

HOW TO MINIMIZE
**STATE TAXATION OF
MULTISTATE BUSINESS**

SPRING 2005

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Miami Beach, FL

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ADVANCED INTERSTATE

May 10-11
Alexander All Suite Ocean Front Resort
Miami Beach, FL

■ This seminar updates practitioners, including returning alumni, on current developments primarily in state income taxation of multistate business, with an emphasis on planning opportunities arising therefrom. Prior attendance at a three-day Interstate Tax Planning conference, this course, or two years' experience in the field are suggested as prerequisites. Estimated continuing education credit: 15 based on a 50-minute hour, including 1 hour for ethics; 13 based on a 60-minute hour, including 1 hour for ethics.

Jurisdiction and Nexus

The latest interpretations by the states and the Multistate Tax Commission of *Wrigley* and *Quill*. Proving nexus elsewhere to stop the operation of the throwback rule. Treatment of passive holding companies, limited partners, officers residing in-state, sales reps working at home, deliveries in company trucks, service companies, financial institutions, credit card and Internet activities, leased property, in-state affiliates and other connections. The effect of voluntarily registering to do business in a state. Dealing effectively with nexus questionnaires. Planning ideas for minimizing state income taxes.

The Unitary Concept

An analysis of current cases interpreting the extent of a state's authority to apply the unitary concept in its many forms, e.g., domestic, worldwide, water's edge combination. Unique statutory and regulatory definitions. The MTC approach. Structuring business to best take advantage of unitary reporting. Using a 482 study to defeat forced combination or win elective combination. Application of the unitary concept to non-income taxes.

Business and Nonbusiness Income

Recent interpretations of the business/nonbusiness distinction by UDITPA and non-UDITPA states. Determining "operational significance." Using the functional, transactional, and unitary tests to minimize state taxation of short and long-term investment income, dividends, capital gains, rents, royalties, 338(h)(10) income, and other intangibles. Effect of operating under centralized cash management, through divisions, partnerships, S corporations, LLCs and other special situations on a business/nonbusiness determination. Treatment of complete and partial liquidations. Legislative developments.

Problems Session

Practical application of the concepts presented.

The Tax Base and Conformity Issues

Limitations imposed by states on deducting net operating losses, depreciation, expenses related to nontaxable income, taxes imposed by other states. Troublesome addbacks. Computing alternative minimum taxes and the New Jersey "alternative minimum assessment." State tax treatment of federal obligations, 338 (h)(10) transactions, intercompany dividends and fees, foreign source income, passive holding companies, flow-through entities and the effect of the check-the-box rules.

Apportionment Factors

Characterizing business activities for purposes of apportionment. Does the company sell tangibles, intangibles, services, mixed products, or a combination? Sourcing issues and methods. State tax treatment of installment, intercompany, cross-border, drop shipment and dock sales; investment activities. Apportioning the income of service providers, flow-through entities, and specialized industries. What's new in the *Joyce/Finnigan* controversy? Apportionment questions in business dispositions and other restructuring transactions.

Dangers and Opportunities in Unclaimed Property

The impact of unclaimed property audits on a company's or state's bottom line. The use of third party auditors to collect unclaimed property. Strategies to minimize assessments and increase recovery of a taxpayer's own unclaimed funds. Recent developments.

Procedural and Ethical Issues

Determining the availability of refunds and the associated procedural requirements, such as payment under protest and "pay to play." Writing a protest; alternative dispute resolution; the right to an administrative appeal. Statute of limitations issues, including the effect of RARs, waivers, settling with the IRS, and choosing the date from which the limitations period should be measured. Ethical and strategic dilemmas involved in conducting state income tax audits. Using nonrefundable overpayments to offset deficiencies and interest.

REGISTRATION

The registration fee is \$775 for the two-day conference and includes continental breakfast, refreshments, specially-prepared seminar materials, and a cocktail reception the first evening of the program. A \$30 discount is available if payment accompanies the registration form and is *received* by Interstate Tax Corporation no later than April 12, 2005. See page 6 for participating speakers, hotel/airfare/car rental discounts and other details, page 8 to register, or call (203) 854-0704 for further information.

