



2015 IPT Advanced State Income Tax School



**The Cliff Lodge
Salt Lake City, Utah
May 31- June 5, 2015**

Institute for Professionals in Taxation®

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Program

◆ SUNDAY, May 31

- 3:00 p.m. - 6:30 p.m. Registration
- 6:15 p.m. - 6:30 p.m. **Opening of School (Joint with Basic School)**
Welcome and Overview By:
- Arthur E. Bennett, CMI**
President, Institute for Professionals in Taxation®
Property Tax Assistance Co., Inc.
Bellflower, California
- 6:30 p.m. - 7:30 p.m. **GENERAL SESSION (Joint with Basic School)**
- ▣ **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:
- *Grasp 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

◆ MONDAY, JUNE 1

- 6:30 a.m. - 8:00 a.m. Breakfast
- 8:00 a.m. - 8:15 a.m. **Welcome to Advanced School by Program Chair:**
- Matthew D. Melinson, CPA**
Partner, State & Local Taxes
Grant Thornton LLP
Philadelphia, Pennsylvania
- 8:15 a.m. - 9:45 a.m. **GENERAL SESSION**
- ▣ **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:

- *Grasp 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:

Matthew D. Melinson, CPA

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

Aaron M. Young, CMI, Esq.

Partner
Reed Smith LLP
New York, New York

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

▣ 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:

- *Grasp 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*
- *Comprehend 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*

◆ MONDAY (continued)

- *Comprehend and apply UDITPA nonbusiness income allocation rules*
- *Recognize existence of areas outside of nonbusiness income where states may directly allocate income.*

Instructors:

Mark E. Holcomb, Esq.

Partner

Madsen Goldman & Holcomb, LLP

Tallahassee, Florida

David J. Shipley, CMI, Esq.

Partner

McCarter & English, LLP

Newark, New Jersey

11:15 a.m. - 12 Noon

GENERAL SESSION

▣ 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:

- *Grasp 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*
- *Comprehend the application of the unitary business principle in separate company states*
- *Comprehend the various state statutory definitions of a unitary business.*

Instructors:

Mark E. Holcomb, Esq.

Partner

Madsen Goldman & Holcomb, LLP

Tallahassee, Florida

◆ MONDAY (continued)

David J. Shipley, CMI, Esq.

Partner
McCarter & English, LLP
Newark, New Jersey

12 Noon - 1:00 p.m. Lunch

1:00 p.m. - 1:30 p.m. **GENERAL SESSION**

▣ Unitary Business: Core Theory & Recent Applications (continued)

Instructors:

Mark E. Holcomb, Esq.

Partner
Madsen Goldman & Holcomb, LLP
Tallahassee, Florida

David J. Shipley, CMI, Esq.

Partner
McCarter & English, LLP
Newark, New Jersey

1:30 p.m. - 2:30 p.m. **CASE STUDY**

▣ Differences Between Unitary and Non-Business

Group 1 - Holcomb

Group 2 - Shipley

Instructors:

Mark Holcomb, 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**

▣ 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 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:

- *Comprehend the federal post-audit settlement process*

◆ MONDAY (continued)

- Define a “final federal determination”: for state reporting purposes.

Instructor:

Kevin M. Zins, CPA
Partner, Tax Services
Grant Thornton LLP
Cincinnati, Ohio

3:45 p.m. - 5:00 p.m. **GENERAL SESSION**

▣ 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

- *Comprehend the growing trend away from an evenly weighted three factor formula*
- *Recognize unique rules for sourcing from services, intangibles, and capital assets*
- *Grasp 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*
- *Comprehend the property factor treatment of rented property, property in transit, moveable property and leased property*
- *Comprehend what compensation is included in a state's payroll factor*
- *Discuss the concept of payroll attribution*

◆ MONDAY (continued)/TUESDAY

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 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:

Glenn C. McCoy, Jr., Esq.

Director
KPMG LLP
New York, New York

Matthew D. Melinson, CPA

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

◆ TUESDAY, JUNE 2

6:30 a.m. - 8:00 a.m. Breakfast

8:30 a.m. - 9:15 a.m. **GENERAL SESSION**

▣ **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:

◆ TUESDAY, JUNE 2 (continued)

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

Instructors:

Gary C. Bingel, CMI, CPA, Esq.

Partner - State & Local Taxes
EisnerAmper LLP
Iselin, New Jersey

Glenn C, McCoy, Jr., Esq.

Director
KPMG LLP
New York, New York

Matthew D. Melinson, CPA

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

9:15 a.m. - 10:15 a.m. **GENERAL SESSION**

▣ **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:

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

Instructors:

Gary C. Bingel, CMI, CPA, Esq.

