



TAX LAW

The Study of Tax Law at Georgetown

GEORGETOWN LAW

A woman with long brown hair, wearing a black blazer over a patterned dress, stands in front of a chalkboard. She is smiling and looking towards the camera. The chalkboard behind her has handwritten notes in white chalk. On the left, there is a large bracket grouping 'AB' and 'FM'. To the right of 'AB' is '\$10,000' and to the right of 'FM' is '\$50,000'. Below these, there is a circled '1' and some arrows. To the right of the woman, the words 'real property,' and 'tion' are visible. The woman is standing next to a wooden podium.

The Study of Tax Law at Georgetown

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The study of tax law at Georgetown offers a unique combination of full-time and adjunct faculty, the most extensive tax curriculum in the country, and the opportunity to study tax in Washington, D.C., where the nation's laws are made, interpreted, and enforced.

The Law Center is located near the foot of Capitol Hill, two blocks from the U.S. Tax Court, and a short walk from the Supreme Court, the Internal Revenue Service, the Treasury Department, and the Department of Justice. Georgetown draws upon these unique resources to enrich our students' experience.

Students at Georgetown may pursue a J.D. degree, or a specialized LL.M. degree in tax law on a full-time or part-time basis, on campus or online. J.D. students also have the option of obtaining both the J.D. and LL.M. degrees in three and one half years of study.

A Rich Academic Life

Georgetown's extensive tax curriculum offers students the opportunity to choose from more than 50 graduate-level courses dealing with every aspect of tax law. These courses range from foundational subjects such as corporate, partnership, and international tax, to dozens of advanced offerings across a variety of specialized areas.

The Law Center regularly hosts conferences addressing domestic and foreign tax issues, as well as panel discussions with national tax experts and government tax officials. During the fall and spring semesters, students may enroll in a variety of externships, which have become important assets in the legal job search process. Externships can be secured with government agencies and non-profit organizations, and for Tax LL.M. students, also with for-profit entities such as law firms and accounting firms.

Students may also broaden their horizons by taking elective courses at the business school or the graduate school on the University's Main Campus. There are many opportunities for writing papers, in seminars or as faculty-supervised Graduate Independent Research, which can lead to opportunities for publication.



Philip Mammen (left) and Deborah Tarwasokono (right) both completed externships at the U.S. Department of Treasury while attending Georgetown's Tax LL.M. program.

A Distinctive Faculty

The breadth of our full-time and adjunct faculty, numbering more than 100 professors total, enables Georgetown to offer an exceptionally large and specialized array of tax courses, taught by professors who bring to the classroom their various experiences in the government, the private sector, academia, and the non-profit community.

Our full-time faculty includes teachers and scholars who are regularly consulted by business, the United States government, and international organizations, including the International Monetary Fund, the OECD, and the World Bank. The full-time faculty has expertise in not only technical issues of taxation, but also the intersection of tax law and public finance, international trade, fiscal policy, behavioral economics, and civil rights. Our adjunct faculty include practitioners at major law and accounting firms, non-profit organizations and think-tanks, as well as top government officials at the Internal Revenue Service, the Department of Treasury, the Department of Justice, and judges at the U.S. Tax Court. At Georgetown, students have the opportunity to be taught not only by world-renowned scholars and top practitioners, but by those who are actually creating tax policy and enforcing and interpreting U.S. tax laws.

Full-Time Faculty



Professor Dorothy Brown

B.S., Fordham University; J.D., Georgetown University Law Center; LL.M. (Taxation), New York University School of Law

Professor Brown is well known for her work in a variety of areas, including the effects of tax policy by race, class, and gender, workplace equity and inclusion, and law school reform. She is the author of *The Whiteness of Wealth: How the Tax System Impoverishes Black Americans, and How We Can Fix It* (2021), and co-author of *Critical Race Theory: Cases, Materials,*

and Problems (2014), and *Problems and Federal Income Taxation: Cases, Problems, and Materials* (West Academic Publishing, Sixth and Seventh editions). She has appeared on CNN, MSNBC, and Bloomberg, and has written numerous opinion pieces addressing current events in the *New York Times*, the *Atlantic*, *CNN Opinion*, the *Washington Post*, and *Forbes*, among other publications. Currently Professor Brown teaches courses in federal income taxation, corporate taxation, critical race theory, and tax policy, and is the recipient of numerous teaching awards at every law school at which she has taught.



