

Tax Executives
Institute
at Fifty



The half-century mark in the life of an organization is an important turning point and opportunity for reflection. So it is for Tax Executives Institute. At this time of reflection, we can look with pride on what has grown from a simple notion — tax executives should talk to one another more — into an extraordinarily successful organization of individuals dedicated to the proposition that it is their duty, as a profession, to train themselves and their confreres, and to work for fair and administrable taxation.

TEI's history is remarkable for sheer steadfastness of purpose. The Institute has witnessed significant changes in the world of taxation — the recodification of the Internal Revenue Code in 1954 and the Internal Revenue Service's shift in the 1950s to a truly professionalized civil service; dramatic changes in the taxation of foreign income in the Revenue Act of 1962 and the taxation of business generally in the reform acts of 1969 and 1976; computerization in tax recordiceping and compliance in the 1970s; the unrelenting nature of tax legislation in the 1980s, from the rate reductions of 1981, to the base-broadening provisions of 1982 and 1984, to the momentous changes made by the Tax Reform Act of 1986, to the budget reconciliation bills late in the decade; and the increasing "globalization" of business and tax administration of the 1990s. Equally dramatic changes have occurred in the state and local tax arena, in Canada, and throughout the world.

Through it all, Tax Executives Institute has been the voice of experience, practicality, and administrability. Whether members are helping one another cope with the burdens of compliance, or assisting U.S. or Canadian tax authorities in designing legislation and regulations, they have acted with the firm belief that it is their affirmative obligation to do so. The TEI member, say our Standards of Conduct, "accepts taxes as the cost of civilization."

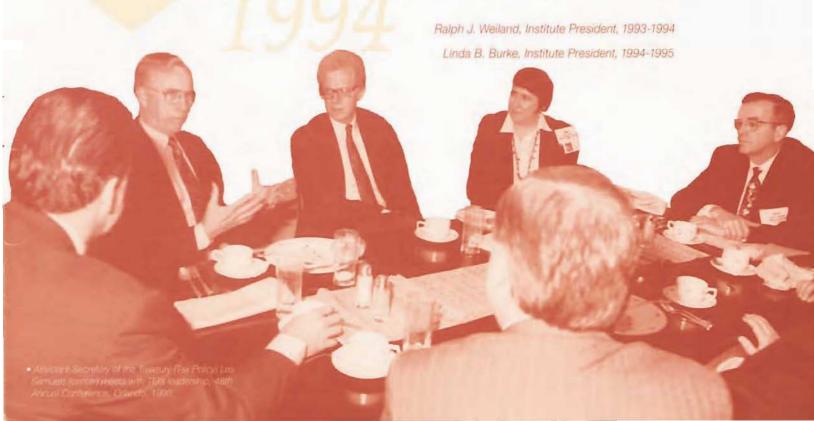
Our golden anniversary theme, "Fifty Years of Service and Professional Growth," reflects the broad scope of TEI's mission. It encompasses TEI's support for the companies employing its members, the tax authorities with whom they interact, and the tax system itself, as well as the educational and professional needs of each member. The theme also covers individual members who have grown through service to the tax community. And it touches the members who serve one another through technical sessions and networking. The by-product, of course, is the advancement of the profession and of the tax system.

rofessional

In these days of ever-expanding agendas, information overload, and continual challenges of the "re-engineering" movement, we believe that our history as an organization shows why TEI enjoys its position as the preeminent voice of the corporate community on taxation. We offer this history as a look back at progress made in realizing the dream of a dozen tax managers five decades ago; a professional association of tax executives. By celebrating and drawing wisdom from our past, we can and will more effectively plan for the future.

As co-chairs of Tax Executives Institute's 50th Anniversary Committee, we express our special appreciation to the TEI members who agreed to be interviewed in connection with this project, the other members who shared their memories and memorabilia, and the members, tax practitioners, and firms that provided financial support for this effort.

We also acknowledge the special skills and talents of Timothy McCormally and Gisela McBride of TEI's staff; of Kecia McDonald, who worked on the history as a 1993 summer intern at TEI; and of the staff of The History Factory. Their commitment to the telling of Tax Executives Institute's story underscores the true secret of the Institute's five decades of success: the vision, dedication, and plain hard work of the women and men who are TEI.







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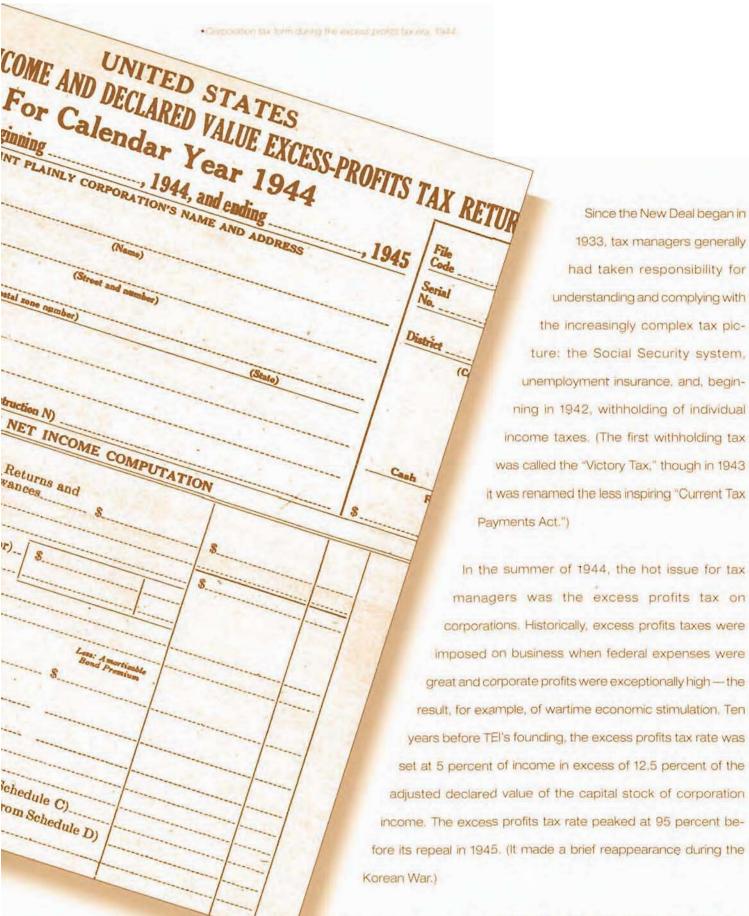


"A true community." That's how Harvard Business School Professor Peter Wilson has characterized Tax Executives Institute. A community of professionals, each of whom is confident, experienced, and eager to learn from and help one another. At the heart of TEI is the quest for knowledge, Insight, and analysis that will simplify compliance, enhance opportunities for effective tax planning, and advance the goal of fair, rational, and equitable taxation.

