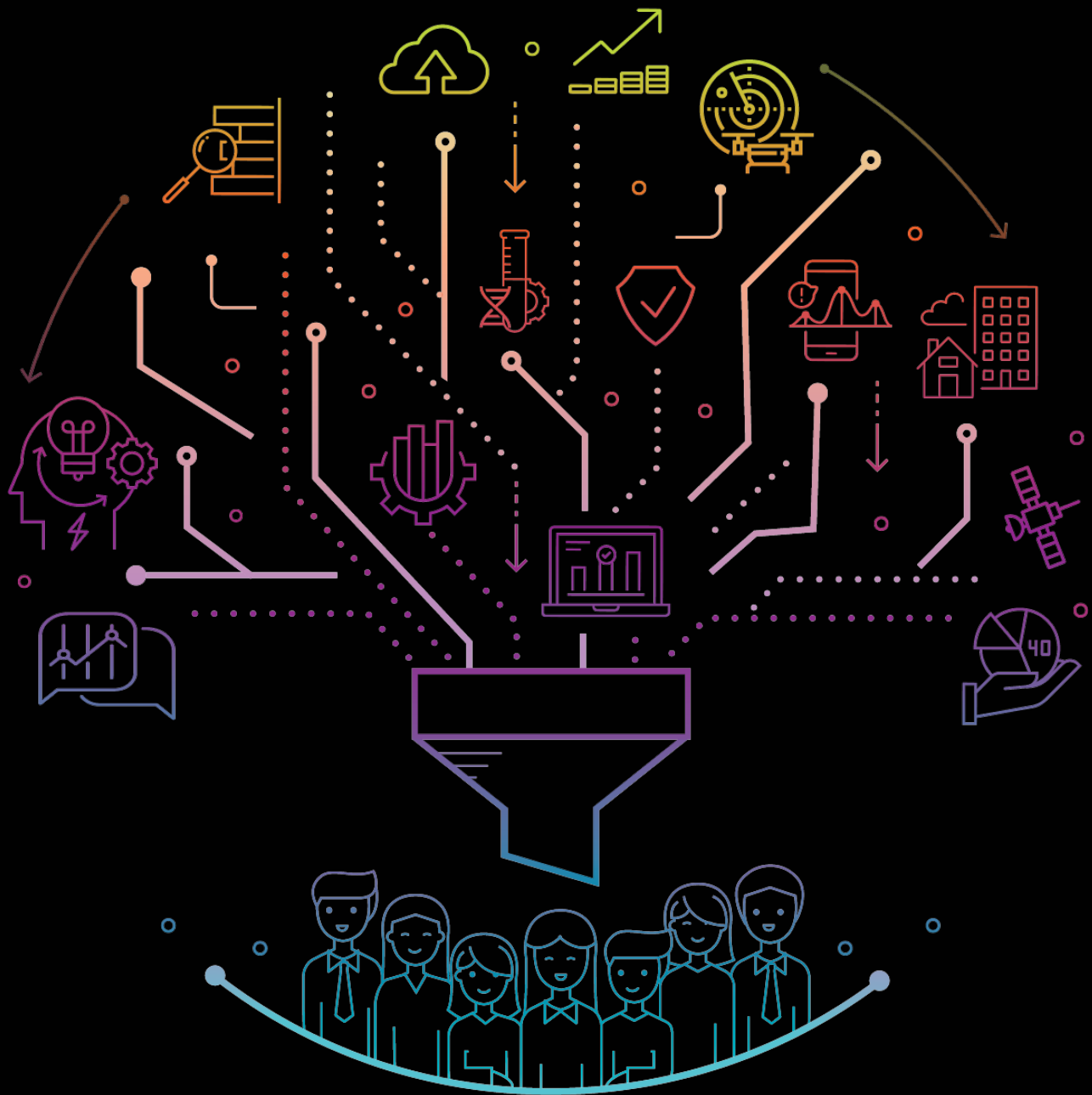


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Deloitte's 2020 National Multistate Tax Symposium West

Mastering the art (and articulation)
of state tax: distilling the complex

May 6-8, 2020

Monarch Beach Resort
Dana Point, CA

[Click here to
register online](#)