Partner - State & Local Taxes
EisnerAmper LLP
Iselin, New Jersey

Glenn C, McCoy, Jr., Esq.

Director
KPMG LLP
New York, New York

Matthew D. Melinson, CPA

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

10:30 a.m.-11:45 a.m. **CASE STUDY**

▣ **Tax Apportionment**

Group 1 - Bingel

Group 2 - McCoy

◆ TUESDAY (continued)

Instructors:

Gary C. Bingel, CMI, CPA, Esq.

Partner - State & Local Taxes
EisnerAmper LLP
Iselin, New Jersey

Glenn C, McCoy, Jr., Esq.

Director
KPMG LLP
New York, New York

Matthew D. Melinson, CPA

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

11:45 a.m.–12:45 p.m. Lunch

12:45 p.m. – 2:30 p.m. **GENERAL SESSION**

▣ **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*

Instructors:

Mark E. Holcomb, Esq.

Partner
Madsen Goldman & Holcomb, LLP
Tallahassee, Florida

Mark L. Nachbar, Esq., CPA

Principal
Ryan, LLC
Downers Grove, Illinois

◆ TUESDAY (continued)

2:45 p.m. – 4:00 p.m. **GENERAL SESSION**

▣ 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:

- *Comprehend 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*
- *Grasp the 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)*
- *Comprehend apportionment factor rules*
- *Recognize 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:

Mary M. Cho

Director, State and Local Tax
Grant Thornton LLP
Seattle, Washington

Karen H. Currie, Esq.

Partner
Jones Day
Dallas, Texas

Kevin M. Zins, CPA

Partner, Tax Services
Grant Thornton LLP
Cincinnati, Ohio

◆ TUESDAY (continued)

4:00 p.m. – 5:00 p.m. **CASE STUDY**

▣ Combined Reporting

Group 1 - Holcomb

Group 2 - Nachbar

Instructors:

Mark E. Holcomb, Esq.

Partner

Madsen Goldman & Holcomb, LLP

Tallahassee, Florida

Mark L. Nachbar, Esq., CPA

Principal

Ryan, LLC

Downers Grove, Illinois

◆ WEDNESDAY, JUNE 3

6:30 a.m. - 8:00 a.m. Breakfast

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

9:00 a.m. - 10:00 a.m. **GENERAL SESSION**

▣ 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*
- *Comprehend the apportionment, combination and tax attribute issues unique to passthroughs.*

Instructors:

William T. Thistle, II, Esq.

Attorney

Bradley Arant Boult Cummings, LLP

Birmingham, Alabama

Margaret C. Wilson, CMI, Esq.

Partner

Wilson Agosto LLP

Somerville, New Jersey

10:15 a.m. - 11:00 a.m. **CASE STUDY**

▣ Passthroughs

Group 1 - Thistle

Group 2 - Wilson

◆ WEDNESDAY (continued)

Instructors:

William T. Thistle, II, Esq.

Attorney

Bradley Arant Boult Cummings, LLP

Birmingham, Alabama

Margaret C. Wilson, CMI, Esq.

Partner

Wilson Agosto LLP

Somerville, New Jersey

11:00 a.m. - 12 Noon **GENERAL SESSION**

▣ **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:

- *Comprehend 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.*

Instructors:

Duane W. Dobson Jr., CMI, CPA

Director, State and Local Tax Practice

KPMG LLP

Tysons Corner, Virginia

John F. Fletcher, Esq.

Partner

Jones Walker LLP

Jackson, Mississippi

12:00 p.m. – 1:00 p.m. Lunch

◆ WEDNESDAY (continued)

1:00 p.m. – 2:45 p.m. **GENERAL SESSION**

▣ 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 Practice

KPMG LLP

Tysons Corner, Virginia

3:00 p.m. – 4:00 p.m. **GENERAL SESSION**

▣ 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:

- *Grasp 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:

John F. Fletcher, Esq.

Partner

Jones Walker LLP

Jackson, Mississippi

Margaret C. Wilson, CMI, Esq.

Partner

Wilson Agosto LLP

Somerville, New Jersey

4:00 p.m. – 5:00 p.m. **CASE STUDY**

▣ State Tax Issues for Foreign Affiliates

Group 1 - Fletcher

Group 2 - Wilson

◆ WEDNESDAY (continued)

Instructors:

John F. Fletcher, Esq.

Partner
Jones Walker LLP
Jackson, Mississippi

Margaret C. Wilson, CMI, Esq.

