



Connect. Engage. Impact.

Audits and Appeals Seminar / April 20-23, 2020 / Grand Hyatt Hotel at SFO, San Francisco, CA

2020 Audits and Appeals Seminar Managing Substantive Tax Disputes – Issues, Strategies and Approaches

Join us for TEI's 2020 Audits and Appeals Seminar! This year's program is updated to meet the current and evolving needs of federal, international, and state tax professionals overseeing audits and litigation for their companies.

April 20-21, 2020

Federal Tax and Transfer Pricing Controversies

- ▶ **Updated Federal Tax and Transfer Pricing Program** – This year's Federal Tax and Transfer Pricing Controversy program focuses on managing **substantive tax** disputes. Our program pairs technical tax experts with controversy specialists to both frame key areas of potential compliance and audit risk and design strategies to manage issue-specific tax controversies arising from those risks. In addition, we are delighted to welcome **IRS Chief Counsel Michael Desmond** to serve as our keynote speaker.
- ▶ **Transfer Pricing Controversies** – How have digital issues complicated your functional analysis and method selection process? What is the current state of the arm's length standard in a world of tax reform? What is the role of financial information in a transfer pricing examination/controversy? These and other developments will be among the themes to be addressed.

April 22-23, 2020

State & Local Tax Controversies

- ▶ **Updated State Tax Controversy Program** – This year's State & Local Tax Controversy program will focus on issues and techniques that are essential to resolving state tax controversies at the audit level.
- ▶ **Legal Writing Workshop** – Kiko Korn of Legal Writing Works will provide a hands-on legal writing workshop on how to write a state tax protest and respond to state tax IDRs effectively.
- ▶ **State Tax Negotiations** – Alison Fragale of Echelon will address how applied research-based strategies can assist your negotiations with state tax auditors and help you resolve state tax controversies.
- ▶ **State of the States Audit Roundtable** – Join us for a TEI member-led state tax audit roundtable! Share your experiences addressing difficult audit issues, and learn from others' efforts to resolve state tax audit issues in this special forum.
- ▶ **State Tax Auditor and State Tax Judges Panels** – This year's seminar will feature a new state tax auditors panel and a recurring favorite, our state tax judges panel.

The complete program can be found at www.tei.org. Registrations for this seminar tend to fill quickly, and we urge you to register early to reserve your place.



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2020 Audits and Appeals Seminar Federal Tax and Transfer Pricing Controversy

MONDAY, APRIL 20

7:45 - 8:15 am	Registration & Continental Breakfast
8:15 - 8:30 am	Welcome & Introductions
8:30 - 9:30 am	Keynote Address Michael Desmond, Chief Counsel <i>Internal Revenue Service</i>
9:30 - 10:45 am	International Tax – Foreign Tax Credits & Competent Authority TCJA Nuts & Bolts – From a Tax Controversy Perspective Transfer Pricing – Digital Issues Complicating Your Functional Analysis and Method Selection
10:45 - 11:00 am	Break
11:00 am - 12:15 pm	Reading a Transcript, Including Payments, Deposits, and Interest Other Business Credits (Energy Credits, Sections 45 48) Transfer Pricing – The State of the Arm’s Length Standard in a World of Tax Reform
12:15 - 1:45 pm	LUNCH PROGRAM ROUNDTABLE DISCUSSION – The State of IRS Administration
1:45 - 3:00 pm	Practical Privilege Valuation Issues – Outside Transfer Pricing Section 199
3:00 - 4:15 pm	Global Exchange of Information Supply Chain Research & Development Credits
4:15 - 4:30 pm	Break
4:30 - 5:30 pm	Tax Return Positions and Ethical Challenges Transaction Costs Statutory Interpretation and Regulatory Deference – Practical Implications
5:45 - 7:00 pm	Reception





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Federal Tax and Transfer Pricing Controversy

TUESDAY, APRIL 21

7:00 - 8:00 am	Breakfast
8:00 - 10:00 am	<i>Selected TCJA Controversy Issues</i> <i>Transfer Pricing – Update on Transfer Pricing Controversies (including Opinions, Appeals, and Early Resolution)</i> <i>Employment Tax Issues</i>
10:00 - 10:15 am	Break
10:15 am - 12:00 Noon	<i>BBA Examinations</i> <i>IRS Interviews and Factory Tours</i> <i>Subpart F Issues</i>
12:00 Noon - 1:00 pm	LUNCH
1:00 - 2:30 pm	<i>S Corporations – Basis Issues</i> <i>Multi-Jurisdictional Tax Disputes</i> <i>Experts and Expert Reports – Uses and Misuses</i>
2:30 - 2:45 pm	Break
2:45 - 4:00 pm	<i>Transfer Pricing – The Role of Financial Information in Transfer Pricing Examinations/Controversy</i> <i>Information Return-Related Penalties</i> <i>Closing Your Exam (870, 870-AD, Closing Agreements)</i>
4:00 pm	Adjourn