Professor Lilian Faulhaber

[A.B., Harvard College](#); [M.Phil., Cambridge University](#);
[J.D., Harvard Law School](#)

Professor Faulhaber is the Ralph H. Dwan Chair in Taxation at Georgetown Law. She teaches in the areas of taxation and international tax law. Before joining the Georgetown faculty, she was an associate professor at Boston University School of Law. From 2013-2015, Professor Faulhaber served as an advisor at the Organization for Economic Cooperation and Development, where she worked on the Base Erosion and Profit Shifting (BEPS) project. Professor Faulhaber has published articles on international taxation, tax avoidance, charitable giving, and European Union law. She clerked for Senior Judge Robert E. Keeton and Judge William G. Young, both on the U.S. District Court for the District of Massachusetts, and was an associate at Cleary Gottlieb Steen & Hamilton LLP in New York.



Professor Itai Grinberg

[B.A., Amherst College](#); [J.D., Yale Law School](#)

Professor Grinberg joined the faculty from the Office of International Tax Counsel at the Department of Treasury. During his first stint at Treasury, he represented the United States on tax matters in multilateral settings, negotiated tax treaties with foreign sovereigns, and was involved with international tax legislative developments and cross-border tax regulations. He also practiced law at Skadden, Arps, Slate, Meagher & Flom LLP in New York, where his practice focused on a wide range of international tax controversy and planning matters. In 2005, Professor Grinberg served as counsel to the President's Advisory Panel on Federal Tax Reform, where he advised a bipartisan presidential commission that made sweeping proposals to restructure the U.S. tax code. Professor Grinberg's academic research focuses on international tax policy, as well as the intersection of international tax law, international trade law, international investment law, international financial regulation, and the relationship between taxation and climate policies. From January 2021 until early 2023, Professor Grinberg served as the Deputy Assistant Secretary (Multilateral Negotiations) in the Office of Tax Policy of the U.S. Department of Treasury. He was the lead U.S. negotiator for the global corporate minimum tax endorsed by leaders of the G20 at their Rome Summit meeting in 2021, and also served as the lead delegate for the United States on international tax issues across all multilateral institutions.



Professor Victoria Perry

[B.A., Yale University](#); [J.D., Harvard Law School](#)

Professor Perry is a Professor in the Graduate Tax Program at Georgetown, where she teaches courses on federal income taxation, international tax, comparative tax law, and taxation and development. Prior to joining the Law Center, Professor Perry served as Deputy Director of the Fiscal Affairs Department at the International Monetary Fund, where she provided technical advice on tax policy and revenue administration to more than 50 countries in all regions of the world. Her research and teaching interests include the role and structure of tax systems in developing countries and the intersection of tax law and public finance. She

has also served as a visiting professor of taxation at Oxford University, and as the Deputy Director of the International Tax Program at Harvard University. In her earlier career, after clerking for Judge James Holden of the U.S. District of Vermont, Professor Perry practiced tax law with the Boston law firm of WilmerHale. She is the past president of the National Tax Association, past president of the American Tax Policy Institute, past Chair of the Value Added Tax Committee of the American Bar Association Section of Taxation, and is presently vice president of the International Institute of Public Finance.



Professor Emily Satterthwaite

[B.A., Yale College](#); [J.D., Stanford Law School](#); [M.A., University of Toronto](#); [LL.M., University of Toronto Faculty of Law](#)

Professor Satterthwaite's research focuses on tax law and examines areas in which taxpayer choices and compliance obligations may have unanticipated equity implications. She uses experimental, qualitative, and quantitative empirical methods to study how the design of elective provisions in tax statutes and tax agency enforcement policies plays out on the ground,

with a particular focus on entry-level entrepreneurs and self-employed individuals. Prior to joining the faculty at Georgetown, Professor Satterthwaite was an associate professor at the University of Toronto Faculty of Law. She previously served as the Assistant Director of the Institute for Justice on Entrepreneurship at the University of Chicago, and practiced for three years as an associate at Skadden, Arps, Slate, Meagher & Flom LLP in New York and Chicago.



