

IPT 34TH ANNUAL CONFERENCE

PRELIMINARY
PROGRAM

JUNE 27-30, 2010
MARRIOTT DESERT RIDGE
PHOENIX, ARIZONA

*MEETING THE RISING
CHALLENGES OF THE FUTURE*

Institute for Professionals in Taxation
Bringing Together Business Tax Professionals



PRELIMINARY PROGRAM ~ JUNE 27-30, 2010
IPT'S 34TH ANNUAL CONFERENCE
MARRIOTT DESERT RIDGE, PHOENIX, ARIZONA

Saturday, June 26, 2010

- 4:00 - 7:00 p.m.
Early Registration

Sunday, June 27, 2010

- 7:30 a.m. - 3:00 p.m.

John P. Myers Memorial Golf Tournament

The tournament will be played at the Marriott Desert Ridge Resort's Golf Course (on-site) and requires a supplemental registration fee.

- 3:00 - 7:00 p.m.
Registration

- 4:00 - 5:00 p.m.
Introduction to CMI

This introduction session will review and explain the professional designation programs offered by the Institute.

- 4:00 - 5:00 p.m.
New Member Welcome

An Introduction to IPT for new members and first-time attendees.

IPT President

Lee A. Zoeller, CMI, Esq.

Partner

Reed Smith LLP

Philadelphia, PA

IPT Membership Promotion & Public Relations

Ginny Buckner Kissling

Principal

Ryan

Dallas, TX

Annual Conference Overall Chair **Wilma L. Murphree, CMI**

Director of Transaction Taxes

Commercial Metals Company

Dallas, TX

- 5:00 - 7:00 p.m.

Opening Reception

Welcome to Phoenix! Reception is included in conference registration fee. Spouses/guests register for this event via supplemental fee. Admittance is by badge/ticket.

Monday, June 28, 2010

- 7:00 a.m. - 4:00 p.m.

Registration Continues

- 7:00 - 8:00 a.m.

Coffee & Pastries

Coffee and pastries are included in conference registration fee. Spouses/guests register for this event via a supplemental fee. Admittance is by badge only.

- 8:00 - 8:45 a.m.

Opening of Conference

Welcome by IPT President

Lee A. Zoeller, CMI, Esq.

Introduction of invited guests.

- 8:45 - 9:45 a.m.

Opening Keynote Session **Economic Outlook**

Session Speaker:

Mark Palim, PhD, CFA

Director of Economics

Fannie Mae

Washington, DC

The session will begin with an overview of the size of different sectors of the economy as well as a discussion of the sources of economic growth in previous cycles. It will continue with an examination of the current state of the economy with a particular focus on the housing market and how the housing market impacts state revenues. Following this, state and local government fiscal trends will be reviewed and consideration will be given to the outlook for the economic factors driv-

ing current deficits. The session will conclude with a question and answer period.

Learning Objectives:

- Describe different sectors of the economy
- Determine sources of economic growth in previous cycles
- Discuss the current state of the economy with a focus on the housing market and how it impacts state revenues
- Generalize state and local government fiscal trends
- Detect economic factors driving current deficits

- 10:00 - 11:00 a.m.

Joint General Session **Overlapping Issues - When** **Income, Sales, and Property** **Tax Issues Intersect**

Session Speakers:

Terry L. Polley, Esq.

Partner

Ajalat, Polley, Ayoob & Matarese

Glendale, CA

Daniel L. Thompson, CMI, CPA

President

Thompson Tax & Associates LLC

Novato, CA

Although many professionals spend most of their time dealing with one type of tax, and many people develop an expertise that runs deep, it is important that professionals know how to identify issues that have broader implications. Knowing how to identify such issues so that the other tax areas can be notified, may save both time and money. This presentation will highlight overlapping issues and implications that various state taxes (income/franchise, sales/use, and property) can have on one another. Specifically, we will cover how the characterization of transactions and property types for one type of tax can produce intended

and unintended consequences for other tax types. Attendees will be presented with suggestions on how to leverage information gathered for various taxes to create a more efficient and integrated overall tax compliance function.

Learning Objectives:

- Discover how an issue can have multiple tax implications
- Demonstrate how to identify such issues
- Investigate how to gather appropriate information in order to address such issues

■ **11:15 a.m. - 12:15 p.m.**

Joint General Session Opportunities for Credits and Incentives in a Down Market

Session Speakers:

Alison Benton

President
Aliquantus Consulting, LLC
Keller, TX

Julia A. Hoffman

Executive Director
Business Incentives & Credits
Ernst & Young LLP
Saint Louis, MO

While record high unemployment and the states' budget deficits are top news stories every day, the competitive landscape for credits and incentives has been rapidly changing. What have some cash-strapped states done to induce investment and retain employment? This multi-tax disciplined session will focus on a handful of proactive states that have taken successful approaches to attracting investment and retaining employment while addressing taxpayers' requirements to hold the line on job growth. In addition, strategies on preserving existing incentives and credits which cannot be utilized in the near future will be presented.

Learning Objectives:

- Discern state governments' objec-

tives and requirements for negotiated incentive packages in the current economic downturn

- Identify current incentive and credit practices among proactive States
- Explore incentive conundrum between capital downsizing and job creation
- Provide outline for successful incentive and credit strategy given economic constraints

■ **12:15 p.m. - 1:30 p.m.**

Lunch in Exhibit Hall

■ **12:15 p.m. - 1:30 p.m.**

Exhibits Open

This is an excellent opportunity to view products — computers, software, system management, publications, data services, valuation aids, and maps — of interest to property, income, and sales tax professionals. Exhibits are limited to product-oriented vendors.

■ **1:30 - 3:00 p.m.**

Income Tax Concurrent Sessions After the Audit and Through the Appeal

(repeated at 3:15 p.m.)

Session Speakers:

Tov B. Haeisen

Senior Tax Manager
GE Corporate Tax
General Electric Company
Stamford, CT

Michael W. McLoughlin, Esq.

Partner
Reed Smith LLP
New York, NY

S. Neal Meadows, CPA

Director - State Taxes
Clear Channel Communications, Inc.
San Antonio, TX

In this session, the speakers will discuss the handling of corporate income tax controversy matters from audit to formal appeal. The speakers will discuss differences between various state audit and appeal procedures, formalizing and filing appeals and moving/resolving the matter through the appeals process.

Learning Objectives:

- Examine the typical stages of a state tax controversy matter from audit to formal appeal
- Detect common differences between state tax audit and appeal procedures
- Explore various strategies to resolve state tax controversies

Current FAS 109 Issues and Just How Do You Prepare a Tax Provision?

Session Speakers:

Audrey M. Cienki

Supervisor – Tax Audits
Comcast Corporation
Philadelphia, PA

David Sekula

Director - Technology Services
The GTM Group
Radnor, PA

This session will give the history of FAS 109 and where it stands today. The speakers will go through the methodology of the preparation of an actual provision. The session is set up to be interactive with the audience for participation.

Learning Objectives:

- Explore the background of FAS 109 and the impact on financial statements
- Examine current issues surrounding FAS 109
- Develop step by step instructions on how to calculate a provision
- Conclude the session with the booking of the FAS 109

■ 1:30 - 3:00 p.m.