Deloitte's 2020 National Multistate Tax Symposium West

BONUS SESSIONS: WEDNESDAY, MAY 6

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

The endless effort to accurately account for state tax law developments that may impact a business's overall tax rate and financial statements continues to challenge many tax department professionals—both from ASC 740 and ASC 450 perspectives. Panelists in this session will consider resulting implications for current state income tax expense, state deferred income tax, and uncertain tax positions. They will address risk considerations for new and existing issues, such as state applications of the federal Tax Cuts and Jobs Act (TCJA) and nexus post-*Wayfair*; identify and measure deferred taxes; and assess the need for valuation allowances. From an indirect tax perspective, the panel will cover post-*Wayfair* complexities in calculating and documenting loss contingency accruals.

3:30–5:00 p.m. Western state roundup

Join us for some important updates from our state tax technical specialists representing Alaska, Arizona, California, Colorado, Idaho, Montana, Nevada, New Mexico, Oregon, Utah, and Washington.

6:00–8:00 p.m. Welcome reception

Join Deloitte's National Multistate Tax Symposium West speakers, attendees, and guests for appetizers and cocktails. Network with fellow tax executives and prepare to enjoy the next two days.

DAY ONE: Thursday, May 7

7:00–8:30 a.m. Breakfast

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

8:45–9:45 a.m. Trends in the corporate tax department function: Looking ahead

Industry executives with varying roles and vantage points (both tax and nontax) will share their thoughts on how to cultivate a company's tax talent and capabilities. They'll also discuss new technologies and how corporate tax departments may deliver greater financial and strategic value to their organization's business partners. The panelists will consider tax compliance, planning, and controversy aspects—including how legacy tools may no longer be responsive in our new age of multistate taxation—and how the need to innovate and embrace state-of-the-art solutions may provide keys to success in 2020 and beyond. The panelists will also comment on how they believe corporate tax department professionals may successfully capture the attention of, and tailor tax-related opportunities and concerns to, their C-suite executives and boards.

9:45–10:45 a.m. Credits and incentives: Important matters for all of us

Tax credits and discretionary incentives (C&I) and state economic development programs in general may be the focus of only a few within a company, but savvy multistate tax executives appreciate how C&I may impact the entire business, affording them the chance to advocate for state tax within the organization, bring greater value, and lower risk. When C&I prospects and matters are communicated to corporate governance and nontax leaders—including information gleaned from real estate, government affairs, and relocation/expansion departments—businesses can make more informed strategic spending and investment decisions. Listen in as C&I specialists share practical tips on how you can learn more about the inner workings and envisioned business plans of your company and effectively communicate how related C&I opportunities (or downsides) may be enhanced (or averted) with proper planning, documentation, execution, and maintenance.

11:00 a.m. – 12:00 p.m. First "Mastering the art (and articulation) of state tax: Distilling the complex" breakout session

(Breakout descriptions are on page 3)

12:00–1:30 p.m. Lunch and luncheon address: A View from Washington: A Political and Policy Update

Shahira Knight, Deputy Managing Principal, Policy & Government Relations, Deloitte LLP

The presidential election is creating considerable uncertainty for some businesses wondering what it will mean for them. In this session, we will provide an update on the state of the Democratic primary, the congressional and presidential elections, and what it means for policymaking in 2020 and beyond.

1:45–2:45 p.m. Second "Mastering the art (and articulation) of state tax: Distilling the complex" breakout session

3:00–4:00 p.m. Third "Mastering the art (and articulation) of state tax: Distilling the complex" breakout session

(Breakout descriptions are on page 3)

4:15–5:15 p.m.

Mastering the art (and articulation) of state tax: Distilling the complex

Addressing select multistate tax compliance, planning, and controversy issues in our post-tax reform, post-*Wayfair* age of multistate taxation, a panel of state tax industry executives and consultants will consider how today's state tax professionals not only must master the underlying principles of state taxation but must also learn to distill and articulate the nuances of these principles—including new opportunities and areas of concern—to the nontax business leaders in their organizations. They will consider how an organization's state tax team may deliver greater value to their business partners by “simplifying the complex” for greater impact in the C-suite while aligning with the business's priorities. Additionally, with these and other ever-increasing expectations for tax executives to do more with less, hear their insights and predictions for what's to come in tax transformation.