Director Ellis Duncan

[B.S., Tulane University](#); [J.D., Tulane University Law School](#); [M.S. \(Accounting\), The George Washington University](#); [LL.M. \(Taxation\), Georgetown University Law Center](#)

Ellis Duncan is the Director of the Graduate Tax Program and an Adjunct Professor of Law. Director Duncan manages the Law Center's Tax LL.M. program, advises students on course selections and other academic matters, and teaches courses in federal income taxation and research and

writing. He also oversees the graduate tax curriculum, consisting of more than 60 courses, reviews and recruits adjunct faculty members, and evaluates applicants for admission and scholarship awards. Director Duncan previously practiced tax law for several years at Dewey Ballantine in New York, NY, and Ropes & Gray in Washington, D.C., where his practice focused on the taxation of domestic and international mergers and acquisitions, dispositions, joint ventures, corporate and partnership restructurings, financial products and other derivatives.



Adjunct Faculty

Amie J. Ahanchian

Principal, KPMG LLP

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Partner, Baker McKenzie LLP

John P. Barrie

Partner, McLaughlin & Stern LLP

John Bates

Principal, Deloitte LLP

Edward J. Beckwith

Partner, Baker & Hostetler LLP

Elizabeth A. Bell

Tax Counsel, United States House of Representatives

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Attorney, Internal Revenue Service

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Managing Director, KPMG LLP

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Partner, Covington & Burling LLP

Graham Cahill

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Karl A. Frieden

Vice President and General Counsel, Council on State Taxation (COST)

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Attorney, IRS Office of Associate Chief Counsel (Passthroughs and Special Industries)

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Jeffrey W. Kroh

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Partner, Jones Day LLP

The Honorable Diana L. Leyden

Special Trial Judge, United States Tax Court

Stephanie A. Lipinski-Galland

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Managing Director, Andersen Tax

The Honorable Peter J.**Panuthos**

Chief Special Trial Judge, United States Tax Court

Joseph Pari

Partner, Weil, Gotshal & Manges LLP

Maury Passman

Managing Director, KPMG LLP

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Principal, KPMG LLP

Ross E. Poulsen

Of Counsel, Jones Day LLP

Peter K. Reilly

Special Counsel, IRS Office of Chief Counsel

Peter Richman

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Bryan Rimmke

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Michael I. Sanders

Partner, Blank Rome, LLP

Steven Schneider

Partner, Baker McKenzie LLP

Susan E. Seabrook

Partner, Winston & Strawn LLP

100 TAX FACULTY



Adjunct Professor Caroline Ciraolo, former Acting Assistant Attorney General of the U.S. Department of Justice's Tax Division, is a partner with Kostelanetz & Fink LLP and founder of its Washington, D.C. office. She teaches two courses at Georgetown: *Criminal Tax Law & Procedure* during the fall semester, and *International Tax Controversy* in the spring semester.

Eric Serron
Partner, Steptoe & Johnson
LLP

Douglas L. Siegler
Partner, Venable LLP

Eric Solomon
Partner, Ivins Phillips &
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Robin Solomon
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Jeffrey L. Vinnik
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Attorney-Advisor, U.S.
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(International Tax Counsel)

Robert B. Williams
Senior Counsel, IRS Office of
Chief Counsel (International)

Thomas Zehnle
Attorney, Law Office of
Thomas E. Zehnle

The Curriculum

The practitioners who make tax law and policy – officials in the Treasury Department, the Internal Revenue Service, the tax-writing committees of Congress, and major law and accounting firms – work within walking distance of the Law Center. Georgetown draws heavily on those assets to provide the most comprehensive tax curriculum available in the United States, with over 50 courses offered annually. The following is a list of courses representative of those offered each year.

