



2014 IPT Advanced State Income Tax School



Georgia Tech Hotel and Conference Center

Atlanta, Georgia

June 1-6, 2014

Institute for Professionals in Taxation®

1200 Abernathy Road, Northeast
600 Northpark Town Center, Suite L-2
Atlanta, Georgia 30328
Telephone: 404/240-2300
Facsimile: 404/240-2315
Home Page: www.ipt.org

Program

◆ SUNDAY, JUNE 1

3:00 p.m. - 6:30 p.m. Registration 2nd Floor Lobby

6:15 p.m. - 6:30 p.m. **Opening of School (Joint with Basic School)** Salon IV - VI

Welcome and Overview By:

Arlene M. Klika, CMI

President, IPT
Schneider
Green Bay, Wisconsin

6:30 p.m. - 7:30 p.m. **GENERAL SESSION (Joint With Basic School)** Salon IV - VI

State of the States

State tax issues are impacted by many factors, with state budgetary concerns at the fore. Learn what's going on now in the state tax world.

Learning Objectives

At the end of this section, the learner will be able to:

- ▶ *Have knowledge of the current economic conditions and state tax developments across the country*

Instructor:

Harley T. Duncan

Tax Managing Director
KPMG LLP
Washington, DC

7:30 p.m. Dinner Conference Dining Room

◆ MONDAY, JUNE 2

6:30 a.m. - 8:00 a.m. **Breakfast** Conference Dining Room

8:00 a.m.- 8:15 a.m. "WELCOME TO THE ADVANCED INCOME TAX SCHOOL"

Paul A. Broman, Esq.

Attorney, State Tax Issues, Audits & Appeals
BP America
Houston, Texas

Margaret C. Wilson, CMI, Esq.

Partner
Wilson Agosto LLP
Somerville, New Jersey

8:15 a.m. - 9:45 a.m. **GENERAL SESSION** Salon V - VI

Evaluating Risk in Nexus and PL 86-272 Issues

This session will examine in detail the United States Supreme Court decisions discussing the "substantial nexus" standard of the Commerce Clause of the United States Constitution and how this standard has been interpreted and developed by various state courts. The discussion will include the development of economic nexus and attributional nexus concepts. Finally, we will examine federal statutory limitations on the states' ability to impose net income-based taxes on nonresident taxpayers pursuant to P.L. 86-272 and selected cases interpreting this limitation.

◆ MONDAY (Continued)

Learning Objectives

At the end of this section, the learner will be able to:

- ▶ *Understand the nuances of the "Substantial Nexus" standard of the commerce clause*
- ▶ *Recognize how this standard has been interpreted and developed by various state courts*
- ▶ *Discuss the concepts of economic nexus and attributional nexus*
- ▶ *Discern federal statutory limitations on the states' ability to impose net income –based taxes on nonresident taxpayers pursuant to P.L. 86-272 and other selected cases*

Instructors:

Maria P. Eberle, Esq.

Partner

McDermott Will & Emery LLP

New York, New York

Aaron M. Young, CMI, Esq.

Partner

Reed Smith LLP

New York, New York

10:00 a.m. - 11:15 a.m. **GENERAL SESSION**

Salon V - VI

Nonbusiness Income: Recent Cases & Remaining Questions

This presentation will explore the distinction between business and nonbusiness income by reviewing the decisions of various state courts regarding the treatment of specific types of income. This presentation also will focus on the sourcing rules for allocating nonbusiness income. Additionally, this presentation will review various state-specific allocation rules for sourcing certain types of income.

Learning Objectives

At the end of this section, the learner will be able to:

- ▶ *Understand the effect of characterizing income as business income or nonbusiness income*
- ▶ *Explain the transactional and functional tests for determining whether income is business or nonbusiness income*
- ▶ *Understand the basis for and effect of the liquidation exception to the functional test*
- ▶ *Recognize the effect of non-uniform definitions of business and nonbusiness income*
- ▶ *Analyze different fact patterns and determine if the resulting income is business income or nonbusiness income under the various statutes, regulations and cases*
- ▶ *Understand and apply UDITPA nonbusiness income allocation rules*
- ▶ *Recognize existence of areas outside of nonbusiness income where states may directly allocate income*

Instructors:

Maria P. Eberle, Esq.

Partner

McDermott Will & Emery LLP

New York, New York

◆ MONDAY (Continued)

David J. Shipley, CMI, Esq.

