



To: Commission  
From: Keith J. Richardson  
Date: April 23, 2026  
Subject: 3<sup>rd</sup> Quarter FY 2026 Report of the Executive Director

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This report is a summary of the Commission's organizational and staff activities for the first three quarters of fiscal year 2026 (July 1, 2025, to March 31, 2026).

## **I. Programs & Activities**

### **A. Joint Audit Program**

The Joint Audit Program completed four (4) income tax audits and parts of three (3) other income tax audits and parts of six (6) sales tax audits during the first three quarters of fiscal year 2026. Currently, there are twelve (12) income tax audits and nineteen (19) sales tax audits in progress.

During the first three quarters, the income tax program proposed net assessments of \$51,367,147 for completed and partially completed income tax audits. Income tax program staff also proposed NOL and tax credit reductions of \$3,796,560. The sales tax program proposed net assessments of \$2,747,963 for partially completed sales tax audits.

The Audit Committee last met on November 19, 2025, in New Orleans, Louisiana, marking its second meeting of fiscal year 2026. The committee's first meeting for the fiscal year was held on July 21, 2025, in Salt Lake City, Utah.

At each meeting, the committee received updates on the status of open audits as well as a SALT case update from MTC legal staff. In addition, members participated in an audit roundtable discussion in New Orleans.

## **B. National Nexus Program**

The National Nexus Program results through the third quarter of FY 2026 (July 1, 2025 – March 31, 2026) are provided in the following table:

	3Q FY 2026	Previous FY (2025) Totals
<b>Collections</b>	<b>\$20,364,461</b>	\$29,083,242
<b>Executed Agreements</b>	<b>268</b>	498
<b>Average Contract Value per State</b>	<b>\$75,987</b>	\$58,400

The above amounts include amounts paid by the taxpayer directly to the states and reported to the Commission.

As of the Third Quarter of FY 2026, Richard Cram participated in the following outreach events:

presentation of CPAacademy Webinar entitled “Nexus Basics and the MTC Multistate Voluntary Disclosure Program,” on September 18, 2025 and rebroadcasted on October 21, 2025;

presentation of CPAacademy Webinar entitled “Mastering Multistate Sales and Use Tax Compliance: Navigating New Collection Law,” on October 9, 2025 and rebroadcasted on December 10, 2025;

update on National Nexus Program provided virtually to AICPA Society SALT TRP Fall Meeting on October 23, 2025;

webinar presentation entitled “Georgia Income Tax Nexus Principles” to Georgia Department of Revenue audit staff on November 4, 2025;

presentation entitled “Current Trends in State Income and Sales Tax” to Connecticut CPA Society in Cromwell, CT on November 13, 2025;

webinar presentation entitled “What’s New at MTC and in SALT” to NYU State Tax Study Group on February 11, 2026;

presentation of CPAacademy Webinar entitled “Nexus Basics and the MTC Multistate Voluntary Disclosure Program,” on March 4, 2026, rebroadcasted on April 14, 2026, and to be rebroadcast on April 29, 2026; and

presentation of CPAacademy Webinar entitled “Achieving Multistate Tax Compliance, Sales Tax, Nexus Laws and Best Practices,” on March 18, 2026, and to be rebroadcast on April 28, 2026.

## C. Legal Staff

In addition to the activities described below, lawyers on the legal staff —

- Staff the Uniformity and Litigation Committees;
- File amicus briefs on behalf of the Commission;
- Oversee the MTC Alternative Dispute Resolution Program established and governed by Bylaw 14;
- Speak at conferences and seminars; and
- Oversee the annual Paull Mines Award, which the Litigation Committee established to recognize contributions to state tax jurisprudence by public-sector attorneys.

### Uniformity Work

The Uniformity Committee submits a separate report to the Executive Committee detailing the status of projects undertaken by that committee. The uniformity counsel and other lawyers on the legal staff support the committee, standing subcommittee, and uniformity work groups in a variety of ways, including providing counsel, performing research, drafting reports and other documents related to the uniformity process, and making and organizing presentations and training, as directed.