In creating Tax Executives Institute in 1944, Paul Smith and the Institute's other founders set a course of unusual clarity and longevity. The new organization dedicated itself to promoting administrability in corporate taxation. It sought to encourage and facilitate communication — free from parochial corporate interests — among "tax men," as they were called half a century ago. In the tumultuous days of 1944, Smith and company set out to make the wishful coinage of "tax executive" a reality. Their success in setting a place at the corporate executive's table for the tax manager has been the result of 50 years of clear vision, unwavering commitment, steady growth, and enduring principle.

TEI's story begins in the summer of 1944. The world was still at war, but with the recent Allied invasion of Normandy, most Americans were convinced that victory was only a matter of time. In the corporate world, the war's impact was as worksome as it was energizing.

"Everyone was gung-ho in support of the war effort," recalls TEI's ninth member, Stephen Greenwald, then of United Merchants & Manufacturers, a multinational textiles company. But the manpower shortage meant 16-hour days for those few employees with tax expertise.



The federal income tax burden also shifted during the war to reach more citizens than ever before. Joining America's wealthiest in paying income taxes were the new members of the expanding middle class. Between 1941 and 1945, the number of individual tax returns doubled, and the workload of the corporate officer responsible for handling employee tax reporting expanded exponentially.

With war's end, public demand for government services grew. Americans yearned for the fulfillment of New Deal promises and the end of the frugality forced by the war. Returning veterans sought help in resuming their civilian roles. Social programs and public improvements neglected during wartime took center stage. Federal, state, and local governments responded with an array of new programs — paid for through an expanding economy, higher tax rates, and new taxes. As business flourished in the post-war period, corporate structures expanded and became more complex.

Eventually, large corporations divided their tax departments into subspecialties, but the World War II-era tax managers were jacks-of-all-trades facing unprecedented complexity in taxation. The stakes were higher than ever before for the employees whose jobs were to minimize the burden of taxation on their corporate employers.

Charter member Stephen Greenwald remembers the stress of those heady days. "We didn't have the media resources that we have today," he recalls. In order to "keep up with what was happening" with tax law and Bureau of Internal Revenue practices, accountants such as Greenwald, together with corporate tax lawyers, followed the cases brought before the courts and relied on the experiences of other tax practitioners. Greenwald made a point of comparing notes with fellow tax men — and men virtually owned the field then — on an informal basis. But the people he could call with a tax question were few.

Fortunately, Greenwald counted among his acquaintances Paul Smith of Schenley Distillers, According to Greenwald, Paul Smith was very outgoing — likable, energetic, and well-connected. That summer, Smith had an idea. Why not organize a group of executive-level



1944

The State of New York grants corporate charter to TEI.

1945

TEI establishes State and Local Tax Committee.

1946

Dinner meeting features speakers from White House, Treasury, IRS, and Revenue Canada.

TEI responds to request from State of New Jersey to comment on property and franchise tax issues.

1947

TEI testifies before Congress on Bureau of Internal Revenue's budget.

Dues raised from \$25 to \$40

tax professionals for regular meetings and exchanges on corporate tax problems? Such an organization could not only facilitate communication among professionals, but also identify and reinforce the very standards of the profession itself.

Writing a year later, Smith explained his rationale: "I found it very difficult to be able to exchange ideas with other tax men for the simple reason that outside of a few direct acquaintances, we do not know tax men intimately enough." Furthermore, he observed, the tax practitioner attending an industry-wide meeting tended to "sit still like a mummy in fear of revealing corporate secrets." In contrast, Smith believed that "the average tax man would like to be able to sit around a table and discuss the problems affecting his business, and YES, going beyond that, being able to pick up the telephone and discuss them directly with his fellow members." Existing industry organizations did not give tax issues the focus they deserved.

From the beginning, Smith proposed two types of meetings. One would feature speakers from the federal and state tax departments, which would enable members to

develop "very cordial

Mission Statement

he mission of Tax
Executives Institute is to
enhance and improve the tax
system and to serve its
members, their employers,
and society generally by
facilitating interaction among,
and the training of, members
and their staffs, by effectively
advocating its members'
views, and by promoting
competence and professionalism in both the private and
government sectors.
(Approved: June 3, 1994)

relationships" with public officials. The other would take the form of a workshop/social event, with topics chosen by the group's federal and state tax committees. This members-only forum would permit participants to "exchange forms, ideas, and methods of operating tax departments" and pick up "short cuts for efficient tax administration."

TEI, however, would not function as a lobby, pledged its founder. It would not presume to influence legislation in the making, and it would not endorse candidates, parties, or political agendas. Instead TEI would be available to help shape the regulations and procedures that the IRS, Treasury Department, and local taxing authorities crafted to apply tax laws to businesses. By interacting with state and federal tax officials and policymakers, TEI hoped to keep abreast of developments in its field and provide expert testimony on the impact of tax policy and regulations on the nation's largest corporations.

On June 29, 1944, Smith invited Greenwald and ten other New York tax managers to discuss his idea. The group voted to proceed with the formal organization of Tax Executives Institute. Carl Arnold of Irving Trust Co. and Charles Flynn of Pan American Airways drafted bylaws. The first meeting took place on August 8, and the Institute received its New York State Certificate of Incorporation on October 23. TEl's first national offices consisted of desk space subleased from Women Flyers of America, Inc. at 274 Madison Avenue for a monthly fee of five dollars. The first directors were Carl Amold; Parker Lindhardt; J. Aldus Rinehart, Ebasco Services, Inc.; Henry Williams, United Merchants & Manufacturers, Inc.; and Harry Wright, Paramount Pictures, Inc., with Paul Smith as President. All were in charge of corporate tax operations at their respective businesses.

