

**THE
AMERICAN TAXATION ASSOCIATION**

The Tax Section of the American Accounting Association

**2011 Mid-Year Meeting
&
JATA and JLTR Conferences
Washington D.C.
March 4 & 5, 2011**



Capital Hilton
1001 16th Street, NW
Washington, District of Columbia

We would like to thank our 2011 sponsors:

Platinum Sponsors:

Deloitte LLP
Ernst & Young LLP
The KPMG Foundation
PwC LLP

Gold Sponsors:

Grant Thornton LLP

Welcome to Washington, DC and the 23rd Annual ATA Mid-Year Meeting. We appreciate our sponsors E&Y, KPMG, PwC, Deloitte, and Grant Thornton. We have representatives from all these firms at the meeting – please help me thank them personally.

This is the second time we have had our Mid-Year meeting in Washington, DC. Sandy Callaghan and her committee have put together a fantastic program for us with many wonderful highlights! We will start the program off with a tax policy panel made up of Doug Holtz-Eakin, Gene Steuerle, Diane Lim-Rogers and Bill Gale. Then on Friday morning we will have Nina Olson, the Taxpayer Advocate speak. Nina spoke at the Mid-Year meeting the last time we were in Washington, DC and was very informative. I know she will provide a lot of good information this time as well. On Friday afternoon, Mark Weinberger, E & Y Global Vice Chair-Tax, will discuss global taxation. Finally, Tax Analysts President and Publisher, Chris Bergin, is our Saturday luncheon speaker. Hopefully you will find these sessions to be enlightening.

We extend special thanks to KPMG for their continued support of the doctoral consortium, which preceded this meeting. This year we welcome 43 doctoral students to the consortium, and I appreciate LeAnn Luna and Raquel Alexander, co-chairs, continuing this excellent tradition. They and their committee have done a wonderful job with the program. The very first doctoral consortium was held the last time we were in Washington, DC for the Mid-Year meeting. This year, for the first time, the consortium will be held at the KPMG offices. I would also like to thank the Ernst & Young Foundation, which has provided travel funds for the doctoral students to attend the consortium. There are also many new faculty who are attending their first ATA Mid-Year Meeting. Both the doctoral student and the new faculty are listed in the program. Please make all our doctoral students and new faculty feel welcome in the ATA.

Once again, the annual JATA Conference has an outstanding array of papers that should produce thought-provoking discussions. Special thanks go to Richard Sansing and his JATA Conference Committee for continuing this tradition of excellence. In addition, Dave Stewart and his Legal Research Committee have assembled a great lineup of legal research papers. Our concurrent teaching sessions will feature this year's ATA/Deloitte Teaching Innovation Award winner presentation and a session on the Evolving Profession and how to prepare our students to meet the challenge.

Washington, DC is a great city to visit and our hotel is in walking distance to many of the national museums and landmarks. If you have never been to DC, or if it's been awhile since you have been here, I hope you were able to arrive early or stay late to see the sights. Finally, thank you for supporting the ATA. This support helps make the ATA the premier section of the American Accounting Association.

Hughlene Burton, ATA President

Program

Friday, March 4, 2011

- 7:15 a.m. **Registration Opens**
- 7:15 - 8:30 a.m. **Continental Breakfast**
- 7:15 a.m. – 5:30 p.m. **Publisher Exhibits**
- 8:15 – 9:45 a.m.
Federal **Plenary Session: An Adult Conversation on US Fiscal Policy in Trying Economic Times**
Panelist: William Gale, Douglas Holtz-Eakin, Diane Lim-Rogers, Eugene Steuerle
Moderator: George Plesko (University of Connecticut)
- An all-star panel of economists from across the political spectrum will discuss the perilous U.S. fiscal situation and their thoughts on possible solutions. The session includes a discussion of current law, legislative proposals (both tax and expenditure policy), how the tax policy process has changed over the last 25 years, and the outlook for the future. The combination of the panelists' economic expertise and high level political experience in and around Washington, D.C. will center the conversation on practical possibilities. After a short moderated session, the panelists will field questions and comments from the audience.
- 9:45 – 10:00 a.m. **Refreshment Break**
- 10:00 – 11:30 a.m.
Federal **The National Taxpayer Advocate's 2010 Annual Report to Congress**
Speaker: Nina Olson (National Taxpayer Advocate)
Moderator: Amy Dunbar (University of Connecticut)
- 11:30 a.m.– 1:00 p.m. **Lunch**
Congressional *Remarks:* Kevin Stocks, American Accounting Association, President (Brigham Young University)
- New faculty will be introduced by John Dexter (Northwood University), Chair of the New Faculty Concerns Committee