ADVANCED SALES & USE

May 12-13
Alexander All Suite Ocean Front Resort
Miami Beach, FL

■ This seminar updates practitioners, including returning alumni, on current developments in sales and use taxation of multistate business, with an emphasis on the planning opportunities arising therefrom. Prior attendance at a Sales & Use Tax Planning conference (previously entitled "Sales & Use Tax Update"), this course, or two years' experience in the field are suggested as prerequisites. Estimated continuing education credit: 15 based on a 50-minute hour, including 1 hour for ethics; 12.8 based on a 60-minute hour, including 1 hour for ethics.

Jurisdiction and Nexus

Determining "substantial nexus" for sales and use tax purposes after *Quill* — the moment it starts and how long it lasts. What in-state connections cause nexus: drop shipments, advertising, title passage, delivery, independent contractors, unpaid representatives, inventory, occasional visits by employees, offices of affiliates? Consequences of using the Internet to conduct business, voluntary registration to collect sales taxes and establishing "temporary nexus." The latest on state attempts to tax mail order and Internet sales.

Mergers and Acquisitions

Impact of the occasional sale exemption on the distribution of assets in mergers, acquisitions, reorganizations, liquidations. Purchase price allocations, contract language, indemnification agreements. The importance of due diligence. Post transaction planning. Other issues.

Procedural and Ethical Issues

The timing of objections, elections, tax increases and assessments. Sufficiency of evidence and ethical issues on audit — maintaining exemption certificates and other records, including those kept electronically, defining good faith, using statistical sampling. Analyzing the benefits and drawbacks of obtaining a ruling. The potential effect of the Streamlined Sales Tax Project in simplifying procedures.

Leasing Issues

Distinguishing between a lease and a sale; an operating lease and a financing lease. Applicability of the sale for resale exemption. State tax treatment of leases involving services, tangibles, real property, intangibles, or a combination thereof. Accounting and tax issues. The Streamlined Sales Tax Project definition. Available elections and exemptions. Taxability of mobile property, sale/leasebacks, leases between related parties. Planning opportunities.

Manufacturing Exemptions

Determining whether a manufacturing exemption is available in a particular state and how far it extends — to manufacturing, processing, fabricating, packaging, R&D, testing, pollution control; to machinery, materials, chemicals, electricity, natural gas, computers, transportation equipment; to the production of intangibles; to retail or service industries. Must the final product be sold? Proving substantial transformation. Manufacturing incentives.

Services and Mixed Transactions

Identifying the type of transaction involved — pure service, mixed or bundled? Sourcing issues. Sales and use tax treatment of computer software and data processing, telecommunications, engineering services, delivery charges, maintenance, access to information and the Internet, and other services. Using the separately stated rule and other planning methods to minimize sales and use taxes on mixed transactions. Attempts to clarify this area, including the Streamlined Sales Tax Project and Internet Tax Freedom Act.

Contractors and Tax Exempt Entities

Distinguishing between exempt sales to the federal government and taxable sales to government employees. Treatment of purchases made with IMPAC and other types of government cards. Sales to state, county, city governments, branches and agencies; religious, charitable, educational and not-for-profit organizations. Critical differences in tax treatment between the states. Structuring the transaction to produce the best result.

Problems Session

Practical application of the concepts presented.

REGISTRATION

The registration fee is \$775 for the two-day conference and includes continental breakfast, refreshments, specially-prepared seminar materials, and a cocktail reception the first evening of the program. A \$30 discount is available if payment accompanies the registration form and is received by Interstate Tax Corporation no later than April 14, 2005. An additional discount of \$30 may be taken only by those practitioners who attend *both* Advanced Interstate *and* Advanced Sales & Use (all four days). See page 6 for participating speakers, hotel/airfare/car rental discounts and other details, page 8 to register, or call (203) 854-0704 for further information.

INTERSTATE TAX PLANNING

May 25-27
Nikko San Francisco
San Francisco, CA

June 6-8
Grand Hyatt Atlanta
Atlanta, GA

June 20-22
Jolly Hotel Madison Towers
New York, NY

■ An intensive three-day study of the concepts, problems and planning opportunities involved primarily in state income taxation of multistate business. Designed for the beginner to intermediate level practitioner, this course offers even the most experienced state tax professional practical ideas and valuable updates on the latest administrative, judicial and legislative developments in interstate taxation. No prerequisites or advance preparation required. Estimated continuing education credit: 23 based on a 50-minute hour, including 1 hour for ethics; 19.7 based on a 60-minute hour, including 1 hour for ethics.