In order to join, Paul Smith later explained, a tax practitioner had to be employed in the corporate setting by a "AAA-rated" company. "He must be responsible for the tax activities . . . as head or assistant head of the corporation tax department," he said. "It is our purpose to make the corporate tax executive an important officer of every company."



1948

TEI Bulletin launched.

1949

U.S. Secretary of the Treasury John Snyder is guest of honor at 5th annual dinner.

TEI buys electric typewriter to save costs of typesetting *The Tax Executive*, the Institute's official bulletin.

1951

Excess Profits Tax Conference is held in New York City; winter meeting later becomes Midyear Conference.

1952

Board authorizes full-time managing director; Albert "Dock" Walters is hired.

MONDAY, September 16, 1940

A.M.—REGISTRATION FOR MONDAY

TEI devoted its first decade to institution-building with remarkable success. At first, operations were handled on a voluntary basis by the officers of the Institute. National-level activities, such as the annual convention, were organized by the Institute's leadership in New York. TEI also responded to member suggestions on topics for technical seminars, continuing education programs, and written analyses.

But that was not all. Leaders voluntarily traveled the nation at their own expense, meeting potential TEI members and facilitating the formation of new chapters. They provided a conduit for topics that TEI might successfully draw to the attention of government officials, sifting those of more universal import from those affecting only a narrow segment of TEI's membership.

TEI's leadership regularly surveyed the membership to assess the evolution of the profession and the responsiveness of the organization to the tax executive's changing needs. The Institute created the structure to support those needs, including national-level committees. It launched a regular bulletin that eventually became *The Tax Executive*, and frequently published essays detailing why the most successful corporations included, as 1956-1957 Institute President Alan Gomick of the Detroit Chapter wrote in 1952, "adequately staffed tax groups as part of top management." It promoted professional interchanges and employment assistance, at first through a formal Committee on Employment at the national level, and later through chapter-level committees.

From its very first year, when TEI was asked to consider revisions of the Federal Corporation Tax Form, TEI successfully built solid relationships with the Treasury Department, Internal Revenue Service, congressional tax-writing committees, and state and local authorities, as well as their counterparts in Ottawa and the Canadian provinces. These relationships smoothed communications and enhanced the responsiveness of both sides. "TEI has been a leader in working cooperatively with the IRS, even before cooperation became

TFI is

n organization of 5,000 members organized in 47 chapters who seek to fulfill the credo "members helping members."

A tax manager in Dallas who supervises a staff of 75 lawyers and accountants engaged in tax planning, compliance, and controversy work.



At the core of the Institute's philosophy is the notion that taxes are a "cost of civilization," and that members accept and will comply with tax laws, even if they disagree with them and seek to change them. The Institute's first declaration of principles declared that TEI "stands for the practice of the highest ethical standards" in preparing tax returns and reports and otherwise administering the tax function. Only by adhering to such standards, the declaration insisted, could tax executives earn and maintain the confidence of both management and government tax authorities and assist the members in their many problems of taxation. In practice, this meant — and continues to mean — not only promoting high standards of performance among members and fairness in taxation, but also sharing the benefit of members' unique expertise and perspective with policymakers and regulators at the local, state, provincial, and national levels.

At the one-decade mark, the Institute had grown to 748 members in 26 chapters across the United States and Canada and committed itself to hiring a full-time administrative staff. Amid the burdens of new taxes imposed in response to the Korean War, TEI had found a broader identity and a stronger voice. That identity now embraced women with the 1953 admission of the Louisville Chapter, whose roster included TEI's first female member, Helen Ferguson. In 1958, TEI moved its headquarters to Washington to "expedite the distribution of timely tax information" and otherwise better serve the members, though it reaffirmed its policy of "not engaging in tax legislation."



1953

IRS Commissioner
Andrews establishes
Citizens Volunteer
Advisory Group (later
renamed Commissioner's
Advisory Group),
including three TEI
members.

1954

TEI News begins publication, and The Tax Executive debuts as quarterly journal (first issue is devoted to just-enacted Internal Revenue Code of 1954).

1956

Toronto and Montreal Chapters are formed in Canada.

1957

James Rivers hired as Managing Director. TEI is . . .

n organization that effectively advocates its members' views.

An organization that promotes competence and professionalism in both the private and government sectors where taxation is concerned.

... A tax executive in Toronto who telephones a tax director of a company in the same industry as his — a member he has never met — and discusses how he might handle a specific issue on audit.

Even before TEI's relocation, federal, state, and local officials eagerly accepted invitations to participate in Institute meetings and looked to TEI as the emerging voice of the business community on tax matters. For example, in 1953 three TEI members served on IRS Commissioner T. Coleman Andrews's first Advisory Group, setting a precedent for continuous service to the IRS commissioners. The three pioneers were Frederick Patton, Boston Chapter (1954-1955 Institute President); Frank Olds, Detroit Chapter; and Morris Rinehart, New York Chapter (1964-1965 Institute President). Numerous conferences, technical sessions, and virtually the entire 1954 annual meeting program focused on the new Internal Revenue Code of 1954, the first revamping of the internal revenue laws since 1913. Even as members grappled with the new legislation, the IRS turned to TEI for advice on how to implement 3,000 changes in the income tax rules.

With the basic organizational structures in place, TEI considered the then unresolved

question of standards of performance for the tax executive. After much discussion, the Institute in 1962 issued its Standards of Conduct. Institute President Leonard Kust of the Pittsburgh Chapter carefully concluded that "there is nothing even mildly unethical in the desire of taxpayers to minimize tax liability," and wrote that the ethical tax executive must also be a "good corporate citizen." The Standards of Conduct acknowledge the tension inherent in a tax system that rests both on voluntary compliance and on adversary proceedings. In electing Kust to Honorary Membership in 1983, TEI's Board of

With the exception of the initial decision to eschew lobbying, Paul Smith's original purposes continue to govern TEI. From the first ten memberships

Directors cited his leadership and courage in spearheading the

executives.