GENERAL TAX PRACTICE

Ethics in Tax Law
Federal Income Taxation
Financial Statement Accounting for Tax Consequences
Income Tax Accounting
Tax Research and Writing
Taxation of Financial Instruments
Taxation of Property Transactions

CORPORATE TAXATION

Business Planning Seminar
Consolidated Returns
Corporate Income Tax Law I
Corporate Income Tax Law II
Corporate Taxation
Taxation of Bankruptcies and Workouts
Taxation of Energy Markets
Taxation of Financial Institutions
Taxation of Mergers and Acquisitions
Tax Planning for Corporate Acquisitions Seminar

INTERNATIONAL TAXATION

Advanced International Taxation
Comparative Tax Law
Digital Taxation Seminar
EU Tax Law
Global Indirect Tax: The VAT
International Business Planning Workshop
International Tax

Tax Treaties
Taxation and Development Seminar
Taxation of Intellectual Property
Transfer Pricing
U.S. Inbound International Taxation
U.S. Outbound International Taxation

PASSTHROUGH ENTITIES

Advanced Partnership Taxation
Drafting Partnership and LLC Agreements
Private Equity and Hedge Funds: Taxation and Transactions
S-Corporations and LLCs: Tax and Business Issues
Tax Planning for Real Estate Transactions Seminar
Taxation of Partnerships

TAX CONTROVERSIES AND TAX PROCEDURE

Criminal Tax Law & Procedure
International Tax Controversy
Tax Court Advocacy Workshop
Tax Practice and Procedure (Administrative Practice)
Tax Practice and Procedure (Litigation)

EMPLOYEE BENEFITS

Employee Benefits: Executive Compensation
Employee Benefits: Health & Welfare Plans
Employee Benefits: Qualified Retirement Plans
Employee Benefits Practicum
Survey of Employee Benefits Law
U.S. Employment Taxes

ESTATE AND SUCCESSION PLANNING

Advanced Individual Income Tax and Personal Financial Planning
Advanced Private Wealth Planning Seminar
Estate & Gift Tax
Income Taxation of Trusts, Estates, and Beneficiaries
Special Topics in Transfer Tax

TAX-EXEMPT ORGANIZATIONS

Non-Profit Organizations
Special Topics in Exempt Organizations
Tax Treatment of Charities and Other Nonprofit Organizations

STATE AND LOCAL TAX

Special Topics in State & Local Taxation
State and Local Taxation

TAX POLICY

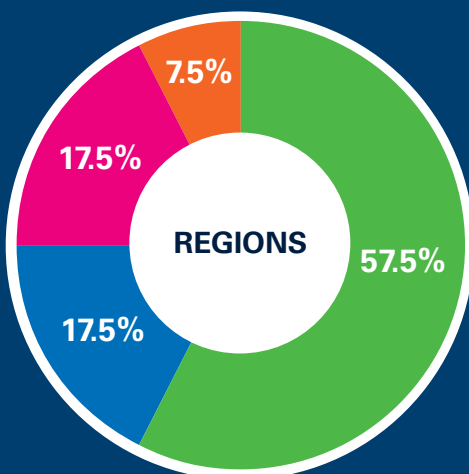
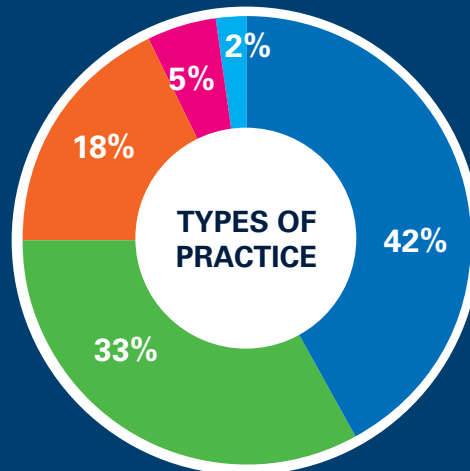
Current Issues in Tax Policy
Tax Law and Public Finance Workshop
Tax Policy Seminar

CLASS OF 2024 EMPLOYMENT

100%

U.S.-Trained Tax LL.M. class of 2022 graduates had secured employment by graduation.

