10TH ANNUAL HIGH TECHNOLOGY TAX INSTITUTE

NOVEMBER 10-11
1994
SANTA CLARA MARRIOTT HOTEL

sponsored by the
■ TAX EXECUTIVES INSTITUTE
  and the
■ SAN JOSE STATE UNIVERSITY DEPARTMENT OF ACCOUNTING AND FINANCE
Since 1984, the Tax Executives Institute (TEI) and San Jose State University have brought the High Technology Tax Institute to Silicon Valley. The Institute's focus on relevant tax issues for computer companies, as well as pharmaceutical, biotech, chemical, and aerospace industries makes it an invaluable, educational tax experience for accountants, attorneys, and corporate representatives who service high technology companies.

Each Institute session is designed to foster the sharing of tax planning ideas and problem solving strategies at a level consistent with TEI's and San Jose State University's high standards for professional tax education. Lectures are presented by nationally recognized practitioners and IRS representatives who have the practical experience of implementation.

Sixteen hours of Continuing Professional Education credit (CPE or CLE) are available for certified public accountants and attorneys who specialize in the field of taxation.

This year's Institute highlights the following topics and speakers:

- International Current Tax Developments Including Section 956A, Foreign Tax Credit Plan, International Tax Havens, etc.
- Domestic Current Tax Developments, Including Research & Development Issues, INDOPOCO, Section 1202 Stock, Lobbying Expenses and Rotable Spare Parts
- Post-Barclays What Do You Do Now and Other Multi-State Corporate Tax Issues
- FASB and SEC Regulatory Issues Impact on High Technology Companies Including In Process R & D Write Offs, Stock Options, Section 162(m), Reporting Compensation, Mark to Market, etc.
- Section 197 Impact on High Tech Companies
- Sales, Use and Property Tax Issues of Intangible and Tangible Property
- LLC's: California's New Kid on the Block
- Building the File: Sections 482 and 6662(e)
- Restructuring the Distribution Function
- Income and Estate Tax Planning for High Tech Executives

GREG BALLANTINE
PHILIP BEHRQUIST
HUGHLENE BURTON
CLAY CAMPBELL
ROBERT EMERY
ELAINE ERICKSON
OWEN FIORE
JIM FULLER
JOANNE GARVEY
VIRGINIA GATES
IVAN HUMPHREYS
CHIP LION

MARTIN McCLINTOCK
JOSEPH MAGLIONE
KIM MARSHALL
ROBERT MATSUI
DOUG MORGAN
ANNETTE NELLEN
WENDY PEREZ
JOHN PETERSON
NORM RICHTER
JEFFREY VESELY
ANNE YAMAMOTO
THURSDAY
NOVEMBER 10

MORNING

8:00-8:30  INTRODUCTIONS
- MARSHALL BURAK
  Dean, College of Business
  San Jose State University
- RAY ROSSI (Intel)
  President, TEI Santa Clara Valley Chapter
- STU KARLINSKY
  Director, High Technology Tax Institute
- BILLIE BROWN
  I.R.S. District Director, San Jose

8:30-10:00  INTERNATIONAL CURRENT TAX
DEVELOPMENTS, INCLUDING SECTION
956A, FOREIGN TAX CREDIT PLANNING,
INTERNATIONAL TAX HAVENS, ETC.
- JIM FULLER
  Fenwick & West

10:00-10:15  COFFEE BREAK

10:15-12:00  DOMESTIC CURRENT TAX DEVELOPMENTS,
INCLUDING RESEARCH & DEVELOPMENT
ISSUES, INDOPOCO, SECTION 1202 STOCK,
LOYBING EXPENSES AND ROTABLE SPARE
PARTS, ETC.
- CLAY CAMPBELL
  Coopers & Lybrand
- ELAINE ERICKSON
  Arthur Andersen

NOON

LUNCH AND SPEAKER
- CONGRESSMAN ROBERT MATSU
  House Ways and Means Trade Sub Committee
  Chairman