Institute's initiative to adopt specific ethical standards for tax



Preliminary Program

Tax Executives Institute

33rd Annual Conference

October 14-18, 1978 Detroit Plaza Hotel Detroit, Michigan

Meet me in St. Louis, Meet Me AT THE CHASE
OCTOBER 2.6, 1965, Missouri
OSTOBER 2.6, 1965, Missouri
OSTOBER 2.6, 1965, Missouri

Chase Park Plaza, St.

Detroit



embers Serving Members

The growth of TEI's chapters was nurtured in the beginning by Paul Smith himself. As Institute President until 1950, Smith made countless visits to potential members across North America. The formation of TEI was followed in March 1945 by the establishment of a Boston (later New England) Chapter. Next came Philadelphia (August), Los Angeles (September), and in mid-1946, the New York members formed a chapter separate from the national organization. TEI's expansion and chapter growth generally occurred first on the East and West Coasts, followed by a filling in of the Midwest.

In 1946 the idea of a South American chapter was fleetingly raised by Paul Smith, but the first foreign chapter was not formed until Toronto was chartered in 1956. Recognizing the expanding numerous interconnections between U.S. and Canadian business interests, a Montreal Chapter soon followed. In the early 1970s, chapters were established in Vancouver and Calgary.

To potential members, Paul Smith emphasized the singular interests of corporate tax managers and the opportunity TEI offered to promote the highest ethical standards in the administration of tax accounting and procedure. Tax managers responded enthusiastically to the idea of positioning themselves at the executive table where critical business decisions are made, moving beyond their traditional role as compliance managers.

Smith's effort to build a national organization succeeded in part because it built upon the work of others. Some chapters, such as those in Philadelphia and Chicago, were outgrowths of informal get-togethers of tax managers. What made TEI unique was the

"IB is the only organization where you can call people you don't know and they'll fell you all of their sacrets."

- Hai Tagoriz Aurus Cay Chapter · Former IRS palsonnel munito at TEIs 16th Armun Conference, San Francisco, 1961



vision and dedication of the Institute's leaders — their drive to move the organization beyond the undeniable need for technical assistance and job connections into the realm of promoting the profession itself. And Smith and other early leaders realized that such a lofty goal required cooperation across a wide geographic area. (Thomas Hurns of the Detroit Chapter, 1952-1953 Institute President, estimated that he traveled more than 25,000 miles visiting chapters and furthering TEI — and this before air travel was *de rigueur*.)

In the early years, chapters adopted a format that remains in use today. Members meet monthly over lunch or dinner to discuss pressing tax problems, share experiences with the IRS and state and local authorities, and brainstorm and benchmark on how to improve their departments' visibility and stature. Chapter meetings include technical sessions devoted to problems of tax planning and compliance and feature presentations by key government officials, outside experts, and TEI's own members.

The benefits extend far beyond the technical information conveyed during the formal sessions. For example, in the course of batting around issues of state and local concern, individuals have invited confreres to join them in efforts to improve state and local tax rules. When Chuck Rau of the Wisconsin Chapter (Institute President, 1985-1986) sought a change in his state's property tax laws in the early 1970s, he realized that the idea would go nowhere without support from others. So he approached members of his TEI chapter. "I said, 'Who's interested? Who'd like to work on this?' We got a group together that was effective. It was not TEI *per se*; it was a group of individual TEI members representing their companies." Such collaborative, industry-based efforts, have no official tie to TEI, but without the forum provided by the Institute, they likely would be impossible.

TEI is. . .

tax accountant in St. Louis who identifies a problem with a set of proposed employee benefit regulations, helps draft an Institute submission on how the problem can be solved, and is pleased when the final regulations correct the problem.

... A manager of federal audits in Texas who reads an article in The Tax Executive and develops a more effective strategy for negotiating a records retention agreement with the IRS.

Chapter members also identify issues of national scope where federal or international tax law comes into play. TEI's committees respond to these concerns, assess whether they affect enough members to become an institute project, and then identify the experts from within the membership to prepare a submission to the appropriate authority. Typically, early TEI submissions focused on questions of administrability rather than overall policy. Until it began to build a professional tax staff in the 1980s, TEI successfully drew almost exclusively upon expertise volunteered by members around the United States and Canada to determine how to ease specific tax compliance burdens, and the members remain the core of the institute's technical activities.

While TEI chapters listened to technical presentations from outside experts, they benefited handsomely from the expertise of fellow members. A.B. "Mac" McKie of the Toronto Chapter, the Institute's first Canadian President (1970-1971), recalls that chapter members "prefer to talk to the practical man rather than the theoretical fellow. The lawyer looks at laws, but the tax executive has to face the audit."

With the seemingly constant redoubling of the size and complexity of the tax picture, TEI's educational sessions, at both the chapter and the Institute levels, have become invaluable for members facing information overload. These sessions range from formal courses and symposia to informal lunch meetings. "Our world changes by the day," says Paul Zagortz of the Kansas City Chapter, "and information travels by word of mouth, Chapter meetings are a tremendous information opportunity and often operate as an effective early-warning system for members." Explains Tom Kerester, TEI's Executive Director from 1985 to

Election of Officers

Laginning September 20, 1970

OFFICIAL bone of the institute

1992: "The chapters are the back-

because the



1963

TEI delegation appears before Royal Commission on Taxation in Ottawa.

1968

Hawaii Chapter chartered.

1970

summed to the Secretary, and be

1070 Your official ballot

Mac McKie, Toronto Chapter, is first Canadian to serve as Institute President.

32 ieme Conference annuelle 1994 32 nd Annual Conference

relationships that members form — with their peers and with government officials — can serve them not only today and tomorrow, but throughout their careers." For this reason, the chapters' "District Director Nights" and "State Tax Days" are among the most popular meetings held, as are the roundtable discussions where TEI members exchange insights on emerging audit issues, on how best to deal with particular state and federal auditors, and on who might be the best practitioner to retain to handle a particular matter.

The two Institute-level conferences each year offer senior executives a special opportunity to focus on major current issues in taxation.

Unlike the courses and seminars.

which give participants either a broad over-

view or in-depth

coordinated examination program of the Internal Revenue Service

TEI is. . .

tax director of a medium-sized company in California who sends new members of her department to the Institute's tax courses because, dollar-for-dollar and minute-by-minute, they offer the best training available to the corporate tax community.