Property Tax
Concurrent Sessions

Measuring Economic Obsolescence in an Uneconomical Market. The Willing Buyer: It Takes Two to Have a Party (and Determine Obsolescence)

(repeated at 3:15 p.m.)

Session Speakers:

Todd R. Barron, CMI

President
Barron Corporate Tax Solutions, Ltd.
Wheaton, IL

Pat W. Sloan, CMI, ASA

Senior Manager
Merit Appraisal & Tax Consulting, LP
Gainesville, TX

As the economy has continued to decline during the past several years, the valuation concept of loss in value due to economic considerations has become increasingly significant. However, quantifying and qualifying such a loss in value remains a challenge for the property tax professional, especially in the absence of market transactions. This discussion will focus on measuring external obsolescence under the various considerations of a hypothetical willing buyer. The session will provide an interactive discussion of case studies showing successes achieved through proper analysis of market and taxpayer-specific data.

Learning Objectives:

- Assess the importance of the considerations of the willing buyer
- Determine external obsolescence impacting their property
- Quantify obsolescence adjustments using various techniques
- Develop creative and effective presentations to the assessment community

Assessing Your Property Tax Process – Capitalize on Strengths and Improve on Weaknesses

(repeated at 3:15 p.m.)

Session Speakers:

David H. LeVan, CMI
CEO

Advantax Group, LLC
St. Charles, IL

Esmeralda Lippold
Marketing Manager
Advantax Group, LLC
St. Charles, IL

Participant Panel

When was the last time you assessed your property tax process? How would you rate your team's effectiveness in each step of the property tax cycle? In this interactive session, you will have the opportunity to assess the strengths and weaknesses of your property tax process by answering questions applicable to each step of the property tax cycle. You will be introduced to a self assessment program created to help leaders, like you, understand and benchmark your strengths and weaknesses with other property tax departments. You will walk away with ideas and strategies, ways to capitalize on your strengths and improve on your weaknesses, maximizing your impact on your company's bottom line.

Learning Objectives:

- Participate in a confidential assessment on your property tax process prior to the session
- Compare results in an interactive format with session participants and benchmark with previously surveyed peer groups
- Recognize strengths and weaknesses in your property tax process
- Identify ideas and strategies to capitalize on your strengths and improve on your weaknesses

State by State, Recent Case Law Updates

(repeated at 3:15 p.m.)

Session Speakers:

Richard J. Ayoob, Esq.

Partner
Ajalat, Polley, Ayoob & Matarese
Glendale, CA

June Summers Haas, Esq.

Partner
Honigman Miller Schwartz and
Cohn LLP
Lansing, MI

This session provides an overview of case law decisions and hot topics that are happening throughout the United States.

Learning Objectives:

- Investigate recent case law decisions and determine how they may affect you
- Explore the "Hottest Topics" in the property tax world and discuss them

■ 1:30 - 3:00 p.m.

Sales Tax
Concurrent Sessions
Update on SUT Legislation and Judicial Decisions

Session Speakers:

Janette M. Lohman, CMI, Esq., CPA

Partner
Thompson Coburn LLP
St. Louis, MO

Stacey L. Sprinkle, CPA

VP - State Tax Policy, MW Area
Verizon Wireless
Englewood, CO

This session will provide an overview of significant legislative activity and pertinent court decisions in 2009 - 2010.

Learning Objectives:

- Explain new or pending tax statutes which will affect their business
- Analyze impact of changes on business operations

- Assist internal government affairs personnel to determine the impact of pending legislation and proactively address those issues

Unclaimed Property

Session Speakers:

Noel E. Hall, Jr., CPA

Principal
Ryan
Los Angeles, CA

James G. Ryan, Esq.

Member
Bailey Cavaleri LLC
Columbus, OH

This session will provide an overview of unclaimed property and what it means to businesses. The presenters are experts in the field and will bring with them the knowledge and experience needed to have a meaningful discussion on the issue including the most recent developments.

Learning Objectives:

- Examine the current state of law concerning unclaimed property
- Investigate the current controversies involving unclaimed property
- Weigh the risks of exposure to unclaimed property and what steps could be taken to establish or reduce reserves for that exposure

The Taxation of Digital Goods – Equality or Desperation?

Session Speakers:

Denise V. Corsaro, Esq.

Senior Tax Manager
Turner Broadcasting System, Inc.
Atlanta, GA

Stephen P. Kranz, Esq.

Partner
Sutherland Asbill & Brennan LLP
Washington, DC

In 2007, only one state had passed a tax on downloaded content and services. Since then, eleven states

have adopted new sales taxes covering a broad array of digital content and services. With all but two states in desperate financial shape, it is no surprise that other states are looking to expand their tax bases to electronically-provided content and services. This session will provide some historical background on why states have headed in this direction, as well as the arguments they have used to justify the tax base expansion. Some state representatives argue that fairness to in-state brick and mortar sellers requires that a tax be levied on the sale of items that are functionally equivalent to tangible products sold in those stores. Are states really concerned with equality, or is the search for new revenue driving legislators to attempt to tax services and other intangibles that have historically been exempt from sales tax? This session will also discuss recent and anticipated legislation within various states, as well as potential federal legislation to address the topic.

Learning Objectives:

- Explore the state and federal trends in this area of sales and use taxation from 2007 through 2010
- Examine what the future holds for the taxation of digital goods and services
- Implement the tools to assist his/her company and/or clients in evaluating potential past, current and future liabilities in connection with downloads of digital goods and services

VAT: Emerging Issues and Reforms

Session Speakers:

Thomas A. Boniface

Director, International Value Added Tax Center
KPMG LLP
New York, NY

Harley T. Duncan

Tax Managing Director
KPMG LLP
Washington, DC

Carlos V. Hernandez

Director, National Accounts
DuCharme, McMillen & Associates, Inc.
Billerica, MA

Richard J. Prem, CPA

Vice President - Indirect Taxes & Tax Reporting
Amazon.com
Seattle, WA

A number of countries – including some of our leading trade partners as well as some of the largest emerging markets – are looking to significantly reform their value added tax (VAT) systems. This session is designed to assist U.S. tax professionals in understanding and adapting to the reformed structures. It will include an overview of the general nature of the reforms and an examination of the general factors driving the reform as well as a more in-depth look at developments in Canada where the two largest provinces are harmonizing their consumption taxes to the GST, India where the government has proposed a complete overhaul of the central and state-level consumption taxes and China where the government is also implementing a total retooling of the VAT.

Learning Objectives:

- Determine the factors driving VAT reform around the globe
- Evaluate the specifics of the reforms being considered or implemented in Canada, China and India
- Assess steps to incorporate the changes into VAT compliance process used by his/her company

■ **3:15 - 4:45 p.m.**
**Income Tax
Concurrent Sessions
After the Audit and Through
the Appeal**
(repeated from 1:30 p.m.)

**State Tax Aspects of
Bankruptcy**

Session Speaker:

Laurie Stoeckmann, Esq.
SALT Partner
Ernst & Young LLP
New York, NY

This session will discuss accepted state tax attribute reduction methodology, state tax attribute creation/preservation strategies, and the changes that occur at emergence. Additionally, the speaker will discuss the importance of the need for state tax input with respect to the Company's organization and structure at emergence.

