

TS1901: Federal Tax Update
Date: Monday, February 18, 2019
Level: Intermediate/Advanced
Tax Area: Federal
CPE Credit: will vary between 6.5 to 8.25 hours depending on final class Agenda

SPECIAL ANNOUNCEMENT!

We regret to announce that due to current circumstances in Washington D.C., Congressman Kevin Brady will be unable to attend the Federal Tax Update session on February 18, 2019. We are excited, however, to have Ray Beeman, EY's Leader of their Washington Council Legislative Affairs Team, to kick-off the day with a detailed briefing on all the latest happenings in DC Tax Policy and what we can expect in 2019.

Course Description:

A comprehensive federal tax review of new tax legislation, significant regulations, cases and rulings covered in 2018, and a treaty update. In addition, we will focus on the tax reform package that may have recently been passed or is still under consideration. This session will also highlight other areas of federal tax law that may be in flux or giving rise to taxpayer challenges and raise planning or other solutions.

Learning Objectives:

Upon completing this course, participants will have a greater understanding of:

- Summary of the most recent federal tax law and regulations changes;
- Understanding of the passed or proposed federal tax reform package; and
- Pending and potential treaty developments

Confirmed Speakers: Ray Beeman (Ernst & Young), Michael Lebovitz, Jason Bazar, and Thomas Humphreys (Mayer Brown), Joshua Odintz (Baker McKenzie), Abdon Rangel (Andersen Tax), Chetan Vagholkar (KPMG)

TS1902: State Income/Franchise Tax Update
Date: Tuesday February 19, 2019
Level: Intermediate/Advanced
Tax Area: State
CPE Credit: will vary between 6.5 to 8.0 hours depending on Final Agenda

Course Description:

Federal tax reform and state legislative actions greatly impacted the area of state income taxation. Furthermore, the *Wayfair* decision changed established rules regarding state tax nexus. This full-day session will address these legislative and judicial developments as well include updates on state income tax audit and compliance issues. The agenda will include:

- State income tax considerations of federal tax reform;
- The impact on state income taxation of *Wayfair*;
- State income and franchise tax audit controversy developments; and
- State specific technical updates including Louisiana, Texas and other states.

Learning Objectives:

Upon completing this course, participants will have a greater understanding of:

- How federal tax reform impacts state income tax filings;
- Whether *Wayfair* may change a company's state income tax footprint;
- What has changed recently with respect to state income and franchise tax audits; and
- Legislative and judicial update on Texas, Louisiana, Mississippi, Oklahoma and California.

Confirmed Speakers:

Marilyn Wethekam and Jordan Goodman (Horwood, Marcus & Berk), Karen Currie (Ernst & Young)

TS1903: Transfer Pricing Basics After Tax Reform
Date: Tuesday, February 19, 2019
Level: Beginner / Intermediate
Tax Area: International
CPE Credit: will vary between 6.5 to 8.25 hours depending on final class Agenda

Course Description:

The Transfer Pricing session begins with a transfer pricing primer, presenting transfer pricing fundamentals and an update of recent transfer pricing developments. It takes a look at why a company's auditor is focused on understanding your company's transfer pricing policies and procedures, how best to meet global transfer pricing requirements, such as country-by-country reporting, master and local files and substance requirements, U.S. federal and state and local transfer pricing transfer pricing.

Learning Objectives:

Upon completing this course, participants will have a greater understanding of:

- Why your auditor focuses on your transfer pricing policies and their implementation;
- Transfer pricing fundamentals;
- How countries are implementing the BEPS action items;
- Global documentation and substance in a BEPS world;
- EU update;
- State and local transfer pricing; and
- Common issues faced by a company when undertaking transfer pricing planning.

Confirmed Speakers: Ryan Lange and Patrick McColgan (Duff & Phelps), Brian Kittle, Jason Osborn, and Shawn O'Brien (Mayer Brown), Erin Miles (Direct Energy), Brent Mica and Clifford Mangano (Diamond Offshore), Kathrin Zoeller (Weatherford), Dominic Stuttaford (Norton Rose Fulbright, London), Gene Tien and Chet Patel (Baker McKenzie), Marco Fiaccadori and Dale Bond (PwC)

TS1904: Partnership Tax Planning Update
Date: Wednesday, February 20, 2019
Level: Intermediate
Tax Area: Federal and International
CPE Credit: will vary between 6.5 to 8.0 hours depending on final class Agenda

Course Description:

This full-day session will cover familiar partnership taxation sub-topics (impact of tax reform, cross-border structuring, etc.). Speakers are being asked to spend less time on the basic partnership rules and instead focus on recent developments and comprehensive planning strategies. You should have a general understanding of partnership taxation before attending this session.

