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2008 TEXAS MARGIN TAX

A Practical Guide for Lawyers and Accountants

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DALLAS
November 19-20, 2008
Cityplace Conference Center

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MORNING	AFTERNOON	
Presiding Officer: Hon. Peter Brooks, Austin, TX	Presiding Officer: Christina A. Mondrik, Austin, TX	3:15 p.m. .50 hr Control, Affiliation and Attribution This presentation discusses the legal requirements built into the Texas Tax Code's new definitions of control and affiliation as well as the Texas Comptroller's regulatory attribution rule. The analysis is the foundation for determining which entities within an organization must be included on a combined group report. Special attention will be given to trusts. Steven D. Moore, Austin, TX
8:00 a.m. Registration Opens Includes continental breakfast.	LUNCHEON PRESENTATION 12:15 p.m. Pick up Box Lunch Included in conference registration fee.	3:45 p.m. 1.25 hrs Putting it Together: Practical Examples of the Application of Margin Tax This visual presentation is aimed at the practical application of the new margin tax to common entities and structures. It includes comparative analysis of federal income tax treatment of the structures. Special attention will also be given to choice of entity; selected nexus issues; special partnership agreement provisions; and the treatment of passive entities within complex organizational structures. William H. Hornberger, Dallas, TX Steven D. Moore, Austin, TX
9:00 a.m. .50 hr Calculating the Taxable Margin: How It Works, What's at Stake Discussion of the elements of the margin tax computation, including combined reporting, and how the elements interrelate to determine the tax liability. Ray H. Langenberg, Austin, TX	12:30 p.m. .75 hr The Margin Tax: The Big Business and Small Business Point of View Dale Craymer, Austin, TX Will Newton, Austin, TX	
9:30 a.m. 1.00 hr Revenue Issues Under the Revised Texas Franchise Tax This presentation will provide a discussion of key issues and opportunities relating to the computation of total revenue under the revised Texas franchise tax. David E. Colmenero, Dallas, TX	1:15 p.m. Break	
10:30 a.m. Break	1:30 p.m. .50 hr Calculating the Compensation Deduction This session will focus on the calculation and compliance issues of the compensation deduction, the identification of planning opportunities to increase the deduction, and the avoidance of potential traps for the unwary. In addition, this session will also address inter-entity services, staff leasing companies, management companies, and other industry-specific issues. Eric Louis Stein, Austin, TX	5:00 p.m. Adjourn
10:45 a.m. .50 hr Top Ten Key Filing and Reporting Issues Common filing mistakes and oversights in determining the affiliated/combined group, revenue, cost of goods sold deduction, and interaction among related entities. Sue Baadsgaard, Dallas, TX	2:00 p.m. 1.00 hr Unitary Taxation—The Texas Approach With the adoption of the revised franchise tax, Texas has left behind more than 100 years of separate entity reporting and joined the ranks of states that require combined reporting if controlling interest requirements are met and the affiliated group operates in a unitary manner. Who is in, who is out, and is there anything that affiliated groups can do about it? This segment focuses upon factors and issues relevant to determining whether an affiliated group is or is not a unitary enterprise, with particular emphasis on the Texas approach. Ira A. Lipstet, Austin, TX	MORNING Presiding Officer: David H. Gilliland, Austin, TX 8:30 a.m. Conference Room Opens Includes continental breakfast.
11:15 a.m. 1.00 hr Cost of Goods Sold Lessons learned on how to tackle the computation of the cost of goods sold. Steven W. Anderson, Houston, TX	3:00 p.m. Break	9:00 a.m. .50 hr Apportionment This presentation will cover apportionment under the revised franchise (margin) tax. The discussion will cover advanced apportionment issues with respect to combined groups, service providers and other taxpayers. Christina A. Mondrik, Austin, TX
		9:30 a.m. .50 hr Taxable and Nontaxable Entities Discussion of issues concerning whether trusts and other entities are subject to margin tax. Elsbeth T. Peshel, Austin, TX

10:00 a.m.

.50 hr

Possible Franchise Tax Changes

Discussion of possible amendments to the franchise tax, how current revenue expectations may affect the likelihood of change, and tax policy criticisms of the revised franchise tax.

David H. Gilliland, Austin, TX

10:30 a.m.

Break

10:45 a.m.

1.50 hrs

Margin Tax Q&A with the Comptroller's Office

Representatives from the Comptroller's Tax Policy Division will be on hand to answer common margin tax questions and field questions from the audience regarding the Comptroller's interpretation of the revised Texas margin tax.

Moderator: David H. Gilliland, Austin, TX
Teresa Bostick, Austin, TX
Janet Spies, Austin, TX

12:15 p.m.

Adjourn

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Includes Course Binder and Box Lunch Presentation

DALLAS—NOVEMBER 19-20, 2008

- ☐ Early Registration Fee due by Wednesday, Nov. 12, 2008 \$425.00
☐ Registration Fee after Wednesday, Nov. 12, 2008 \$475.00
☐ State Employee Registration Fee (\$300 after Nov. 12, 2008) \$250.00

HOUSTON—DECEMBER 4-5, 2008

- ☐ Early Registration Fee due by Monday, Nov. 24, 2008 \$425.00
☐ Registration Fee after Monday, Nov. 24, 2008 \$475.00
☐ State Employee Registration Fee (\$300 after Nov. 24, 2008) \$250.00

AUSTIN—DECEMBER 11-12, 2008

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DALLAS

NOVEMBER 19-20, 2008
CONFERENCE LOCATION



Cityplace Conference Center

2711 North Haskell Avenue
Dallas, TX 75204
214-515-5100

Parking: Complimentary
Self-Parking
(subject to change)

KEY DATES

Registration & Cancellation

Nov. 12, 2008–5 p.m.
last day for early registration
add \$50 for registrations
received after this time

Nov. 14, 2008–5 p.m.
last day for full refund

Nov. 17, 2008–5 p.m.
last day for partial refunds
\$50 processing fee applied

Weds., Nov. 19, 2008–9 a.m.
conference begins

AUSTIN

DECEMBER 4-5, 2008
CONFERENCE LOCATION



Norris Conference Center

2525 West Anderson Lane,
Suite 365
Austin, TX 78757

Parking: Complimentary
Self-Parking
(subject to change)

KEY DATES

Registration & Cancellation

Nov. 26, 2008–5 p.m.
last day for early registration
add \$50 for registrations
received after this time

Nov. 28, 2008–5 p.m.
last day for full refund

Dec. 1, 2008–5 p.m.
last day for partial refunds
\$50 processing fee applied

Thurs., Dec. 4, 2008–9 a.m.
conference begins

HOUSTON

DECEMBER 11-12, 2008
CONFERENCE LOCATION



Hyatt Regency

1200 Louisiana Street
Houston, TX 77002
713-654-1234

Parking: \$12 Valet;
Self-parking available nearby
(subject to change)

KEY DATES

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Dec. 3, 2008–5 p.m.
last day for early registration
add \$50 for registrations received
after this time

Dec. 5, 2008–5 p.m.
last day for full refund

Dec. 8, 2008–5 p.m.
last day for partial refunds
\$50 processing fee applied

Thurs., Dec. 11, 2008–9 a.m.
conference begins

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PricewaterhouseCoopers LLP
Dallas, TX

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