



GEORGETOWN UNIVERSITY LAW CENTER

COURSE SELECTION ADVICE FOR U.S.-TRAINED GRADUATE TAX STUDENTS

This *Course Selection Guide* is designed primarily to assist U.S.-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. For assistance in selecting courses related to any specialty degree program or certificate, please contact the appropriate academic advisor listed in this *Guide*.

II. PROGRAM REQUIREMENTS

- (1) *Credit Hour Requirements.* To obtain the Tax LL.M. degree, U.S.-trained students must complete 24 academic credits, 20 of which must be earned in tax courses. Please consult our website to view which courses count as tax courses for purposes of meeting this requirement.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.* There are three required courses for U.S.-trained students:
 - (a) *Corporate Income Tax Law I (2 credits) or Corporate Taxation (4 credits);*
 - (b) *Income Tax Accounting (2 credits);* and
 - (c) *Basic Principles of Finance (0 credit online course)*

A student who has taken the substantial equivalent of *Corporate Income Tax Law I* during his or her J.D. program and has received a grade of “B” or better in such course may request a waiver from Ellis Duncan, the Director of the Graduate Tax Program, by e-mail at ellis.duncan@georgetown.edu on or before September 10, 2019 (the end of the add/drop period for the fall 2019 semester). When requesting a waiver of a particular course, please attach a copy of your law school transcript and a copy of the course description to the e-mail request. Please note that *Income Tax Accounting* is a tax accounting course examining provisions of the Internal Revenue Code, and not a financial accounting course that a student might take as part of a business school program. Because very few law school courses are substantially similar to *Income Tax Accounting*, this requirement is seldom (if ever) waived.

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 will be made available to students

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.”

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.

III. SUGGESTED CURRICULUM

(1) Course Prerequisites

- (a) *In General*. Several taxation courses list one or more courses as prerequisites. If you have taken the listed course at Georgetown or an equivalent course at another law school, then you have met the prerequisite and do not need to request a waiver. If you have not taken the prerequisite course but believe you nonetheless possess the requisite knowledge, you will need to request a waiver from the professor or your academic advisor. It may be possible to request a waiver by e-mailing the professor or your academic advisor during the summer prior to matriculation.
- (b) *Federal Income Taxation*. Most taxation courses list *Federal Income Taxation* as a prerequisite. U.S.-trained students will invariably have taken the equivalent of *Federal Income Taxation* before matriculating in Georgetown's Tax LL.M. program (or successfully completed Georgetown's online course, *Foundations of Federal Income Taxation*) which, in both cases, satisfies the *Federal Income Taxation* prerequisite.

(2) Suggested Courses

While the formal course requirements for the Tax LL.M. degree are minimal, and while Georgetown wishes to allow students the flexibility to explore different areas of tax law and have the opportunity to specialize, the Faculty and Administration of the Graduate Tax Program believe that students are well-served by taking a broad selection of courses in a number of different areas. Students are advised to take at least one course in each of the following five areas: (1) corporate taxation; (2) property transactions; (3) partnership taxation; (4) international taxation; and (5) tax procedure, as well as at least one course or seminar requiring the completion of a paper.² Suggested courses in these five areas are listed below. A student who has taken a substantially similar course in law school or who has relevant practice experience should feel free to substitute a different elective for any such course.

- (a) *Corporate Income Taxation I (2 credits) & II (2 credits) or Corporate Taxation (4 credits)*³
 (b) *Taxation of Property Transactions (fall semester)*⁴

² The Faculty and Administration of the Graduate Tax Program feel that clear and persuasive legal writing is the single most important ingredient for success in sophisticated tax practice. Therefore, graduate tax students are strongly encouraged to take at least one course or seminar that requires the completion of a paper, or write a Graduate Independent Research paper under the direct supervision of a tax professor.

³ *Corporate Income Tax Law I (2 credits) or Corporate Taxation (4 credits)* is a requirement for the Tax LL.M. degree unless a waiver is granted. *Corporate Income Tax Law I* covers more basic concepts of how a corporation and its shareholders are taxed. *Corporate Income Tax Law II* covers corporate mergers, acquisitions, and reorganizations. *Corporate Taxation (4 credits)* is a more comprehensive course that covers the material examined in *Corporate Income Tax Law I (2 credits)* and *Corporate Income Tax Law II (2 credits)*.

⁴ Students who have successfully completed a comprehensive course on individual federal income taxation should review the syllabus and past examinations for *Taxation of Property Transactions* to see if they have mastered this material.

- (c) *Taxation of Partnerships* (fall or spring semester)
- (d) *International Tax* (fall or spring semester)⁵
- (e) A course in tax procedure⁶
- (f) At least one course or seminar requiring the completion of a paper (or the completion of an individual Graduate Independent Research paper under the direct supervision of a professor).

