



GEORGETOWN UNIVERSITY LAW CENTER COURSE SELECTION ADVICE FOR FOREIGN-TRAINED GRADUATE TAX STUDENTS

This *Degree Guide* is designed primarily to assist foreign-trained graduate tax (LL.M.) students with their course selection. This *Guide* complements but does not supersede course registration materials provided in print and online. If any information in this *Guide* is inconsistent with the online version of the course schedule, the latter controls.

I. ACADEMIC ADVISING

For general assistance in selecting courses, please contact Ellis Duncan, the Director of the Graduate Tax Program, by e-mail at ellis.duncan@georgetown.edu, or by telephone at (202) 662-4056.

II. PROGRAM REQUIREMENTS

- (1) *Credit Hour Requirements.* To obtain the Tax LL.M. degree, foreign-trained students must complete 20 academic credits, 16 of which must be earned in tax courses. Please consult our website to view which courses qualify as tax courses.¹
- (2) *Credit Hour Limits.* A full-time student may take no more than 13 credits per semester. A part-time student may take no more than 7 credits per semester. Students are advised to keep these credit limits in mind when researching courses and planning schedules. Please be aware that Week One courses count as part of the maximum 13 credit hours permitted during the Spring semester.
- (3) *Required Courses.* Foreign-trained tax LL.M. students are required to take the following three courses:
 - (a) *Federal Income Taxation* (Professor Faulhaber, fall semester); and
 - (b) *Corporate Income Tax Law I* (2 credits) or *Corporate Taxation* (4 credits) (spring semester); and
 - (c) *Basic Principles of Finance* (0 credits – online course).

Federal Income Taxation is a prerequisite for most of our upper-level elective courses in taxation. Foreign-trained students satisfy this prerequisite by taking this course with Professor Faulhaber during the fall semester. The lecture portion of this course will take place on Mondays and Wednesdays from 1:20-3:20 pm. There will also be a mandatory weekly supplemental class exclusively for foreign-trained Tax LL.M. students. The supplemental class will be co-taught by Professors Faulhaber and Grinberg and will take place on Tuesday afternoons between 3:30-4:30 pm.

Basic Principles of Finance is a zero-credit, online course that is required for students matriculating into the Tax LL.M. program during their first semester in residence. This course has no meeting times and students must complete the multiple choice take-home exam no later than the end of the fall semester final exam period (Saturday, December 21 at 11:59 pm). The website for the course

¹ A list of all tax courses can be found on our website here (<https://curriculum.law.georgetown.edu/course-search/>). You may view a list of qualifying tax courses by using the drop-down menu for “Courses in a Graduate Program” and selecting “Taxation LL.M.”

will be made available to students on June 1, 2019. Students are encouraged to complete this course during the summer before arriving on campus. If you have any questions about the course, or would like to gain access to the videos and exam before your course schedule becomes available, please e-mail Cynthia Rockwell (clr72@georgetown.edu). Please be aware that you need to have an activated Georgetown net ID and password in order to access the website for this course.

- (4) *Recommended Courses.* In addition to the required courses noted above, the Faculty and Administration of the Graduate Tax Program recommend that foreign-trained Tax LL.M. students also take the following two courses:

- (a) *International Tax* (fall semester); and
- (b) *Taxation of Partnerships* (spring semester).

In addition to the suggested courses listed above, all students who enter the full-time Tax LL.M. program who are seeking employment in the United States following graduation are encouraged to complete an externship during the spring semester, if possible. Externships that are tax-focused will be counted on a case-by-case basis toward the tax specialization credits required for the Tax LL.M. degree.

- (5) *Course Sequencing.* Students are advised to carefully consider the sequencing of courses prior to registration. For example, unless a particular student has a strong background in U.S. income tax law, that student is urged not to take courses covering the taxation of business entities (e.g., *Corporate Taxation* or *Taxation of Partnerships*) prior to learning the fundamental U.S. income tax concepts explored in *Federal Income Taxation* during the fall semester.
- (6) *Model Schedule.* Below is a model schedule for a foreign-trained Tax LL.M. student seeking a well-rounded education in U.S. tax law. This schedule is intended for illustrative purposes only. Students are encouraged to speak with their academic advisor in order to choose courses that meet their individual needs and objectives.

