MULTISTATE TAX COMMISSION

AGENDA
MTC SALT TRAINING AND ATTORNEY ROUNDTABLE
SAVANNAH, GEORGIA
NOVEMBER 9, 2026
All Times are Approximate and Listed in Eastern Time

8:30-8:55	**Introductions**
8:55-9:55	**Attorney Roundtable** MTC roundtable discussions provide a forum for public sector tax attorneys to share ideas and seek guidance from colleagues in other states. We request attendees to submit by COB Wednesday, Nov. 4 a brief description of any issues or challenges that may benefit from a group discussion. The objective is to generate a group discussion on those issues or challenges, and discuss possible resolutions or share how those issues or challenges were resolved. We also invite attendees to offer extemporaneous state updates. Please send your discussion ideas to ray.langenberg@cpa.texas.gov. The roundtable is not eligible for CLE credit.
10:00-10:30 **(BREAK 10:30-10:45)** **10:45 - 11:45**	**2026 State Tax: The Highlights Reel (1.50 HOURS)** Join MTC attorneys Jonathan White and Jenn Stosberg for a review of the significant state tax cases and developments that shaped 2026, as well as a brief discussion of AI and other emerging state tax issues. The presentation will also include an update from Brian Hamer on recent P.L. 86-272 developments. The discussion will conclude with a look ahead at state tax developments for 2027.

11:45-12:15	**Impact of Louisiana Procurement Companies on Your State's Sales Tax (.50 HOURS)** MTC Litigation Committee chair Ray Langenberg will discuss the use of Louisiana purchasing companies to claim use tax credits in other states for Louisiana sales tax paid.
12:15-1:45	**Lunch**
1:45-2:30	**Download from a SALT Leader (.75 HOURS)** Chief Georgia Tax Court Judge Frank O'Connell, who previously served as Georgia State Revenue Commissioner and DOR General Counsel, will discuss how attorneys can most effectively present a case and potential pitfalls they should watch out for, and also describe lessons learned over the course of decades doing tax administration
2:30-3:30	**Recent Federal Transfer Price and Other Developments That Will Affect States (1.0 HOUR)** Tax Notes contributing editor Ryan Finley will address noteworthy federal transfer price developments impacting states, his observations on whether the IRS will step away from making transfer price adjustments in the wake of NCTI, the evolving impact of the Supreme Court's *Loper Bright* decision on tax cases, and other federal tax developments that states should be aware of. MTC Audit Director Holly Coon and Tax Specialist David Merrien will join him to discuss recent transfer tax developments.
3:30-3:45	**Break**
3:45-5:30	**Anatomy of a Corporate Tax Audit (1.75 HOURS)** MTC attorneys Lila Disque and Bruce Fort will review key aspects of corporate income tax law and MTC audit supervisors Jeff Silver and Larry Shinder will describe core audit procedures that revenue agency attorneys and auditors should understand. This session will be of

	value to attorneys, auditors, and tax administrators at every level of experience.