 Members share agrenorices, via an Audit Practicesi Subcommittee's report, 1968



Serving Our Nation

When TEI's Board of Directors, under the leadership of Institute President Carl Brieske, voted in 1971 to take a more activist stance in tax policymaking, an important era in the Institute's history began. No longer would TEI shy away from influencing tax rules before the enactment of legislation. No longer would TEI members watch poor policy or procedures heading for approval without having their say.

Although members frequently felt the frustration of "sitting on the sidelines," few could criticize the careful and judicious course TEI had followed to its new activist role. Without nearly 30 years of restricting efforts to influence tax policy (as opposed to tax administration) — without its proven record of objectivity and balanced professionalism — TEI would not have earned the respect and trust of government policymakers.

The questions of whether and when TEI should lobby during the formulation of legislation were never easy to resolve. From the first decade, the minutes of board of directors' meetings record discussions of adding legislative involvement to the group's activities, but concerns about politicization defeated the idea time and again. Said George Ruppel of the New York Chapter in 1950, "The prestige and acceptance [of TEI by government officials] which has been attained to date . . . would be lost in a very short time" if the Institute sought involvement in tax policy beyond its traditional role of response to government requests for information on how proposals might or might not be administrable. Over time other opportunities were declined as inconsistent with Institute policies, in 1962 TEI reviewed and reaffirmed its policy of contributing only to administrative aspects of federal tax policy.

continuity required to tratarise many competing in such to expensions in such to expensions who expensions are constructive in ordinary factors and expensions for my expensions in the expension of the expension

 Sersor Vice Prescient Raph Musting trassits It is not surprising that TEI eventually took the leap however measured - into advocacy and lobbying. From the beginning, TEI members were drawn into advisory roles to government tax TEI is. . . policymakers, regulators, and administrators. The first request for expert advice came when TEI was in its second year. In April 1946, the Treasury manager of state Department asked for the Institute's help in revising the Federal Corporation Tax Form. In March 1948, TEI was asked by the Bureau of Internal Revenue to testify before the Senate

taxes for a multijurisdictional company headquartered in Illinois who participates in the drafting of an institute amicus brief in a Supreme Court case involving nexus standards.

polled the membership and then voted to approve the appearance. From this cautious willingness to play a formal role in tax administration grew the Institute's policy of cooperation and consultation with tax policymakers to promote a better system for all. TEI's opinions are valued precisely because they are based on the actual daily experience of TEI members, experience that allows them effectively to identify and analyze the practical ramifications of new policies and regulations. An internal review of TEI's evolution characterized the Institute's approach as "both responsive and responsible.... TEI does not 'cry wolf' and does not criticize just for the sake of being

critical.... TEI does not take cheap shots. TEI knows what it is talking about, because

its members are the ones who must live with what is done in Washington and Ottawa

and the states and the provinces."

Committee on Appropriations against proposed cuts in the Bureau's staff, in an early

example of TEI's actions "in the interests of good tax administration," the Board of Directors

The 1970s saw an expansion of TEI's involvement beyond responding to the IRS's requests for comment on regulations and forms. TEI's expert testimony was sought by Congress, House and Senate tax committee members invited TEI's assessment of

TAX COURSE

how their proposals would play out in actual practice. In the judicial realm, too, the Institute took modest steps forward in 1971. TEI filed its first "friend of the court" brief with the Supreme Court of the United States in Chase Brass & Copper Co. v. Franchise Tax Board. Similarly, TEI provided its views to Canada's Department of National Revenue and the Royal Commission on Taxation.

Indeed, it was TEI's actions in commenting on Canada's Royal Commission that prompted a review of the Institute's general policy in 1971. Building on its tradition of advising government in order to promote the common good where taxation was concerned, the Institute decided to confirm its more activist stance by adding an eighth purpose to its original seven: "To promote and support, in such manner and to such extent as the Board of Directors may from time to time determine, the improvement of the tax laws, and of their administration at all levels of Government."

Where TEI had once reacted, after enactment, to government proposals, it now struck a more anticipatory posture, initiating and influencing tax legislative proposals. Speaking about the early 1980s, Linda Burke of the Pittsburgh Chapter (Institute President, 1994-1995) recalls, "Not only were we the keepers of the administrative grail in taxes, but we became much more interested in the formulation of the substance." Moving from the declaration of purpose to implementation took time, but by the mid-1980s, with the building of a professional tax staff in TEI's Washington office, the pieces were in place to make TEI a significant player in policy and legislative matters. "That's when we got the courage to work with the expertise that we have," says Burke, "and to say. "We've got a much bigger role to play"... and we've got to do it to serve our membership properly.""

Typically, TEI responds to laws or rules that, while possible, reasonable, or defensible on paper, fail the test of actual practice. For example, in 1990, a proposed IRS rule intended to block abusive tax avoidance schemes involving multiple corporations





 Reportation, State and Local Property by Grame, Alchigan State University, 1976.

TEI is. . .

member in

Minneapolis who attends a corporate tax management seminar to learn how to communicate better with her senior management—how to escape from what some companies consider "the black box" of taxes and tax departments.

... A tax counsel in New York who regularly participates in IRS training programs, thereby gaining insight into how case managers and team members approach issues.

"simultaneously killed scores of legitimate transactions," says Paul Zagortz. The effect was the same as using a broad spectrum antibiotic when a simpler, more targeted drug would do the trick — the III effects outweighed the good. So TEI

submitted comments to the IRS pointing out the unintended outcome and suggesting alternatives. As often happens, TEI did not succeed in getting the IRS to retract completely, but the IRS did soften the rule and thereby permitted more transactions to proceed.

Even with the lifting of its proscription on lobbying, the Institute remains cautious about the scope of legislative activity. TEI declines to work on tax provisions or regulations that apply only to a small portion of the membership or that are politically motivated or divisive. "TEI's diversity — which is its greatest strength — often prevents us from acting," explains Timothy McCormally, the Institute's General Counsel and Director of Tax Affairs. "We sometimes cannot reach a consensus because of the scope of our membership. We shouldn't be embarrassed by our inability to take positions on certain issues, nor should we be afraid to forge a consensus where an issue affects a cross-section of our membership."