- Law Firm
- Accounting Firm
- Government
- Business and Industry
- Academia



- Mid-Atlantic
- South
- West
- Northeast

Tax LL.M. Program

Widely recognized as one of the preeminent programs of its kind, Georgetown's Master of Laws (LL.M.) in Taxation program has the highest enrollment (more than 200 students) among the graduate programs at the Law Center. Georgetown's location in Washington, D.C. allows us to offer the most comprehensive tax curriculum of any graduate tax program in the country, comprising more than 50 different courses.

Master of Laws (LL.M.) in Taxation

Georgetown's Tax LL.M. Program is open to students who have a U.S. juris doctor degree, as well as to students who earned their primary law degree abroad. Students may pursue the Tax LL.M. degree on campus or online, on a full-time or part-time basis. Full-time students normally must complete their degree requirements within one year. Part-time students generally complete their degree requirements within three years, with possible extensions made on a case-by-case basis.

Georgetown's online Taxation LL.M. program offers students the same high-quality instruction and learning experience as the on-campus program, but allows them the flexibility to attend classes and complete assignments at times that are convenient to them. Students enrolled in the online program also receive the same Taxation LL.M. diploma that is conferred to those who complete the program on campus. No distinction is made between students who complete the Taxation LL.M. degree on campus or online.

Other than a basic course on federal income taxation (which most U.S.-trained students will have completed in a J.D. program), there are no formal requirements, other than the completion of 24 credit hours (for U.S.-trained students) and 20 credit hours (for foreign-trained students). Students are free to design their program to suit their personal academic and career objectives, and receive individualized academic advising and access to robust professional development resources. Students may choose to enroll in a broad selection of courses in a variety of different practice areas, or specialize in one or more areas of tax law. With careful planning, foreign-trained students may also take subjects to satisfy both the requirements of the Taxation LL.M. degree and the New York bar exam in two semesters. Georgetown has also established a successful joint degree program that offers J.D. students the opportunity to earn the Taxation LL.M. degree in one additional semester.



200
STUDENTS

Scholarships and Fellowships

Georgetown offers at least a dozen graduate tax scholarships and fellowships to incoming Tax LL.M. students each year. These include up to seven graduate tax scholarships, as well as scholarships funded by KPMG LLP, Akin Gump, and the Council on State Taxation (COST). The named scholarships below are only available to full-time students completing the LL.M. program on campus. Other scholarship amounts may be awarded annually to individual students based on merit, and financial aid is available to most students.

Georgetown Graduate Tax Scholars

Each year the Law Center designates up to seven incoming Tax LL.M. students as Graduate Tax Scholars based on their demonstrated interest in tax policy and their potential to excel in tax scholarship. All scholars receive full tuition awards and participate in an enrichment program with leading tax scholars, practitioners, and government officials.

Graduate Tax Scholars must complete a substantial research paper on a tax topic, either in a seminar course or as a Graduate Independent Research. These scholarships are available to both U.S. and foreign-trained Tax LL.M. students, and are limited to applicants who will be matriculating on-campus as full-time students. Scholars generally may not accept paid employment outside of the Law Center during the academic year, although they are free to apply for academic externships.

Graduate Fellowships in State and Local Taxation

In conjunction with the Council on State and Local Taxation (COST), the Law Center invites applications for two annual fellowships in State and Local Taxation, one of the fastest-growing disciplines. COST is a membership organization comprised of approximately 50 corporations engaged in multistate business. Fellows receive a \$7,500 stipend and an internship at COST, which exposes students to cutting-edge state and local tax issues through participation in the preparation of amicus briefs and analysis of state legislation.

KPMG Tax Scholarship

This scholarship of up to \$15,000 is awarded annually on the basis of academic achievement and financial need. Students need not intend to specialize in any particular area of tax law in order to apply. This scholarship is made possible by the generosity of the tax professionals at KPMG and by matching gifts from the KPMG Foundation.