### Litigation Committee Support

To ensure that interested state attorneys are aware of Litigation Committee programs and other MTC programs that may be of interest to them, and to identify attorneys that may be a resource to attorneys in other states, lawyers on the legal staff maintain the Litigation Committee attorney roster, which includes more than 400 attorneys across all states, plus the District of Columbia and one U.S. territory. Lawyers on the legal staff also work with Litigation Committee leadership to organize attorney training programs in conjunction with the MTC's spring and fall in-person meetings and organize virtual training and information sharing opportunities throughout the year.

### Training

The legal staff provides a combination of in-person and online training programs for state attorneys and other state tax personnel. After a multi-year effort, the Commission has an established CLE policy and dedicated webpage that helps attorneys claim CLE credits in many states.

MTC Counsel Jonathan White hosted a series of webinars on August 22, August 29, and September 5 titled "Navigating ITFA," where he introduced an annotated version of the statute and discussed the substantive provisions of ITFA in detail. The sessions are now available for viewing on the MTC's learning management system at <https://learning.mtc.gov/>.

MTC Senior Counsel Bruce Fort hosted an online "MTC Tax Talk" training on November 5, 2025, entitled: "How to Prepare for (and Win) an Alternative Apportionment Case." Approximately 185 state government employees listened in on the presentation. The session is available on the MTC's learning management system at <https://learning.mtc.gov/>.

A NASBA-compliant ethics course was made available on the learning management system in December of 2025. It is still available free of charge for anyone seeking a self-study ethics credit.

Helen Hecht, Bruce Fort, Chris Barber, and David Merrien made use of the MTC's brand-new training facility to record a Tax Talk: *Changes in Federal Taxation of Multinational Corporate Groups*, which accompanies the [briefing book](#) they recently released. The session is available on the MTC's learning management system at <https://learning.mtc.gov/>.

Helen Hecht and David Merrien conducted a partnership tax training for the New Mexico Taxation and Revenue Department in the first week of April 2026.

### Litigation Support and Legal Advice

The legal staff regularly consults with state attorneys and other state representatives, by request, on litigation matters, including strategy, issues, arguments, and by serving as expert witnesses. Lawyers on the legal staff also work on legislative and policy issues on request, including review of draft legislation, assistance to implement MTC model laws and other guidance, and providing testimony on SALT issues.

During the reporting period, legal staff provided litigation support and legal advice to the following states:

- Alabama
- Alaska
- Arkansas
- California
- District of Columbia
- Florida
- Hawaii
- Idaho
- Massachusetts
- Maryland
- Montana
- Oregon
- Pennsylvania
- Rhode Island
- Utah
- Vermont

### Support for the Commission's Programs and Projects

Legal staff support the Commission's Multistate Joint Audit and National Nexus Programs, and other Commission programs and projects, as requested. For example, at each in-person Audit Committee meeting MTC counsel provides a court case update. MTC legal staff also provides support for the Commission's general administration by addressing open meetings issues; maintaining confidentiality policies; handling records requests; researching and making recommendations for record retention policies; reviewing and drafting contracts; and filing corporate registrations and reports.

### Amicus Briefs Filed on Behalf of the Commission

*Cruise Lines International Association, Inc. and United States of America v. Sukanuma*, Case No. 25-8058. This case concerns whether federal courts may assert jurisdiction over a state tax matter where the claim by the taxpayer is barred under the federal Tax Injunction Act, but the federal government has intervened in the case. The MTC filed a

brief supporting Hawaii and emphasizing the need for state tax matters to be resolved in state courts.

### Legislative Tracking and Newsletter

Legal staff track state and federal bills that address primarily income, franchise, and sales and use taxes and that relate to the Multistate Tax Compact or core MTC programs and uniformity initiatives and issues periodic newsletters. Any public sector tax administrator or attorney may sign up to become a subscriber by emailing [bhamer@mtc.gov](mailto:bhamer@mtc.gov) or [jwhite@mtc.gov](mailto:jwhite@mtc.gov).