Partner
McCarter & English, LLP
Philadelphia, Pennsylvania

11:15 a.m. - 12:00 p.m. **GENERAL SESSION** **Salon V - VI**

Unitary Business: Core Theory & Recent Applications

This session will review the United States Supreme Court's decisions that developed the unitary business principle and the various tests used to determine what constitutes a unitary business. Additionally, this presentation will discuss the treatment in separate-company states of income derived from non-unitary business activities as well as income derived from non-unitary affiliates. This session also will discuss the implications of being part of a unitary business in unitary combined reporting states.

Learning Objectives

At the end of this section, the learner will be able to:

- ▶ *Understand the evolution of unitary business concept*
- ▶ *Recognize and understand cases attempting to exclude nonunitary income from tax*
- ▶ *Identify and apply the three tests for determining the existence of a unitary business*
- ▶ *Explain the difference between operational and investment income and identify when the operational function test should be applied*
- ▶ *Understand the application of the unitary business principle in separate company states*
- ▶ *Understand the various state statutory definitions of a unitary business*

Instructors:

Robert S. Goldman, CMI, Esq.

Partner
Madsen Goldman & Holcomb, LLP
Tallahassee, Florida

David J. Shipley, CMI, Esq.

Partner
McCarter & English, LLP
Newark, New Jersey

12:00 p.m. - 1:00 p.m. Lunch **Conference Dining Room**

1:00 p.m. - 1:30 p.m. **GENERAL SESSION** **Salon V - VI**
Unitary Business: Core Theory & Recent Applications (continued)

Instructors:

Robert S. Goldman, CMI, Esq.

Partner
Madsen Goldman & Holcomb, LLP
Tallahassee, Florida

David J. Shipley, CMI, Esq.

Partner
McCarter & English, LLP
Philadelphia, Pennsylvania

1:30 p.m. - 2:30 p.m. **Case Study**

◆ MONDAY (Continued)

Differences Between Unitary and Non-Business

Group 1 – Goldman
Group 2 – Shipley

Conf. C
Conf. D

Instructors:

Robert S. Goldman, CMI, Esq.

Partner

Madsen Goldman & Holcomb, LLP

Tallahassee, Florida

David J. Shipley, CMI, Esq.

Partner

McCarter & English, LLP

Newark, New Jersey

2:45 p.m. - 3:45 p.m.

GENERAL SESSION

Salon V - VI

State Tax Issues for Foreign Affiliates

In today's global economy, state tax experts must be able to identify and address issues specific to foreign affiliates; this session will give you the tools you need.

Learning Objectives

At the end of this section, the learner will be able to:

- ▶ *Understand what nexus rules apply and the interplay of treaty and federal tax rules*
 - ▶ *Consider unique state tax issues for cross-border businesses and transactions*
- Instructors*

Instructors:

Karen H. Currie, Esq.

Partner

Jones Day

Dallas, Texas

John F. Fletcher, Esq.

Partner

Jones Walker, LLP

Jackson, Mississippi

3:45 p.m. - 4:45 p.m.

Case Study

State Tax Issues for Foreign Affiliates

Group 1 – Currie
Group 2 - Fletcher

Conf. C
Conf. D

Instructors:

Karen H. Currie, Esq.

Partner

Jones Day

Dallas, Texas

John F. Fletcher, Esq.

Partner

Jones Walker, LLP

Jackson, Mississippi

◆ TUESDAY, JUNE 3

6:30 a.m. - 8:30 a.m. **Breakfast** **Conference Dining Room**

8:30 a.m. - 10:15 a.m. **GENERAL SESSION** **Salon V - VI**
Complex Problems in Combined Reporting and Advanced Return Mechanics

Implications of separate, consolidated and combined state income tax returns differences, including discussion of the mechanics and implications of each, the income and apportion factors used, the effect on inter-company transactions and treatment of tax attributes.

Learning Objectives

At the end of this section, the learner will be able to:

- ▶ *Explain which entities are typically included in the different types of returns*
- ▶ *Appreciate the distinctions between a full consolidated return versus a nexus consolidated return*
- ▶ *Recognize the difference between the states authority to require combination versus a taxpayers ability to elect combination*
- ▶ *Recognize the difference in the treatment of inter-company transactions under different return types*

Instructor:

Mark L. Nachbar, Esq., CPA

Principal

Ryan, LLC

Downers Grove, Illinois

10:30 a.m. - 11:15 a.m. **Case Study**
Combined Reporting

Group 1 – Nachbar

Group 2 - TBA

Conf. C

Conf. D

Instructors:

Mark L. Nachbar, Esq., CPA

Principal

Ryan, LLC

Downers Grove, Illinois

11:15 a.m. - 12:00 p.m. **GENERAL SESSION** **Salon V - VI**
Advanced Problems in Mergers & Acquisitions

Acquisitions, mergers and reorganizations can take many different forms, and each can have significant state and local tax implications. This session will explore the various types of transactions used to buy and sell businesses and examine the state tax issues inherent in such deals. The session will also review typical provisions in acquisition agreements with an analysis emphasizing the consequences for state income taxes, as well as sales and property taxes.

