SHANNAN GILMARTIN CUDDY, ESQ.

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PROFESSIONAL EXPERIENCE:

MFA – The MFA Companies **Tewksbury, MA**
Lead Partner – State and Local Tax Services *July 2013 – Present*
http://www.mfa-cpa.com/Team/Shannan-Cuddy

- Responsible for leading, managing and growing MFA's SALT practice.
- Works directly with MFA's audit practice to review state tax accrual work papers for reasonableness, including identifying and documenting findings.
- Assists multi-state companies (including corporations and flow-through entities) in understanding their overall state income/non-net income tax posture, utilizing proprietary tools developed by MFA's SALT team.
- Develops practical and phased approaches/deliverables for MFA's sales tax clients that assist client's in understanding their sales tax compliance requirements, the taxability of their products and services, potential exposure and mitigation strategies.
- Assists clients with their state and local tax controversy issues, including working with clients to determine any potential exposure, doing the legwork for the auditors, preparing deliverables that auditors can incorporate into their audit software and representing them in all other controversy matters (*e.g*., penalty abatement requests, client hearings, etc.).
- Works with due diligence teams to identify potential state tax issues that may impact a transaction, both on the sell-side (including pre-sale issue spotting/providing resolution strategies) as well as the buyer/investor-side (including quantifying potential exposure).
- Assists clients in understanding their business and tax considerations related to the initial alignment of their corporate structures, as well as providing business restructuring recommendations as the client matures.
- Develops and provides SALT Boot camp training seminars for clients, law firms, private equity firms, MFA members and other professional organizations.
- Drafts and publishes blogs on various state tax issues.

MFA – Moody, Famiglietti & Andronico LLP **Tewksbury, MA**
Senior Manager – State and Local Tax Practice November 2010 – June 2013

- Established MFA's SALT practice.
- Engaged in state tax planning, audit and controversy consulting, sales and use tax consulting, credit reviews, payroll tax and unemployment tax consulting, return and provision reviews, sales initiatives, etc.
- Performed state tax due diligence reviews, including identifying and quantifying exposure items as well as working with clients to mitigate such exposure.
- Assisted companies to become compliant from an overall state tax perspective, including performing nexus reviews, understanding and documenting the taxability of a client's products/services, determining the method for apportioning the client's sales, quantifying any exposure identified and working with state voluntary disclosure coordinators to mitigate the exposure.

Ernst & Young LLP **Boston, MA**
Senior Manager – State & Local Tax Practice April 2006 – October 2010

- Oversaw state compliance for large corporate client.
- Performed return reviews/assisted in the preparation of state tax provisions.
- Performed state tax due diligence reviews for mergers and acquisitions transactions.
- Assisted clients in the realignment of their organizational structures.
- Performed credits and incentives reviews, including identifying statutory credits as well as negotiated incentives.
- Lead EY's Northeast sales campaign related to Section 48D, Qualifying Therapeutic Discovery Project Credit, including serving as the subject matter expert, as well as selling, managing and billing 50+ projects, with approximately 200+ different applications.
- Prepared client proposals, budgets, and engagement letters and was responsible for client billing.
- Prepared 50 state study identifying the filing requirements for partnerships and their shareholders.

PricewaterhouseCoopers LLP **Boston, MA**
Manager – State & Local Tax Practice December 2004 – March 2006

- Managed 20+ state sales/use and income/franchise tax voluntary disclosure project.
- Managed complex nexus studies, sales factor reviews and documented state tax filing requirements.
- Assisted in the state tax due diligence review of multiple mergers and acquisitions deals.
- Managed and oversaw the implementation of a United States subsidiary by a foreign corporation and documented the state tax implications and compliance requirements associated with the activities conducted by the subsidiary.
- Prepared/reviewed multiple modeling exercises for various client transactions (i.e., restructuring, acquisitions).
- Performed state partnership apportionment study (e.g., separate accounting vs. flow-through treatment).

KPMG LLP **Boston, MA**
Manager – State & Local Tax Practice September 1999 – November 2004

- Assisted clients in the realignment of their organizational structures.
- Assisted multi-state companies with state and local tax controversies and filing preferences/obligations.
- Researched, drafted technical memoranda, and rendered oral advice regarding federal and state tax issues.

EDUCATIONAL BACKGROUND:

- Fordham University School of Law, J.D., 1999
  - Managing Editor and Founding Member, *Fordham Journal of Corporate & Financial Law*
- Fairfield University, B.S., Management, 1995

PROFESSIONAL MEMBERSHIPS:

- Massachusetts Board of Bar Overseers, Member Since 2002
- Massachusetts Society of CPA's, Member: State Taxation Committee Board

ACTIVITIES:

- Field Hockey Director and Head Coach, Lynnfield Youth Field Hockey