Friday, March 4, 2011

- 1:00 – 2:30 p.m.
Federal **Understanding the Rapidly Changing Business Landscape**
Speaker: Mark Weinberger (EY Global Vice Chair - Tax)
Moderator: Dick Larsen (George Mason University)
- Mark Weinberger will talk about the key factors that are driving change in the global tax landscape, including the accelerating pace of globalization, the shifting economy, the rapid succession of legislative and regulatory changes, and the changing model of tax administration. Mark will discuss the impact these four engines of change are having on businesses and governments around the world.
- 2:30 – 3:00 p.m. **Refreshment Break**
- 3:00 – 4:30 p.m. **Concurrent Sessions**
- Federal* **(1) Research-in-Process**
- Moderator:* Stacie Laplante (University of Georgia)
- Financial Statement Incentives and Benefits of Voluntary Real-Time Audits**
Authors: Paul J. Beck (University of Illinois) and Petro Lisowsky (University of Illinois)
Discussant: Casey Schwab (University of Georgia)
- Taxes and Adverse Selection**
Author: Stephanie A. Sikes (University of Pennsylvania)
Discussant: Brad Lindsey (William and Mary)
- Distilling the Reserve for Uncertain Tax Positions: The Revealing Case of Black Liquor**
Authors: Lisa De Simone (University of Texas), John R. Robinson (University of Texas) and Bridget Stomberg (University of Texas)
Discussant: Devan Mescall, (University of Saskatchewan)

Friday, March 4, 2011

3:00 – 4:30 p.m.

South American

Concurrent Sessions

(2) From Accounting for Taxes to Advanced Business Entities – Strategies for Graduate Tax Classes

Moderator: Charlene Henderson (Mississippi State University)

Income Taxes: Financial Reporting and Auditing

Presenter: John Phillips, recipient of 2010 ATA/Deloitte Innovation in Teaching Award (University of Connecticut)

This presentation focuses on teaching accounting for income taxes from several different perspectives: preparation of the tax accrual, financial statement presentation, disclosure, internal controls and auditing.

A Comparative Life-Cycle Case for Teaching Corporate and Partnership Taxation

Presenter: Toby Stock (Ohio University)

This Excel-based case provides students with an “active learning” approach to learning corporate and partnership organization, operation, distributions, and corporate restructuring. The case is longitudinal (multi-year) with a single set of facts. The two linked versions of the case--a partnership/LLC version and a corporate version--allow students to compare the results for each year across these two organizational forms.

6:00 – 7:00 p.m.

Congressional

Evening Reception

Saturday, March 5, 2011

7:15 – 8:15 a.m.

Continental Breakfast

7:15 a.m. - 4:45 p.m.

Publisher Exhibits

8:00 – 10:00 a.m.

South American

Concurrent Sessions

(1) CPE Sessions

IRS Compliance Initiatives: Challenges and Opportunities

This session is led by Mike Dolan, National Director, KPMG Washington National Tax Practice.

JCT's Role in the Legislative Process and International Tax Provisions

This session is led by Kevin Levingston of the Joint Committee on Taxation

Saturday, March 5, 2011

8:00 – 10:00 a.m.