6:30 p.m.

Dinner event

Join us for a relaxed dinner with your fellow conference colleagues and guests.

DAY TWO: Friday, May 8

7:00–8:00 a.m.

Breakfast

Join your industry peers for informal networking time over breakfast before starting your day. Tables will be labeled for the industries that are represented by the attendees this year. Come meet your peers and join the conversation.

8:00–9:00 a.m.

General breakout session 1

(Breakout descriptions are on page 4)

9:15–10:15 a.m.

State tax policy: Recent developments in Multistate taxation

States are striving to promote greater economic growth within their respective jurisdictions while simultaneously trying to balance the realities of budgetary constraints. Listen in as multistate tax specialists discuss the latest in state tax policy—including some recent state tax legislative trends, proposals, administrative changes, and controversies—and how these state actions and reactions may impact your business, today and in the coming years. Listen to the panel's thoughts on how potential revenue windfalls may affect policy priorities. Additionally, hear them explore avenues for engaging with state and local taxing authorities on how to deal with emerging issues and “gray” areas.

10:30–11:30 a.m.

State officials panel – States' perspectives on distilling the complex

Moderated by a former state tax administrator, this panel of state tax agency officials will share their goals, viewpoints, and concerns in our post-tax reform, post-*Wayfair* age of multistate taxation and how they believe their respective governments and taxpayers are coping in today's transformed environment. These state officials will address tax administration compliance, guidance, systems issues, and their overall policy perspectives, as well as select issues and trends facing the states and business organizations today, including some of their own thoughts on what they believe a company's C-suite should know.

11:30 a.m.–1:00 p.m.

Lunch and luncheon address – Tax policy in a divided Congress

Jonathan Traub, Principal, Deloitte Tax LLP

With the TCJA now more than two years old, Congress has settled back into a more familiar routine on tax policy. In this session, we will explore what the 116th Congress has been doing to the tax code and what could still be in the offing before the end of the year. We will also take a deeper dive into some of the tax policy ideas being talked about on the campaign trail and how those ideas could impact traditional tax policy and replace it with bold new approaches.

1:15–2:15 p.m.

General breakout session 2

2:30–3:30 p.m.

General breakout session 3

(Breakout descriptions are on page 4; choose 3)

“Mastering the art (and articulation) of state tax: Distilling the complex” breakouts

Tax transformation: The technology path forward for Multistate tax function

With tax reform, the rise of the digital economy, migration to the cloud, re-examination of indirect tax post-*Wayfair*, and the changing global regulatory regime, today's multistate tax environment presents an increasingly complex landscape for tax departments to navigate. This dynamic environment, the exploding volume of data, and increasing pressure for more real-time analysis, analytics, and tax reporting are prompting tax executives to explore ways to transform their tax departments and meet these challenges. In this session, the speakers will address some ways in which tax departments are leveraging emerging technologies to more efficiently bring greater transparency and visualization to vast amounts of data, improve state tax planning, and meet growing intricate state tax compliance requirements—including ways to bring together tax professionals and automation to amplify their collective capabilities and cultivate needed talent and skills for the digital future.

State corporate income tax complexities post-Tax Cuts and Jobs Act

This session will explore some state corporate income tax compliance issues and potential planning considerations in light of select provisions of the federal Tax Cuts and Jobs Act (TCJA) and accompanying administrative guidance, including IRC §163(j) interest expense limitations and debt-related considerations; global intangible low-taxed income (GILTI) and the taxation of foreign source income; and the deduction for foreign-derived intangible income (FDII). The speakers will address underlying factor representation considerations; nuanced state coupling, decoupling, and other tax-base related issues; and state filing groups and other methodologies. Learn how your business may navigate the maze of ongoing and evolving complexities post-TCJA, including tips on distilling and articulating these issues for the nontax business leaders in your organization, as well as how to better support and document your return positions along the way.