Jurisdiction and Nexus

Constitutional limitations on state powers to tax interstate business. Protected solicitation and *de minimis* activities under Public Law 86-272. Attributional nexus. Consequences of selling through employees or independent contractors, advertising, using the Internet, delivering, owning or leasing property in a state, other issues. The applicable standard for franchise, privilege, other non-income taxes and service companies.

Unitary and Separate Accounting

Unitary, combined, consolidated and separate returns: When does the state or the taxpayer have the right to choose? Limitations on the states' ability to force unitary combination. Tests for determining when a business is unitary after *Container* and how they may be turned into planning opportunities for the astute tax practitioner.

Business and Nonbusiness Income

The business/nonbusiness distinction as interpreted by UDITPA, Multistate Tax Compact and other states. The latest on the transactional versus functional tests. State taxation of capital gains, dividends, interest, rents and royalties after *ASARCO/Woolworth* and *Allied-Signal*. Factor representation and adjustment opportunities.

The Tax Base and Conformity Issues

State tax treatment of flow-through entities and their owners, income from federal obligations, taxes paid to other jurisdictions, depreciation, net operating losses, 338(h)(10) transactions, passive holding companies, corporate distributions, foreign source income. State imposition of alternative minimum taxes and the use of other alternative tax bases. Planning and refund opportunities.

Ethics and Managing the State Tax Function

Organizing state tax planning, compliance and audit activities in light of Sarbanes-Oxley and other developments that have made ethics a more important part of the state tax practice. Improving state tax department image. Conducting effective state tax research that can be relied upon. How computerization of state tax returns helps or hinders the state tax function.

Problems

Sample problems in the major areas. Will apply concepts discussed during the seminar.

The Property Factor

Determining the relevant property and the timing of its inclusion — tangible, intangible, real and personal. Capitalizing leasehold interests. Using original cost, net book value, basis or fair market value to measure the property factor. Impact of depreciation strategies on, and the role of inventories in, the formula. Situs issues. Treatment of specialized industries.

The Payroll Factor

Examining the scope of the payroll factor — wages, salaries and other personal service compensation. Treatment of management fees, partnership reimbursements, outside contractors, leased or shared employees, specialized industries. Ascertaining the place where services are performed — defining “incidental services” and “base of operations.” Using the cash versus accrual method.

The Sales Factor

Determining the type of receipts — tangibles, intangibles, services or a combination — and the proper sourcing method to apply — destination, cost of performance, origination and more. Treatment of returns, allowances, installment and occasional sales, discounts; services, rents, royalties, investment income, other intangibles. Throwback, throwout and dock sales.

Current Developments

Current administrative, court and legislative developments on certain critical interstate tax topics, including: proving discrimination against interstate commerce; whether states may apply decisions invalidating state tax statutes on a prospective basis; jurisdictional disputes after *Wrigley*, *Quill* and *Geoffrey*; tax base and conformity issues; the differing state approaches to the unitary concept; the business/nonbusiness distinction; apportionment sourcing issues for services and other industries; procedural traps for the unwary. Planning and refund opportunities.

State and Multistate Tax Audits

The audit process — from information requests and extensions of the statute to the final conference. Ethical considerations. Dealing with the consequences of centralized versus decentralized records. Handling a Multistate Tax Commission audit. Conducting audits in an electronic environment. The burden of monitoring unclaimed property: reporting responsibilities, recovering funds, potential audits.

REGISTRATION

The registration fee is \$1035 for the three-day conference and includes continental breakfast, refreshments, specially-prepared seminar materials, and a cocktail reception the first evening of the program. A \$40 discount is available if payment accompanies the registration form and is *received* by Interstate Tax Corporation at least four weeks before a conference date (April 27-CA, May 9-GA, May 23-NY). See page 6 for participating speakers, hotel/airfare/car rental discounts and other details, page 8 to register, or call (203) 854-0704 for further information.