Concurrent Sessions

Federal

(2) JATA Conference Session I

Moderator: Richard Sansing (Dartmouth College)

Dual Class Ownership and Tax Avoidance

Authors: Sean McGuire (Texas A&M University), Dechun Wang (Texas A&M University) and Ryan Wilson (University of Iowa)

Discussant: Sonja Rego (University of Iowa)

Does a Firm's Business Strategy Influence its Level of Tax Avoidance?

Authors: Danielle M. Higgins (University of Connecticut), Thomas C. Omer (Texas A&M University) and John D. Phillips (University of Connecticut)

Discussant: Stephanie Sikes (University of Pennsylvania)

10:00 – 10:30 a.m.

Refreshment Break

10:30 – 12:30 p.m.

Concurrent Sessions

Federal

(1) JATA Conference Session II

Moderator: Richard Sansing (Dartmouth College)

Network Ties among Low-tax Firms

Authors: Jennifer L. Brown (Arizona State University) and Katharine D. Drake (Arizona State University)

Discussant: Scott Dyreng (Duke University)

Is there Information Content in the Tax Footnote?

Authors: Jana S. Raedy (University of North Carolina), Jeri Seidman (University of Texas) and Douglas A. Shackelford (University of North Carolina)

Discussant: David Weber (University of Connecticut)

Saturday, March 5, 2011

10:30 – 12:30 p.m. **Concurrent Sessions**

South American

(2) JLTR Conference

Moderator: Dave Stewart (Brigham Young University)

Judicial Deference to Regulations in Conflict with Court Decisions and the Administrative Procedures Act - Intermountain Insurance Service of Vail, LLC v. Commissioner

Authors: Donald T. Williamson (American University) and A. Blair Staley (Bloomsburg University of Pennsylvania)

Discussant: Xiaoli Yuan (Elizabeth City State University)

Tax Professionals' Perception of Large and Mid-Size Business Tax Law Complexity

Authors: Stewart Karlinsky (San Jose State University - emeritus) and Hughlene A. Burton (University of North Carolina Charlotte)

Discussant: Tina Quinn (Arkansas State University)

Codification of the Economic Substance Doctrine or how Congress Commemorated the Seventy-fifth Anniversary of the Gregory Case

Authors: Tonya K. Flesher (University of Mississippi) and Tina Quinn

(Arkansas State University)

Discussant: Art Cassill (Elon University)

Are Venture Capital Investments Inefficiently Organized?

Authors: Eric Allen (University of California at Berkeley) and

Sharat Reghavan (University of California at Berkeley)

Discussant: Sharon Stipe (University of West Alabama)

12:30 – 2:00 p.m.

Congressional

Luncheon

Speaker: Chris Bergin (President and Publisher of Tax Analysts)

Saturday, March 5, 2011

2:00 – 3:30 p.m.

Concurrent Sessions

Federal

(1) Research by New Faculty and Ph.D. Students

Moderator: Stacie Laplante (University of Georgia)

Investor Valuation of Tax Avoidance Through Uncertain Tax Positions

Author: Allison Koester (University of Washington)

Discussant: John Phillips (University of Connecticut)

Corporate Tax Implications of Hedge Fund Activism

Authors: C.S. Agnes Chen (Louisiana State University), Henry Huang (Prairie View A&M), Yinghua Li (Purdue) and Jason Stanfield (Purdue)

Discussant: Charles Enis (Penn State)

Social Influences on Aggressive Accounting: The Impact of Corporate Social Responsibility on Tax Aggressiveness

Author: Luke Watson (Penn State)

Discussant: Gil Manzon (Boston College)

South American

(2) An Evolving Profession: Preparing Students to Meet the Challenges

Panelist: Phillip Brunson (Deloitte, Partner, Tax Learning and Development), Mindy Malbasa (Grant Thornton, National Tax Strategic Solutions, Tax Learning), Mark Higgins (Dean, University of Rhode Island) Dan Schisler (Chair, Department of Accounting, East Carolina University)

What skill set will new professionals need? What challenges will higher education face in preparing future tax professionals? Leaders in practice and education will take a look into the future as they answer these and other questions.

3:30 – 3:45 p.m.

