department with the important task of capturing the attention of, and tailoring tax-related opportunities and concerns to, their C-Suite executives and boards. With the use of working examples, this session will focus on leading practices to help members of your Tax department become more involved, and possibly find a seat at the table, with corporate leadership and the strategic business decisions they make. The panelists will encourage audience participation to share stories of C-Suite communication and positioning successes, as well as disappointments and hopes for the future.

Planning for future-state taxation regimes—And the “future state”

Scott Schiefelbein, Managing Director, Deloitte Tax LLP

Marc Simonetti, Partner, Eversheds Sutherland (US) LLP

Stacey Sprinkle, Vice President-Federal Tax Policy, Verizon

This session will explore the breadth and evolving landscape of state taxation regime changes and reforms—whether conducted in response to or regardless of the recently enacted federal and/or international tax changes. Among the various state issues and trends for discussion are rate changes, base broadening, transfer pricing arrangements, intercompany debt versus equity characterization, use and taxation of pass-through entity structures, market-targeted sourcing mechanisms, federal income tax conformity, gross receipts-based taxation, tax haven jurisdiction laws, and expanded “nexus” concepts. The panelists will provide their insight on the interplay of these topics and their potential impact on future-state taxation regimes—as well as on your own business’s state tax posture in years to come.

Pass-through entity structures: State tax issues for today and tomorrow

Paul Buchman, Senior Director, State Taxes, Johnson Controls, Inc.

Maria Eberle, Partner, Baker & McKenzie LLP

Todd Hyman, Partner, Deloitte Tax LLP

Today’s corporate organizational structures frequently comprise of various types of flow-through entities—often in the form of limited partnerships, limited liability companies and joint ventures. Pass-through entity specialists in this session will address some pressing state tax issues facing such structures from a practical standpoint. Among other pass-through-related topics, the session will take a closer look at what you should know—now and for the future—about intercompany transactions, unitary groups, entity-level taxation, factor flow-through, withholding, and the impact of the new federal partnership tax audit rules from a state tax perspective.

Indirect taxes—Hot topics in the digital economy

William Lasher, Senior Director, Indirect Taxes, eBay Inc.

Janette M. Lohman, Partner, Thompson Coburn LLP

James Nason, Partner, Deloitte Tax LLP

This session will provide an update on important issues in state sales, use, and other indirect taxation in our digital economy—including the sharing economy, marketplace/inventory nexus, Internet of things, and cloud computing. The panelists will cover select developments related to economic, affiliate and “click-through” nexus, digitally delivered products and services, bundled transactions, computer software, and Internet sales—with emphasis on issues associated with characterization, sourcing rules, and transactions involving multiple points of use. The session will consider practical approaches for businesses to gather the requisite data and document their transactions for purposes of accurately collecting and reporting the appropriate amounts of taxes in the state and local tax jurisdictions where they do business.

Credits and incentives—Top 10 opportunities and pitfalls

William M. Backstrom, Jr., Practice Group Leader for the Tax, Trusts and Estates Practice Group, Jones Walker LLP

Brian O’Leary, Senior Vice President, Tax Counsel, NBCUniversal Media, LLC

Kevin Potter, Managing Director, Deloitte Tax LLP

State and local tax credits and incentives, such as job creation and investment tax credits, property tax exemptions, and infrastructure improvement grants, may offer many industries and businesses the opportunity to reduce or offset escalating expenses—some which may be more expansive in application than you might first think. This panel of C&I specialists will explore some top credits and incentives opportunities that your business should consider—whether recently enacted or revised, long standing, or possibly forthcoming—including some potential underlying risks and pitfalls that may be averted with proper planning, documentation, execution, and maintenance.

Emerging technologies: Keeping your Tax department current

Andy Gold, Partner, Deloitte Tax LLP

Tyler P. Juckem, Staff VP Taxation, Anthem, Inc.