Learning Objectives

At the end of this section, the learner will be able to:

- ▶ *Understand the state tax principles of mergers and acquisitions*
- ▶ *Understand specific state income tax considerations of reorganizations, for both buyer and seller*
- ▶ *Understand provisions of an acquisition agreement and the relevant importance in a transaction*

◆ TUESDAY (Continued)

Instructors:

Karen H. Currie, Esq.
Partner
Jones Day
Dallas, Texas

John F. Fletcher, Esq.
Partner
Jones Walker, LLP
Jackson, Mississippi

12:00 p.m. - 1:00 p.m. Lunch **Conference Dining Room**

1:00 p.m. - 1:45 p. m. **GENERAL SESSION** **Salon V - VI**
Advanced Problems in Mergers & Acquisitions (continued)

Instructors:

Karen H. Currie, Esq.
Partner
Jones Day
Dallas, Texas

John F. Fletcher, Esq.
Partner
Jones Walker, LLP
Jackson, Mississippi

1:45 p.m. - 2:30 p.m. **Case Study**
Mergers & Acquisitions

Group 1 – Fletcher
Group 2 - Currie

Conf. C
Conf. D

Instructors:

Karen H. Currie, Esq.
Partner
Jones Day
Dallas, Texas

John F. Fletcher, Esq.
Partner
Jones Walker, LLP
Jackson, Mississippi

2:45 p.m. - 4:15 p.m. **GENERAL SESSION** **Salon V - VI**
Tax Planning

No matter what your position, it is critical that you be equipped to evaluate the state and local tax concerns in any proposed tax planning (whether being done for federal or for state purposes) or any proposed restructuring of your business. This session will also explore the growing importance of having business purpose and economic substance from a state and local tax perspective.

Learning Objectives

At the end of this section, the learner will be able to:

- ▶ *Understand the state tax considerations of corporate/entity reorganizations*
- ▶ *Understand and be able to identify restructuring options that lead to a more tax efficient outcome*
- ▶ *Understand business purpose and economic substance concepts, and when to be concerned about them*

◆ TUESDAY/WEDNESDAY

Instructors:

Margaret C. Wilson, CMI, Esq.

Partner

Wilson Agosto LLP

Somerville, New Jersey

Mark L. Nachbar, Esq., CPA

Principal

Ryan, LLC

Downers Grove, Illinois

4:15 p.m. - 5:00 p.m.

Case Study

Tax Planning

Group 1 – Wilson

Group 2 - Nachbar

Conf. C

Conf. D

Instructors:

Margaret C. Wilson, CMI, Esq.

Partner

Wilson Agosto LLP

Somerville, New Jersey

Mark L. Nachbar, Esq., CPA

Principal

Ryan, LLC

Downers Grove, Illinois

◆ WEDNESDAY, JUNE 4

8:15 a.m. - 9:00 a.m.

QUIZ

Salon V -VI

9:00 a.m. - 10:00 a.m.

GENERAL SESSION

Salon V - VI

Passthroughs - Advanced Issues

While passthrough entities may escape federal taxation, they raise a host of state tax issues. Our experts will focus on those unique nexus, apportionment and other issues.

Learning Objectives

At the end of this section, the learner will be able to:

- ▶ *Consider the nexus implications (and limits) of owning an interest in a passthrough*
- ▶ *Understand the apportionment, combination and tax attribute issues unique to passthroughs*

Instructors:

Troy Deason, CPA

Director

HCA Holdings, Inc.

Nashville, Tennessee

Margaret C. Wilson, CMI, Esq.

Partner

Wilson Agosto LLP

Somerville, NJ

10:15 a.m. - 11:00 a.m.

Case Study

Passthroughs

Group 1 – Deason

Group 2 - Wilson

Conf. C

Conf. D

◆ WEDNESDAY (Continued)

Instructors:

Troy Deason, CPA

Director
HCA Holdings, Inc.
Nashville, Tennessee

Margaret C. Wilson, CMI, Esq.