Refreshment Break

3:45 – 4:45 p.m.

South American

CPE Session: Legislative Update

This session is led by Dave Auclair, Managing Principal in the Washington National Tax Practice of Grant Thornton.

END OF PROGRAM

PLEASE WELCOME THE FOLLOWING PH. D. STUDENTS

Eric Allen	University of California-Berkeley
Chelsea Austin*	University of Iowa
Chris Becker	Southern Illinois University
Tim Bell*	University of Connecticut
Billy Brink	University of South Carolina
Jason Chen*	University of Central Florida
Travis Chow*	University of Waterloo
Will Ciconte*	University of Florida
Steve Davenport*	University of Alabama-Tuscaloosa
Lisa De Simone*	University of Texas at Austin
Michael Donohoe*	University of Florida
Katharine Drake*	Arizona State University
John Gallemore*	University of North Carolina
Joanna Garcia*	Virginia Tech University
Victoria Glackin	SUNY-New Paltz
Lauren Gorman	Oklahoma State University
Erin Henry*	University of Connecticut
Brad Hepfer*	University of Iowa
Danielle Higgins*	University of Connecticut
Kim Honaker*	Kennesaw State University
Jeffrey Hoopes*	University of Michigan
Margot Howard*	University of North Carolina
Kerry Inger*	Virginia Tech
Cory Johnson*	University of Georgia
David Kenchington*	University of Arizona
Allison Koester	University of Washington
Thomas Kubick*	University of Nebraska
Ryan Larkin*	Texas A & M University
Stephen Lusch*	University of Arizona
Daniel Lynch*	Michigan State University
Michael Mayberry*	Texas A & M University
Rebekah McCarty*	University of Tennessee
Wayne Nesbitt*	University of Georgia
Leigh Rosenthal*	Florida Atlantic University
Alan Stancill*	Virginia Tech
Jason Stanfield*	Purdue University
James Stelberg*	University of Southern California
Bryan Stewart	University of South Carolina
Bridget Stomberg*	University of Texas at Austin
Erin Towery*	University of Texas at Austin
Luke Watson*	Penn State University
Laura Wellman*	Arizona State University
Scott White*	University of Tennessee
Janie Whiteaker-Poe*	University of Kansas
Jaron Wilde*	Texas A & M University
Candace Witherspoon*	University of Kentucky

*Attended Tax Doctoral Consortium

We would like to express our appreciation to KPMG for again sponsoring our Tax Doctoral Consortium, and Ernst & Young for assisting with travel costs.

PLEASE WELCOME THE FOLLOWING NEW FACULTY

Linda Campbell	Texas State University-San Marcos
Linda Chen	University of Massachusetts-Boston
James Chyz	University of Tennessee
Ann Davis	Clemson University
Drew Gross	University of Wisconsin-Milwaukee
Amy Hageman	Kansas State University
Janet McDonald	University of South Florida
Megan McInerney	Old Dominion University

PLEASE WELCOME THE FOLLOWING WHO ARE ATTENDING THEIR FIRST ATA MID-YEAR MEETING

Mahamood Hassan	Cal State Fullerton
Dave Jones	Case Western Reserve University
Nan Luo	Michigan State University
Missy Ross	Deloitte
Takako Sakai	Osaka Prefecture University
Steve Ulke	LS Power Development LLC
Anu Varadharajan	University of Illinois
Sarah Webber	University of Dayton
Don Williamson	American University

THANK YOU TO OUR EXHIBITORS

CCH, a Wolters Kluwer business
Deloitte Dbriefs U
McGraw-Hill/Irwin
South-Western Cengage Learning

Continuing Professional Education

We plan to comply with requirements necessary for you to receive CPE for attending the sessions at this meeting. Please be sure to sign in and out at every session for which you plan to claim CPE.

The American Accounting Association is registered with the National Association of State Boards of Accountancy (NASBA) 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 the National Registry of CPE Sponsors, 150 Fourth Avenue North, Suite 700, Nashville, TN 37219-2417. Web site: www.nasba.org.