Partner
Wilson Agosto LLP
Somerville, New Jersey

◆ THURSDAY, JUNE 4

6:30 a.m. – 8:00 a.m. Breakfast

8:30 a.m. – 10:00 a.m. **GENERAL SESSION**

▣ **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:

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

Instructors:

Karen H. Currie, Esq.

Partner
Jones Day
Dallas, Texas

John F. Fletcher, Esq.

Partner
Jones Walker LLP
Jackson, Mississippi

10:15 a.m. – 11:00 a.m. **CASE STUDY**

▣ **Mergers & Acquisitions**

Group 1 - Currie

Group 2 – Fletcher

◆ THURSDAY (continued)

Instructors:

Karen H. Currie, Esq.

Partner
Jones Day
Dallas, Texas

John F. Fletcher, Esq.

Partner
Jones Walker LLP
Jackson, Mississippi

11:00 a.m. – 12 noon **GENERAL SESSION**

▣ 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:

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

Instructors:

Karen H. Currie, Esq.

Partner
Jones Day
Dallas, Texas

Mark L. Nachbar, Esq., CPA

Principal
Ryan, LLC
Downers Grove, Illinois

12 Noon - 1:00 p.m. Lunch

1:00 p.m. - 1:30 p.m. **GENERAL SESSION**

▣ Tax Planning (continued)

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.

◆ THURSDAY (continued)

Learning Objectives

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

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

Instructors:

Karen H. Currie, Esq.

Partner
Jones Day
Dallas, Texas

Mark L. Nachbar, Esq., CPA

Principal
Ryan, LLC
Downers Grove, Illinois

1:30 p.m. – 2:15 p.m. **CASE STUDY**

▣ Tax Planning

Group 1 - Currie

Group 2 - Nachbar

Instructors:

Karen H. Currie, Esq.

Partner
Jones Day
Dallas, Texas

Mark L. Nachbar, Esq., CPA

Principal
Ryan, LLC
Downers Grove, Illinois

2:15 p.m. – 3:30 p.m. **GENERAL SESSION**

▣ 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:

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

◆ THURSDAY (continued)

Instructor:

Jordan M. Goodman, Esq., CPA
Partner
Horwood Marcus & Berk Chartered
Chicago, Illinois

3:45 p.m. – 4:45 p.m. **CASE STUDY**

▣ **Related Party Transactions** **Group 1 - Goodman**

Instructors:

Jordan M. Goodman, Esq., CPA
Partner
Horwood Marcus & Berk Chartered
Chicago, Illinois

◆ FRIDAY, JUNE 5

6:30 a.m. - 8:00 a.m. Breakfast

8:00 a.m. - 10:00 a.m. **GENERAL SESSION**

▣ **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:

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

Instructors:

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

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)**

▣ **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.

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:

Mark A. Loyd, Esq.

Partner and Chair, Tax and Finance Group
Bingham Greenebaum Doll LLP
Louisville, Kentucky

Glenn C. McCoy, Jr., Esq.

Director
KPMG LLP
New York, New York

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

12:15 p.m. – 1:15 p.m. Lunch

Conclusion of School

Advanced State Income Tax School Sponsors

Ernst & Young LLP

Grant Thornton LLP

Marvin F. Poer and Company

Ryan

2015 IPT ADVANCED INCOME TAX SCHOOL COMMITTEE

Chair

Matthew D. Melinson, CPA
Partner, State & Local Taxes
Grant Thornton LLP
Philadelphia, Pennsylvania

Vice-Chair

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

Duane W. Dobson Jr., CMI, CPA

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

Margaret C. Wilson, CMI, Esq.

Partner
Wilson Agosto LLP
Somerville, New Jersey

Mark L. Nachbar, Esq., CPA

Principal
Ryan, LLC
Downers Grove, Illinois

Aaron M. Young, CMI, Esq.

Partner
Reed Smith LLP
New York, New York

David J. Shipley, CMI, Esq.

Partner
McCarter & English, LLP
Newark, 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.

Gary C. Bingel, CMI, CPA, Esq.

Partner - State & Local Taxes
EisnerAmper LLP
Iselin, New Jersey

Jordan M. Goodman, Esq., CPA

Partner
Horwood Marcus & Berk Chartered
Chicago, Illinois

Mary M. Cho

Director, State and Local Tax
Grant Thornton LLP
Seattle, Washington

Mark E. Holcomb, Esq.

Partner
Madsen Goldman & Holcomb, LLP
Tallahassee, Florida

Karen H. Currie, Esq.

Partner
Jones Day
Dallas, Texas

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Partner and Chair, Tax and Finance Group
Bingham Greenebaum Doll LLP
Louisville, Kentucky

Duane W. Dobson Jr., CMI, CPA

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

Glenn C. McCoy, Jr., Esq.