In addition to the suggested courses listed above, all students who enter the full-time Tax LL.M. program without any substantive work experience are encouraged to complete at least one externship at some point during the program. The completion of an externship serves to enhance a student's resume and generally improves a student's chances of finding full-time employment following graduation. Please keep in mind that credits earned through an externship do not count toward the 20 tax specialization credits needed to complete the Tax LL.M. degree.

(3) Model Schedules

The Faculty and Administration have put together several model schedules to assist students with various objectives when selecting courses. These schedules are 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.

Below is a model schedule for a student who wishes to take a well-rounded curriculum without specializing or earning a certificate.

Fall Semester

Corporate Income Tax Law I (2 credits)
Income Tax Accounting (2 credits)
International Tax (3 credits)
Tax Practice & Procedure (Admin/Lit) (2 credits)
 [Tax of Property Transactions/Externship (2 credits)]
Basic Principles of Finance (0 credits)

Total: 11 - 13 credits

Spring Semester

Corporate Income Tax Law II (2 credits)
Taxation of Partnerships (2 or 3 credits)
Survey of State and Local Tax (2 credits)
Course/Seminar requiring a paper (2 credits)
Elective (2 credits)
Second Externship/Elective (2 credits)

Total: 11 - 13 credits

IV. SPECIALIZED CURRICULUM

In addition to the Program Requirements and Suggested Curriculum listed in this *Guide*, students are given the opportunity to specialize in a particular area of tax and earn one of Georgetown's four tax specialty certificates. Georgetown offers specialty certificates in each of the following areas:

- (1) Certificate in International Taxation
- (2) Certificate in Employee Benefits
- (3) Certificate in Estate Planning
- (4) Certificate in State & Local Taxation

⁵ Students who pursue the Certificate in International Taxation will take *U.S. Inbound International Tax* and *U.S. Outbound International Tax* instead of the three credit *International Tax* course.

⁶ This course may include: (1) *Tax Practice & Procedure (Administrative Practice)* (fall or spring semester) or (2) *Tax Practice & Procedure (Litigation)* (spring semester).

Students who wish to enroll in a particular certificate program may do so by e-mailing Ellis Duncan (ellis.duncan@georgetown.edu) on or before September 10, 2019 (the end of the add/drop period for the fall 2019 semester). Students are free to add, drop or change certificate programs at any time before January 21, 2020 (the end of the add/drop period for the spring 2020 semester).

Requirements and model schedules for each of these certificates are listed in this *Guide*.

(1) Certificate in International Taxation

(a) *Academic Advising*

For assistance in selecting courses in this area or to discuss potential career options, please contact Professor Stafford Smiley by e-mail at smileys1@georgetown.edu or by telephone at (202) 662-9906.

(b) *Certificate Requirements*

In order to obtain the Certificate in International Taxation in conjunction with the Tax LL.M. degree, students must complete a minimum of 10 academic credits in international taxation⁷, including the following four required courses:

- (i) *U.S. Inbound International Taxation* (fall semester);
- (ii) *U.S. Outbound International Taxation* (fall semester);
- (iii) *Tax Treaties* (fall or spring semester); and
- (iv) A course on transfer pricing⁸

(c) *Model Schedule*

Below is a model schedule for a student who wishes to take a well-rounded curriculum and obtain the Certificate in International Taxation in conjunction with the Tax LL.M. degree.

Fall Semester

Corporate Income Tax Law I (2 credits)
Income Tax Accounting (2 credits)
[Tax of Property Transactions/Externship (2 credits)]
U.S. Inbound International Taxation (2 credits)
U.S. Outbound International Taxation (2 credits)
Survey of Transfer Pricing (2 credits)
Basic Principles of Finance (0 credits)

Total: 12 credits

Spring Semester

Corporate Income Tax Law II (2 credits)
Taxation of Partnerships (2 or 3 credits)
Advanced International Taxation (2 credits)⁹
Tax Treaties (2 credits)
Survey of State & Local Tax (SALT) (2 credits)
Second Externship/Elective (2 credits)

Total: 12 - 13 credits

⁷ 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 can sort by using the drop-down menu for “Courses in a Graduate Program” and selecting “International Taxation Certificate.” Please note that the three-credit course *International Tax* does not count toward the completion of the Certificate in International Taxation for U.S.-trained students.

⁸ This course may include: (1) *Survey of Transfer Pricing* (fall semester) or (2) *Transfer Pricing: Selected Topics* (spring semester).

⁹ Students who are interested in controversy vs. tax planning work may wish to consider taking *International Tax Controversy*.

(2) Certificate in Employee Benefits Law

(a) *Academic Advising*

For assistance in selecting courses in this area or to discuss potential career options, please contact Henry Eickelberg, the Faculty Advisor for the Certificate in Employee Benefits program, by e-mail at hce3@georgetown.edu or by telephone at (703) 876-3745.