- Examine the accepted state tax attribute reduction methodology and possible positions and views that may be used to preserve state tax attributes
- Explore the state tax law guidance regarding those methodologies and positions
- Observe opportunities to create/preserve state tax attributes at emergence

■ **3:15 - 4:45 p.m.**
**Property Tax
Concurrent Sessions
Measuring Economic Obsolescence in an Uneconomical Market. The Willing Buyer: It Takes Two to Have a Party (and Determine Obsolescence)**
(repeated from 1:30 p.m.)

**Assessing Your Property
Tax Process – Capitalize on
Strengths and Improve on
Weaknesses**
(repeated from 1:30 p.m.)

**State by State, Recent Case
Law Updates**
(repeated from 1:30 p.m.)

■ **3:15 - 4:45 p.m.**
**Sales Tax
Concurrent Sessions
Amnesty & VDA Programs:
Advantages, Pitfalls and
Other Considerations You
Need to be Aware of for Past
and Future Programs**

Session Speakers:

Vito A. Cosmo, Jr., CPA
Director
LECG-SMART
Devon, PA

Frank J. Gallo, CMI, Esq.
Partner
Reed Smith LLP
Philadelphia, PA

This session will provide an overview of recent and upcoming amnesty programs available to taxpayers. The presenters will discuss the advantages and disadvantages of amnesty programs compared to voluntary disclosure programs; discuss little-known traps and overlooked benefits; and discuss potential issues awaiting amnesty program participants for past and future amnesties.

Learning Objectives:

- Determine which states currently offer amnesty programs
- Assess whether an amnesty or voluntary disclosure program is best for their company's needs
- Identify areas of opportunity or

problems when considering a program

- Identify issues to watch for after the initial program application is completed

**Audit Activity in an Economic
Downturn**

Session Speakers:

Carolyn L. Carpenter, CMI
Manager, Sales/Use & Property Tax Audits
International Paper Company
Memphis, TN

Theresa Watson, CMI, CPA
Senior Tax Process Engineer
Hewlett-Packard Company
Colorado Springs, CO

The session will give an overview of the "State of the States" regarding overall economic conditions, how states are reacting to budget shortfalls, how this is affecting state sales tax audits from the taxpayer perspective and how the tax professional can effectively manage the audit process. The speakers will identify the issues surrounding state sales tax audits and provide guidance to the attendee on how to effectively manage the audit process and minimize any audit assessment.

Learning Objectives:

- Determine which states have increased audit activity
- Identify any changes in audit activity through frequency, methodology, timing to conduct audit and appeal processes
- Minimize audit assessment through process improvements and effective audit techniques

Monday, June 28, 2010 continued

3:15 - 4:45 p.m.

Working with Government Affairs on Tax Issues

Session Speakers:

Dennis Austin

Director of Government Affairs
Raytheon Company
Waltham, MA

Susan Traylor Bittick, Esq.

Director, Public Affairs
Ryan
Austin, TX

States are experiencing major budget constraints due to current economic conditions and are finding ways to increase revenue through the legislative and judicial process. What does it mean to companies when tax policy changes? How does a tax department get involved in the legislative process? What are the lobbying rules? Are you utilizing all resources to maximize state tax incentives? This session will explore the value of monitoring state legislation and judicial decisions and how tax departments can partner with its internal government affairs team and outside state trade associations.

Learning Objectives:

- Recognize and understand the value of partnering with Government Affairs and State Trade Associations to monitor and prioritize state tax changes
- Explain what constitutes lobbying activities and recognize that the definition of lobbying varies from state to state
- Discuss the value of partnering with Government Affairs when pursuing state tax incentives

■ 4:45 – 6:00 p.m.

Appointment with Exhibitors

This is an excellent opportunity to view products — computers, software, system management, publications, data services, valuation aids, and maps — of interest to property, income, and sales tax professionals. Exhibits are limited to product-oriented vendors.

■ 6:00 – 8:00 p.m.

Reception in Exhibit Hall

Reception is included in conference registration fee. Spouses/guests register for this event via supplemental fee. Admittance is by badge/ticket.

Tuesday, June 29, 2010

■ 7:00 a.m. - 4:00 p.m.

Registration

■ 7:00 - 8:00 a.m.

Exhibits Open

Coffee and pastries will be available with the exhibitors (included in conference registration fee). Spouses/guests register for this event via supplemental fee. Admittance is by badge only.

■ 8:00 – 9:15 a.m.

Joint Income Tax & Sales Tax General Session Slicing and Dicing Business Operations

Session Speakers:

David Agosto, Esq.

Assistant General Counsel -
Tax Matters
Verizon
Basking Ridge, NJ

Kimberley M. Reeder, Esq.

Partner
Morgan, Lewis & Bockius LLP
Palo Alto, CA

Margaret C. Wilson, CMI, Esq.

Partner
McDermott Will & Emery LLP
New York, NY
Business efficiencies often drive internal reorganization plans and even the outsourcing of certain functions, or pieces of functions. Whether formally re-aligning corporate entity lines (merging affiliates to eliminate redundancy, or creating a new subsidiary to house shared functions) or just shifting employees or assets to achieve better management alignment, unanticipated on-going sales tax and income tax consequences can result. This panel will explore the issues below, and also consider ways to take advantage of a

business reorganization to potentially create new state tax efficiencies.

Learning Objectives:

- Explain how the placement of legal entity lines between employees and the assets they service, or use, changes the sales tax outcome
- Discover how breaking out, or combining, certain functions or assets among legal entities can change the sales tax characterization of those “elements” of business operations
- Explore ways to achieve possible sales tax deferral
- Investigate creating or eliminating state income tax transfer pricing exposures, and determining appropriate pricing
- Examine apportionment factor impacts
- Examine nexus and PL 86-272 impacts

■ 8:00 – 9:15 a.m.

General Property Tax Session Current and Proposed Gov- ernment Green Building Policy and Its Effect on Real Estate Valuation

Session Speakers:

Ross Litkenhous

Manager, Real Property
SC&H State & Local Tax
McLean, VA

Charlie Popeck, LEED-NC

President
Green Ideas
Phoenix, AZ

Once a company decides to “Go Green”, the current financial crises and the recession should not affect a taxpayer’s strategy to Go Green. In fact, Going Green can be beneficial from a property tax perspective during challenging economic conditions. This session will focus on the various property tax incentives available and provide practical advice for identifying and implementing green solutions for

existing buildings, new construction, or expansions. You will learn how many green incentives actually offset the costs of Going Green. The speakers will guide you through the impact that Going Green has on real estate valuations and discuss recommended arguments for the property tax practitioner to use during the appeals process.

Learning Objectives:

- Examine the effects of current government legislated green building policies on real estate assessments and valuation
- Analyze how assessing departments may address green building valuation
- Recommend appeal arguments to assessment increases predicated on green building construction
- Summarize green building tax credits currently available to offset the cost of “going green”
- Contemplate future government “green” policy and how it will affect the commercial real estate industry and the subsequent value of real estate

■ 9:30 – 10:45 a.m.

