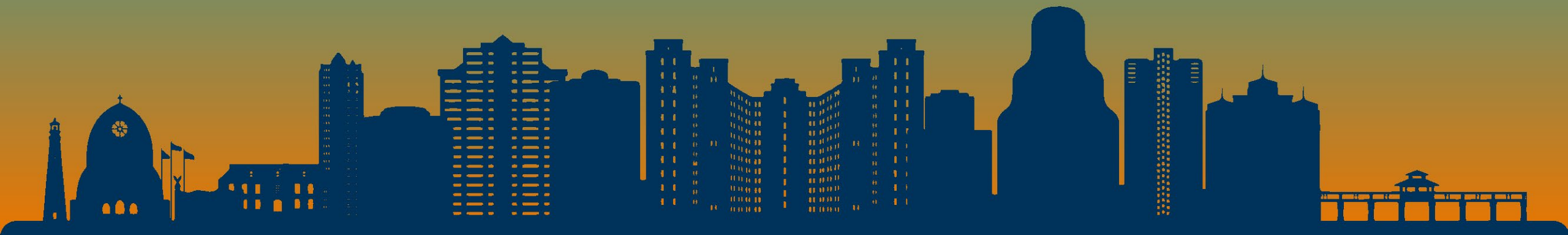


JOHN BONK & BRIAN SENGSON



State and Local Tax

LEA GLOBAL NORTH AMERICAN REGIONAL CONFERENCE



SALT Collaboration Group

- What is going well
 - Fly-ins
 - Steering Committee
- What is not going well
 - LEA Conference Participation
 - Overall Engagement
- Where we need help
 - Every firm should have a person at SALT collaboration group
 - Firms with established groups
 - Firms without groups
 - Firms looking to create a group

General SALT

- **Nexus Studies**
- **Income/Franchise Tax Opportunities**
- **State Tax Reviews & Legal Entity Optimization Strategies**
- **Controversy & Consulting**
- **Sales/Use (Indirect) Tax Opportunities**
- **Reverse Audits & Accrual Services**
- **Local Tax Issues**
- **Credits and Incentives**
- **Unclaimed Property**

General SALT

- **Nexus Studies**
 - Often overlapping considerations
 - Gross receipts taxes often overlooked
- Income/Franchise Tax Opportunities
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General SALT

- Nexus Studies
- **Income/Franchise Tax Opportunities**
 - Tennessee Franchise Tax: Limited amended return opportunity
 - P.L. 86-272 (state adoption of revised regulations)
 - States adjusting application of COP rules for service revenue sourcing (e.g., TX and FL)
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- **Sales/Use (Indirect) Tax Opportunities**
 - Due diligence, acquisitions, never addressed
 - Voluntary disclosures, prospective filings
 - Ongoing compliance, manual, Avalara, other

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- **Reverse Audits & Accrual Services**
 - Offers value-add/possible contingency fee arrangement with material savings

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