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From: John Mascaro, CPA <john.mascaro@saltmarshcpa.com>
Sent: Wednesday, May 16, 2018 4:56 PM
To: CITReview
Subject: TCJA FL Comments

Corporate Income Tax Review
c/o Director of Legislative and Cabinet Services
Department of Revenue
P.O. Box 5906
Tallahassee, Florida 32314-5906

To Whom It May Concern:

While **not specifically impacted by the Tax Cuts & Jobs Act** we would hope and presume that for purposes of the Florida corporate income tax return F-1120, an Other Subtraction will be permitted for the **federal employment retention wage credit** afforded as result of hurricanes or other storms that impacted Florida taxpayers who closed down their offices due to the storm(s), yet retained Florida workers on their payroll during that time. As you know, for federal purposes, taxpayers generating such employment related federal tax credits must also reduce the federal deduction for wages/salaries for the year generated for federal purposes and thereby increases federal taxable income (the starting point for the Florida F-1120 return) income tax computation. As you are surely also aware, the **federal employment retention credit**, while similar to other federal employment credits, is a new credit and is why we raise the issue.

Not to allow a Florida Other Subtraction for the **federal employment retention credit** would seem contrary to the spirit of the Florida statute and Regulations in this regard which also allows for a Florida Other Subtraction, for example, in the case of Work Opportunity Tax Credits.

Just hoping to point this out unless it has already been addressed.

Best regards and respectfully submitted,

John Mascaro

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