**General
Income Tax Session
Corporate Tax Update:
Recent Income Tax Cases
and Legislation**

Session Speakers:

Daniel B. De Jong, Esq.
Tax Counsel
Tax Executives Institute
Washington, DC

Timothy G. Schally, Esq.
Coordinator of the Taxation Group
Michael Best & Friedrich LLP
Milwaukee, WI

David J. Shipley, Esq., CPA
Partner
McCarter & English, LLP
Philadelphia, PA

This session will explore significant cases and important legislative changes and proposals from around

the country. The session will also strive to identify the practical implication of these developments and traps for the unwary.

Learning Objectives:

- Explore recent state tax developments throughout the country including case law, statutory and regulatory guidance
- Specify significant state tax audit issues being raised by state tax authorities in various regions of the country
- Evaluate practical implications and solutions to the recent developments and state tax audit issues discussed during the sessions

■ 9:30 – 10:45 a.m.

**General Concurrent
Property Tax Sessions
Software Technology –
A Single Platform**

Session Speakers:

Charles Wesley Ferris, III
Director, Customer Relations
Thomson Reuters
St. Louis, MO

Scott H. Walters
EPMO Director
Corporate Market Portfolio
CCH, a Wolters Kluwer Business
Boston, MA

Kristen Wilder-Bernhard
Senior Account Executive
Tax Compliance, Inc.
San Diego, CA

A review of the trend in tax software towards creating a single platform that provides corporate tax departments with an integrated solution for managing multiple tax types. These recently released platforms integrate the data from income, property, and sales tax systems for high-level management and dashboard reporting. They also provide common document management, workflow solutions, and calendaring in a single collaborative environment. This session is a must see for tax managers who are looking

to leverage the talents of their multiple tax disciplines.

Learning Objectives:

- Demonstrate how technology can provide real time insight into disparate processes and data from a single source
- Implement technology that, for the first time, can be shared to manage multiple disciplines across the tax department
- Discover how integrated document management and workflow technology differs from traditional methods
- Examine how data management challenges across various disciplines can be addressed with a common tool and database
- Determine how to improve control around and visibility into the tax department’s critical processes

**Websites and Other Cool
Tools for the Property Tax
Professional**

Session Speaker:

R. Wayne Pugh, MAI, CRE
CEO
R. Wayne Pugh and Company
Baton Rouge, LA

This session will be an interactive demonstration on websites available for the property tax professional in managing valuations, appeals, and audits. The presenter will take you through a multitude of internet sites and demonstrate the applications inherent in effectively managing property taxes.

Learning Objectives:

- Discover helpful and user-friendly websites for property tax and valuation professionals
- Select appropriate websites for specific appraisal assignments
- Discuss an array of websites related to the property tax professional
- Design a road map for seeking assistance on the web in property valuation

■ 9:30 – 10:45 a.m.

**General
Sales Tax Session
Data Security in the Audit
Process**

Session Speaker:

Sam Guevara

Principal
KPMG LLP
Chicago, IL

This session will provide an overview of the evolving issues concerning how data must be handled during the audit process. The presenter will provide insight as to the new/changing laws and policies in place for protecting information while attempting to comply with the needs of jurisdictions.

Learning Objectives:

- Interpret and assess some of the various federal and state laws relating to data security
- Differentiate the types of records which can and cannot generally be provided to outside sources including state employees and/or consultants
- Distinguish when records should be provided to a third party vs. merely providing access to various records
- Plan the types of controls that are required to be in place when providing access to systems
- Question the authority of contractual agreements with customers/vendors related to personal information

■ 11:00 a.m. - 12:15 p.m.

**Income Tax
Concurrent Sessions
Protecting FIN 48 Workpapers
- Best Practices Following
Textron**

(repeated at 1:30 p.m.)

Session Speakers:

Ryan Kroiz, Esq.

Senior Director - State Tax Planning & Controversy
Tyco Electronics
Berwyn, PA

Marc A. Simonetti, Esq.

Partner
Sutherland Asbill & Brennan LLP
New York, NY

Regulatory changes and accounting practice standards have dramatically increased the amount of documentation that large multistate taxpayers are required to maintain to support their income tax positions. The First Circuit's decision in *Textron* has called into question what rights taxpayers have to protect this documentation from state tax auditors. Further, the new Federal policy regarding the requirement for taxpayers to disclose uncertain tax positions on their tax returns increased the scrutiny around confidential and sensitive documentation regarding uncertain tax positions. This panel will explore best practices for creating, maintaining and protecting this documentation from disclosure, while ensuring that external auditors receive the information needed to conduct financial statement audits.

Learning Objectives:

- Analyze FIN 48 issues from the perspective of clients, accountants and their attorneys
- Differentiate federal attorney-client privilege and work product protection rules with state rules, including the implications of *Textron* for state tax litigation
- Determine best practices for creating, maintaining and protecting FIN 48 files

**Costs of Performance:
Fundamentals and Strategies**

Session Speakers:

Ellen J. Berenholz, CPA

Director, Tax Policy
Comcast Corporation
Philadelphia, PA

Caleb Gauen, Esq.

Director
PricewaterhouseCoopers LLP
New York, NY

This panel will provide a practical discussion of the sourcing of receipts

for state income tax apportionment purposes based on the costs of performance methodology. The conversation will include a pragmatic approach to calculating, documenting, and defending costs of performance filing positions. Hear real life costs of performance examples from the perspective of taxpayers, tax advisors, and the person sitting next to you.

Learning Objectives:

- Discover the principles of costs of performance sourcing
- Unravel the ambiguities in concepts such as income producing activities and direct costs
- Discuss building a rock solid audit support file by maximizing qualitative and quantitative documentation
- Contemplate the standards for invoking alternative sales factor sourcing methodologies

■ 11:00 a.m. - 12:15 p.m.

**Property Tax
Concurrent Sessions
Hotel Property Tax
Management from an
Insider's Perspective**

Session Speakers:

Michael L. Hunter, CMI

Vice President of Property Taxes
FelCor Lodging Trust Incorporated
Irving, TX

Heather J. Reichardt, MRICS

Director, Lodging Property Tax
Marriott International, Inc.
Bethesda, MD

Clayton Rash

Director – Property Tax
Ashford Hospitality Trust, Inc.
Dallas, TX

Hear from several corporate tax officials (who operate within different ownership structures) about how they manage the ever-evolving property tax challenges associated with hospitality properties. What is important to the REIT Tax Vice President as compared

to the management company tax manager? How do those involved measure satisfactory real estate tax assessments for their hotels? In which jurisdictions do the speakers feel their hotels are treated properly for assessment purposes? Additional discussion will center around the differences between types of hotel properties and the myriad of brands in the marketplace.

Learning Objectives:

- Examine the issues that are important to hospitality-related tax managers
- Explore lodging assessments in various jurisdictions
- Contrast real differences between brands and market segments

Best Practices in Fixed Asset Management

Session Speaker:

Scott Swarts

President
Paragon Valuation Group
A Division of Paragon International, Inc.
Schaumburg, IL

This session will focus on identifying and highlighting best practices for the property tax professional in managing fixed assets. In today's highly specific, yet linear world of fixed asset management, property tax implications are rarely considered; however, fixed asset decision-making often has a resounding impact on property taxes. This presentation will cover multi-industry best practices and offer insight for the property tax professional in participating in the fixed asset cycle.

