

G E O F F R E Y J . C H R I S T I A N

Managing Member – Dow Lohnes Price Tax Consulting Group LLC

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BIOGRAPHY:

Geoff Christian is a Senior Tax Specialist who joined Dow Lohnes Price Tax Consulting Group LLC in 2001, became a Member in 2005 and became Managing Member of the group in 2006. As the Managing Member, Mr. Christian has been instrumental in expanding the firm's media practice and has developed close working relationships with companies in cable, broadcasting, publishing, Internet services, interactive media and entertainment. Under Mr. Christian's leadership, the firm has provided, and continues to provide, significant state tax services and dispute resolution to numerous companies, both public and private, with multiple lines of business in publishing (both subscription and non-subscription newspapers and periodicals), television and radio broadcasting, Internet, cable, sports entertainment, television programming and film production.

Mr. Christian's practice primarily consists of successful resolution of state and local tax examinations throughout the country for multistate Fortune 500 companies for a broad range of issues including unitary/non-unitary, business/nonbusiness, apportionment, intercompany expenses and addbacks, filing positions and constitutional matters. Consulting services include identification of state and local tax opportunities and exposures with resolution through affirmative refund claims, voluntary disclosure filings and prospective operational changes resulting in facts justifying a different tax treatment. Mr. Christian is also involved with Internal Revenue Service controversies, transaction taxes, sales and use taxes, property taxes, tax litigation support and other tax planning matters.

Mr. Christian started his career with KPMG Peat Marwick in Greenville, South Carolina in 1989, last serving as Senior Tax Manager of the Information, Communications, and Entertainment practice in the Georgia/Carolina region with multiple clients in daily and community newspapers, radio and television broadcasting, cable and entertainment production and distribution. In this capacity, Mr. Christian managed all aspects of federal and state compliance and tax planning including such projects as FAS 109 implementation, earnings and profits studies, state amended returns to reflect federal return audit adjustments, determination of basis in the stock of subsidiaries, and services related to mergers and acquisitions for a variety of media clients. Mr. Christian also managed tax services at the firm's regional Manufacturing, Retail and Distribution practice.

In 1999, Mr. Christian became the Tax Director for Advantica Restaurant Group, Inc., the nation's largest operator of family dining restaurants with brands such as Denny's, El Pollo Loco, CoCo's and Carrows and was responsible for federal and state compliance including income, franchise, sales and use, and property taxes for over 2,000 locations with filings in every state.

PROFESSIONAL ACTIVITIES AND MEMBERSHIPS:

Member - Broadband Tax Institute

Member - COST (Council On State Taxation)

Member - American Institute of Certified Public Accountants

Former Adjunct Faculty – Bob Jones University – Taxation I, Taxation II

Tax Committee Member of Media Financial Management

Contributor - Dow Lohnes Price SALT To Taste newsletters

Quoted in 2011 Annual Survey of State Tax Departments by Bureau of National Affairs (BNA)

Co-author, "The Evolution of UDITPA Section 18's Applicability and its Distortion Standard" as published in Corporate Taxation, March/April 2011

"Tax Apportionment Shift Hits Multistate Companies" as interviewed by CFO magazine, March 31, 2011

Co-author, "Alternative Apportionment Methods: Will South Carolina Ruling Have Nationwide Impact?" as published in CCH Journal of State Taxation, Mar./Apr. 2011

Co-author, "A Perspective on Change – Where Does Fair Apportionment Stand?" as published in CCH Journal of State Taxation, Nov/Dec 2010

Co-author, "Fair Tax Relief - State Supreme Court ruling affects multistate businesses" as published in Upstate Tax Trends, Oct. 2010

"Digging Deep - Budget crisis have states scrambling for extra tax revenue" as interviewed by Accounting Today for the WebCPA, Sept. 13, 2010

"South Carolina Supreme Court Media General Decision Alters the Landscape for Combined Reporting by Taxpayers" as interviewed by the Bureau of National Affairs in the Tax Management Multistate Tax Report, Aug. 27, 2010

"Court Rules on Entity Apportionment in Tax Case" as interviewed by Accounting Today for the WebCPA, June 18, 2010

"Landmark Ruling by South Carolina Supreme Court to Impact Taxpayers Nationwide; Ruling Reverses Corporate Tax Reporting Policy – Addresses Need for Fair Tax Relief" discussed in PRWeb press release, June 17, 2010

"Dow Lohnes Price Tax Alert: South Carolina Supreme Court Issues Ruling in Alternative Apportionment Case" discussed in Business Wire press release, June 16, 2010

Author, "Are Your State Audits Ridiculous? It's Time To Push Back!" as published by the Bureau of National Affairs in the Tax Management Weekly State Tax Report, Jan. 2010

Co-author, "Fighting Back Against Addbacks" as published in The Financial Manager, Sept. 2009

Co-author, "Archaeology for Unitary Determinations: Create a Time Capsule Today to Build the Paper Trail That Will Win Tomorrow's Audit" as published by the Bureau of National Affairs in the Tax Management Multistate Tax Report, May 2009

Co-author, "Taxation in Brief," as published in Understanding Broadcast & Cable Finance - A Primer for Nonfinancial Managers, 2008

Speaker – 2011, 2010 & 2009 Media Industry Tax Conference

Speaker – 2011 Dow Lohnes Price Audio Teleconference

Speaker – 2010 COST Southeast Regional State Tax Seminar

Speaker – 2009 COST Spring Audit Session/Income Tax Conference

Speaker – 2009, 2008 & 2005 Broadband Tax Institute Annual Conference

EDUCATION:

B.S., magna cum laude, Bob Jones University, 1989