Partner
Wilson Agosto LLP
Somerville, NJ

11:00 a.m. - 12:00 p.m. **GENERAL SESSION** **Salon V - VI**

Advanced Issues in Using and Accounting for Net Operating Losses

This session will focus on the issues related to the calculation and utilization of state net operating losses (NOLs). The session will address differences in the calculation of NOLs (e.g., some states calculate NOLs on a pre-apportionment basis and others calculate NOLs on a post-apportionment basis), issues related to the utilization of NOLs (e.g., the ability to carryforward or carryback NOLs), and the measurement and recognition of NOLs for financial statement purposes. We will also discuss related issues such as capital loss carryforwards and the interaction of alternative minimum tax calculations with NOL utilization.

Learning Objectives

At the end of this section, the learner will be able to:

- ▶ *Understand the issues and methodologies related to the states' calculation of net operating loss carryforwards (NOLs)*
- ▶ *Determine the potential utilization of NOLs, including when a taxpayer may carryback or carryforward an NOL and when the states limit the ability to carryback or carryforward the NOL*
- ▶ *Apply the information to situations where taxpayers must address the correct reporting of state NOLs for tax compliance and financial reporting purposes*

Instructor:

Duane W. Dobson, Jr., CMI, CPA

Director, State and Local Tax
KPMG LLP
Tysons Corner, Virginia

12:00 p.m. - 1:00 p.m. **Lunch** **Conference Dining Room**

1:00 p.m. - 2:45 p.m. **GENERAL SESSION** **Salon V - VI**

SALT Tax Provisions and Accruals

Explore the nuances of tax provision and FIN 48 by working through practical applications to uncertain tax positions, including nexus and related party transaction reporting (or non-reporting) positions. Mastering the computational aspects of FIN 48.

Learning Objectives

At the end of this section, the learner will be able to:

- ▶ *Master complicated tax provision concepts*
- ▶ *Improve upon technical ability to apply FIN 48 to situations faced in practice*

Instructors:

Duane W. Dobson, Jr., CMI, CPA

Director, State and Local Tax
KPMG LLP
Tysons Corner, Virginia

◆ WEDNESDAY (Continued)

Benjamin Luedeke

Director, State and Local Tax Practice
PricewaterhouseCoopers LLP
New York, New York

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

GENERAL SESSION

Salon V - VI

IFRS: What the Future Holds for SALT

What is the future of IFRS, and what are its implications for state and local tax? Get out ahead of the issues.

Learning Objectives

At the end of this section, the learner will be able to:

- ▶ Understand IFRS and how it impacts state and local tax

Instructors:

Duane W. Dobson, Jr., CMI, CPA

Director, State and Local Tax
KPMG LLP
Tysons Corner, Virginia

Benjamin Luedeke

Director, State and Local Tax Practice
PricewaterhouseCoopers LLP
Boston, Massachusetts

3:30 p.m. - 5:00 p.m.

GENERAL SESSION

Salon V - VI

Thorny Issues with “Other” Business Taxes: Margin Tax, Franchise Tax, B&O, Etc.

This session will look at why more states are adopting gross receipts taxes. The session will identify taxable entities and persons subject to gross receipts taxes and the differences in states' jurisdiction to impose gross receipts taxes. The instructors will explain typical elements in the gross receipts tax base, common exemptions, and reporting rules. The session will also review apportionment factor issues and discuss the major compliance issues for gross receipts taxes imposed in Washington, Michigan, Ohio and Texas.

Learning Objectives

At the end of this section, the learner will be able to:

- ▶ *Understand why states have adopted gross receipts taxes*
- ▶ *Identify the taxable entities and persons that are commonly subject to gross receipts taxes*
- ▶ *Specify why nexus is different for a gross receipts tax from other types of state taxes*
- ▶ *Understand nuances of what constitutes the gross receipts tax base*
- ▶ *Identify nuances of items exempted from the gross receipts tax base*
- ▶ *Identify nuances of gross receipts tax reporting options (e.g., combined, consolidated or separate)*
- ▶ *Understand apportionment factor rules*
- ▶ *cognize the major credits for the gross receipts taxes in Washington, Ohio, Texas, and Michigan*
- ▶ *Discuss the major compliance issues for the gross receipts taxes in Washington, Ohio, Texas, and Michigan*
- ▶ *Identify issues related to the financial statement treatment of gross receipts taxes*

Instructors:

Karen H. Currie, Esq.

Partner
Jones Day
Dallas, Texas

◆ WEDNESDAY/THURSDAY

Lynn A. Gandhi, Esq., LLM, CPA

Partner

Honigman Miller Schwartz and Cohn LLP
Detroit, Michigan

◆ THURSDAY, JUNE 5

8:45 a.m. - 10:00 a.m.