Fall Semester

Federal Income Taxation (4 credits)
International Tax (3 credits)
Intro to U.S. Legal Systems (2 credits)
U.S. Legal Research (Duncan/Kelly) (2 credits)

Total Credits: 11

Tax Credits: 9

Spring Semester

Corporate Taxation (4 credits)
Taxation of Partnerships (3 credits)
Tax Elective (2 credits)
Tax Externship (2 credits)

Total Credits: 11

Tax Credits: 11

III. CERTIFICATE IN INTERNATIONAL TAXATION

Both U.S.-trained and foreign-trained Tax LL.M. students may pursue the Certificate in International Taxation in conjunction with the Tax LL.M. degree. The Faculty and Administration of the Graduate Tax Program encourage foreign-trained LL.M.s to gain exposure to a wide variety of courses in U.S. tax law during their LL.M. program instead of focusing all of their elective courses in the international tax area. For this reason, we encourage all foreign-trained LL.M. students interested in the Certificate in International Taxation to

discuss their objectives with their academic advisor. Students who wish to add the Certificate in International Taxation to their degree program should notify Ellis Duncan (ellis.duncan@georgetown.edu) no later than the end of the add/drop period for the fall 2019 semester (September 10, 2019).

Students interested in obtaining the Certificate in International Taxation must complete a minimum of 10 academic credits in international taxation,² including the following three required courses:

- (a) *International Tax* (fall Semester)³
- (b) *Tax Treaties* (spring Semester); and
- (c) A course on transfer pricing⁴

IV. NEW YORK BAR EXAM

Many foreign-trained attorneys choose to take the New York Bar exam after completing their degree requirements for the Tax LL.M.⁵ Because the New York Bar requires 12 credit hours of subjects tested on the exam, and the Tax LL.M. degree requires the completion of 16 credit hours of coursework in taxation, students must generally take 28 total credit hours if they intend to sit for the New York Bar. For this reason, Tax LL.M. students who intend to sit for the New York Bar exam are strongly encouraged to come to Georgetown during the summer and complete one or more required courses prior to the start of the fall semester.⁶

However, because the 2-credit *U.S. Legal Research, Analysis and Writing* (LAWG-844-20) course with Professors Duncan and Kelly is a course required for the New York Bar and is also counted toward the fulfillment of the 16 tax specialization credits, with careful planning, students may be able to complete all of the courses required for the Tax LL.M. degree and for the New York bar by taking 13 credits during both the fall and spring semesters (students are not permitted to take more than 13 credits during a single semester). Tax LL.M. students who also seek to take the coursework required for the New York Bar are urged to discuss their schedule with Ellis Duncan (ellis.duncan@georgetown.edu) prior to registration.

Below is a model schedule for a foreign-trained student who wishes to obtain the Tax LL.M. degree and sit for the New York Bar examination.

² A list of courses that qualify for the Certificate in International Taxation can be found on our website here (<https://curriculum.law.georgetown.edu/course-search/>). You may sort by using the drop-down menu for “Courses in a Graduate Program” and selecting “International Taxation Certificate.”

³ Students who intend to complete the Certificate in International Taxation in conjunction with the Tax LL.M. degree in a single academic year should plan to take *International Tax* in the fall semester (with Professor Grinberg) and *Tax Treaties* in the spring semester (with Professor De Vos).

⁴ This course may include: (1) *Survey of Transfer Pricing* (Fall semester) or (2) *Transfer Pricing: Selected Topics* (Spring semester).

⁵ More information about the New York bar exam can be found here: <https://www.law.georgetown.edu/academics/graduate-programs/student-services/student-advising/bar-exam-information/>

⁶ More information about the LL.M. Summer Experience can be found here: <https://www.law.georgetown.edu/academics/graduate-programs/student-services/student-advising/ll-m-summer-experience/>

Fall Semester

Federal Income Taxation (4 credits)

International Tax (3 credits)

U.S. Legal Research (Duncan/Kelly) (2 credits)

Intro to U.S. Legal Systems (2 credits)

Professional Responsibility in the U.S. (2 credits)

Basic Principles of Finance (0 credits)

Total Credits: 13

Tax Credits: 9

New York Bar Credits: 6

Spring Semester

Corporate Taxation (2 credits)

Taxation of Partnerships (3 credits)

Intro to Contracts (3 credits)

Evidence (3 credits)

Tax-related Externship (2 credits)

Total Credits: 13

Tax Credits: 7

New York Bar Credits: 6

Because it is not possible for a foreign-trained Tax LL.M. student to obtain the International Tax Certificate and take the courses necessary to sit for the New York Bar exam in a single academic year, students are encouraged to attend the LL.M. Summer Experience and discuss their objectives with an academic advisor prior to registering for courses.