Learning Objectives:

- Appraise the importance of property tax participation in fixed asset management
- Demonstrate common and unusual circumstances which impact property taxes
- Detect noted proactive and suc-

cessful fixed asset management practices

- Design an outline for best practice implementation

Managing Property Taxes in a Declining Economy: Having To Do More with Less Resources....Is It Happening To You?

Session Speakers:

David L. Meier, II

Tax Specialist
Toyota Motor Engineering & Manufacturing North America, Inc.
Erlanger, KY

Dena M. Smith

Manager-Property and Sales/Use Taxes
ThyssenKrupp USA, Inc.
Troy, MI

How has the recession affected your property tax department? Have you experienced downsizing? How are you handling being asked "to do more with less"? There is a significant amount of public and governmental relations connected with managing a property tax department during a declining economy. What happens when a manufacturer has received significant incentives (based on their employment levels as well as their capital expenditure) and they close the plant? Find out the answers to these questions and more from the automotive industry and from the manufacturing industry in general.

Learning Objectives:

- Discover what happens when you close a plant where you have received significant savings and how manufacturers have been dealing with it from a property tax management perspective
- Investigate what a property tax director is faced with when managing both public and governmental relationships during a recession

- Examine how change in the resources available to the tax department affects the way in which you handle these issues

■ **11:00 a.m. - 12:15 p.m.**

Sales Tax

Concurrent Sessions

Whatever Happened to the SSTP?

(repeated at 3:00 p.m.)

Session Speakers:

Scott Peterson

Executive Director
Streamlined Sales Tax Governing Board, Inc.
Nashville, TN

Richard J. Prem, CPA

Vice President - Indirect Taxes & Tax Reporting
Amazon.com
Seattle, WA

After years of discussion and developments on the streamlined sales tax, where are we now? What future developments can we expect and when are these likely to occur? This session will provide a brief update of the developments to date but will focus primarily on the impact of the SSTP to date and what future developments (if any) we can expect.

Learning Objectives:

- Distinguish the current and anticipated future state of the SSTP
- Examine the interplay of SSTP and prospects for Federal legislation to overturn the *Quill* decision
- Explore the potential impact of vendor compensation proposals being discussed by SSTP
- Assess the impact of the anticipated future state of the SSTP on his/her business
- Propose system changes required by anticipated future SSTP developments

11:00 a.m. - 12:15 p.m.

Canadian GST

Session Speakers:

Annette Beshwaty, CGA
Senior Manager - Indirect Tax
KPMG LLP
Montreal, QC

Carlos V. Hernandez
Director, National Accounts
DuCharme, McMillen & Associates,
Inc.
Billerica, MA

Is your company considering doing business in Canada? Did you know that Ontario and British Columbia will be merging the GST and PST into an HST? Hold on a second. What is GST, PST, and HST? If you are curious about the answers to these questions, then you should plan on attending this session on Canadian GST.

Learning Objectives:

- Summarize the Canadian sales tax system, including a focus on the mechanism of the federal sales tax system as well as the different sales tax regimes at the provincial levels
- Interpret the meaning of carrying business in Canada and the sales tax implication for those who may be required to register
- Discuss certain sales tax relieving provisions for non residents who purchase goods and services from suppliers in Canada

Refund Requests (repeated at 3:00 p.m.)

Session Speaker:

Timmy Hulin, CMI
Director of Audits
Didier Consultants, Inc.
Baton Rouge, LA

Rick L. Johnson, CMI
Manager, Sales & Use Taxes
Limited Brands, Inc.
Columbus, OH

David Yerkes, CMI

Tax Principal
Grant Thornton LLP
Dallas, TX

This session will provide a current perspective on refund requests and the difficulties or trends being experienced on working refund claims through states bureaucracies in the current economic environment. Further, this session will address various state procedural matters or trends being experienced that make the refund claim process more difficult and various ways to settle refund claims in line with the current economic realities that states are operating under.

Learning Objectives:

- Examine the current state environment and approach to handling refund claims in a down economy
- Specify the strategies to help move refund claims forward
- Explain the reality of state budget limitations and alternatives to resolving refund claims
- Assess various state trends that one needs to consider in handling refund claims in a more proactive way in a down economy

■ **12:15 - 1:30 p.m.**
Lunch in Exhibit Hall -
IPT 2010-2011 Committees

■ **12:15 - 2:00 p.m.**
Exhibits Open

■ **1:30 - 2:45 p.m.**
Income Tax
Concurrent Sessions

Protecting FIN 48 Workpapers
- Best Practices Following
Textron

(repeated from 11:00 a.m.)

Combined Reporting Trends and Structures (repeated at 3:00 p.m.)

Session Speakers:

Eric J. Coffill, Esq.
Tax Partner
Morrison & Foerster LLP
Sacramento, CA

Joe W. Neff, Esq.
National Managing Director State and Local Tax Practice
RSM McGladrey, Inc.
Los Angeles, CA

With the recent enactment of combined reporting legislation in Wisconsin, Massachusetts, West Virginia and New York, 23 of the 45 states with corporate income and similar taxes have implemented this filing methodology. Unfortunately, there is little consistency in the combined reporting rules for each state and determining the members of a combined group can be a challenge. Furthermore, the combined reporting trend is predicted to continue and gain even more momentum as states believe it will raise revenue and close perceived tax avoidance loopholes. This session will highlight the new combined reporting legislation in the above states, discuss the various combined return reporting structures available to taxpayers and review the current combined reporting trends.

Learning Objectives:

- Review the newly enacted combined reporting legislation in WI, MA, WV & NY
- Explain the various combined reporting structures available to taxpayers (pre vs. post apportionment, nexus consolidations, etc.)
- Discuss the trends and theory behind the new rash of combined reporting legislation in various states

■ 1:30 - 2:45 p.m.
Property Tax
Concurrent Sessions

Convergence in the Communication Industry & Impact on Asset Valuation

Session Speakers:

Michael S. Heaton
Director Property Tax
Duff and Phelps LLC
Shawnee Mission, KS

Richard R. Masching, ASA
Director-Property Taxes
Verizon
Irving, TX

Kelly A. Necessary, CPA
Senior Director - Property Tax
Time Warner Cable
Charlotte, NC

Eric S. Tresh, Esq.
Partner
Sutherland Asbill & Brennan LLP
Atlanta, GA

This session will provide an overview of the communications industry and the convergence of its businesses. Where we are now, where we have been and where we are going, changing technology and the obsolescence that comes with it. Find out what the hot topics are.

Learning Objectives:

- Explore the brief history of the communications industry and the convergence of its products and services
- Investigate the technologies utilized in the landline, wireless and cable industries and how convergence has changed such technology
- Discuss how such convergence and technology changes have impacted property tax valuation

Puerto Rico ~ A New Kind of "Hot Spot"

Session Speakers:

Martha Jackle-Lagervall
Property Tax Manager
T-Mobile USA, Inc.
Bellevue, WA

David W. Schneider, CPA, CIA
Property Tax Manager
Sprint Corporation
Overland Park, KS

Hear from two corporate property tax managers about how they manage the property tax challenges in Puerto Rico associated with the wireless industry. What special considerations exist for U.S. based businesses operating in Puerto Rico? How is real estate property taxed? Certainly not in the manner in which we are used to being taxed in the U.S.! How is personal property taxed? What is the CRIM? What is the administrative and judicial review process? Additional discussion will center around recent litigation, legislation, and the current property tax structure.