State indirect tax complexities post-Wayfair

This panel of indirect tax specialists will explore the varying state and local tax responses to *Wayfair* and touch on related roles of Congress and the Streamlined Sales Tax Governing Board. From a practical standpoint, the panel will discuss how *Wayfair* not only impacts some retailers and e-commerce, but also businesses selling SaaS, cloud, and digital goods/services to end users, including inbound companies with no U.S. permanent establishment that sell into the country. The session will focus on day-to-day considerations for related tax compliance, such as how internal IT systems, business models, and processes may be impacted—as well as emerging issues over required recordkeeping, audit exposure, and liability protections and determining who is the “retailer” and “responsible party” in a transaction. The speakers also will consider how to articulate these issues to the nontax business leaders in your company.

Tax transformation: Remodeling tax departments for the future

With mounting regulatory requirements, talent gaps, and cost concerns, many large corporate tax departments are facing efficiency challenges from their current operating structures. At the same time, companies are looking to tax departments to deliver additional value—and confidence—to the business organization. Learn about how tax leaders are considering new ways to structure their organizations – not only to help get the job done but also to maintain visibility, transparency, and governance globally.

General breakout sessions

Multistate tax controversies: A mixed bag of issues

This session will explore a myriad of “classic” yet ongoing multistate tax issues still being challenged by the states in audits or other administrative forums, including transactions between affiliates through IRC § 482-type state provisions, discretionary adjustment powers in transfer pricing arrangements, states’ use of outside contractors, debt versus equity analysis in recharacterizing hybrid structure intercompany debt, interpretations of statutory related-party expense disallowance provisions, and reporting federal audit adjustments at the state level. The speakers will also look at some newer state tax controversies and issues that may arise in our digital age in light of *Wayfair*, the new federal partnership-level audit regime, and the growing use of cryptocurrency. Learn how your business may cope and prepare to defend state audits or assessments arising from this mixed bag of multistate tax issues.

Property tax update for today’s state tax executives

Much like the federal and state governments within which they operate, local taxing jurisdictions may seek to generate revenue through added or higher taxes while simultaneously trying to attract and maintain certain business investment in their localities through fewer or lower taxes. This session will cover the latest developments on California’s “Split Roll” property tax ballot initiative. The session also will examine taxation at the local level – specifically property taxation – and how businesses must navigate varying trends and procedures with local taxing authorities within the context of neighboring commerce and community debate. They also will cover select controversies, legislation and administrative developments in property taxation, and how they may impact your business.

Indirect tax: Marketplace facilitators – could this be you?

Panelists in this session will discuss the manner and scope of state and local taxing power over out-of-state businesses in our post-*Wayfair* world and what the expanded reach over out-of-state businesses to register and collect indirect/sales/use taxes means for your tax planning and compliance functions. On the buy side, the speakers will consider how businesses now may be more vulnerable to double or multiple taxation on purchased goods and services given the i) new landscape of vendors and marketplace participants that may include remote sellers, marketplace facilitators, and referrers—all with their own sets of rules and responsibilities; and ii) intricacies of tracking tax payments and accruals across multiple supply chains. The speakers will highlight some practical tips and leading practices for your indirect tax compliance systems and processes to mitigate the increased risks.

Living with market-based sourcing – calculating today’s sales factor

Uncertainty and frustration may occur when it comes to applying and implementing the myriad of state corporate income-franchise tax sales factor “market-based sourcing” rules in today’s transformed and digitized business environment. Statutory and administrative guidance, if any, can be lengthy, confusing, and sometimes conflicting, and yet taxpayers must file their state returns and “comply.” This session will take a closer look at some practical real-world market-based sourcing issues and then consider documentary and compliance options for your organization, including what may be a permissible “reasonable approximation,” ways to plan for and manage related audits and disputes, and whether it makes sense to proactively pursue alternative apportionment to reach a workable solution. The session also will touch on how market-based sourcing rules potentially may influence state nexus and tax filing positions overall in our post-*Wayfair* world.