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Newark, New Jersey

Margaret C. Wilson, CMI, Esq.

Partner
Wilson Agosto LLP
Somerville, New Jersey

William T. Thistle, II, Esq.

Attorney
Bradley Arant Boult Cummings, LLP
Birmingham, Alabama

Aaron M. Young, CMI, Esq.

Partner
Reed Smith LLP
New York, New York

Kevin M. Zins, CPA

Partner, Tax Services
Grant Thornton LLP
Cincinnati, Ohio

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 website at www.ipt.org for the electronic [Registration Form](#) for the School. The form can be completed electronically and emailed or printed out and sent to IPT. Completing it electronically ensures clarity of the data that IPT receives and results in fewer errors.

Notification of acceptance will be sent out. **All applications need to be received by the IPT Office no later than May 1, 2015, for timely consideration.** Names received thereafter may not appear in the printed registration list. Full refunds will be issued for any applications not accepted.

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

By May 1, 2015

\$795 (Applicant Personally Belongs To IPT)
\$1,045 (Applicant Does Not)

After May 1, 2015

\$845 (Applicant Personally Belongs To IPT)
\$1,095 (Applicant Does Not)

NOTE: In cases where local registrants from the Salt Lake City area are not residing at The Cliff Lodge Hotel, there is an added registration fee supplement of **\$550.00**.

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

There is a \$100 cancellation fee 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

There is a substitution fee of \$40.00 prior to (including) May 1st; \$50.00 after May 1st. Substitute must be a member of the same company as the original registrant.

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 Cliff Lodge in Salt Lake, Utah. Reservations may be made by calling the Reservation office at **800-453-3000** (reference the IPT Tax School room block) or you can go to the website at <https://reservations.snowbird.com> to get the IPT room rate. Reservations should be made with the hotel by May 8, 2015, 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 \$1,295.00 including taxes for single or \$970 per person for double occupancy. Package includes: 5 Dinners starting on Sunday night; 5 nights lodging (Sunday-Thursday); breakfast Monday - Friday; Lunch Monday - Friday. Check-in time is 4:00 p.m. and check-out time is 11:00 a.m. 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.

For free transportation to and from the hotel, Registrants must notify The Cliff Lodge via 800-453-3000 or lodging@snowbird.com of their flight details when available.

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 Salt Lake City registrants, however, to stay at home, there is a supplemental registration fee of **\$550.00** to cover some of the overhead costs that are a part of the hotel registration fee. The \$550 supplemental fee covers - dinner on Sunday night, **continental breakfast on the second floor (not the full breakfast in the dining room)**, and lunch Monday through Friday, refreshment breaks and the individual daily participant fee charged by the hotel that is applied to audio visual and meeting room space costs.

FURTHER INFORMATION

Attendance will be electronically recorded. **Also, all students must arrive at the hotel no later than 6:00 p.m. Sunday afternoon, May 31st. Class sessions will begin Sunday at 6:15 p.m. after registration.** Attire during the day is business casual.

PHOTOGRAPHY

Consent to Use of Photographic Images: Photos will be taken at this event and may be published in IPT publications, multimedia presentations, website, LinkedIn and Facebook pages, and other IPT related social media sites. Registration and attendance at, or participation in, IPT meetings or other activities constitutes agreement by the registrant/speaker/attendee to IPT's use and distribution of the registrant's, speaker's, or attendee's image or voice in photographs, videotapes, electronic reproductions, and tapes of such events and activities.

TESTING

Quizzes will be given during the week, with a final quiz on Friday, June 5th that will be administered from 11:15 a.m. to 12:15 p.m. 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.

CONTINUING EDUCATION CREDIT

Approximately 40 continuing education credits (including 1 Ethics credit) are available for full attendance Sunday through Friday. Each attendee will be able to obtain a copy of his or her scanned attendance (Certificate of Attendance) through the IPT website on the “My Participation” tab approximately two weeks after the end of the program. Students will receive their official results by email.

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 submitted to the National Registry of CPE Sponsors through its website: www.learningmarket.org. In accordance with the standards of the National Registry of CPE Sponsors, CPE credits have been based on a 50-minute hour. IPT also files for credit with the Texas Department of Licensing and Regulation.

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, each individual must scan his or her bar-coded badge during the first 15 minutes of each session. No credit for the session will be given to un-scanned attendees.

CMI’s will receive hour-for-hour continuing education credits for actual session attendance, including 1 hour of Ethics for full program attendance. CMI Designation Information is included in the school brochure.

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.

Prerequisites:	Basic Income Tax School
Recommended Field of Study:	Taxation (Income Tax) Regulatory Ethics
Program Level:	Basic
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](#)