For more information regarding administrative policies such as complaint and refund, please contact the American Accounting Association at 941-921-7747.

Call for Papers 2012 JATA Conference

The 18th *Journal of the American Taxation Association* Conference will be held in conjunction with the ATA Midyear Meeting in New Orleans, Louisiana, on February 24-25, 2012. Original papers addressing interesting and relevant tax issues will be considered for the conference. Papers submitted to the conference will not automatically be considered for publication in *JATA*. You are free to submit the paper to any journal. A paper under review (or being revised for resubmission) at another journal as of the conference submission deadline may not be submitted.

All research methods (including, but not limited to, archival, analytical, behavioral, experimental, and field studies) will be considered. Contingent on suitable revisions in accordance with *JATA*'s normal review procedures, papers submitted to *JATA* and accepted for the conference will be published in a regular issue of the journal, along with discussants' comments. Conference papers will be made available to conference participants in advance of the midyear meeting through the ATA web site. Papers submitted to *JATA* but not accepted for the conference will be treated as regular submissions to *JATA*. Authors will be notified of the conference selection decision by December 5, 2011.

Manuscripts must be submitted through the Manuscript Submission and Peer Review System for *JATA*, located at <http://jata.peerx-press.org>. The site contains detailed instructions regarding the preparation of files for submission. To ensure anonymous review, please note that the article title page (with author names) must be in a separate file from the manuscript text. All manuscripts must comply with the **JATA editorial policies and style guidelines**. Please indicate that the paper is being submitted for the Conference and whether you are also submitting the paper for publication in *JATA* by checking the appropriate box on the submission website.

To be considered, papers must be received no later than September 30, 2011. Contact Professor Phillips by email at jata@business.uconn.edu if file compatibility or electronic submission presents a problem.

The submission fee of \$75 in U.S. funds should be paid by credit card following instructions provided on the AAA web site:

<http://aaahq.org/pubs/author.htm>

The submission fee is only required if the paper is to be considered for publication in *JATA*.

Questions about the submission process may be emailed to John Phillips at jata@business.uconn.edu.

2011 ATA Mid-Year Meeting Program Committee

Committee members

Raquel Alexander (Co-Chair, Doctoral Consortium), University of Kansas
John Barrick, Brigham Young University
Sandy Callaghan (Chair), Texas Christian University
Amy Dunbar, University of Connecticut
Steve Gill, San Diego State University
Charlene Henderson, Mississippi State University
Zite Hutton, Western Washington University
Kim Key, Auburn University
Stacie LaPlante, University of Georgia
Dick Larsen, George Mason University
LeAnn Luna (Co-Chair, Doctoral Consortium), University of Tennessee
Cheryl Metrejean, Georgia Southern University
Nancy Nichols, James Madison University
Sarah Nutter, George Mason University
Elizabeth Plummer, Texas Christian University
Tim Rupert, Northeastern University
Christine Bauman (advisory), University of Northern Iowa
Shirley Dennis-Escoffier (advisory), University of Miami
George Plesko (advisory), University of Connecticut
Huglene Burton (President), University of North Carolina – Charlotte

Please address your questions or comments regarding this meeting to:

Sandy Callaghan
Neeley School of Business
Texas Christian University
TCU Box 298530
Fort Worth, TX 76129
s.callaghan@tcu.edu
(817)257-7191

Mark your calendars for next year's meeting:

**2012 American Taxation Association (ATA)
Mid-Year Meeting & JATA Conference**

New Orleans Intercontinental

444 Saint Charles Avenue
New Orleans, LA 70130

2 blocks from the French Quarter, 4 blocks from Harrah's New Orleans,
and 6 blocks from the riverfront

February 24 & 25, 2012



Please forward your 2012 meeting ideas/recommendation to:

Nancy Nichols
James Madison University
MSC 0203
Harrisonburg, VA 22801
(540) 568-8778 office
(540) 568-3017 fax
nicholnb@jmu.edu