Indirect tax classification challenges – digitizing the archaic

Most state sales and use tax regimes were enacted when sales of goods, rather than services, constituted the vast majority of consumer spending—which prompts the question of how, in our now predominantly service-based digital economy, some states have been translating somewhat “archaic” state sales and use tax provisions that are still on the books. The speakers in this session will consider select instances where state taxing authorities have interpreted existing provisions to expand the tax base, limit exemptions, or put a new type of service or offering into an already enumerated (and possibly wholly unrelated) taxable service. Alternatively, the speakers will consider how taxpayers in today’s digital economy potentially may apply some of these older provisions amidst the chaos of often outdated state sales and use tax provisions.

Multistate tax and Pass-through entity structures

Pass-through entity specialists in this session will closely examine the new federal partnership-level audit regime from a state perspective, including conflicting views on the Multistate Tax Commission’s model statute for reporting federal partnership audit adjustments at the state level, as well as surveying how some states have chosen to implement pass-through entity-level audits at the state level since enactment of the federal 2015 Bipartisan Budget Act. Addressing both tax compliance and controversy aspects and providing practical tips along the way, the speakers also will cover other trending multistate tax issues facing businesses with flow-through entity structures, including some complex state tax considerations brought about by the TCJA.

Mergers, acquisitions, & restructurings in a post – tax reform world

Out with the old; in with the new—especially in our post-TCJA world. This new era of multistate taxation brings chances and challenges to address state tax issues and execute state tax planning arising from mergers, acquisitions, and reorganizations. The speakers in this session will examine state income tax implications and considerations of corporate transactions within the context of various federal tax authorities, including distributions, contributions, liquidations, and tax-free reorganizations. They will also review and consider i) differences between the federal tax treatment of transactions under the consolidated return rules, state combined return treatment under specific state regimes, and separate state return treatment; ii) the due diligence process, such as successor liability, indemnifications, and other possible risks brought about by *Wayfair* and the TCJA; and iii) post-restructuring integration prospects to achieve tax efficiencies.

Additional information

What the Deloitte National Multistate Tax Symposium West is all about

Deloitte's 2020 National Multistate Tax Symposium West 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. This event is open to in-house tax professionals only.

How to register

Due to limited availability for this conference, we strongly advise you to register early by visiting our [registration site](#). Early bird registration is available at the cost of \$895. Starting April 16, 2020, the cost will increase to \$995. This includes tuition, evening events, and all group meals throughout the conference.

Location and accommodation

Deloitte's 2020 National Symposium West will be held at the Monarch Beach Resort, Dana Point in California. A limited number of rooms are reserved for participants at the rate of \$335, plus a discounted resort fee of \$20, and a room tax of 10.22% and occupancy tax of 10.22%. Please **do not** contact the hotel directly. Shoulder dates are subject to availability and may be at a higher rate.

Deloitte's 2020 National Multistate Tax Symposium West

Monarch Beach Resort, One Monarch Beach Resort, Dana Point, CA 92629 USA, +1 949 234 3900

www.deloitte.com/us/multistate-tax-symposium-west

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.

Continuing education

Up to 18 CPE credits based on breakout selection in the subject areas of taxes, accounting, and specialized knowledge. Credit amount may be dependent on session selection. Visit our [CPE landing page](#) for more information.

Cancellation

Refunds issued for cancellations received prior to April 22, 2020.

Additional benefits available to registrants:

- Valet Parking—Discounted valet parking, \$30 a day.
- Spa Services—10% discount on all available spa services, at the Miraval Life in Balance Spa. Book here: <http://www.monarchbeachresort.com/miraval-spa-dana-point/>
- Golf—For individual or group rates (for 12 or more) contact <https://www.monarchbeachgolf.com/BOOK-TEE-TIMES/>

Airport

The Monarch Beach resort is approximately 25 miles from John Wayne-Orange County Airport (SNA), 41 miles from Long Beach Airport (LGB), and 60 miles from Los Angeles International Airport (LAX).

Evening events – guest attendance

One adult guest per paid attendee is welcome to attend Wednesday's welcome reception on May 6th and Thursday's dinner on May 7th. Guests must be registered in advance of the Symposium for these events.

For more information:

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