SALES & USE TAX PLANNING

May 23-24
Nikko San Francisco
San Francisco, CA

June 9-10
Grand Hyatt Atlanta
Atlanta, GA

June 23-24
Jolly Hotel Madison Towers
New York, NY

■ *An intensive two-day study of the concepts, problems and planning opportunities involved with sales, use and gross receipts taxes. Designed for the beginner to intermediate level practitioner, this course offers even the most experienced state tax professional practical ideas and valuable updates on the latest administrative, judicial and legislative developments in sales and use taxation. No prerequisites or advance preparation required. Estimated continuing education credit: 15 based on a 50-minute hour, including 1 hour for ethics; 12.75 based on a 60-minute hour, including 1 hour for ethics.*

Fundamental Aspects

Sales, use, gross receipts taxes – their similarities and differences. Determining whether the tax is imposed on the purchaser or seller. Taxation of services, tangible personal property, contractors, corporate and partnership transactions. Sales and use taxes on the local level. The administrative aspect: licenses, permits, collection fees, exemption certificates, filing requirements. Double taxation – impact of lack of uniformity and recent multijurisdictional cooperation agreements to promote compliance. The effect of the Streamlined Sales Tax Project.

Jurisdiction, Nexus and the Internet

Coping with increased sales tax collection and use tax remittance requirements. Impact of in-state order acceptance versus telephone, direct mail or Internet solicitation, drop shipments, distribution from out-of-state, delivery in company trucks, warehousing, national versus local advertising, collection, financing, other service activities. Destination and title passage issues. Economic, physical, electronic presence and their tax consequences. How to respond to nexus questionnaires. Recent administrative, court and legislative developments.

Taxability of Special Transactions

Application of sales and use taxes to leases, short-term rentals, installment sales, sale/leasebacks, leases with an operator; the various forms of computer software – canned, custom, electronic, load-and-leave; pure services and mixed transactions; installation and fabrication labor; repairs and warranties; sales of assets in mergers, acquisitions, liquidations or corporate reorganizations; sales to government, exempt and charitable organizations; construction contractors. Supporting the exemptions – problems of proof. Planning and refund opportunities.

Determining the Taxable Base

The inclusion or exclusion of specific items in determining the gross proceeds or sales upon which the tax is based. Treatment of cash and trade discounts, coupons, rebates, returns and allowances, transportation expenses, trade-ins, finance charges, repossessed property, bad debts and taxes paid to other jurisdictions. Impact of the separately stated rule on the taxability of gross receipts and how transactions may be structured to minimize the imposition of tax.

Current Developments

Extensive analysis of, and updates on, the following critical sales and use tax subjects: obtaining the manufacturing and sale for resale exemptions; taxation of intercompany, information, telecommunication, Internet and other services, maintenance contracts, advertising and other mixed transactions, catalogues, display units, samples and other promotional materials; procedural limitations on refunds and assessments; sourcing issues in multijurisdictional transactions. Planning and refund opportunities.

Ethics and Managing the Sales and Use Tax Function

Structuring the sales and use tax function to maximize effectiveness while complying with ethical standards. Record keeping and research techniques. Organizing and maintaining electronic records that can be trusted. Motivating and training staff to apply sales and use tax laws correctly to both purchases and sales. Cost saving strategies. Using computer software programs to manage exemption certificates and file sales and use tax returns.

Audits and Litigation

How to handle a sales or use tax audit, from the arrival of the audit notice to the post-audit review. Ethical considerations. Statistical samplings – their benefits and burdens. Analyzing whether to protest an assessment to the administrative, trial and appellate levels. Working effectively with outside counsel.

REGISTRATION

The registration fee is \$775 for the two-day conference and includes continental breakfast, refreshments, specially-prepared seminar materials, and a cocktail reception the first evening of the program. A \$30 discount is available if payment accompanies the registration form and is *received* by Interstate Tax Corporation no later than four weeks before a conference date (April 25-CA, May 12-GA, May 26-NY). An additional discount of \$40 may be taken only by those practitioners who attend *both* Interstate *and* Sales & Use Tax Planning (all five days). See page 6 for participating speakers, hotel/airfare/car rental discounts and other details, page 8 to register, or call (203) 854-0704 for further information.

SEMINAR INFORMATION

Registrations will be confirmed with a letter and admission ticket upon receipt of the completed application form and payment. Please call us if you have not received this letter at least a week before the seminar. All seminar fees must be paid in full before entry to the meeting room.

Formal Registration will take place on the first day of the conference outside the meeting room at 8:00 AM. Seminar materials and badges will be given out at this time. Badges should be worn to ensure admission to each session. Casual dress, appropriate to a classroom setting, is acceptable.

The Meetings Start at 8:30 AM on the first day, adjourn at 5:00 PM on the first day or days, and conclude at 4:00 PM on the last day.