GENERAL SESSION

Salon V - VI

Apportionment—Current Issues with Factors: Market vs. COP, Joyce vs. Finnigan, Gross vs. Net, (MTC Compact)

This session discusses the major issues pertaining to apportionment. The management of a taxpayer's property, payroll and sales factors can give a taxpayer some discretion over their apportionment profile and, to some extent, which state(s) it will pay tax in. In some cases, state law may contain certain unique and beneficial rules for constructing the traditional apportionment formulas or permit favorable alternative apportionment. In other cases, "nowhere" factors can be created by having amounts in the denominator of a factor which are not included in any state numerators. These issues, as well as efforts by states to modify a taxpayer's factors--through throwout and throwback statutes, for example--will be discussed.

Learning Objectives

At the end of this section, the learner will be able to:

Units 1 and 2

- ▶ *Understand the growing trend away from an evenly weighted three factor formula*
- ▶ *Recognize unique rules for sourcing from services, intangibles, and capital assets*
- ▶ *Understand the difference between sourcing receipts costs of performance and market approaches*
- ▶ *Recognize the rationale for a state's inclusion of net receipts, as opposed to gross receipts, from sales of treasury function investments in the sales factor*
- ▶ *Recognize some of the gray areas in characterizing income for sales factor purposes*
- ▶ *Discuss the different methods used to value property for property factor purposes*
- ▶ *Understand the property factor treatment of rented property, property in transit, moveable property and leased property*
- ▶ *Understand what compensation is included in a state's payroll factor*
- ▶ *Discuss the concept of payroll attribution*

Unit 3

- ▶ *Appreciate the risk of being denied the right to apportion*
- ▶ *Define the "ultimate destination" rule*
- ▶ *Describe the "throwback rule" and when it applies*
- ▶ *Define the "Joyce" rule and when it applies*
- ▶ *Define the "Finnegan" rule and when it applies*
- ▶ *Describe the "double throwback rule" and when it applies*
- ▶ *Describe the "throwout rule" and when it applies*
- ▶ *Define a "dock sale" and its potential implication on sales factor apportionment*

Unit 4

- ▶ *Identify the major constitutional issues related to the apportionment of income, including the issues related to the Due Process Clause and Commerce Clause*
- ▶ *Address the ability of a taxpayer to request a change or modification of a statutory apportionment factor and what*

◆ THURSDAY (Continued)

information may influence the state to grant such a modification

- ▶ *Understand the state taxing authorities' powers to modify a taxpayer's apportionment factor and how the state may apply these powers*

Instructors:

Matthew D. Melinson, CPA

Partner, State and Local Taxes

Grant Thornton LLP

Philadelphia, PA

Giles B. Sutton, Esq.

Partner

McGuireWoods

Washington, DC

10:00 a.m. - 10:45 a.m. **GENERAL SESSION** **Salon V - VI**

Apportionment—Weighing Constitutional Issues

Formulary apportionment rules vary from state to state, but are always limited by federal constitutional constraints; learn how to spot and address them.

Learning Objectives

At the end of this section, the learner will be able to:

- ▶ *Understand which constitutional clauses may apply to limit overly inclusive apportionment schemes*
- ▶ *Consider the practical implications of pursuing such challenges*

Instructor:

David J. Shipley, CMI, Esq.

Partner

McCarter & English, LLP

Philadelphia, Pennsylvania

11:00 a.m. - 12:00 p.m. **GENERAL SESSION** **Salon V - VI**

Apportionment - Seeking Alternative Relief

“Section 18” relief from unfair apportionment is available in most states, but how do you seek it and is it ever granted? And, how might it be used against you?

Learning Objectives

At the end of this section, the learner will be able to:

- ▶ *Understand the mechanics and proof issues for seeking alternative apportionment*
- ▶ *Consider defenses to state attempts to impose alternative approaches*

Instructors:

Giles B. Sutton, Esq.

Partner

McGuireWoods

Washington, DC

12:00 p.m. - 1:00 p.m. **Lunch** **Conference Dining Room**

1:00 p.m. - 2:15 p.m. **Case Study**

◆ THURSDAY (Continued)

Tax Apportionment

Group 1 – Shipley
Group 2 - Sutton

Conf. C
Conf. D

Instructors:

David J. Shipley, CMI, Esq.

Partner
McCarter & English, LLP
Newark, New Jersey

Giles B. Sutton, Esq.

Partner
McGuireWoods
Washington, DC

2:15 p.m. - 3:30 p.m.

GENERAL SESSION

Salon V - VI

Related Party Transactions: Transfer Pricing, 311(b) Distributions, etc.

States are focusing more scrutiny on related party transactions, seeking to adjust prices, force gain recognition, and more. Our experts will bring you up to date on the latest issues, and how to avoid or address them.