Mike Sontag, Member, State and Local Tax Group, Bass Berry & Sims

The panelists in this session will discuss what tax executives should know about how emerging technologies are altering the ways companies operate; disrupting standard business models; and creating complexities, demands, and potential opportunities for Tax departments—including innovative ways these technologies are transforming businesses and Tax departments. The panelists will encourage audience participation as they consider “what’s actually working” now as companies advance to automate routine tax functions and manage their data.

Additional information

What The National Multistate Tax Symposium is all about

The 2018 National Multistate Tax Symposium provides a world-class, value-driven educational forum where leading authorities throughout the state tax industry address the latest developments and current issues in areas of state and local taxes. The Symposium offers an extensive curriculum focused on a broad base of issues presented from a practical standpoint. This forum will provide an opportunity for interaction with leading practitioners, peers, and colleagues from across the country.

Who should attend

Multistate tax professionals, including vice presidents of tax, tax directors, state tax directors, state tax managers, and other multistate tax specialists, seeking expert discussion of the latest in state tax technical, legislative, and planning developments.

How to register

Due to limited availability for this conference, we strongly advise you to register early by [clicking here](#). An early bird registration price will be available through the end of 2017 at the cost of \$895. Starting January 8, the cost will increase to \$995. This includes tuition, evening events, and all group meals throughout the conference.

Accommodations

The Symposium will be held at Disney's Grand Floridian Resort & Spa, Orlando, Florida. A limited number of rooms are reserved for participants at the rate of \$285, plus applicable tax. Please do not contact the hotel directly. You will have an opportunity to select your desired hotel reservations when you register, including additional days before and after the conference.

Benefits available to registrants

Disney's Grand Floridian Resort & Spa is offering the special rate of \$285 for three days prior to and three days following The National Multistate Tax Symposium (based on hotel space and special rate availability). Special theme park tickets are available to The Symposium attendees, their guests, and family members. You can save time and money with an advance purchase discount. Links to more information on these benefits are available on our registration site.

The 2018 National Multistate Tax Symposium Advisory Board

Chairs—Valerie Dickerson, Deloitte Tax LLP, **William D. Townsend**, Dean, Mead & Dunbar

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Kevin Herzberg, Grant Thornton LLP
Mark E. Holcomb, Dean, Mead & Dunbar
Mitchell I. Horowitz, Buchanan Ingersoll & Rooney PC
Tyler Juckem, Anthem, Inc.
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William Lasher, eBay Inc.

Emeritus Board members

Jim Buresh, Retired Partner, Deloitte Tax LLP

Symposium site

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Transportation

Disney's Grand Floridian Resort & Spa is approximately 45 minutes from Orlando International Airport. The cost of a taxi is approximately \$75. Private car service to and from Orlando International Airport can be arranged by calling Mears Transportation at +1 407 423 5566. The cost is \$104 from the airport and \$89 from the hotel. Disney's Magical Express service, which provides complimentary transportation from Orlando International Airport and delivery of your bags to your room, is available to you as well. You can make a booking as soon as your flights are purchased by calling +1 407 827 6777.

Attire

Business casual attire is appropriate for daytime sessions. Casual attire is encouraged for Wednesday's welcome reception and Thursday's dinner event. A sweater or jacket may be appropriate for evening events.

Evening events— Guest attendance

Wednesday's welcome reception is a networking event geared toward adults with appetizers and drinks. Thursday's family friendly event will have dinner, drinks, several activities, and special guests for you and your children to enjoy!

Continuing education

Up to 18 CPE Credits, Accounting, Taxes, and Specialized Knowledge and Applications (under consideration). Credit amount may be dependent on session selection. [Click here for more information](#). Florida Bar members who attend this program will receive 21.5 hours of general CLE credits and 1 hour of ethics. This program also qualifies for 21.5 certification credits in state and federal government and administrative practice and 21.5 certification credits in tax law.

Cancellation

Refunds will be issued for cancellations received prior to January 5, 2018.

For more information:

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