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2020 Audits and Appeals Seminar State & Local Tax Controversy

WEDNESDAY, APRIL 22

8:00 - 8:30 am	Breakfast & Welcome
8:30 - 9:30 am	<i>Strategic Considerations for Managing Your State Tax Audit Portfolio</i>
9:30 - 10:30 am	<i>Best Practices in Managing a State Tax Audit</i>
10:30 - 10:45 am	Break
10:45 am - 12:00 Noon	<i>How to Write a State Tax Protest and Response to State Tax IDRs Effectively</i>
12:00 Noon - 2:00 pm	LUNCH <i>State Tax Auditor Panel</i>
2:00 - 2:15 pm	Break
2:15- 3:30 pm	<i>Navigating State Tax Negotiations</i>
3:30 - 5:30 pm	<i>State-of-the-States Audit Roundtable</i>

THURSDAY, APRIL 23

8:00 - 8:30 am	Breakfast
8:30 - 9:30 am	<i>State Tax Ethics</i>
9:30 - 10:45 am	<i>State Tax Technology Review</i>
10:45 - 11:00 am	Break
11:00 am - 12:00 Noon	<i>Reserve, Release or Restate – Tax Accounting Controversies</i>
12:00 Noon - 2:00 pm	LUNCH <i>All Rise for a Peek Behind the Bench</i>





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GENERAL INFORMATION

Registrations

Registration is limited to members of TEI and other in-house tax professionals. (Individuals engaged in private law, accounting, or other consulting practice are ineligible to attend.) No partial or split registrations are permitted. Registration forms without payment will not be processed by TEI. **Please note:** Membership in Tax Executives Institute is on an individual basis; there are no "company" or "corporate" memberships. Only members of the Institute — or individuals whose membership applications are pending at TEI — are entitled to the member rate. All others are required to pay at the listed nonmember rate. For membership information, visit the "Membership" section of www.tei.org. A registration will not be processed unless it is accompanied by payment, and no registrations will be taken over the telephone.



By web:



By mail:



By fax:



By email:

www.tei.org. You must login before registering.

Tax Executives Institute, Lockbox 9407 PO Box 70280, Philadelphia, PA 19176-0280. Send registration form with check or credit card information.

202.638.5607. Credit card registrations only. VISA, MasterCard, American Express, Diners Club, and Discover only. To ensure confidentiality, please fax between 9 a.m. and 4 p.m. ET.

meetings@tei.org

Enrollment is limited and registrations will be accepted on a first-come, first-served basis. Should maximum enrollment be reached prior to the seminar and TEI cannot accept your registration, you will be notified immediately. You will receive a confirmation by email; no other confirmation will be sent.

Applications should be completed in full. The requested information will be used to comply with continuing education requirements established by state CPA and bar associations as well as federal antidiscrimination rules.

Cancellation and Substitution Policy

All cancellations must be made **in writing** by 4:00 pm ET on April 3, 2020, and will be subject to an administrative service charge of \$75 (U.S.); for cancellations after April 3, 2020 (the date handout materials become available) and before April 10, 2020, the charge will be \$200 (U.S.). No refunds will be made for cancellations received after April 10, and for no-shows. To cancel, please send an email to meetings@tei.org. In the event of cancellation or oversubscription of the conference, TEI's liability is limited to the return of the registration fee. There will be a \$50 substitution fee assessed if you would like to change registrants.

Handout Materials

Materials will be posted in a searchable format on a secure website. Beginning two weeks before the conference, registrants will be able to access the handouts via a secure link (requiring a password), so they can download or print them out. **No paper copies will be provided in your registration materials, and no onsite printing facilities will be available.** TEI encourages you to download or print documents of interest in advance. (Wi-Fi will be available in the meeting rooms but we strongly suggest downloading the materials in advance.) Materials will remain accessible by registrants for one month after the conference.

Facilities

TEI has secured a discounted block of rooms at the Grand Hyatt Hotel at SFO. Sleeping rooms are available at the discounted rate of \$269 + tax per night. [CLICK HERE](#) for online reservations. You may also call (888) 803-7534 for reservations, be sure to mention you are attending "TEI's Audits & Appeals Seminar" to receive our discounted rate. Reservations should be made prior to March 25, 2020, when TEI's room block is released for re-sale. Please note: Our sleeping room block is limited and could sell out prior to March 25, so do not delay in making your reservations. Once our room block sells out sleeping rooms will only be available at prevailing rates.

