

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**

**10TH ANNUAL  
HIGH TECHNOLOGY  
TAX INSTITUTE**

SAN JOSE STATE UNIVERSITY  
DEPT. OF ACCOUNTING & FINANCE, BT 850  
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**...an invaluable, educational tax experience for accountants, attorneys, and corporate representatives who service high technology companies.**

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**S**ince 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 •

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**T**his 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, INDOPCO, 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  | • MARTIN McCLINTOCK |
| • PHILIP BEHRQUIST | • JOSEPH MAGLIONE   |
| • HUGHELENE BURTON | • KIM MARSHALL      |
| • CLAY CAMPBELL    | • ROBERT MATSUI     |
| • ROBERT EMERY     | • DOUG MORGAN       |
| • ELAINE ERICKSON  | • ANNETTE NELLEN    |
| • OWEN FIORE       | • WENDY PEREZ       |
| • JIM FULLER       | • JOHN PETERSON     |
| • JOANNE GARVEY    | • NORM RICHTER      |
| • VIRGINIA GATES   | • JEFFREY VESELY    |
| • IVAN HUMPHREYS   | • ANNE YAMAMOTO     |
| • CHIP LION        |                     |

# MORNING

## **T** HURSDAY NOVEMBER 10

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, INDOPCO, SECTION 1202 STOCK, LOBBYING EXPENSES AND ROTABLE SPARE PARTS, ETC.**

- CLAY CAMPBELL  
Coopers & Lybrand
- ELAINE ERICKSON  
Arthur Andersen

# AFTERNOON

## **T** HURSDAY NOVEMBER 10

12:00-1:30

### **LUNCH AND SPEAKER**

- CONGRESSMAN ROBERT MATSUI  
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

# MORNING

8:00-9:45

## **F**RIDAY NOVEMBER 11

**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
- HUGLENE BURTON  
San Jose State University

# AFTERNOON

3:00-3:15

3:15-5:00

## **F**RIDAY NOVEMBER 11

**SESSION B: Building the File:** Sections 482 and 6662(e)

- GREG BALLANTINE  
KPMG Peat Marwick
- I.R.S. SPOKESPERSON
- PHILIP BEHRQUIST  
Apple Computer

### REFRESHMENT BREAK

**SESSION C: Restructuring the Distribution Function:** An International Tax Perspective - Permanent Establishment Rules, Centralization vs. Decentralization, etc.

- JOHN PETERSON  
Baker & McKenzie
- MARTIN McCLINTOCK  
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 Fiore



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Frank, Rimerman & Co.

# REGISTRATION

## 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

### TUITION FEES CPE/ CLE CREDITS

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 •

### HOTEL ACCOMO-DATIONS

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 •