



ELIZABETH PASCAL

Partner, Accountant Professional Practice Leader

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Liz is a partner in the firm's State & Local Tax Practice and leader of the Accountant Professional Practice. She concentrates her practice on individual and business tax issues with a focus on the state and local tax impacts of complex transactions, whether from an individual or business tax perspective at the planning stage, or in a state tax controversy. Liz assists clients with planning and controversy matters in New York State, New York City, and Connecticut, as well as in multistate matters. She regularly advises clients on state tax allocation and apportionment for individuals and businesses; New York City taxes, including Unincorporated Business Tax, General Corporation tax, and Commercial Rent Tax; Pass-Through Entity Taxes; corporate franchise tax; and residency. She works frequently with clients on state tax controversies involving IRC § 1031 exchanges and other complex tax matters. Liz also assists businesses in managing the state tax implications of remote work, working closely with them to address current and future state tax obligations of a multistate workforce.

Liz has extensive experience with audits and appeals in New York State, New York City and Connecticut. She has also successfully guided hundreds of clients through the voluntary disclosure process.

Liz is a frequent presenter on a wide range of topics including Pass-Through Entity Taxes; Residency; Multi-State Apportionment; and the State Tax Implications of Remote Work. She is a contributor to the American Bar Association's Sales and Use Tax Deskbook; the New York Residency and Allocation Audit Handbook; the New York Bar Association Tax Section reports; and has published articles in State Tax Notes, Bloomberg Tax, TaxStringer, and Journal of Accountancy.

Honors

- Professor Louis DelCotto Award for taxation, University at Buffalo School of Law
- Former articles editor, *Buffalo Law Review*

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140 Pearl Street
Suite 100
Buffalo, NY 14202

New York City
605 Third Avenue
Suite 2300
New York City, NY 10158
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Practices & Industries

Accountant Professional
Sales & Use Tax
State & Local Tax
Tax Residency
Voluntary Disclosure - Multistate Programs

Admissions

Connecticut
New York

Education

Columbia University, B.A., cum laude
University of Michigan, M.A.
University of Michigan, Ph.D.
University at Buffalo School of Law, J.D., magna cum laude

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- Co-author, Bloomberg BNA New York Corporate Income Tax Navigator

Experience

Hodgson Russ assisted a high-net-worth taxpayer with planning associated with New York State's 548-day rule. The planning involved detailed work with our client and his advisors on interpretation and application of New York's residency provisions as well as the obtainment of a favorable advisory opinion on certain points related to the 548-day rule.

Hodgson Russ represented an individual in a New York State tax audit and at a conciliation conference through the New York State Department of Taxation and Finance Bureau of Conciliation and Mediation, resulting in the cancellation of a \$1 million tax assessment based on residency.

Hodgson Russ represents a prominent New York City cultural organization in various tax matters, including sales tax and withholding tax. Our representation of this client has previously resulted in the cancellation of several New York State sales tax assessments.

In the News

NY State And NYC Align Corp. Tax Nexus Provisions
Law 360, August 31, 2022

N.Y. Crypto Owners to Get Tax Guidance on Digital Investments
Bloomberg Tax, July 6, 2022

NY Tax Dept. Probing Taxpayers About Residency, Attys Say
Law 360 Tax Authority, May 6, 2021

Remote Work Boom Complicates State Income Taxes
Stateline, October 2, 2020

Coronavirus Telecommuters Could Face a Tax Nightmare
Fortune, June 27, 2020

Telework Taxation Uncertainties Remain as States Begin to Reopen
Tax Notes, June 1, 2020

Thought Leaders: New York State Tax
Buffalo Business First, October 4, 2019

Three Hodgson Russ Attorneys Admitted to New York State Bar
March 27, 2009

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Press Releases

Hodgson Russ Announces Five Newly Elected Partners, Four Attorneys Promoted to Senior Associate
Press Release, January 10, 2017

Hodgson Russ Announces Five Newly Elected Partners: Four Additional Attorneys Promoted to Senior Associate
Press Release, January 3, 2014