In order to respond to the extraordinary challenge of the Tax Reform Act of 1986 — the most significant tax overhaul since 1954 — the Institute turned again to its diverse membership for guidance. The three volumes of Treasury Department proposals were divided among members of TEI's standing committees, who combed the provisions for those that potentially affected broad segments of the membership. Then the short list was approved by the full Board of Directors — a list that culminated in the submission of a 100-plus-page position paper. Describing the process he oversaw as Institute President, Chuck Rau explains, "The Institute focused primarily on the administrative aspects of the House

and Senate bills — those proposals that could materially affect the integrity of our self-assessment system and, because of the burdens they would impose, the competitive position of U.S. business. We also discussed whether the proposals would produce their intended effects." Similar efforts culminated in the submission of comprehensive comments on Canadian tax reform proposals, relating both to the income Tax Act and the Goods and Services Tax.

TEI members hoping to affect federal tax policy gravitate toward the Institute's standing committees, for service on these committees not only offers members a broader view of tax issues affecting the entire nation, but also enlarges their personal horizons. For Linda Burke, service on the Federal Tax Committee "enhanced everything that was happening to me. Because I knew so much about what was going on with the IRS at the national level, I was able to make things go better for my company at the district level." When Burke was under consideration to become her company's

Milestones

1982

Ned Sprague becomes Executive Director, Timothy McCormally appointed Tax Counsel, as TEI begins to build professional tax staff.

Emmett Murphy of San Francisco Chapter receives first-ever TEI President's Award.



Streams, State and Local Property Inc Course, 1976



TEI is. . .

chief financial officer in Georgia who came up through the tax ranks and retains his membership in the Institute because of the access it provides to the top tax talent in the country and the camaraderie among members.

At TEI's half-century mark, there are nearly 20 committees and subcommittees divided into two categories: tax-related issues and institute operations. The number and composition of committees and subcommittees have changed over the years in response to the changing tax picture. Chapters generally establish their own counterparts to the Institute-level committees. Committee work offers an important avenue for intellectual growth and public service. Vince Alicandri of the Toronto Chapter, former chair of the Institute's Canadian Income Tax Committee, notes that his chairmanship forced him to "become an expert in new areas" on a regular basis. "While I'm preparing presentations and submissions [to the Canadian tax authorities], I'm learning." And those submissions and comments, published in the bi-monthly *The Tax Executive*, educate members and other readers as well.

The 1980s were years of dramatic growth for Institute-level activities with the happy result that TEI's voice was heard and heard often by government officials and corporate executives. In 1982 TEI hired Timothy McCormally as its in-house tax counsel in order to "communicate more efficiently with various government agencies," according to then President Tom Maletta of the Pittsburgh Chapter. In practice, and with the addition of two more tax attorneys over the next decade, this change meant that the Institute now had "eyes, ears, and hands" in Washington, ready to research, draft, and coordinate TEI's submissions and comments, and to alert members to developments in areas of interest, whether those be legislative, administrative, or procedural. As it entered the 1990s, the Institute moved to solidify and enhance its stature by recruiting Mike Murphy, a 30-year IRS veteran who served as Deputy Commissioner, to become Executive Director.

As a result of these developments, and the unrelenting pace of tax law changes, the number of TEI submissions, liaison meetings, and other technical activities has increased exponentially. TEI has become a familiar presence on Capitol Hill, testifying on tax bills

before the House Ways and Means Committee and the Senate Finance Committee, Rob Leonard, Chief Counsel and Staff Director of the House Committee on Ways and Means during much of the 1980s, has written that "in major bill after major bill, TEI has provided critical information about business exigencies or mechanical problems that warranted amendments to proposed statutory language. Without TEI's reservoir of practical experience, the Congressional tax-writing committees might well have faced many more technical corrections than the comparatively modest number enacted in the past."

TEI also continues to cooperate with Treasury and the IRS in drafting regulations and procedures recently on records retention procedures. consolidated return rules, regulations to limit deductions for executive compensation and lobbying, and penalties. In all of these activities, the direction taken and the arguments made are based on the concerns of TEI's members as developed and refined by the Institute's committees.

Supreme Court of the United St

No. 91-615

ALLIED SIGNAL INC., as successor-in-interest to The Bendix Corporation,

DIRECTOR, DIVISION OF TAXA

On Writ of Certiorari to Supreme Court of New J

BRIEF OF TAX EXECUTIVES AS AMICUS CURIAE SUPPOR

INTEREST OF AMIC

Pursuant to Rule 37 of the Executives Institute, Inc. respe as amicus curiae. Tax Execut "TEI" or "the Institute") is a ciation of corporate and other agers, and administrators wh



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Senior Tax Executives

The 1980s also saw TEI become much more active in filing briefs in court cases of broad application to the business community. The Institute paid particular attention to Supreme Court cases involving state taxation, preparing "friend of the court" briefs seeking to vindicate the Commerce Clause, Due Process, and Equal Protection rights of multistate and multinational businesses. "Not only has TEI's involvement helped persuade the High Court to consider particular cases, but our briefs often discuss issues and arguments the parties themselves have sidestepped," explains Bob Perlman of the Santa Clara Valley Chapter (1992-1993 Institute President). "Our amicus briefs give us the opportunity to stake out the high ground, clarifying constitutional principles while aiding our members."

> TEI in the 1990s has helped the IRS educate and train its agents and appeals officers

through participation in the "reinvention" of the IRS's Coordinated Examination Program, under which all major corporations are audited every year. TEI also produced an analysis of value-added tax systems throughout the world, with the goal of ensuring that ongoing congressional studies of the possible alternatives to the U.S. income tax system have access to the most complete and thoughtful analysis available. That analysis was also used by the Canadian parliament as it considered proposals to revamp Canada's Goods and Services Tax.

de Frenkly of the Ansittate's International Day Course

Perhaps the most significant source of knowledge on taxes has been the array of training programs that led to TEI being named the primary source of education for top tax managers, according to three 1980s surveys of Fortune 500 companies. The groundwork for this role dates from the Institute's founding purpose — education.

Almost from the outset, TEI sought to cooperate with academic institutions in preparing candidates for careers in corporate tax administration. The Institute's goal was to interest college students in preparing themselves for tax administration careers and to promote relevant course offerings in taxation, finance, business administration, international and domestic economics, and law at appropriate graduate schools. At TEI's 50th anniversary, a dozen chapters have established scholarship programs at local colleges and universities to advance that goal, and many more chapters sponsor "Students' Nights" to introduce interested students to tax executives and in-house tax careers.