Learning Objectives

At the end of this section, the learner will be able to:

- ▶ Understand transfer pricing implications for state tax
- ▶ Learn to spot gains that may be triggered for state tax only

Instructors:

Jordan M. Goodman, Esq., CPA

Partner
Horwood Marcus & Berk Chartered
Chicago, Illinois

TBA

3:45 p.m. - 4:45 p.m.

Case Study

Related Party Transactions

Group 1 – Goodman
Group 2 - TBA

Salon V - VI

Instructors:

Jordan M. Goodman, Esq., CPA

Partner
Horwood Marcus & Berk Chartered
Chicago, Illinois

4:45 p.m. - 5:45 p.m.

GENERAL SESSION

Salon V - VI

Coordinating Federal and State RARs and Compliance

Amending state returns pursuant to federal changes can be a daunting task, and one in which taxpayers frequently seek advice. In particular, issues such as when a final federal determination

◆ THURSDAY/FRIDAY

has been made for state reporting purposes and what items are open for adjustment of state returns can involve state-specific research. This session of the school highlights several issues that practitioners should be aware of when companies report federal income tax adjustments for state purposes.

Learning Objectives

At the end of this section, the learner will be able to:

- ▶ Understand the federal post-audit settlement process
- ▶ Define a “final federal determination”: for state reporting purposes

Instructor:

Giles B. Sutton, Esq.

Partner

McGuireWoods

Washington, DC

◆ FRIDAY, JUNE 6

8:00 a.m. - 10:00 a.m.

GENERAL SESSION

Salon V - VI

Taxpayer Remedies: The How To's of Tax Controversies

Our experts will give you critical tools for protests, litigation strategies, building your case, and dealing with the fall-out.

Learning Objectives

At the end of this section, the learner will be able to:

- ▶ Understand the options in tax controversies and learn how to evaluate them
- ▶ Build your strategic controversy skill set

Instructors:

Robert S. Goldman, CMI, Esq.

Partner

Madsen Goldman & Holcomb, LLP

Tallahassee, Florida

Jordan M. Goodman, Esq., CPA

Partner

Horwood Marcus & Berk Chartered

Chicago, Illinois

10:15 a.m. - 11:15 a.m.

GENERAL SESSION (Joint With Basic School)

Salon IV - VI

Ethics

Unethical conduct on the part of sports and entertainment celebrities, government officials and business leaders continues to make headlines. Violations affect not just the offending individual, but families, colleagues, employers, clients and the profession at large. The publication and enforcement of a Code of Ethics is central to IPT's mission as an organization promoting the integrity of the SALT profession and the members of the public who use our services. This class examines the provisions of the IPT Code in the context of real-life scenarios with which state and local tax professionals are confronted. Emphasis is given to recent amendments to the Code and a discussion is included of the procedures followed when a complaint is filed.

◆ FRIDAY (Continued)

Learning Objectives

At the end of this section, the learner will be able to:

- ▶ Develop an understanding of the role of ethical canons in the SALT profession
- ▶ Become familiar with the IPT Code of Ethics
- ▶ Learn the procedures for reporting and responding to complaints alleging a violation of the IPT Code

Instructors:

Glenn C. McCoy, Jr., Esq.

Director

KPMG LLP

New York, New York

11:15 a.m. - 12:15 p.m. **Quiz**

Salon IV - VI

Conclusion of School

2014 IPT ADVANCED INCOME TAX SCHOOL PROGRAM CO-CHAIRS

Co-Chair:

Paul A. Broman, Esq.

Attorney, State Tax Issues, Audits & Appeals

BP America

Houston, Texas

Co-Chair:

Margaret C. Wilson, CMI, Esq.

Partner

Wilson Agosto LLP

Somerville, New Jersey

Faculty

Seventeen Instructors constitute the full faculty; the private and corporate sectors are represented. Biographical summaries of the Instructors will be furnished at registration.

Karen H. Currie, Esq.

Partner
Jones Day
Dallas, Texas

Troy Deason, CPA

Director
HCA Holdings, Inc.
Nashville, Tennessee

Duane W. Dobson, Jr., CMI, CPA

Director, State and Local Tax
KPMG LLP
Tysons Corner, Virginia

Harley T. Duncan

Tax Managing Director
KPMG LLP
Washington, DC

Maria P. Eberle, Esq.

Partner
McDermott Will & Emery LLP
New York, New York

John F. Fletcher, Esq.

Partner
Jones Walker, LLP
Jackson, Mississippi

Lynn A. Gandhi, Esq., LLM, CPA

Partner
Honigman Miller Schwartz and Cohn LLP
Detroit, Michigan

Robert S. Goldman, CMI, Esq.