Learning Objectives:

Participants will leave the session with knowledge of changes, both authoritative and practical, in the following areas of partnership taxation:

- Impacts of US tax reform on partnership planning and structuring;
- Cross-border structures;
- Partner compensation;
- Proposed legislation/regulations;
- Partnership allocation matters; and
- Partnership audit considerations.

Confirmed Speakers: TBA

TS1905: Federal Compliance and Consolidated Return Issues
Date: Wednesday, February 20, 2019
Level: Intermediate
Tax Area: Federal
CPE Credit: will vary between 6.5 to 8.25 hours depending on final class Agenda

Course Description:

This full day session will provide an update on recent developments in the taxation of companies filing consolidated returns. Topics will include recent cases and guidance on utilization and limitations on consolidated return attributes and intercompany transactions. In addition, several sessions will focus on tax reforms and its impact on consolidated groups.

Learning Objectives:

Upon completion of this course, participants should be able to:

- Discuss the latest legislative, judicial and administrative developments relating to consolidated returns;
- Discuss the impact of the consolidated return rules on corporate transactions; and
- Identify key federal issues related to consolidated returns.

Confirmed Speakers: TBA

TS1906: Upstream & Downstream Tax Planning
Date: Thursday, February 21, 2019
Level: Intermediate
Tax Area: Federal
CPE Credit: will vary between 6.5 to 8.25 hours depending on final class Agenda

Course Description:

This full-day session will address a variety of tax planning issues faced by taxpayers in the oil and gas industry. Topics will appeal to both upstream and downstream businesses, as well as domestic and international taxpayers. The focus of the class will be on the application of newly issued regulations of importance to the industry. Topics to be covered include: (1) application of new foreign tax credit provisions (i.e., branch basket, etc.); (2) application of new GILTI regime including methodologies to determine foreign oil related income, (3) new Sec. 163(j) regulations, (4) the impact of tax reform on Master Limited Partnerships, and (5) an update on bonus depreciation and unit of property issues applicable to the industry.

Learning Objectives:

Upon completing this course, participants will have a better understanding of:

- Impact of the Tax Cuts and Jobs Act on upstream and downstream oil & gas businesses;
- FTC Planning, Subpart F and GILTI;
- Application of Master Limited Partnerships after tax reform;
- Application of interest expense deduction limitations; and
- Bonus depreciation provisions.

Confirmed Speakers: TBA

TS1907: Global Audit and IRS Audit Tax Controversy Update
Date: Thursday, February 21, 2019
Level: Intermediate
Tax Area: Federal
CPE Credit: will vary between 6.5 to 8.25 hours depending on final class Agenda

Course Description:

Several panels of tax professionals will provide presentations during the day on various IRS and global audit issues and procedures. Sessions will focus on Global Audits & IRS Audits. There will be additional relevant topics added as February 21, 2019 nears. All sessions will be interactive to allow for specific questions on current audit issues at your company.

Learning Objectives:

Upon completing this course, participants will be able to:

- Understand the current audit environment and resources of tax authorities; and
- Share common industry issues and concerns with panels for discussion on best practices.

Confirmed Speakers:

Beth Tucker (PwC), Steve Diamond, Sheri Wilcox, and Susan Bennett (EY), Rob Morris and Rob Kovacev (Norton Rose Fulbright), George Clarke and Dan Rosen (Baker McKenzie), Richard Hussein (Baker Botts), David Aughtry and Pete Lowy (Chamberlain, Hrdlicka), Eduardo Telles (Mayer Brown), Bernando Ramirez (Chevez)

TS1908 **International Tax Planning Update**
Date: **Friday, February 22, 2019**
Level: **Intermediate / Advanced**
Tax Area: **International**
CPE Credit: **will vary between 6.5 to 8.25 hours depending on final class Agenda**

Course Description:

The international tax update session will cover various (and several new) international tax planning and compliance issues facing both inbound and outbound taxpayers. This session will cover the BEAT, FDII, GILTI, interest expense limitation provisions, fundamental changes to the foreign tax credit environment, US tax implications to inbound multinationals, and other changes and planning considerations under the TCJA. In addition, the course will cover subpart F, tax controversy, BEPS updates, tax treaty planning, future use of CFCs and inbound deployment of assets into the US, and post-tax reform issues and strategies with respect to repatriation, supply chain planning, other structuring and M&A.

