



Consolidated Returns Seminar / May 12-13, 2020 / Marriott Cleveland Downtown at Key Tower, Cleveland, OH

## 2020 Consolidated Returns Seminar

### PLANNING COMMITTEE:

Katrina H. Welch  
*International President, TEI*

James A. Kennedy  
*Chair, TEI's Continuing Education Committee*

John P. Orr, Jr.  
*Chair, TEI's Federal Tax Committee*

Julia Lagun  
*Vice Chair, TEI's Federal Tax Committee*

Eli J. Dicker  
*Executive Director, TEI*

Watson M. McLeish  
*Tax Counsel, TEI*

Throughout the last quarter century, the U.S. Department of the Treasury and Internal Revenue Service fundamentally reshaped the consolidated return regulations, moving from a separate member to a "single entity" approach. The rules governing intercompany transactions, investment adjustments, and corporate loss utilization—including the separate return limitation year (SRLY) and section 382 rules—were all significantly revised. And with the promulgation of the "unified loss rule" regulations to replace the former loss-disallowance rules, Treasury and the IRS reached the culmination of a long journey in implementing the single entry regime—or so we thought. The enactment of Public Law 115-97, commonly known as the Tax Cuts and Jobs Act (TCJA), marked the dawn of another new era of change and complexity for affiliated groups filing consolidated returns.

Consolidated return preparation and tax planning for members of an affiliated group is one of the most complex areas of law that tax executives must comprehend to serve their employers. To ensure the continuing professionalism of TEI's members in this important area in the wake of tax reform, TEI's Federal Tax Committee has planned a comprehensive seminar to update members on the latest legislative, judicial, and regulatory developments relating to consolidated returns. The two-day program, TEI's **2020 Consolidated Returns Seminar**, will be held on May 12-13, 2020, at the newly renovated Cleveland Marriott Downtown at Key Center in Cleveland, Ohio. The seminar will address the nuts and bolts of consolidated returns, enabling participants to learn or reacquaint themselves with the compliance challenges and planning opportunities for affiliated groups and controlled transactions. The focus will then shift to more advanced planning topics, including acquisitions and separations of members of affiliated groups, uses of partnerships and disregarded entities within the affiliated group, among others. Each session will cover relevant changes wrought by the TCJA, and the seminar will conclude with a special two-hour session focusing on significant U.S. international tax issues in affiliated groups post tax reform.



Connect. Engage. Impact.

# 2020 Consolidated Returns Seminar

## TUESDAY, MAY 12

7:00 - 8:00 AM	Registration & Breakfast
8:00 - 8:15 AM	Welcome & Opening Remarks
8:15 - 10:15 AM	<b><i>Overview of Affiliation, Consolidated Returns &amp; Elections</i></b>
10:15 - 10:30 AM	Refreshment Break
10:30 AM - 12:00 Noon	<b><i>Investment Adjustments &amp; Related Issues</i></b>
12:00 Noon - 1:30 PM	Luncheon
1:30 - 3:30 PM	<b><i>Intercompany Transactions – The Fundamentals, TCJA Complexities &amp; Other Developments</i></b>
3:30 - 3:45 PM	Refreshment Break
3:45 - 5:15 PM	<b><i>Tax Attributes in Consolidated Groups, Including Losses, Loss Limitations &amp; TCJA Changes</i></b>
5:30 - 7:00 PM	Cocktail & Networking Reception

## WEDNESDAY, MAY 13

7:00 - 8:00 AM	Breakfast
8:00 - 10:00 AM	<b><i>Acquisitions, Dispositions &amp; Separations of Affiliated Corporations</i></b>
10:00 - 10:15 AM	Refreshment Break
10:15 - 11:15 AM	<b><i>Unified Loss Rule</i></b>
11:15 AM - 12:30 PM	<b><i>Using DREs and Partnerships in Affiliated Groups, Including JV Structures &amp; Acquisition/Disposition Planning</i></b>
12:30 - 1:30 PM	Lunch
1:30 - 3:30 PM	<b><i>International Tax Issues in Affiliated Groups, Including TCJA-related Considerations</i></b>
3:30 PM	Adjournment





Connect. Engage. Impact.