Partner
Madsen Goldman & Holcomb, LLP
Tallahassee, Florida

Jordan M. Goodman, Esq., CPA

Partner
Horwood Marcus & Berk Chartered
Chicago, Illinois

Benjamin Luedeke

Director, State and Local Tax Practice
PricewaterhouseCoopers LLP
New York, New York

Glenn C. McCoy, Jr., Esq.

Director
KPMG LLP
New York, New York

Matthew D. Melinson, CPA

Partner, State and Local Taxes
Grant Thornton LLP
Philadelphia, Pennsylvania

Mark L. Nachbar, Esq., CPA

Principal
Ryan
Downers Grove, Illinois

David J. Shipley, CMI, Esq

Special Counsel
McCarter & English, LLP
Newark, New Jersey

Giles B. Sutton, Esq.

Partner
McGuireWoods
Washington, DC

Margaret C. Wilson, CMI, Esq.

Partner
Wilson Agosto LLP
Somerville, New Jersey

Aaron M. Young, CMI, Esq.

Partner
Reed Smith LLP
New York, New York

CONTINUING EDUCATION CREDIT

Approximately 40.5 continuing education credits (including 1 IPT Ethics credit) are available for full attendance. In accordance with the standards of the National Registry of CPE Sponsors, CPE credits have been granted based on a 50-minute hour. CMIs will obtain credit on an hour for hour basis for attendance.

Registrants who wish to obtain credit from other organizations for the school must submit their own forms to the IPT office or utilize the standardized form provided by the Institute.

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. Lost name badges should be reported immediately to an IPT staff member for a replacement. All attendees will receive a Certificate of Attendance with a record of their scanned attendance.

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CMI DESIGNATION—INCOME TAX

The Institute for Professionals in Taxation's designation, Certified Member of the Institute (CMI), is available to anyone who meets specific educational requirements, has five years of income tax experience, and is currently an income tax member in good standing of the Institute. The educational requirements to achieve the CMI Income Tax professional designation include successful completion of IPT's Advanced Income Tax School, IPT's Income Tax Symposium and either the IPT/ABA Income Tax Seminar or the Income Tax track at IPT's Annual Conference. Other educational credits, which may be obtained by attending additional programs such as other income/franchise tax courses, are required. A description of acceptable courses can be found in the CMI brochure and application.

Successful completion of both the written and oral CMI examinations is required. The CMI requirements and the CMI Candidacy Application can be downloaded from the IPT website at: www.ipt.org or you may contact the IPT office at 404.240.2300.

REGISTRATION

Registrations must be completed in advance through the IPT Office. **No on-site registration is allowed. Enrollment is limited to IPT members and individuals from their companies, only.**

PLEASE GO TO THE IPT WEB SITE FOR THE IPT ELECTRONIC REGISTRATION FORM FOR THE SCHOOL (WWW.IPT.ORG). THE FORM CAN BE COMPLETED ELECTRONICALLY AND EMAILED OR PRINTED OUT AND SENT TO IPT. COMPLETING IT ELECTRONICALLY INSURES CLARITY OF THE DATA THAT IPT RECEIVES AND RESULTS IN FEWER ERRORS.

Full refunds will be issued for any applications not accepted. Notification of acceptance will be sent out. **All applications need to be received by the IPT Office no later than May 2, 2014, for timely consideration.** Names received thereafter may not appear in the printed registration list.

REGISTRATION FEES ARE AS FOLLOWS (APPLICANT OR SOMEONE FROM COMPANY MUST BELONG TO IPT):

By May 2, 2014	After May 2, 2014
\$795 (Applicant Personally Belongs To IPT)	\$845 (Applicant Personally Belongs To IPT)
\$995 (Applicant Does Not)	\$1,045 (Applicant Does Not)

NOTE: In cases where local registrants from the Atlanta area are not residing at the Conference Center Hotel, there is an added registration fee supplement of **\$600.00**.

All registrations must be completed in advance of the school. The Institute accepts credit cards as indicated. The following applies for registration fees received by the IPT Office:

CANCELLATION FEE

\$100 for any filed registration, whether mailed or faxed. After May 16th, no refunds will be made. **No cancellations will be valid unless placed in writing to IPT.** For more information regarding administrative policies such as complaint and refund, contact the IPT office at (404) 240-2300.