Learning Objectives:

Upon completing this course, participants will have a greater understanding of:

- International tax implications from TCJA changes;
- Subpart F income regulations;
- Common understanding of international tax planning tools;
- Understanding of international tax principles of outbound and inbound companies;
- Common issues faced by companies implementing an international tax strategy; and
- Transactional and negotiation issues in cross-border deals with respect to addressing tax procedure/controversy

Confirmed Speakers:

Jonathan Martin (Baker McKenzie), Nick DeNovio and Miriam Fisher (Latham & Watkins), Seth Abrams and Amelia McKnight (Deloitte), Mike Masciangelo, John Fiorito, and Bill Macey (Ernst & Young), Chetan Vagholkar and Alex Hanhan (KPMG)

TS1909: Indirect Taxes – Current and Future Vision
Date: Friday, February 22, 2019
Level: Intermediate/Advanced
Tax Area: Federal and State
CPE Credit: will vary between 6.5 to 8.25 hours depending on final class Agenda

Course Description:

This full-day session will cover a variety of topics around indirect tax. Technical updates on state sales/use taxes, motor fuel excise taxes, and other indirect taxes will be covered. The course will also provide a glimpse into the future as several technological advances and digital trends around automation will be discussed. Tax planning around these types of taxes will also be explored.

Learning Objectives:

Upon completing this course, participants will have a better understanding of:

- Recent developments, issues, and compliance tips on indirect taxes;
- Indirect tax planning ideas; and
- Automation and digital trends of indirect taxes.

Confirmed Speakers:

Pat McCown and Tam Vo (Grant Thornton), Harley Duncan (KPMG), Robert Weyman and Shail Shah (Reed Smith), Melissa Wofford and Tracy Watts (RSM), William Waltman and Leo Varner (PwC), Ed Greenstein and Jeff Marks (Deloitte)

TS1910:Federal Compliance: Tax Reform Considerations & Refresher

Date: Monday, May 6, 2019

Level: Intermediate

Tax Area: Federal

CPE Credit: Will vary between 6.5 to 8.25 hours depending on final class Agenda

Course Description:

We have been discussing the Tax Cut & Jobs Act (“TCJA”) for over 2 years. We first had to determine how to report it in our tax provisions, now it’s time to get it into our federal compliance. What new forms do we need to complete? How have the forms changed? Do we need to modify old statements and elections or add new ones? Do we need to file 3115’s for method changes caused by the new rules?

This full day session is an opportunity for us to hear what experts in the field recommend we do and don’t do in our first federal returns after the enactment of TCJA. We hope for audience participation during the panels so that we can all benefit from industry colleagues sharing their experiences as we navigate through this new reporting experience together.

We will also have a few refreshers on key federal compliance topics.

Learning Objectives:

Upon completion of this course, participants will have a greater understanding of:

- Summary of the most recent federal tax law and regulation changes;
- How to report Tax Reform changes in federal returns; and
- Refresher of key federal compliance topics.

Key takeaways from this session include:

- Insights into how other companies or firms are applying the federal tax reform changes into their first return after the TCJA was enacted; and
- A better understanding of new or modified forms, statements and elections that should be included in your returns.

Confirmed Speakers: TBA

TS1911:Cross-Border Tax Issues**Date: Monday, May 6, 2019****Level: Intermediate / Advanced****Tax Area: International****CPE Credit: will vary between 6.5 to 8.25 hours depending on final class Agenda****Course Description:**

This course will provide insight into relevant tax issues to be considered when dealing with cross-border transactions. It will cover practical international tax issues after implementation of the U.S. Tax Reform, cross-border tax controversy trends based on current court cases, and impact of U.S. Tax Reform on M&A structuring and planning. The program will also discuss treaty analysis in light of the MLI, managing treasury operations and intercompany financing in the current tax environment, and latest tax developments around the globe.

Learning Objectives:

Upon completing this course, participants will have a greater understanding of:

- Issues and strategies to be aware of when doing tax planning for cross-border and M&A transactions after U.S. Tax Reform;
- Key issues to look out for based on current tax controversy trends;
- How treaty analysis is changing with the implementation of the MLI;
- Managing day to day treasury operations and intercompany financing from a tax perspective; and
- Relevant tax law changes in foreign jurisdictions affecting common tax structures.