Learning Objectives:

- Examine the Puerto Rico Municipal Property Tax Act of 1991
- Discriminate what is considered real estate property and how the property is assessed
- Explore ACT No. 7 of 2009, the Special State Property Tax (SSPT), and the impact to businesses operating in PR

**Best Practices for Personal Property Audits
(repeated at 3:00 p.m.)**

Session Speakers:

Robert J. DeWitte
Manager - Property Taxes
Masco Corporation
Taylor, MI

Charles Alan Long, CMI
Executive Director
Ernst & Young LLP
Charlotte, NC

This will be a presentation about the positive and negative experiences of the past and current personal property audit programs as gathered from the IPT membership. These experiences will be discussed and viewed for developing ideas for best practices. Discussions will range from electronic preparation/sources and what has worked successfully and what has not. The forum will be open discussion. Presented will be the results of a poll gathering information from the IPT membership about their current and immediate past experiences regarding personal property audits. Data gathered ranges from good experiences to bad.

Learning Objectives:

- Examine successful audit programs from other IPT members
- Discuss many ways to respond to an audit electronically
- Apply the good and not so good experiences to a best practices program

■ 1:30 - 2:45 p.m.
Sales Tax
Concurrent Sessions

**Computer Audits
(repeated at 3:00 p.m.)**

Session Speakers:

Julie A. Crist
Manager, Property & Transaction Taxes
Sunstone Hotel Investors, Inc.
San Clemente, CA

Steve Oldroyd, CPA
Senior Director
BDO Seidman, LLP
San Jose, CA

The session will provide an overview of best practices that should be considered in conducting a computer audit. The session will help participants understand how the data could be used versus how it should be used, and what the ramifications could be if the data is used incorrectly.

Learning Objectives:

- Demonstrate best practices to be used during computer audits
- Help maintain an audit program that fairly reflects any potential audit liability or refunds equitably
- Recognize the importance of how data is obtained and used in a computer audit
- Advise on the importance of managing a computer audit efficiently and within the parameters of a fair data management model

1:30 - 2:45 p.m.

Nexus - Affiliate Nexus Trends and Current/Pending Legislation

Session Speakers:

Mary T. Benton, Esq.

Partner
Alston & Bird, LLP
Atlanta, GA

Laura A. Kulwicki, Esq.

Attorney
Jones Day
Columbus, OH

Did you ever wonder why this subject is discussed at most conferences? Simply stated: It is important for you as a state and local tax expert to have a firm grasp of this subject in order for your company to avoid the pitfalls of unplanned tax liabilities, including penalties and interest.

Learning Objectives:

- Demonstrate a firm grasp of the constitutional nexus standard physical presence
- Recognize the basic principles of attributional nexus and the inherent complexities
- Examine the nuances within affiliate nexus inquiries
- Appraise proposed, pending and recently enacted state legislation related to nexus and the potential impact of streamlined sales tax and federal legislative efforts
- Explore "trouble areas" and practical planning opportunities

1:30 - 2:45 p.m.

Refund Opportunities for Bad Debts on Private Label Credit Cards

Session Speakers:

Mark E. Holcomb, Esq.

Partner
Madsen Goldman & Holcomb, LLP
Tallahassee, FL

Amy F. Nogid, Esq.

Of Counsel
Morrison & Foerster LLP
New York, NY

Does your company issue Private Label Credit Cards? If so, have you ever wondered why there has been a recent stream of court cases regarding a company's right to claim bad debts on Private Label Credit Cards? Come and see what the hoopla is all about!

Learning Objectives:

- Compare the historical underpinnings of bad debt credits/refunds with modern retail sales practices
- Analyze common statutory requirements for claiming bad debt credits/refunds
- Evaluate each party's claim to the bad debt credit/refund in third party-financed retail sales transactions
- Appraise potential statutory and contractual solutions to claim the bad debt credit/refund in third party-financed retail sales transactions
- Recognize and address various proof problems that may arise in claiming the bad debt credit/refund in third party-financed retail sales transactions

■ 3:00 - 4:15 p.m.

Income Tax Concurrent Sessions

Decoupling of Depreciation for the States

Session Speakers:

Theresa Esparza, CPA

Director of Tax
P.F. Chang's China Bistro, Inc.
Scottsdale, AZ

Jamie C. Yesnowitz, Esq.

Senior Manager
State and Local Tax
Grant Thornton LLP
Washington, DC

In recent years, Congress has enacted numerous statutes that allow corporate taxpayers to take bonus depreciation deductions on their federal income tax returns. These deductions are for business property purchased during a certain time period, and in some cases for a certain type of property. Many states, however, have not incorporated these deductions for their state taxable income calculations, and others have not taken a position on adding back bonus depreciation. This has created confusion as to how bonus depreciation is to be treated for state tax purposes when the deduction has been taken on the federal return. This session will cover the history of federal bonus depreciation, along with the variety of state responses to these provisions.

Learning Objectives:

- Explore federal bonus depreciation
- Explain various state-specific methodologies concerning depreciation in response to the federal provisions
- Design a framework by which corporations can deal with state-specific depreciation compliance

Combined Reporting Trends and Structures

(repeated from 1:30 p.m.)

■ 3:00 - 4:15 p.m.

Property Tax Concurrent Sessions

Global Property Taxation: Australia, Canada and the United Kingdom

Session Speakers:

Tim Davies, FCA, FTIA

Principal and National Practice Head
Realty Tax Consulting
Altus Page Kirkland
Australia

James Derbyshire, FRICS, MIMA, PLE

Global President, Tax
Altus Group Limited
Canada

Alex Probyn, MRICS

Vice President and
National Head of Rating
Realty Tax Consulting
Altus Edwin Hill
United Kingdom

This session will provide an overview of property taxation in Canada, the United Kingdom and Australia. The USA, UK, Australia and Canada are the largest English speaking countries in the world. Although we will be addressing a predominately American audience, we will work within a similar discipline being the "Management of Taxation". These countries share very similar cultures; however they are all unique and different from each other. To that end, our panel will highlight the nuances of their respective systems.

Learning Objectives:

- Explore the nuances that Canada, the UK and Australia experience with their property tax systems
- Compare and contrast the similarities and differences between these countries and the USA's property taxation
- Investigate why the USA represents a large group of Multi-National Companies who have historically targeted these countries to locate and expand their companies

Best Practices for Personal

Property Audits (repeated from 1:30 p.m.)

Valuation Issues Affecting Retail Properties in the Present Real Estate Economy

Session Speaker:

Paul J. Mooney, Esq.