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1983

Dues raised to \$150.

TEI holds first annual liaison meetings with Treasury Department and Joint Committee on Taxation.

Deauville Resort hosts TEI after the Diplomat Hotel burns a fortnight before the Annual Conference.

1984

TEI initiates IRS Audits and Appeals Seminar.

1985

Tom Kerester appointed
Executive Director; Deborah
Gaffney named TEI's first
Director of Conference
Planning; Tom Plutz
becomes Director of
Administration.

1986

TEI files 100-plus-page submission on 1986 Tax Reform Act.

How To Talk So Upper

manager of international taxes for a Chicago company who regularly participates in panel discussions at chapter meetings and Institute conferences.

Over time, TEI's educational focus has grown to include continuing education programs designed both for tax executives and also for their staff — younger tax managers who lack the seniority and experience to qualify for TEI membership. The first such course, the Federal Tax Course, was offered in 1968 during the presidency of Charley Gebhardt of the Cincinnati Chapter. The Federal Tax Course set an important precedent by drawing instructors from the most experienced tax practitioners and TEI members. (TEI's educational efforts took a leap forward in 1965 with the hiring of Bill Lynch, who had previously worked at the Treasury Department. Lynch, who later became Managing Director and served until his retirement in 1983, was instrumental in developing the Institute's tax courses and other programs.)

Since that first course, Institute-sponsored programs have grown to include a Canadian Tax Course, State and Local/Property Tax Course, and International Tax Course; eventually, two levels of Federal and International Tax Courses were established. These programs are complemented by targeted seminars that either survey the far-reaching provisions of recent legislation or home in on specific subjects. In 1987, the Institute established the nonprofit TEI Education Fund, which sponsors these courses and other programs. The Fund also supports independent research such as the Institute's value-added tax study and a 1993 analysis of the structure and size of corporate tax departments.

In the mid-1990s, the corporate world continues its inexorable expansion across international borders. "International tax practice is growing exponentially," says Lisa Norton of the New Jersey Chapter, former chair of the International Tax Committee. "Everyone's doing business overseas. We've seen the largest amount of flux and proliferation of rules and with it complexity in the international area of tax."

In keeping with TEI's commitment to anticipate member needs, Larry Langdon of the Santa Clara Valley Chapter (Institute President, 1988-1989) and his successor Bill Burk of

Ianagement Will Listen

the New Jersey Chapter identified the coming interdependence and interrelationship of the world's tax systems as a subject for Institute concern. They initiated TEI's "globalization efforts" with an international symposium on the impact of the new European Economic Community and efforts to coordinate activities with counterpart organizations in other countries. Through the leadership of Reg Kowalchuk of the Toronto Chapter (1991-1992 Institute President), TEI in 1992 joined with the United Nations to cosponsor a symposium on the taxation of foreign investment in Central and Eastern Europe.

In its golden anniversary year, TEI membership continues to grow despite corporate "downsizing" and "outsourcing" (hiring independent professionals to handle tasks once performed by staff). Indeed, the reduction of corporate tax staffs has made TEI's advocacy initiatives even more important, since individual companies may decide to cut back on such activities despite their inherent value. By responding to changes in the tax system, TEI has avoided the stagnation that can render professional groups obsolete.

Respire pace with TEX growth the nutrition strategy.
 15 professorable is now in the place. TOBA.







1987

TEI's offices return to Washington after a decade in Rosslyn, Virginia.

1988

TEI files amicus brief with Supreme Court in National Can case, involving refund of unconstitutionally collected state taxes.

1989

Board adopts guidelines for establishment of chapter scholarship programs.

The Tax Executive and TEI
News are merged; new
publication is produced inhouse using desktop
publishing system.

1990

Dues raised to \$200.



Serving the Future

As its second half-century beckons, TEI is an organization that is seasoned, highly regarded by government, and exceptionally well-positioned to move forward. "TEI's 5,000 members deserve credit for the current advances in the profession, its acceptance as a specialty, and the elevation of the tax executive to a major role player in the corporate setting," says Raiph Weiland. Despite all of the advances of the last 50 years, Executive Director Mike Murphy observes, the question for the future is: "Will TEI members be looked at by their top management as major players in the overall management of their corporations? Or will they be seen merely as the persons responsible for filing returns and paying tax? Will they be viewed as a cost center — overhead — or as providing a valuable service?"

Harvard Business School Professor Peter Wilson has reported that, of ten major U.S. corporations that "are very good at tax planning," all ten treat their tax executives as full partners in corporate management. And all have tax departments with the highest level of expertise, broad knowledge of their particular business, and the interpersonal skills that engender trust, mutual respect, and creativity. These key success factors, says Wilson, are all addressed and supported by TEI. For the Institute to prosper, it must keep these strengths in the forefront.

Executive Director Murphy sees opportunities for TEI to increase its influence and contributions to the tax systems of the United States and Canada, and throughout the world. "For TEI to retain its prominence, TEI must not only continue to prepare high-quality submissions and testimony, but must also assist government officials in reinventing the tax system. We must also continually reinvent ourselves."

The last system and tare executives face great crossings. Based on partnersonce to date, I have every confidence that TEI ask stay in important and pack of old in shaping the total. I have exemple trained.

= d T. Goldberg, Jr. Familia Commissioner of Informal Reviews



TEL is. . .

Canadian lawyer attending a training program on U.S. tax laws and a U.S. accountant attending a similar program on Canadian transfer pricing developments.

A vice presidenttaxes of a software company in Silicon Valley whose staff totals five, and the assistant controller-tax administration of a large multinational who supervises more than 120 people. What's more, Weiland adds, the challenges of the future are not only global but local in nature. "State taxes promise to become even more important, both in absolute terms and compared with federal taxes." That is why the Board of Directors in 1994 appointed a special task force to map out a strategy for future action in the state and local area. "I have no doubt that we will continue to be active on federal and international issues, but we must position ourselves to address the emerging issues of the day, regardless of where they arise, If we want to remain relevant, we must exert stronger leadership in the state and local area, too."