Cancellation qualifies for a refund, less a nonrefundable registration fee of \$75, if received *in writing* by Interstate Tax Corporation no later than two weeks before a conference date. No refunds or transfers (see below) will be allowed for cancellations received after this date. Refunds will be given after all the courses have concluded.

Transfers are treated as cancellations and will be subject to the same fees and timing limitations (see above). Substitutions (with notice to Interstate Tax Corporation in writing) are permissible at any time without penalty.

Continuing Education Credit is required for attorneys and CPAs by many professional organizations and governmental agencies. Our courses are designed to meet CPE, enrolled agent and CLE credit standards. Those who request such credit on the registration form will receive a letter by mail *after the conference* certifying their attendance and the amount of credit hours approved.

NASBA. Interstate Tax Corporation is registered with the National Association of State Boards of Accountancy 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 NASBA, 150 Fourth Avenue North, Suite 700, Nashville, TN 37219-2417, web site: www.nasba.org. For information regarding ITC's complaint resolution policy, please contact our office at (203) 854-0704.

Hotel Accommodations are arranged and paid for by the registrants themselves. A block of rooms at discounted rates has been reserved at each of the hotels listed below until one month before the conference dates; thereafter, reservations will be taken on a space and rate available basis. You must call the hotel directly, not the 800 #, and mention Interstate Tax Corporation in order to receive the applicable discounts and any amenities given specially to our group. If you have any difficulty securing a sleeping room at the discounted rate, please call our Meeting Coordinator at (203) 854-0704 for assistance. We urge you to make your hotel and travel plans early to avoid disappointment.

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Alexander All Suite
Ocean Front Resort
5225 Collins Avenue
Miami Beach, FL 33140
(305) 865-6500

Discounted Rate:
\$169 Single/Double

San Francisco, CA
Nikko San Francisco
222 Mason Street
San Francisco, CA 94102
(415) 394-1111

Discounted Rate:
\$185 Single/Double

New York, NY
Jolly Hotel Madison Towers
22 E. 38th Street
at Madison Avenue
New York, NY 10016
(212) 802-0600

Discounted Rate:
\$225 Single/Double

Atlanta, GA
Grand Hyatt Atlanta
3300 Peachtree Road N.E.
Atlanta, GA 30305
(404) 365-8100

Discounted Rate:
\$160 Single/Double

Airline and Car Rental Discounts are available. Just call American Airlines at (800) 433-1790 re: Star File # 9155AN for the May conferences and Star File # 4365AP for the June conferences to obtain a discount of 5% off the lowest quoted fares. This discount is only available through American's 800 # and not its website. Discounts on Avis car rentals may be obtained by calling (800) 331-1600 re: AWD # D002760.

Tape Recording of Interstate Tax Corporation meetings is prohibited.

SPEAKERS

Listed below are the speakers scheduled to participate in the Spring 2005 conference series. Conferences (INT-income, S&U-sales & use) and locations (*i.e.*, FL, CA, GA, NY) are indicated next to each name. Please note that some names may be added and/or changed based on availability.

John Amato, State Tax Counsel, G.E. Financial Services, Stamford, CT (INT-FL)

Patricia Barganier, Principal, Barganier & Associates, Atlanta, GA (INT-FL)

J. Elaine Bialczak, General Counsel, DuCharme, McMillen & Associates, Atlanta, GA (S&U-GA)

Karen J. Boucher, Partner, Deloitte & Touche LLP, Milwaukee, WI (INT-FL)

Paul H. Frankel, Partner, Morrison & Foerster LLP, New York, NY (INT-NY)

Jeffrey A. Friedman, Partner, Sutherland Asbill & Brennan LLP, Washington, DC (INT-NY)

Timothy H. Gillis, Partner, KPMG LLP, Washington, DC (INT-GA)

June Summers Haas, Partner, Honigman Miller Schwartz & Cohn LLP, Lansing, MI (S&U-GA)

Kathryn M. Jaques, Multistate Tax Consultant, Hamilton Accountancy Corporation, Solana Beach, CA (INT-CA)

John E. Kinney, Partner, KPMG LLP, New York, NY (INT-CA, NY)

Ginny Buckner Kissling, Principal, Ryan & Company, Dallas, TX (S&U-CA)

Richard A. Leavy, Partner, McDermott, Will & Emery, New York, NY (S&U-NY)

Michael H. Lippman, Partner, KPMG LLP, McLean, VA (INT-FL)

Jeremiah T. Lynch, Principal, Ryan & Company, New York, NY (S&U-FL)