Partner
Mooney, Wright & Moore, PLLC
Mesa, AZ

Learning Objectives:

- Explain the economics of low base rents for anchor department stores
- Understand and factor-in percentage rents in a recession
- Recognize high base rents paid by mall tenants and understand why those rents are not solely attributable to the property
- Recognize the "groupie" phenomenon
- Understand why market rents for stand-alone, big-box retail stores are fundamentally different from those for attached anchor department stores
- Determine "market" rents in a declining real estate economy
- Understand how retail bankruptcies and foreclosures, as well as the closure of marginal stores of national chains, are affecting the determination of market rents
- Measure the impact of declining sales volumes per square foot of retail space on market rent in both anchor and non-anchor stores with percentage rent clauses
- How to divorce "business value" from the valuation of retail properties
- Learn whether "trade dress" and other "brand name" finishes and fixtures contribute to the market value of the real property as opposed to representing value in-use
- Learn how to measure obsolescence, both functional and ex-

ternal, in the present real estate market

- Gain knowledge of how the present economy has impacted the capitalization rates that should be used to value retail properties

■ 3:00 - 4:15 p.m.

Sales Tax Concurrent Sessions

Refund Requests

(repeated from 11:00 a.m.)

Whatever Happened to the SSTP?

(repeated from 11:00 a.m.)

Computer Audits

(repeated from 1:30 p.m.)

■ 4:30 - 5:30 p.m.

Annual Business Meeting

- Election of officers and members to the Board of Governors.
- Discussion of Institute business and plans.

■ 6:00 - 8:00 p.m.

President's Reception

Reception is included in conference registration fee. Spouses/guests register for this event via a supplemental fee. Admittance is by badge/ticket only.

■ 7:00 - 8:00 a.m.
Coffee and Pastries

■ 8:00 – 9:00 a.m.
Joint General Session

Ethics in Action for SALT Professionals

Session Speaker:

Cass D. Vickers, CMI, Esq.
State Tax Counsel
Institute for Professionals in Taxation

Panel:

Alexander L. Hazen, ASA, IFAS
CEO
International Appraisal Company Inc.
Upper Saddle River, NJ

Janette M. Lohman, CMI, CPA, Esq.
Partner
Thompson Coburn LLP
St. Louis, MO

Glenn C. McCoy, Jr., Esq.
Principal in Charge State and Local Tax
Holtz Reubenstein Reminick LLP
New York, NY

The daily news stories are replete with accounts of prominent people whose conduct has passed beyond accepted professional norms. They range from politicians using government resources for personal purposes to business leaders concealing manufacturing defects, from use of banned substances among athletes to misstatement of scientific findings. In this session, a panel of SALT professionals encounters various real-life scenarios. Panel members give their take on the implications of the codes applicable to lawyers, accountants and other consulting tax professionals. Discussions are built around the ABA Model Rules of Professional Conduct, the AICPA Code of Professional Conduct and the IPT Code of Ethics—all with a view toward finding the ethical course of action.

Learning Objectives:

- Understand the role of codes of ethics in protecting SALT professionals, their employers and cli-

- ents, the profession and the public
- Be familiar with some of the canons most frequently implicated in the handling of state and local tax matters
- Gain some acquaintance with the intersection and divergence of various codes of ethics and learn how to stay on the compliance side of the line

■ 9:15 - 10:30 a.m.
Concurrent General Session: Income Tax

IFRS Impact on State Tax Reporting. What Impact Does Having a Joint Venture with a Foreign Company Have on U.S. Reporting?

Session Speaker:

Robert C. Ozmun
Partner
PricewaterhouseCoopers LLP
Saint Louis, MO

U.S. companies will be required to adopt IFRS for financial reporting prior to 2014. This session will explore what impact IFRS reporting will have on state income and franchise tax reporting.

Learning Objectives:

- Assess the impact that IFRS will have on franchise tax bases which typically rely on financial statement reporting
- Evaluate the impact that IFRS will have on the property factor in the apportionment factor for both income and franchise taxes
- Weigh the impact IFRS will have on reporting the receipts factor
- Determine the impact IFRS will have on computing taxable income

■ 9:15 – 10:30 a.m.
Concurrent General Session: Property Tax

Preparing for a Property Tax Appeal as a Non-Attorney

Session Speakers:

James Cairo
Tax Manager
Henkel of America
Scottsdale, AZ

Bruce J. Stavitsky, Esq.
Attorney
Stavitsky & Associates LLC
Clifton, NJ

You filed a property tax appeal; now what do you do? Many taxpayers are handling appeals in house in lieu of a hired attorney. However, there are many intricacies you may need to be aware of before continuing the appeal process. This session will provide the non-attorney/property tax manager a general knowledge of terms, definitions, and legal basis to conduct an appeal to the pre-trial process and avoid the potential pitfalls with the unlawful practice of law.

Learning Objectives:

- Explain the post-filing steps of an appeal as a non-attorney
- Determine the proper application of statutes and case law
- Demonstrate effectively leading opposing counsel during exhibit exchanges and settlement conferences
- Explore the possibility to retain outside counsel and avoid the unlawful practice of law

■ 9:15 – 10:30 a.m.
Concurrent General Session: Sales Tax

Become a Strategic Business Partner by Implementing a Risk Intelligence Approach

Session Speaker:

Karen L. Warner, CPA
Partner
Deloitte Tax LLP
Dallas, TX

Looking ahead and integrating tax implications early in a business process is a value add for tax departments. While seeking ways to add strategic value, why do many tax departments fail to understand the importance of risk management and timely disclosure of tax risk? This session will cover the importance of being involved in managing company risk by laying the groundwork and controlling tax risk and reward through the execution of a risk intelligence approach.

Learning Objectives:

- Recognize and understand the value of being proactively involved in risk management and expanding strategic partnerships by proactively collaborating with finance, accounting, and other business areas
- Comprehend when and how to timely communicate probable and estimable risk
- Explain the importance of an action plan to control existing and future tax risks

■ 10:45 a.m. – 12:15 p.m.
Concurrent General Session: Income Tax

Economic Nexus and Interstate Commerce Clause Concerns

Session Speaker:

Timothy L. Fallaw, Esq.
Partner
Alston & Bird LLP
Atlanta, GA

This session will cover the history of economic nexus. The definition of nexus has varied with the continuous changing methods of the way interstate commerce has changed over the decades.

Learning Objectives:

- Appreciate the historical nexus cases and their impact on interstate commerce
- Explain the various ways interstate

commerce has developed through the years and the effects on nexus

■ 10:45 a.m. – 12:15 p.m.
Concurrent General Session: Property Tax

Jurisdictions' Constraints in the Current Economy

Session Speakers:

John Noguez
Special Assistant
Los Angeles County Assessor's Office
Los Angeles, CA

Keith E. Russell, MAI
Assessor
Maricopa County
Phoenix, AZ

Even during normal conditions, an assessor faces increasing demands with limited resources. But during a recession and the current economic environment, the challenges faced by a jurisdiction can be overwhelming. This session will review and analyze some jurisdictions' creative methods to "accomplish more with less." How do the agreed upon and negotiated property tax incentives fare during a down economy? Come hear an explanation of how new and existing incentives can be favorable to both jurisdictions and taxpayers. With so many factors affecting market values, how can mass appraisal techniques be fair and equitable in distressed markets? And if more appeals are filed during harsh economic conditions, what are the chances of a fair hearing? During this session you will not want to miss the helpful tips provided for dealing with personnel from the assessing community.