### Advisory Boards & Publications

Uniformity Counsel Helen Hecht is a member of the State Tax Notes Advisory Board and submits periodic “board briefs” on various topics. She also serves, along with Director of Operations Chris Barber, on Bloomberg Tax’s State Tax Advisory Board, which helps that platform expand and improve its state tax content and analysis. Chris also serves on the Bloomberg Pass-Through Entity Navigator working group.

## **D. Training and Events**

Training is an important focus for many of the Commission’s staff, across program and staffing areas. Staff are continuing to develop content for the new virtual learning platform (LMS).

In addition to the LMS and course development, the training and event staff have been setting up virtual event and meeting registrations, performing back-end support, and providing real-time support to various online and in-person events and meetings.

## **II. Staffing & Administration**

Auditor Ali Pazand left the Commission’s staff in October.

Executive Director Greg Matson left the Commission’s staff in February.

Keith Richardson, formerly of the Washington, DC Office of Tax and Revenue, joined the Commission as Executive Director in March.

Lila Disque, who had been Commission Counsel and has been an integral part of the staff since 2012, was named Acting General Counsel.

Chris Barber was named Director of Operations in February.

## **III. Outside Presentations & Events**

The following are the programs, conferences, and other events of *outside* organizations at which members of the staff represented the Commission:

### JULY 2025

- Moss Adams, Tax Services Group Conference, *on everything*, Bellevue, WA

(White).

AUGUST 2025

- 2025 NESTOA (Northeastern States) Annual Meeting, *The Impact of OBBBA on State and Local Taxes* (Disque, panelist), Philadelphia, Pennsylvania.
- 2025 NESTOA (Northeastern States) Annual Meeting, *Current Issues: P.L. 86-272 and Economic Presence* (Hamer, panelist), Philadelphia, Pennsylvania.
- NCSL Legislative Summit, (Hamer, attendee) Boston, Massachusetts

SEPTEMBER 2025

- Kansas Bar Association Lawlawpalooza 2025, *PL 119-21—A State Perspective* (Disque), virtual session
- 2025 MSATA (Midwestern States) Annual Meeting, *The Impact of OBBBA on State and Local Taxes* (Barber, panelist), Oklahoma City, Oklahoma.
- Taxpayers Federation of Illinois State & Local Tax Conference; *Agreement & Disagreement* (Hamer, presenter); Rolling Meadows, Illinois
- FTA Revenue Forecasting and Research Conference: State Taxation of Partnerships – Context for Revenue Forecasting (Hecht & Merrien presenters); The Evolution of the Federal International Tax System under Subchapter N (Hecht & Merrien presenters); Oklahoma City, Oklahoma

OCTOBER 2025

- Paul J. Hartman State and Local Tax Forum; *Top Ten Income Tax Cases to Watch* (Fort, presenter), *A Seat at the Government Roundtable* (Matson, moderator), *SALT Developments Impacting Multistate Pass-Through Entities* (Stosberg, presenter); Nashville, Tennessee
- The FTA Western States Association of Tax Administrators; *The Impact of OBBBA on State and Local Taxes* (Hecht, presenter); Albuquerque, New Mexico

DECEMBER 2025

- 2025 FTA Compliance Conference, *Not So Big and Beautiful Activities in the Federal Government* (Disque); *Legal Update – Commissioner's Summit* (Disque, presenter); Jacksonville, FL
- NYU 44<sup>th</sup> Institute on State and Local Taxation, *Recent Developments in the State Taxation of Passthrough Entities and their Owners* (David Merrien, Panel Participation); New York, NY

JANUARY 2026

- ABA Mid-year Tax Meeting – SALT Committee and SALT Executive Committee (White, attendee); San Diego, CA
- Testimony before the House Ways and Means Committee of the Vermont Legislature regarding proposed corporate tax legislation (Fort), via Zoom

FEBRUARY 2026

- Testimony before the Senate Tax, Tax, Business and Transportation Committee of the New Mexico Legislature on proposed corporate income tax legislation (Fort), Santa Fe, NM

MARCH 2026

- 2026 ABA/IPT Advanced Tax Seminar, *Modern Challenges to P.L. 86-272* (Fort, panelist); New Orleans, LA