

2014 NATIONAL SALT SUMMIT

Thursday, November 6, 2014

1001 Pennsylvania Ave. NW

Washington, D.C. 20004

AGENDA

- 8:00 am **Registration and Continental Breakfast**
- 8:30 am **Welcome and Introductory Remarks**
 Walt Nagel, Partner, Crowell & Moring LLP; Washington, D.C.
- 8:45 am **Beyond Ad Valorem** — Explore current developments in the property tax space, and examine cutting edge strategies for reducing your property taxes with our expert panel. (45 Min.)
 Walt Nagel, Partner, Crowell & Moring LLP; Washington, D.C.
 Tab Weaver, Managing Director – Tax, Duff & Phelps, LLC; Austin, TX
 Gerry Amoroso, Jr., Manager – Property Tax, General Electric Co.; Atlanta, GA
- 9:30 am **New Perspectives on Apportionment** — Examine hot topics such as recent changes to Article IV of the Multistate Tax Compact, special issues with alternative apportionment, and constitution-based apportionment challenges. (45 Min.)
 Don Griswold, Partner, Crowell & Moring LLP; Washington, D.C.
 Dan Carey, Vice President – State and Local Taxes, Time Inc.; New York, NY
 Kevin Hennessy, Sr. Director – Corporate Taxes, Alarm.com
- 10:15 am **Networking Break**
- 10:30 am **Fresh & Clean: Maximizing Benefits from Pollution Control Property** — There are numerous sales tax and property tax benefits available for Pollution Control (PC) Property within the Energy, Oil & Gas, and Manufacturing industries. You may be surprised what qualifies as pollution control property. (30 Min.)
 Kathy Tronsberg Macciocca, Director – Tax, Duff & Phelps, LLC; Philadelphia, PA
 Jeremy Abrams, Counsel, Crowell & Moring LLP; Washington, D.C.
- 11:00 am **Evolving Audit Issues in Transfer Pricing** — Many states conduct transfer pricing audits to attack intercompany transactions. The standards and methodologies to be applied in a state transfer pricing audit are ambiguous at best and nonexistent at worst. Is federal case law our only guide to this area? (45 Min.)
 Don Griswold, Partner, Crowell & Moring LLP; Washington, D.C.
 Doug Richards, Senior V.P. – Tax, Level 3 Communications; Broomfield, CO
 Gregory Matson, Deputy Exec. Dir., Multistate Tax Commission; Washington, DC

- 11:45 am **Don't Crash & Burn: Dealing with Aircraft Transactions** — Complying with FAA and tax requirements presents unique challenges. We'll explore common issues related to corporate aircraft including acquisitions and trade-ins, repairs, leases, charters and personal use, etc. (30 Min.)
Eileen Gleimer, Partner, Crowell & Moring LLP; Washington, D.C.
Jeremy Abrams, Counsel, Crowell & Moring LLP; Washington, D.C.
- 12:15 pm **Lunch and Speaker: Surviving a Corporate Take-Over**
Tracy Turner, V.P. – Corporate Tax, Smithfield Foods, Inc.; Smithfield, VA
- 1:45 pm **Finding Incentives** — States are in a constant battle with each other for your business. In order to win that battle, state and local governments offer myriad economic incentives. In this session we will explore ways to increase your EBITDA and fund your expansion plans through tax incentives. Using a case study, we'll analyze the available incentives, the business strategy that drives those incentives, and ways to maximize those incentives to help your company's bottom line. (30 Min.)
Gregory Burkart, Managing Director – Tax, Duff & Phelps, LLC; Detroit, MI
- 2:15 pm **Something You Never Considered** — We'll identify unique opportunities, many of which may be worth millions of dollars to your company. (15 Min.)
Dan Sasse, Partner, Crowell & Moring LLP; Irvine, CA
- 2:30 pm **Uncanny Unclaimed Property Issues** — We'll examine the aggressive audit techniques used by bounty hunter auditors and the challenges they pose for corporate America, and explore how whistle blower actions have altered the risk profile for companies. (45 Min.)
Walt Nagel, Partner, Crowell & Moring LLP; Washington, D.C.
Bob Peters, Managing Director – Tax, Duff & Phelps, LLC; Chicago, IL
- 3:15 pm **Networking Break**
- 3:30 pm **Avoiding Tax Appeal Blunders** — An experienced tax litigator will recount "favorite" courtroom blunders he's witnessed. (30 Min.)
Robert Willmore, Partner, Crowell & Moring LLP; Washington, D.C.
- 4:00 pm **State Tax Crystal Ball** — This panel will explore the biggest challenges ahead for taxpayers and administrators and predict what lies ahead. (45 Min.)
Don Griswold, Partner, Crowell & Moring LLP; Washington, D.C.
Shirley Sicilian, Mng. Dir. – Nat'l SALT Controversy, KPMG LLP; Washington, D.C.
Walt Nagel, Partner, Crowell & Moring LLP; Washington, D.C. (moderator)
- 4:45 pm **Closing Remarks**
Don Griswold, Partner, Crowell & Moring LLP; Washington, D.C.
- 5:00 pm **Cocktails on Pennsylvania Avenue**
- 6:30 pm **Dinner at Fiola (2014 Fine Dining Restaurant of the Year)**