# 2020 Consolidated Returns Seminar

## GENERAL INFORMATION

### Registrations



By web:



By mail:



By fax:



By email:

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 \$950 member rate. All others are required to pay at the \$1,150 nonmember rate. For membership information, visit the "Membership" section of [www.tei.org](http://www.tei.org). A registration will not be processed unless it is accompanied by payment, and no registrations will be taken over the telephone.

[www.tei.org](http://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](mailto: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.

All cancellations must be made **in writing** by 4:00 pm ET on April 20, 2020, and will be subject to an administrative service charge of \$75 (U.S.); for cancellations after April 20, 2020 (the date handout materials become available) and before April 27, the charge will be \$200 (U.S.). No refunds will be made for cancellations received after April 27, and for no-shows. To cancel please send an email to [meetings@tei.org](mailto: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.

### Cancellation and Substitution Policy

### 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.

### Lodging

TEI has secured a discounted block of rooms at the Marriott Cleveland Downtown at Key Tower Hotel for seminar registrants at the rate of \$189 + tax per night. To make your reservation, please call 800-228-9290 or +1 216-696-9200 and say you are with the "TEI Consolidated Returns Seminar". For a link to online reservations, please visit the event page on TEI's website. TEI's discounted room block is limited and will likely sell out prior to our April 27, 2020 cutoff date when remaining rooms will be released back to the hotel for resale and prevailing rates will apply. Make your reservations today.

Marriott Cleveland Downtown at Key Tower, 1360 W Mall Dr, Cleveland, OH 44114

### Recording Devices

The use of tape or digital recorders in the classroom is prohibited. Please silence mobile phones, email devices, and pagers 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](mailto:meetings@tei.org).

### Questions?

Call TEI at 202.638.5601, email to [meetings@tei.org](mailto:meetings@tei.org) or visit [www.tei.org](http://www.tei.org). Click on "Continuing Education".



Connect. Engage. Impact.

# 2020 Consolidated Returns Seminar

## 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](http://www.nasba.org).

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

Date	May 12-13, 2020
Delivery Method	Group Live
Program Level	Basic
Field of Study	Taxes
Learning Objective	To provide in-depth training in selected technical issues and legislative, judicial, and regulatory developments affecting the treatment of, and transactions undertaken by, affiliated groups of corporations filing consolidated returns, including LLCs and disregarded entities within the affiliated group.
Prerequisite	No prerequisites.
Advanced Preparation	No advanced preparation required.
CPE Credit	<b>15.5</b> (based on a 50-minute hour).
CLE Credit	<b>13.0</b> (based on a 50-minute hour).

\* Please note: CPE hours are subject to change.

### 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.






Connect. Engage. Impact.

# 2020 Consolidated Tax Returns Seminar

## 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](http://www.tei.org). Credit card registrations may be faxed to 202.638.5607 or scanned and emailed to: [meetings@tei.org](mailto: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](mailto: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.

Name \_\_\_\_\_

Nickname for Badge \_\_\_\_\_

Company \_\_\_\_\_

Mailing Address \_\_\_\_\_

City \_\_\_\_\_

State/Province \_\_\_\_\_ Zip/Zone \_\_\_\_\_

Telephone \_\_\_\_\_ Fax \_\_\_\_\_

Email \_\_\_\_\_

### FEES

#### Amount (U.S. Funds)

- \$ 950 Member Fee
- \$1,150 Non-Member Fee

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](mailto:meetings@tei.org).

All cancellations must be made in writing by 4:00 pm ET on April 20, 2020, and will be subject to an administrative service charge of \$75 (U.S.); for cancellations after April 20, 2020 (the date handout materials become available) and before April 27, the charge will be \$200 (U.S.) No refunds will be made for cancellations received after April 27, and for no-shows. Cancellations must be received in writing to [meetings@tei.org](mailto: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 \$400 (U.S.).