Grand Hyatt Hotel at SFO, 55 S. McDonnell Road, San Francisco, CA 94128

Transportation to Hotel

The Grand Hyatt Hotel at SFO is serviced by the AirTrain that takes you from the San Francisco Airport into the lobby of Grand Hyatt at SFO.

Recording Devices

The use of recording devices is prohibited. Please silence all electronic devices upon entering the meeting room.

Financial Aid for Illinois Licensed Attorneys

Scholarships to defray tuition expense for this program are available for in-house tax professionals (both TEI members and nonmembers) who are temporarily unemployed and who are Illinois licensed attorneys with a demonstrated financial hardship. Scholarships will be reviewed and provided upon application on a case-by-case basis. Attorneys who qualify will receive at least a 50% reduction in the conference fee (which does not include any reduction or reimbursement for meals, lodging, or travel costs associated with the seminar). To request information on whether you might qualify, please contact us at meetings@tei.org.

Questions?

Call TEI at 202.638.5601, email to meetings@tei.org or visit www.tei.org. Click on "Continuing Education."



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CPE CREDIT INFORMATION



Tax Executives Institute 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.

For more information regarding administrative policies such as complaint or refund, please contact TEI directly at 202.638.5601.

Date	April 20-23, 2020
Delivery Method	Group Live
Program Level	Basic
Field of Study	Taxes
Learning Objective	Designed to provide the tools and techniques to enable tax professionals to effectively manage federal, transfer pricing and state and local tax controversies.
Prerequisite	No prerequisites.
Advanced Preparation	No advanced preparation required.
CPE Credit	31.5 Maximum minutes for four-day program (based on a 50-minute hour).
CLE Credit	26.5 Maximum minutes for four-day program (based on a 60-minute hour).
Ethics Credit	1.0 Credits are available during federal/transfer pricing days.

Disclaimers

Tax Executives Institute and TEI Education Fund accord to participants of any race, color, creed, sex or national ethnic origin all the rights, privileges, programs, and activities generally accorded or made available to participants at its program, courses, and other activities.

CPE/CLE requirements vary from jurisdiction to jurisdiction. TEI's education programs are designed to meet NASBA standards, and are generally accepted by CPE/CLE agencies across the United States. Registrants should check the rules in their own jurisdictions to ensure eligibility.





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REGISTRATION FORM

Please check here if you require special accessibility or assistance at this function. We will contact you.



Fee covers course materials and other items specified in seminar announcement. Applications will be accepted on a first-come, first-served basis. Applicants are encouraged to register via www.tei.org. Credit card registrations may be faxed to 202.638.5607 or scanned and emailed to: meetings@tei.org. If registering by check, make checks payable to Tax Executives Institute and mail to Tax Executives Institute, Lockbox 9407 PO Box 70280, Philadelphia, PA 19176-0280. **Do not mail applications to TEI's street address.** Questions? Call 202.638.5601 or email: meetings@tei.org.

ELIGIBILITY

TEI events are open to members of TEI and other in-house tax professionals. Individuals engaged in private law, accounting, or other consulting practice, as well as government employees, are ineligible to attend.

NOTE

Registrants may sign up for two or four day programs.

FEES Amount (U.S. Funds)

4-Day Registration

(2 days Federal + 2 days SALT)

\$1,250 Member

\$1,550 Non-Member

2-Day Registration

(2 days Federal only)

\$950 Member Fee

\$1,150 Non-Member Fee

2-Day Registration

(2 days SALT only)

\$950 Member Fee

\$1,150 Non-Member Fee

Name _____

Nickname for Badge _____

Company _____

Mailing Address _____

City _____

State/Province _____ Zip/Zone _____

Telephone _____ Fax _____

Email _____

Charge to: VISA MasterCard American Express Discover Diners Club

Card Number _____

Exp. Date _____ CVV _____

Cardholder Name (print) _____

Signature _____

If faxing your registration using a credit card, please do so between 9:00 am and 4:00 pm ET to ensure confidentiality. Fax number for registrations and cancellations is 202.638.5607. This form can be scanned and emailed to meetings@tei.org.

All cancellations must be made in writing by 4:00 pm ET on April 3, 2020, and will be subject to an administrative service charge of \$75 (U.S.); for cancellations after April 3, 2020 (the date handout materials become available) and before April 10, 2020, the charge will be \$200 (U.S.) No refunds will be made for cancellations received after April 10, 2020, and for no-shows. Cancellations or substitutes must be received in writing to meetings@tei.org. Refunds of credit card registrations, less administrative charge, will be made to credit card account. TEI's Federal Taxpayer ID Number is 52-0239291.

In accordance with section 274(n) of the Internal Revenue Code, registrants are notified that that the portion of the course registration fee attributable to food and beverage is \$320 for the 2 day program and \$640 for the 4 day program.