SUBSTITUTION FEE

Prior to (including) May 2 nd :	\$40.00
After May 2 nd :	\$50.00

SCHOOL NOTEBOOK

An integral part of the school is the notebook that contains all of the learning materials. **No notebooks will be distributed at the school.** As part of the registration fee, students will be given web access to be able to download, save and print copies of the book chapters, appendices and breakout problems to a single device seven days before the school and during the school. **A student may elect to order a printed copy of the book for a price of \$50.00 up to fourteen (14) days before the school.** If this option is desired, please check the appropriate box on the IPT Registration form. Please note that having access to the materials during the school is imperative in the learning process. Web access will not be available during the school in the meeting rooms nor are there readily accessible power outlets available in the meeting rooms to power a computer if the materials are stored on a hard drive.

ACCOMMODATIONS

Registrants for this program are expected to reside at the Georgia Tech Hotel and Conference Center. Reservations may be made by calling the Reservation office at **800-706-2899** (reference the IPT Tax School room block). Reservations should be made with the hotel by May 9, 2014, to ensure receiving the group rate. After this date, or once the room block is filled, reservations requested will be on a space available basis. The package rate for this program is \$1,302.65 including taxes for single or \$1,002.50 per person for double occupancy. Package includes: Dinner on Sunday night; 5 nights lodging (Sunday-Thursday); breakfast Monday - Friday; Lunch Monday - Thursday. Check-in time is 3:00 pm and check-out time is 12:00 pm. The hotel accepts cash, major credit cards, or travelers checks. In order to guarantee a reservation, a deposit

equivalent to one night's room and tax or the guarantee of the same by a major credit card is required. Please check with the hotel regarding their cancellation policy. There is a \$600.00 supplemental registration fee for local registrants not staying at the Georgia Tech Hotel and Conference Center under IPT's group package.

Registrants are expected to stay at the hotel given the peer interaction that takes place which is an essential part of the program. Should election be made by Atlanta registrants, however, to stay at home, there is a supplemental registration fee of **\$600.00** to cover some of the overhead costs that are a part of the hotel registration fee. The \$600 supplemental fee covers - dinner on Sunday night, **breakfast items that are available on the second floor continental breakfast (not the full breakfast in the dining room)**, and lunch Monday through Thursday, refreshment breaks and the individual daily participant fee charged by the hotel that is applied to audio visual and meeting room space costs.

FACTS ABOUT GEORGIA TECH HOTEL AND CONFERENCE CENTER

The Georgia Tech Hotel and Conference Center is an integral part of Georgia Tech's campus in Midtown Atlanta. In addition to its high-tech features, the hotel has the following amenities: an outdoor courtyard, an all-day dining room, club lounge, an indoor swimming pool, and a fully equipped fitness center. Taxi cab fare is \$32.50 (flat fee) from the airport to the Conference Center. There is a subway station (MARTA) at the airport which has a stop four blocks from the hotel.

FURTHER INFORMATION

A link will be furnished to each student allowing electronic access to the school notebook. Attendance will be electronically recorded, and all Registrants will be required to complete a final quiz on Friday, June 6th that will be administered from 1:15 a.m. to 12:15 p.m. **(please make your travel arrangements accordingly).** **Also, all students must arrive no later than 6:00 p.m. Sunday afternoon, June 1st.** **Class sessions will begin Sunday at 6:15 p.m., after registration.** Attire during the day is business casual.

GENERAL INFORMATION

Quizzes will be given during the week, with a final quiz on Friday. A cumulative passing score must be realized on the quizzes for successful completion of the school. The final quiz must be taken Friday at the scheduled time, so travel arrangements should be made accordingly. **No exceptions can be made to taking the quiz at the stated time on Friday.**

Fluency in English is required for successful completion of this course. Foreign language dictionaries may not be used during examinations.

Attire during the day is business casual.

Photos will be taken at this event to use in publications on the IPT website and in organizational and individual photo albums.

CONTINUING EDUCATION CREDIT

Approximately 39.5 continuing education credits (including 1 IPT Ethics credit) are available for full attendance. In accordance with the standards of the National Registry of CPE Sponsors, CPE credits have been granted based on a 50-minute hour. CMEs will obtain credit on an hour for hour basis for attendance.

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Prerequisites:	Five or more years' experience in state income tax
Recommended Field of Study:	Taxation (Income Tax) Regulatory Ethics
Program Level:	Advanced
Instructional Method:	Group Live
Advance Preparation Required:	None

State Business Income Taxation

State Business Income Taxation includes contributions from some of the nation's preeminent state business income tax practitioners, a virtual Who's Who of SALT professionals. This treatise, derived from the authors' many years of expertise in state business income taxation, is a vital reference tool. Let the leading state and local income tax experts provide you with the answers you need by purchasing this book and accompanying CD today!

Please go to the following IPT link for ordering information:

[Publications Order Form](#)