(b) *Certificate Requirements*

To obtain the Certificate in Employee Benefits Law, by itself or in conjunction with the Tax LL.M. degree, students must complete a 10 academic credits, which consist of the following courses in employee benefits law:

- (i) *Employee Benefits: Executive Compensation* (fall semester);
- (ii) *Employee Benefits: Health & Welfare Plans* (fall semester);
- (iii) *Employee Benefits: Qualified Retirement Plans* (fall semester); and
- (iv) *Employee Benefits Practicum* (spring semester)

(c) *Model Schedule*

Below is a model schedule for a student who wishes to take a well-rounded curriculum and obtain the Certificate in Employee Benefits Law in conjunction with the Tax LL.M degree.

Fall Semester

Corporate Income Tax Law I (2 credits)
Income Tax Accounting (2 credits)
[Tax of Property Transactions/Externship (2 credits)]
Employee Benefits: Executive Compensation (2 credits)
Employee Benefits: Health & Welfare Plans (2 credits)
Employee Benefits: Qualified Retirement Plans (2 credits)
Basic Principles of Finance (0 credits)

Total: 12 credits

Spring Semester

Taxation of Partnerships (3 credits)
International Tax (3 credits)
Employee Benefits Practicum (4 credits)
Second Externship/Elective (2 credits)

Total: 12 credits

(3) Certificate in Estate Planning

(a) *Academic Advising*

For assistance in selecting courses in this area or to discuss potential career options, please contact Professor Stafford Smiley by e-mail at smileys1@georgetown.edu or by telephone at (202) 662-9906.

(b) *Certificate Requirements*

To obtain the Certificate in Estate Planning, by itself or in conjunction with the Tax LL.M. degree, students must complete 10 academic credits, which consist of the following four estate planning courses:

- (i) *Estate Planning: Income Taxation of Trusts, Estates & Beneficiaries* (fall semester);
- (ii) *Estate Planning: Estate & Gift Tax* (fall semester);

- (iii) *Estate Planning: Special Topics in Transfer Tax* (fall semester); and
- (iv) *Advanced Private Wealth Planning Seminar* (spring semester).

It is also highly recommended that students pursuing the Certificate in Estate Planning take the following two additional courses: (1) *Taxation of Partnerships* and (2) *Taxation of Charities & Other Nonprofit Organizations*.

(c) *Model Schedule*

Below is a model schedule for a student who wishes to take a well-rounded curriculum while obtaining the Certificate in Estate Planning in conjunction with the Tax LL.M degree.

Fall Semester

Corporate Income Tax Law I (2 credits)
Taxation of Charities & Nonprofits (2 credits)
Income Tax Accounting (2 credits)
Income Taxation of Trusts & Estates (2 credits)
Estate & Gift Tax (2 credits)
Special Topics in Transfer Tax (2 credits)
Basic Principles of Finance (0 credits)

Total: 12 credits

Spring Semester

Taxation of Partnerships (3 credits)
International Tax (3 credits)
Advanced Private Wealth Seminar (4 credits)
Externship/Elective (2 credits)

Total: 12 credits

(4) Certificate in State and Local Taxation

(a) *Academic Advising*

For assistance in selecting courses in this area or to discuss potential career options, please contact Professor Phil Tatarowicz by e-mail at tatarowp@georgetown.edu or by telephone at (202) 661-6698.

(b) *Certificate Requirements*

To obtain the Certificate in State & Local Taxation (SALT), by itself or in conjunction with the Tax LL.M. degree, students must complete must complete 10 academic credits, which consist of the following five courses in state and local taxation:

- (i) *State & Local Taxation: Income & Franchise Taxes* (fall semester);
- (ii) *State & Local Taxation: Other Business Taxes* (fall semester);
- (iii) *State & Local Taxation: Sales & Use Taxes* (fall semester);
- (iv) *Federal Limitations on State & Local Taxation* (spring semester); and
- (v) *Special Topics in State & Local Taxation* (spring semester).

(c) *Model Schedule*

Below is a model schedule for a student who wishes to take a well-rounded curriculum and obtain the Certificate in State & Local Taxation in conjunction with the Tax LL.M degree.

Fall Semester

Corporate Income Tax Law I (2 credits)
Income Tax Accounting (2 credits)
[Tax of Property Transactions/Externship (2 credits)]
SALT: Income & Franchise Taxes (2 credits)
SALT: Other Business Taxes (2 credits)
SALT: Sales & Use Taxes (2 credits)
Basic Principles of Finance (0 credits)

Total: 12 credits

Spring Semester

International Tax (3 credits)
Taxation of Partnerships (3 credits)
Federal Limitations on SALT (2 credits)
Special Topics in SALT (2 credits)
Second Externship/Elective (2 credits)

Total: 12 credits