Confirmed Speakers:

Scott Stewart (Mayer Brown); James Ginty (PwC); others TBA

TS1912: Introduction to Accounting for Income Taxes
Date: May 7, 2019
Level: Beginner / Intermediate
Tax Area: Federal
CPE Credit: will vary between 6.5 to 8 hours depending on final class Agenda

Course Description:

This course will provide an understanding of the corporate income tax principles that form the basis of tax accounting and works through the fundamentals of ASC 740, Accounting for Income Taxes. This training caters to those that have limited or no knowledge of tax accounting and want to enhance their understanding of the underlying principles. Learn the step-by-step process on how to calculate current and deferred tax starting from basic principles under ASC 740. Topics such as identifying book to tax adjustments, validation of deferred and current tax balances (including RTA/TBBS) and preparing the effective tax rate reconciliation will be discussed as well as uncertain tax positions and valuation allowance analysis. It is a highly interactive session in which participants are encouraged to share their questions and experiences. This is designed to deliver solid foundation in the basic/intermediate level of tax accounting under ASC 740 principles.

Learning Objectives:

Upon completing this course, participants will be able to:

- Describe ASC 740's principles and scope;
- Accelerate their ASC 740 comprehension;
- Prepare a tax provision using the 10-step methodology;
- Understand the impact of current and deferred tax on the financial statements;
- Understand the importance and difference between RTA and TBBS;
- Analyze the need for UTPs and Vas; and
- Understand the reporting requirements under ASC 740.

Confirmed Speakers:

Deloitte Tax

TS1913: Transfer Pricing Planning under BEPS
Date: Tuesday, May 7, 2019
Level: Intermediate / Advanced
Tax Area: International
CPE Credit: will vary between 6.5 to 8.25 hours depending on final class Agenda

Course Description:

This full-day session will provide insights into how transfer pricing planning has changed under BEPS. The session will focus on updating the participant on transfer pricing issues being faced by companies, best practices in applying transfer pricing in a BEPS world to international tax planning, and global tax controversy. Advisors and industry practitioners provide their experiences and challenges as they address as they newly developed audit tools resulting from new transfer pricing laws and regulations adopted by countries after BEPS and how transfer pricing controversy may increase.

Learning Objectives:

Upon completing this course, participants will have an understanding of the changing global transfer pricing environment, including:

- Update on how tax authorities are implementing new transfer pricing laws under BEPS;
- How companies manage transfer pricing country-by-country documentation;
- Best practices when applying transfer pricing to international tax planning; and
- The latest in transfer pricing controversies and audits.

Confirmed Speakers: TBA

TS1914: Advanced ASC 740
Date: Wednesday, May 8, 2019
Level: Intermediate/Advanced
Tax Area: Federal
CPE Credit: will vary between 6.5 to 8.25 hours depending on final class Agenda

Course Description:

The Advanced ASC 740 course will provide an “in-depth” dive into the practical tasks and challenges corporate tax professionals face today in the tax accounting world. The course includes updates from the Tax Cuts and Jobs ACT (“TCJA”) signed into law in December 2017. Panel discussion offers practical guidance on the issues/key challenges tax professionals must address requiring both expertise and judgement for reporting a company’s tax provision to external and internal parties. The session offers real-time examples of calculations and schedules to support the technical disclosure requirements of ASC 740, and outline their best practices for making defensible decisions in this area. Topics discussed include current tax accounting updates, outside basis differences, structuring opportunities, foreign currency issues and considerations in recording deferred taxes as well as ongoing valuation allowance requirements after TCJA was effective in December 2017. It is a highly interactive session in which participants are encouraged to share their questions and experiences.

Learning Objectives:

Upon completing this course, participants will be able to:

- Identify key challenges arising with income tax accounting especially after TCJA;
- Better understanding on recent technical pronouncements and guidance from FASB and SEC;
- Evaluate outside basis difference and its interaction with various US provisions including GILTI, FTCs and WHTs;
- Understand the related foreign currency issues; and
- Analyze VA considerations post-tax reform.

Confirmed Speakers:

David Northcut and Matt Rychlicki (EY); Robert Gabriel and Jeffrey Wright (Deloitte); John Swilling and Sean Johnson (PwC); Christine Griffith (KPMG); others TBA

TS1915: State Income/Franchise Tax and Case Update
Date: Wednesday, May 8, 2019
Level: Intermediate/Advanced
Tax Area: State
CPE Credit: will vary between 6.5 to 8.0 hours depending on final class Agenda

Course Description:

This course will be a follow up to the State Income/Franchise Tax Update held February 19, 2019 and will include additional updates on various state tax controversy issues not covered and will be as current as possible. While the course is not intended to be duplicative of the February session, it is designed to provide additional opportunities to participants who unable to attend that session.