Burke adds, "There are no guarantees that the 'old ways of doing business' — essentially reacting to proposed legislation and regulations (however successful they have been) — will be enough. We must be willing to adapt, to seize the initiative, and to be more visionary about what we want the tax system to be."

The challenges, moreover, extend beyond TEI's advocacy initiatives, encompassing both its educational endeavors and its efforts to enhance communication and networking among members. "We must continue to sponsor top-notch seminars and conferences," Weiland explains. "And we have got to be bold enough to explore new ways of sharing information with one another — via the so-called information superhighway or otherwise. In other words, we must continue to carry the baton that Paul Smith passed us half a century ago."

As Tax Executives Institute observes its fiftieth anniversary, it is a strong, robust organization. The faith of founder Paul Smith in his fellow tax practitioners has been vindicated. The foundation is solid and will continue to support the aspirations and needs of the members, buffeted as they may be by the vagaries of tomorrow's taxation and corporate trends.

The basics that drew the first members to TEI in 1944 continue to appeal. The willingness to share ideas and insights, to work for positive change in the tax system, and to build up the profession itself remain vibrant and inspiring.

"There's something different — and remarkable — about the way this organization treats and respects individuals," observes Burke. "People really want to belong. We can and do help one another, and we help the system, too. That's one thing that future leaders will never seek to change."





1992

Former IRS Deputy Commissioner Mike Murphy named Executive Director.

Jeff Rasmussen becomes Assistant Tax Counsel, joining Timothy McCormally and Mary Lou Fahey on legal staff.

TEI and the United Nations cosponsor symposium on taxation of investment in Central and Eastern Europe.

1993

The Structure and Size of the Corporate Tax Department published.

1994

Membership reaches 5,035 (June 30).

New Statement of Mission, Principle, and Purposes approved by Board.

Linda Burke, Pittsburgh Chapter, becomes TEI's first female Institute President.



Purposes

To facilitate the association of professionals whose work is principally concerned with administering the tax affairs of business entities and to enhance the role of tax executives in the management of those entities.

To promote an awareness among business entities and government of the significance of both taxes and tax administration as a cost of business and a factor in global competitiveness, and of the importance of sound business tax management practices.

To promote and support the improvement of the tax laws, and of their administration, at all levels of government.

To cooperate and exchange ideas with government tax officials for the purpose of identifying and resolving issues and problems in tax administration.

To promote the interchange of ideas and mutual assistance among the members, and between the members and government tax officials.

To promote high standards of competence, professionalism, and performance in business tax management and government tax administration.

To obtain and disseminate information on the subject of taxation for the benefit of the members, their employers, and other interested parties, through educational programs, publications, or otherwise.

(Approved: June 3, 1994)

Chapters

Region I

Calgary • 1971

Montreal • 1956

Toronto • 1956

Vancouver • 1972

Region II

New York • 1944

Niagara Frontier • 1958

Rochester • 1949

Syracuse • 1946

Region III

Connecticut Valley • 1969

New England • 1945

Westchester-Fairfield • 1983

Region IV

Harrisburg • 1989

New Jersey • 1974

Philadelphia • 1945

Region V

Atlanta = 1960

Baltimore-Washington • 1961

Carolinas • 1952

Florida • 1971

Nashville • 1992

New Orleans • 1948

Virginia • 1979

Region VI

Cincinnati • 1952

Cleveland • 1954

Detroit • 1947

Indiana • 1954

Louisville • 1952

Pittsburgh • 1954

Western Michigan • 1951

Region VII

Chicago • 1953

Kansas City • 1950

Minnesota • 1953

St. Louis . 1948

Wisconsin • 1956

Region VIII

Dallas • 1952

Houston • 1954

Oklahoma • 1980

Rocky Mountain • 1964

Salt Lake City • 1991

San Antonio • 1989

Region IX

Arizona • 1976

Hawaii • 1968

Los Angeles • 1945

Orange County • 1993

Portland • 1954

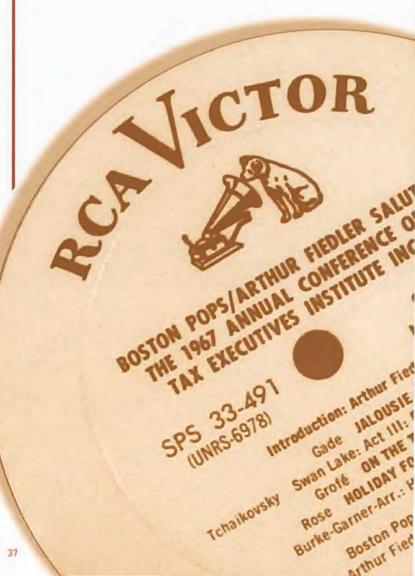
San Francisco • 1947

Santa Clara Valley • 1983

Seattle • 1952

Principle

Tax Executives Institute is dedicated to the development of sound tax policy, compliance with and uniform enforcement of tax laws, and minimization of administration and compliance costs to the benefit of both government and taxpayers. The organization believes these goals can be attained only through the members' voluntary actions and their adherence to the highest standards of professional competence and integrity. (Approved: June 3, 1994)



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Committees

Committees on Tax and Tax-Related Issues

Canadian Commodity Tax

Canadian Income Tax

Commonwealth of Puerto Rico and U.S. Possessions

Consumption Tax

Corporate Tax Management

Federal Tax

International Tax

IRS Administrative Affairs

State and Local Tax

Tax Information Systems

Committees on TEI Organization

Advisory Committee to the President

Awards

Communications

Continuing Education

Fiftieth Anniversary

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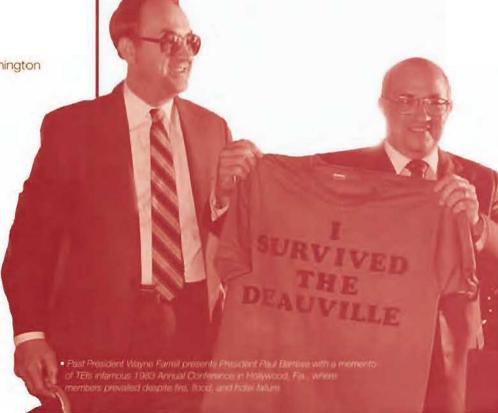
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