Publications

The New York Pass-Through Entity Tax (PTET): Frequently Asked Questions and Answers
The TaxStringer, November 1, 2023

New Jersey Enacts Major Changes to Corporate and Gross Income Tax
Hodgson Russ LLP State & Local Tax Alert, July 6, 2023

New York State Budget Notes – May 5, 2023
Hodgson Russ State and Local Tax Alert, May 5, 2023

New Jersey Tax Laws: Out with the Old and In with the New Tax Laws in 2023
Hodgson Russ SALT Alert, January 3, 2023

Tax Updates from New York City – September 2022
Hodgson Russ TriState Tax Alert, September 12, 2022

Tax Provisions of Interest in New York's 2022-23 Budget
Hodgson Russ State & Local Tax Alert, April 12, 2022

Tax Updates from New Jersey - March 2022
Hodgson Russ Tristate Tax Alert, March 28, 2022

New Jersey Enacts Amendments to its SALT Cap Workaround
Hodgson Russ New Jersey Tax Alert, January 21, 2022

Tax Updates from Connecticut, New Jersey and New York City - January 2022
Hodgson Russ Tristate Tax Alert, January 18, 2022

Local Sales Taxes on Solar-Generated Electricity
Hodgson Russ SALT and Renewable Energy Alert, November 15, 2021

Presentations & Events

2024 Florida Tax Residency Series
Hodgson Russ LLP, Palm Beach, Boca Raton, Sarasota, Naples, Florida, January 25, 2024 - March 7, 2024

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A Day With Hodgson Russ: Selected NYS and City Tax Topics Workshop Webcast
NYSSCPA, December 11, 2023

A Day with Hodgson Russ: Selected NY State and City Tax Topics Workshop Webcast
NYSSCPA, December 11, 2023

58th Annual Tax Institute
NYS Society of CPAs and Monroe County Bar Association, Oak Hill Country Club, 145 Kilbourn Rd, Rochester, NY
14618, November 17, 2023

2023 Hodgson Russ Fall Tax Series
CCH CPELink, October 25 - November 29, 2023

State Tax 360 Conference
CT CPA, CTCPA Education Center, 716 Brook St. Suite 100, Rocky Hill, CT 06067, November 8, 2023

New York PTET Guidance Update
NYSSCPA, September 8, 2023

Income Tax Apportionment Issues for Multistate Businesses
Lawline, August 24, 2023

Multistate PTETs and Resident Credits
University of Illinois Tax School and CCH/Wolters Kluwer, August 8, 2023

2023 Summer Tax Series
Hodgson Russ LLP, 605 Third Avenue, New York, New York, June 21 - August 2, 2023

Blog Posts

- Important Updates for New York's Pass-Through Entity Tax

Noonan's Notes Blog, October 7, 2021

- New York Issues Guidance on Pass-Through Entity Tax

Noonan's Notes Blog, August 26, 2021

- Corporate Partners: Beware of New York's Changes to its Draft Regulations!

Noonan's Notes Blog, November 21, 2019

- New York City Finally Releases Guidance on Impact of TCJA Business Interest Deduction Limitations on City Business Income Tax Returns

Noonan's Notes Blog, October 15, 2019

- Decoupling for Trusts and Estates and Other Disallowances Included in Last Minute Revisions to Budget Bill

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Noonan's Notes Blog, April 2, 2019

- Mismatch for Decoupling in New York: Trusts and Estates Not Covered!

Noonan's Notes Blog, March 18, 2019

- Regarding Hurricanes Harvey and Irma and their Impact on New York Residency

Noonan's Notes Blog, September 8, 2017

- Give your feedback on draft of new Corporation Franchise Tax Regulations

Noonan's Notes Blog, May 12, 2017

- Corporate Tax Reform FAQs

Noonan's Notes Blog, April 17, 2017

- Attention Hedge Fund Investment Advisors: Connecticut Court Permits Credit for Taxes Paid on Carried Interest

Noonan's Notes Blog, April 7, 2017

Professional Affiliations

- New York State Bar Association

Community & Pro Bono

- Secretary, Just Buffalo Literary Center board of directors