Learning Objectives:

Upon completing this course, participants will have a greater understanding of the impact of legislative and judicial decisions.

Confirmed Speakers:

John LaBorde (Andersen Tax); Jimmy Martens (Martens, Todd and Leonard), others TBA

TS1916: Mergers & Acquisitions – Selected Topics
Date: Thursday, May 9, 2019
Level: Intermediate / Advanced
Tax Area: Federal
CPE Credit: will vary between 6.5 to 8.25 hours depending on final class Agenda

Course Description:

This full-day session will address various topics common to mergers and acquisitions, as well as recent relevant developments. Expected topics include: common deal structures, corporate separation transactions, tax accounting and employee benefit matters relating to acquisitions and dispositions, reviewing acquisition and disposition transaction agreements, cross-border transactions, the use of partnerships and other transparent entities in mergers and acquisitions and the possible effects of tax reform on acquisition and dispositions.

Learning Objectives:

Upon completing this course, participants will have a more in-depth understanding of tax-related aspects of M&A transactions, including the following:

- Common transactions currently in use domestically and internationally;
- Employee benefit considerations in acquisitions and dispositions;
- Private and public equity transactions being used in the current economic environment;
- State and local tax aspects of acquisitions and dispositions;
- Common issues in reviewing acquisition and disposition agreements; and
- Various planning alternatives available in structuring transactions.

Confirmed Speakers:

Patricia McDonald (Baker & McKenzie), Kai Kramer (Baker & McKenzie), Robert Phillipott (Baker Botts), Marianna Dyson (Covington & Burling), Tracy Hennesy (Grant Thornton), Kevin Herzberg (Grant Thornton), Carol Conjura (KPMG), Nick DeNovio (Latham and Watkins), Miriam Fisher (Latham and Watkins), Larry Stein (Latham and Watkins), Sam Blossom (PWC), Will Byrd (PWC), Steve Kuntz (Norton Rose Fulbright)

TS1917: Back to Basics – Fundamental of Oil and Gas
Date: Thursday, May 9, 2019
Level: Beginner/Intermediate
Tax Area: Federal
CPE Credit: will vary between 6.5 to 8.25 hours depending on final class Agenda

Course Description:

This course covers the key tax topics involved in the upstream (exploration and production) sector of the oil and gas industry. The course will provide background on the industry, common tax issues, beginning with an introduction to the oil and gas business and commercial arrangements, an overview of the international tax rules and how those impact the oil and gas business, some of the common structuring for joint ventures and associated issues, MA&D issues (including discussion of due diligence and agreements), an overview of the common methods of expense recovery (IDC, G&G, depreciation, and depletion), and issues with tax accounting for the oil and gas business (e.g., uniform capitalization rules, inventory, and cost of goods sold). The course is a brisk-paced refresher on the basics that will progress into conversations on the more complex and nuanced topics.

Major Topics:

- Introduction to the oil and gas business;
- Fundamentals of international taxation of oil and gas (including BEAT, GILTI and FDII);
- Oil and gas joint ventures: pool of capital, unitization, farm-ins, farm-outs, and the new API Model Partnership Agreement;
- Upstream acquisitions and dispositions: diligence issues and agreements;
- Oil and gas expenses: IDC, G&G and depletion; and
- Tax accounting for oil and gas.

Confirmed Speakers: TBA

TS1918: Ethics for CPAs - It's a Matter of Choice
Date: Friday, May 10, 2019
Tax Area: Ethics
CPE Credit: 4 hours

Course Description:

Why do good people do bad things? Would we have made the same choice? This interactive and thought-provoking session provides a look into both our personal and professional ethics and discusses the values upon which our choices are based. Ethical behavior is more than mere knowledge of right and wrong but making the right choices for our profession and organization. The public looks to us as a standard of ethics and integrity and the Texas State Board holds us accountable for protecting the CPA brand. Are we meeting these obligations?

Learning Objectives: In this interactive and thought-provoking session, participants will have the opportunity to:

- Explore the foundations and philosophies of ethics
- Understand the Texas State Board's Rules of Professional Conduct and the core values of our profession;
- Practice applying ethical judgment in making choices appropriate for the profession and the public;
- Identify the components and red flags of fraud; and
- Determine opportunities for improvement for protecting the brand.

**This course is designed to meet the Texas State Board of Public Accountancy's (TSBPA) Ethics Course Requirements for Licensees for four hours of continuing education.*

Confirmed Speaker: Deanna Sullivan