1:30-3:00  POST-BARCLAYS WHAT DO YOU DO
NOW AND OTHER MULTI-STATE
CORPORATE TAX ISSUES
- JOANNE GARVEY
  Heller, Ehrman & White
- VIRGINIA GATES
  Price Waterhouse

3:00-3:15  REFRESHMENT BREAK

3:15-5:00  FASB AND SEC REGULATORY ISSUES
IMPACT ON HIGH TECHNOLOGY
COMPANIES INCLUDING IN PROCESS
R & D WRITE-OFFS, STOCK OPTIONS,
SECTION 162 (m), REPORTING
COMPENSATION, MARK TO MARKET,
ETC.
- WENDY PEREZ
  Ernst & Young
- JOSEPH MAGLIONE
  Deloitte & Touche

5:15-7:30  RECEPTION CELEBRATING INSTITUTE'S
TENTH ANNIVERSARY THEME: "Ten Years
of Tax Institute Excellence"
- INTEL MUSEUM
FRIDAY
NOVEMBER 11

8:00-9:45
SECTION 197 IMPACT ON HIGH TECHNOLOGY COMPANIES: Mergers and Acquisitions. Section 382, Accounting for Income Tax
- ROBERT EMERY
  Robertson and Stephens
- IVAN HUMPHREYS
  Wilson, Sonsini
- ANNETTE NELLEN
  San Jose State University

9:45-10:00
COFFEE BREAK

10:00-12:00
SALES, USE AND PROPERTY TAX ISSUES OF INTANGIBLE AND TANGIBLE PROPERTY
- KIM MARSHALL
  Ernst & Young
- JEFFREY VESELY
  Pillsbury, Madison & Sutro

12:00-1:30
LUNCH AND SPEAKER
- NORM RICHTER
  Deputy International Tax Counsel

1:30-3:00
BREAK-OUT SESSIONS

SESSION A: LLC's: California’s New Kid on the Block
- CHIP LION
  Hopkins & Carley
- HUGHELNE BURTON
  San Jose State University

3:00-3:15
SESSION B: Building the File: Sections 482 and 6662(e)
- GREG BALLANTINE
  KPMG Peat Marwick
- I.R.S. SPOKESPERSON

3:15-5:00
REFRESHMENT BREAK

SESSION C: Restructuring the Distribution Function: An International Tax Perspective - Permanent Establishment Rules, Centralization vs. Decentralization, etc.
- JOHN PETERSON
  Baker & McKenzie
- MARTIN MCCINTOCK
  Deloitte and Touche
- DOUG MORGAN
  Price Waterhouse

SESSION D: Income and Estate Tax Planning for High Tech Executives
- ANNE YAMAMOTO
  Frank Rimerman & Co.
- OWEN FIORE
  Office of Owen Flore
SAN JOSE STATE UNIVERSITY
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  Advanced Micro Devices
- ANNE YAMAMOTO
  Frank, Rimerman & Co.

REGISTRATION AND ACCOMODATIONS

The tuition fee for the High Technology Tax Institute includes all sessions, materials, lunches, and refreshment breaks. Fees are as follows:

- On or before October 25: $425
- After October 25: $450
- Special TEI Member Rate: $375
- Guest of TEI Member: $375

The High Technology Tax Institute has been approved for Continuing Professional Education accreditation by the California State Board of Accountancy and the California Board of Legal Specialization. CPAs and attorneys can receive 16 hours of CPE or CLE credits.

Rooms have been reserved at the Santa Clara Marriott Hotel for this event at the nightly rate of $89 single or double. Please contact the hotel directly by November 8, 1994 and identify yourself as a High Technology Tax Institute participant. 408/988-1500

REFUND POLICY: The Institute will refund registration fees provided we receive a written request postmarked by October 25, 1994. A $50 processing fee will be retained by the Institute. No refund requests postmarked after October 25 will be accepted.