

Program Overview

The morning program will focus on important sales tax issues. Using the case study method, the speakers will lead a discussion of the most troubling issues facing tax professionals who must deal with Louisiana State and local sales taxes.

At lunch, Carolyn Shantz and Mark Young with the firm of Alvarez and Marsal will address the ticklish issues related to compliance with FAS 5 and FIN 48.

During the afternoon sessions, the Jones Walker faculty will update the class on the latest developments in Louisiana income and franchise taxation, with an emphasis on current audit and litigation issues. In addition, as anyone who practices in Louisiana state and local taxation knows, there are many procedural obstacles that often frustrate taxpayers and lead to additional cost.

The speakers will address the trickiest procedural aspects of Louisiana state and local taxation and update the class on how to avoid the procedural pitfalls and protect claims.

The program will close with a timely update on legislation recently enacted by the Louisiana Legislature. The 2009 Regular Session of the Legislature was a fiscal session, meaning that all aspects of state and local taxation were germane. There were a number of tax-related bills considered, and companies that do business in Louisiana need to know what the Legislature did.

The full day's classes have been submitted for 6 hours of CPE. The program will be unique and informative and, maybe as important, close to home. This is one that you will not want to miss. Be among the first to graduate from this program!

JONES
WALKER
201 St. Charles Avenue
New Orleans, Louisiana 70170-5100



presents

Back to School

with the

Jones Walker SALT Team

A Louisiana State &
Local Tax Seminar:



"Louisiana State & Local Taxes for Texans"

Thursday, September 17, 2009
The Houston Club | Houston, Texas
8:30 a.m.–5:00 p.m.

Louisiana State and Local Taxes for Texans

The state and local tax environment in Louisiana is one of the trickiest in the nation. Businesses that dip their toes into the murky waters of the Louisiana state and local tax systems must know where the hidden traps may be lurking. This all-day seminar will provide attendees with the latest information regarding the hottest topics in Louisiana state and local taxation and will provide guidance in navigating those murky waters for those doing business in Louisiana. This program will be directed toward individuals with moderate to extensive experience with state and local tax matters.

Objectives of the Program

- identify sourcing of sales for Louisiana state and local sales and use tax;
- determine the “cost price” and “sales price” for sales and use tax purposes;
- identify processes and procedures for documenting and reporting transactions;
- identify current Louisiana income and franchise tax issues facing businesses operating in Louisiana;
- evaluating procedural options for handling audits; responding to proposed and formal assessments; handling administrative and judicial appeals; as well as protecting claims and addressing differences between state and local tax procedures;
- inform participants of how to navigate the Louisiana Amnesty Program; *and*
- understand recently enacted legislation relative to Louisiana state and local taxation.

Program In-Depth: Hot Topics

This program is intended for intermediate to advanced practitioners in state and local tax administration and those doing business in both Texas and Louisiana. Topics to be covered in this program include:

Louisiana Income & Franchise Taxation

This segment will cover hot topics in Louisiana income and franchise taxation, including nexus issues, sourcing of sales, return filing methodologies, and inter-company indebtedness.

Louisiana Tax Procedure and Administration

This topic will address issues such as protests, appeals, refunds and credits, multi-jurisdictional and local audits, and contract auditors.

Louisiana Legislative Update

This segment will review Louisiana tax legislation, what did and didn't pass the last legislative session, and the impact on businesses in Louisiana. Included will be the 2009 Tax Amnesty Program, “Pay to Play” attorneys fees, the “Green Job Industries” tax credit, and the Ports Investor tax credit.

Program In-Depth: Case Studies

Unlike many tax programs, this one will incorporate the use of case studies that will highlight the most pressing sales/use tax issues that businesses face in Louisiana. The case studies, a/k/a participants' homework, will be sent to participants prior to the seminar. At the seminar, the team of Jones Walker's SALT “instructors” will guide the “students” through an interactive discussion of the problems and suggest ways to address the “hot” Louisiana sales/use tax issues presented in the problems. This unique approach will allow the participants to apply the fundamental sales/use tax rules to real-life situations.

Case Study #1: Inter-jurisdictional Commerce and Sourcing of Sales

This case study will cover inter-jurisdictional transactions, interstate commerce issues and the sourcing of sales including the following:

- Point of sale issues
- Storage for use
- Fabrication
- Contracts to build
- Moveable and immovable property

Case Study #2: Further Processing

This case study will explore the *International Paper (IP)* Standard including the 3-part test on exclusions for further processing, including:

- History of the exclusion
- Current 3-part test
- Use of internal technical staff
- Use of experts to make your case
- Trial preparation and evidence
- The “Bananas Foster” defense

Case Study #3: Determining Sales Price

This case study will review the issue with determining the sales price, including:

- Trade discounts and rebates
- Valuation
- Barter transactions
- *Columbia Gas, Hanover, and POI Cases*
- Industry exclusions and exemptions

Space is limited. Register by September 14 to make sure you don't miss this program.
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