20+ GRADUATE TAX SCHOLARSHIPS

Albert G. Lauber Endowed Scholarship

Established by Professor Craig Hoffman in honor of the Honorable Albert G. Lauber and his service to Georgetown, this partial tuition scholarship is awarded annually to an incoming Tax LL.M. student on the basis of academic achievement and potential to excel in the practice of tax law.

Akin Gump Robert Rothman Scholarship

The Akin Gump Robert Rothman Scholarship is made possible by the generosity of the law firm Akin Gump Strauss Hauer & Feld LLP in honor of the life of Robert Rothman, a Senior Counsel at the firm who was a major contributor to the firm's tax practice. A partial award will be given to one full-time U.S.-Trained Tax LL.M. student per year that shows both scholastic aptitude and need. Selection will be based upon a candidate's application materials.

Careers

The Graduate Tax Program has a full-time professional development staff devoted exclusively to helping students with academic and career planning. They provide individual counseling sessions, weekly newsletters, resume reviews, mock interviews and panels featuring speakers (including many Georgetown alumni) from specialized areas of tax practice.

Employment outcomes for graduates of Georgetown's Tax LL.M. program are excellent. For the past decade, since Georgetown began collecting employment data of graduating students, over 90 percent of U.S.-Trained graduates of the Tax LL.M. program had secured employment by graduation (meaning, they had started full-time employment by October of that year). These outstanding figures are due in large part to the strength of Georgetown's reputation among employers, as well as the commitment of the school's academic and professional development advisors to the success of Georgetown students.

Externships

Because of Georgetown's location in the Nation's capital, students have numerous (more than 50, to be precise) opportunities for externships at government agencies, international organizations, and professional service firms. These externship opportunities are available during both the fall and spring semesters. Students completing externships do not receive compensation but earn academic credit. Tax LL.M. students in recent years have been awarded externships at the Internal Revenue Service, the Department of Treasury, the U.S. Tax Court, the Senate Finance Committee, the House Ways and Means Committee, the Joint Committee on Taxation, as well as major law firms and the national offices of Big Four Accounting Firms. Successful externships allow students to gain valuable work experience, enhance their credentials, and can pave the way for permanent job offers following graduation.

Interview Programs

Early in the spring semester, Georgetown students participate in the Taxation Interview Program (TIP), a job fair co-hosted with New York University. TIP provides Tax LL.M. students with the opportunity to interview with employers from national and regional law firms, major accounting firms, corporations and government agencies. The Internal Revenue Service also appears frequently on campus, participating in TIP during the spring semester and at the Government Interview Program during the fall semester. Major law firms and accounting firms host on-campus receptions and post job openings on the Law Center's computerized jobs database. Georgetown also hosts other on-campus interview programs during both the fall and spring semesters.



Hugo Latrabe completed an externship at the House Committee on Ways and Means when the Tax Cuts and Jobs Act of 2017 was enacted. He is now an Associate at Cleary Gottlieb in Paris.

Clerkships

A Tax Court clerkship is one of the most useful credentials that a new tax lawyer can acquire. Over the years, numerous students have secured clerkships at the Tax Court, which is located across the street from the Law Center. Many of its judges hold Tax LL.M. degrees from Georgetown, and several teach or have taught here as adjunct professors. Students interested in applying should do so early in the summer before they matriculate at the Law Center. Interviews are generally conducted in September, although occasionally opportunities arise at other times during the academic year.



For more information, to request an admissions brochure and application materials, or to apply online, please visit the Law Center's website at www.law.georgetown.edu/admissions.

For questions about the Tax LL.M. degree, please contact Ellis Duncan, the Director of the Graduate Tax Program, at 202-662-4056 or ellis.duncan@georgetown.edu.

For specific questions about the admissions process, you may contact the Graduate Admissions Office at 202-662-9020 or lawllmadmis@georgetown.edu.

Produced by The Georgetown Law Graduate Tax program, **Ellis Duncan**

Design **Brent Futrell**; Photography **Sam Hollenshead**; also Brent Futrell

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GEORGETOWN LAW