J. Mark McCormick, Managing Director, Alvarez & Marsal LLC, Atlanta, GA (INT-FL, GA)

Caryl Nackenson-Sheiber, Attorney/Editor, Interstate Tax Insights, Norwalk, CT (INT, S&U-FL, CA, GA, NY)

Timothy J. Peaden, Partner, Alston & Bird LLP, Atlanta, GA (INT-GA)

Dennis Prestia, Partner, KPMG LLP, New York, NY (S&U-FL)

Frank Schaefer, Executive Director, Grant Thornton LLP, New York, NY (INT-FL, GA, NY)

Kelly W. Smith, Partner, PricewaterhouseCoopers LLP, Atlanta, GA (INT-GA)

Jim Songey, Partner, KPMG LLP, San Francisco, CA (INT-CA)

Earl R. Thomas, Multistate Tax Consultant, Earl Thomas & Associates, Berkeley, CA (S&U-FL, CA; INT-CA)

Patrick R. Van Tiflin, Partner, Honigman Miller Schwartz & Cohn LLP, Lansing, MI (S&U-FL)

Joseph A. Vinatieri, Partner, Bewley, Lasseben & Miller LLP, Whittier, CA (S&U-CA)

Mona Vineyard, Senior Tax Consultant, Ryan & Company, Dallas, TX (S&U-CA)

Stewart M. Weintraub, Partner, Schnader Harrison Segal & Lewis LLP, Philadelphia, PA (S&U-NY)

Denise Woods, Multistate Tax Consultant, Arlington, TX (S&U-GA)

Kenneth T. Zemsky, Partner, Ernst & Young LLP, New York, NY (INT, S&U-FL, NY)

INTERSTATE TAX INSIGHTS



Soft Landing Between a Rock and a Hard Place: New California Law Facilitates Income Tax Refund Claims for Installments Paid Over More Than One Year

JAMES P. KLEIER
BRIAN W. TOMAN

OVERVIEW

Until recently, California law regarding filing refund claims for income and franchise taxes paid in installments over a period of more than one year (hereinafter "installment payments") was out of sync with the federal system, which was more practical and fair in its approach. The federal scheme allowed an informal claim mechanism. The state had no such counterpart. This article examines the federal approach to installment payments and informal claims, describes the framework of the California law and past precedent, examines the policy reasons for having the same informal refund claim process in place for federal and state purposes, explains the new law and concludes with suggestions as to how taxpayers should proceed with refund claims involving installment payments.

The Problem

Some taxpayers cannot, or for economic or other business reasons do not, pay the full amount of a final liability for income or franchise taxes within the statutory time frame so as to allow a refund claim to include the full amount of the tax paid. For example, if a taxpayer paid a liability in equal installments over a period of five years, the statute

(cont'd on p. 2)

JAMES P. KLEIER and BRIAN W. TOMAN are Tax Partners in the San Francisco law office of Preston Gates & Ellis LLP. Mr. Toman was the former Chief Counsel of the California Franchise Tax Board (FTB).

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- **Since 1990**, Interstate Tax Corporation has provided its unique coverage of developments in state taxation of multistate business through its publication, first entitled Interstate Tax Report, now Interstate Tax Insights. With the help of authors who are active practitioners in the field, Interstate Tax Insights has examined current interstate tax cases, legislation, incentives, trends and planning opportunities on an ongoing basis.
- **Recent issues** of ITI have included in-depth articles on changes to Illinois treatment of a unitary business, the effect of bad debts on the calculation of sales and use taxes, California treatment of refund claims for taxes paid in installments, taxpayer challenges to overreaching state tax regulations, NOL issues in mergers and acquisitions, and more.
- **Upcoming articles** will discuss how to determine the state of commercial domicile in order to properly allocate nonbusiness income, state and taxpayer reactions to the controversial decision invalidating Ohio tax incentives, the proper test to be applied to a mixed transaction for sales and use tax purposes, state tax minimization tactics for the purchase of corporate aircraft, plus other hot topics in interstate taxation.
- **Why not subscribe today** and join your colleagues who are already benefiting from the in-depth analyses and tax savings ideas that appear regularly in Interstate Tax Insights?

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Caryl Nackenson-Sheiber

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STATE TAXATION OF MULTISTATE BUSINESS SPRING 2005 REGISTRATION FORM

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- Early Payment Discount (\$30)*
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