Learning Objectives:

- Explain the interrelationship between a jurisdiction's objectives and the rights of a taxpayer
- Discover how property tax incentives are affected during an economic downturn, and how they can impact your company and your job.

- Examine a jurisdiction's constraints in a down economy and pick up helpful tips for your dealings with assessor personnel
- Explore how market forces impact property values.

■ 10:45 a.m. – 12:15 p.m.
Concurrent General Session: Sales Tax

A Case Study on VAT Complexity

Session Speakers:

Stephen James, CTA
Principal and International Tax
Technology Practice Leader
Ryan
San Francisco, CA

Dr. Robert F. van Brederode
Principal
Ryan
Atlanta, Georgia

The presentation will start with a general overview of the essential characteristics of a VAT, and will then delve into a case study of an imaginary US company deciding to expand its business overseas through a license agreement for the Asian market and through sales subsidiaries in Europe. This expansion is followed in 12 steps and will discuss the typical VAT issues which emerge at each step.

Learning Objectives:

- Examine basic concepts of European and Asian VAT
- Specify points in an acquisition at which trigger VAT considerations
- Address commencing activities through appropriate VAT planning

12:15 p.m. Program concludes



Registration Information:

Any IPT member or employee of a company/firm with member(s) in the Institute may register for the Conference. The registration fee

provides for the usual Conference expenses and also includes luncheons, receptions, refreshment breaks, and Conference materials. All spouse/social guests are charged additional fees. Admission to all social functions and sessions is by display of badge (tickets when applicable).

The early registration fee for IPT members is \$575 before May 28, 2010. Registrant saves \$25 if payment is received prior to May 28, 2010. The Conference registration fee is \$600 after May 28, 2010. Individuals who are not members of IPT, but whose company or firm has members in IPT, may attend the Conference for an additional \$200 charge. In this case, the total Conference fee for nonmembers would be \$775 before May 28, 2010, and \$800 after May 28, 2010.

If the registrant so elects, he or she may join as an Income, Property, or Sales Tax Associate Member (providing their company already has a member in IPT) for annual dues of \$275. In this case, the total Conference fee would be \$850 before May 28, 2010, and \$875 after May 28, 2010. Dues are nonrefundable even if registration is cancelled. Please see registration form. Members may also register for the conference online at IPT's website by logging in to the "members' only" section. If you do not know your login and password, please follow the instructions on the login page.

Faxed registrations are subject to the payment due date and cancellation fees. There is a cancellation charge of \$100. Any faxed registration that is not cancelled in writing prior to the June 18, 2010 cut-off date is subject to the entire Conference fee. All

requests for refunds must be in writing. No refunds for cancellations will be given after June 18, 2010 (5:00 pm EST). All registrations are to be handled in ADVANCE through the IPT office. If a person is not registered in advance, a surcharge of \$25 will be assessed over and above the late registration fee. For more information regarding administrative policies such as complaint and refund, please contact our office at 404-240-2300.

There is a substitution charge of \$40 on or before May 28, 2010; it becomes a \$50 charge after that date (a substitute must be someone from your company). All registrations must be paid in full within three weeks of acceptance and prior to Conference (\$25 surcharge applies to any payment received after May 28, 2010; \$50 surcharge if payment is still outstanding as of June 27, 2010). Confirmation of acceptance will be sent.

All fees must be in U.S. funds. The following credit cards may be used: American Express, VISA, and Master Card. In order for credit cards to be processed, it is important that the information requested on the registration form be filled out completely. If the address on your registration form differs from the billing address for your credit card, you must provide IPT with the credit card billing address.

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Institute for Professionals in Taxation

Mail payment to:

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Building 600, Suite L-2
1200 Abernathy Road, NE
Atlanta, GA 30328

Phone: 404-240-2300

Fax: 404-240-2315

Spouse/Guest Information:

Conferees who bring their spouse/guest to the Conference are required to pay for the events attended by the spouse/guest. The optional IPT events available are the receptions, coffee with the exhibitors, and the golf tournament. See [registration form](#).

Hotel Information and Reservations:

The Institute's Annual Conference is being held at the JW Marriott Desert Ridge, 5350 East Marriott Drive, Phoenix, Arizona. The guest room rate is \$199 per night for single or double occupancy. Room rates are subject to applicable state and local taxes. All reservations must be accompanied by a first-night room deposit or guaranteed with a major credit card. There is no additional charge for children under the age of 18 occupying a room with their parents with existing bedding. Make your reservations early to ensure availability. Accommodations requested after May 28, 2010, or sooner if the block sells out, cannot be ensured. Reserve your accommodations directly with the JW Marriott Desert Ridge Hotel by: Phoning your reservation to the hotel: 1 (480) 293-5000 or 1 (800) 898-4527 (identify yourself as being affiliated with IPT) or by using the hotel's website, [click here](#), and complete your on-line reservation.

Continuing Education Credits:

Approximately nineteen (19) CPE credits (including 1 IPT ethics credit hour) are available for full attendance Monday through Wednesday. Each attendee will be emailed a Certificate with the record of his or her scanned attendance approximately two weeks after the end of the program.

The Institute for Professionals in Taxation is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor of continuing professional education on the National Registry of CPE Sponsors. State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be addressed to the National Registry of CPE Sponsors, 150 Fourth Avenue North, Suite 700, Nashville, TN, 37219-2417. Website: www.nasba.org. In accordance with the standards of the National Registry of CPE Sponsors, CPE credits have

been based on a 50-minute hour.

As required by regulatory agencies, IPT must verify individual attendance at sessions in order to grant Continuing Education Credits. Each attendee's name badge has a unique barcode that identifies that individual. In order to obtain CE credit, the individual must have his or her bar-coded badge scanned during the first 15 minutes of each session. No credit for the session will be given to un-scanned attendees.

CMLs will receive hour for hour continuing education credits for actual session attendance.

Dress:

For the Conference, dress is business casual, with a reminder; meeting room temperatures and personal comfort ranges vary widely. Since meeting rooms always seem cool, please bring a sweater or jacket.

Golf Tournament:

The Institute's John P. Myers Memorial Golf Tournament is scheduled for Sunday with a shotgun start at 7:30 a.m. It is being held at the Faldo Championship Golf Course at Wildfire Golf Club located within the master planned community of Desert Ridge at JW Marriott. The fee is \$115 per person which includes green fees, golf cart, range balls, tee prize, \$10,000 hole-in-one and other prizes, and refreshments on the course. This year's event will be played like tournaments in the past, as a four person (a, b, c, d) scramble and will be played using the "STRING" tournament format. Each team will be provided a length of string, which can be used to extend any shot (e.g., that birdie putt left 6 inches short, can be counted in the hole by using 6 inches of string). The challenge here is to make the string count and not have any string left at the end of the round. Participants will have the option to sign up as an individual or as a team. Complete details, including a release form, will be sent to you upon receiving your completed conference registration form.

Photos will be taken at this event. These photos may be published in IPT publications, multimedia presentations, and on our website. Your attendance at this event grants IPT the right to publish these photos.

Prerequisites: None

Program Level: Update

Field of Study: Taxation & Regulatory Ethics

Instructional Method: Group Live

Advanced Preparation Required: None

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