

Table of Contents

Overview	Overview-1
Why a national multistate income tax course?	Overview-3
Tax formula for multistate corporate taxpayers	Overview-5
Irregular corporate tax structures	Overview-8
Chapter 1	1-1
Interstate Activity and Nexus	1-1
Nexus defined	1-3
What we know and where to go from here	1-30
Chapter 2	2-1
Calculation of State Taxable Income: Modifications	2-1
Additions	2-3
Subtractions	2-12
Chapter 3	3-1
Filing Methods for Multistate Taxpayers	3-1
Separate, consolidated, or combined filing	3-2
The landmark cases	3-8
Multistate Tax Commission	3-23
Chapter 4	4-1
Apportionment and Allocation	4-1
Current rules	4-2
The Hercules cases	4-20
The Supreme Court: Once again	4-23
Chapter 5	5-1
Apportionment Formulas and Factors	5-1
Payroll, property, and sales factors	5-2
The payroll factor	5-7
The property factor	5-11
The sales factor	5-17

How much distortion is enough?	5-32
The treatment of factors in partnerships	5-33
Appendix A	A-1
Basic Ideas of Multistate Income Tax Planning	A-1
Identifying goals and methodologies	A-4
Appendix B	B-1
Audit Defense Strategies	B-1
Audit selection	B-4
The pre-audit	B-6
Initial meeting and audit work	B-8
Closing conference	B-10
Glossary	Glossary 1
Index	Index 1
Solutions	Solutions 1
Chapter 1	Solutions 1
Chapter 2	Solutions 3
Chapter 3	Solutions 4
Chapter 4	Solutions 6
Chapter 5	Solutions 7