GEORGETOWN UNIVERSITY LAW CENTER
DEGREE GUIDE FOR U.S.-TRAINED GRADUATE TAX STUDENTS

This Degree 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 ged5@law.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 or Taxation II (J.D. course);
(b) Income Tax Accounting; and
(c) Basic Principles of Finance (Online course)

A student who has taken the substantial equivalent of Corporate Income Tax Law I or Income Tax Accounting 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 ged5@law.georgetown.edu on or before September 6, 2016 (the end of the add/drop period for the Fall 2016 semester). When requesting a waiver of a particular course, students are asked to attach a copy of his or her 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 waived.

Basic Principles of Finance (formerly "Demystifying Finance") is a zero-credit, online course that is required for students matriculating into the Tax LL.M. program during or after the Fall 2015 semester. This course is designed to provide students with the understanding of the basic principles of finance and accounting in order to enhance their study of tax law. This course must be completed in a student's first semester at

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\(^1\) A list of all tax courses for the fall (http://apps.law.georgetown.edu/curriculum/tab_schedules.cfm?Status=Schedule&Type=Cluster&Program=LLM&Year=39&Term=2016C&Clusters=37) and spring (http://apps.law.georgetown.edu/curriculum/tab_schedules.cfm?Status=Schedule&Type=Cluster&Program=LLM&Year=39&Term=2017A&Clusters=37) semesters.
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) Taxation I. Most taxation courses list Taxation I as a prerequisite. U.S.-trained students will invariably have taken the equivalent of Taxation I before matriculating in Georgetown’s Tax LLM program (or successfully completed Georgetown’s online course, Foundations of Federal Income Taxation) which, in both cases, satisfies the Taxation I prerequisite.

(2) Suggested Courses

While the formal course requirements for the Tax LLM 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. 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 Tax Law I, Taxation II or Corporate Income Tax Law II
(b) Taxation of Property Transactions (Fall semester)
(c) Taxation of Partnerships (Fall or Spring semester)
(d) U.S. Taxation of International Transactions (Fall or Spring semester)

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 to write a Graduate Independent Research paper.

3 Corporate Income Tax Law I (or Taxation II) is a required course. If a student has taken substantial equivalent of this course in law school and received a grade of “B” or better, he or she should consider substituting Corporate Income Tax Law II for Corporate Income Tax Law I (if he or she has not taken the substantial equivalent of Corporate Income Tax Law II in law school).

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.

(e) A course in tax procedure\textsuperscript{6}

(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 LLM. program without any substantive work experience are encouraged to complete an 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 LLM. 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)
- Taxation of Property Transactions (2 credits)
- Income Tax Accounting (2 credits)
- U.S. Taxation of International Transactions (3 credits)
- Tax Practice & Procedure (Admin/Lit) (2 credits)
- Basic Principles of Finance (0 credits)

**Spring Semester**

- Corporate Income Tax Law II (2 credits)
- Taxation of Partnerships (2 credits)
- U.S. Subnational Tax (SALT) (2 credit)
- Course/Seminar requiring a paper (2 credits)
- Elective (2 credits)
- Externship/Elective (2 credits)
- Week One Tax Course (1 credit)\textsuperscript{7}

4. 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

Students who wish to enroll in a particular certificate program may do so by e-mailing Ellis Duncan (gcd15@law.georgetown.edu) on or before September 6, 2016 (the end of the add/drop period for the Fall 2016 semester). Students are free to add, drop or change certificate programs at any time before January 23, 2017 (the end of the add/drop period for the Spring 2017 semester).

\textsuperscript{6} This course may include: (1) Tax Practice & Procedure (Administrative Practice) (Fall or Spring semester) or (2) Tax Practice & Procedure (Litigation) (Fall or Spring semester).

\textsuperscript{7} During the Spring 2017 semester, Georgetown will offer two Week One courses in Taxation: (1) European Union Tax Law, (2) Financial Statement Accounting for Tax Consequences (the latter course is highly recommended for students who wish to work for an accounting firm after graduation). These courses will meet on consecutive days (Monday-Friday) from January 9-13, 2017.
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@law.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 taxation, including the following four required courses:

(i) U.S. Taxation of Domestic Persons with Activities Outside the United States (Fall semester);
(ii) U.S. Taxation of Foreign Persons in the United States (Fall semester);
(iii) Tax Treaties (Fall or Spring semester)
(iv) A course on transfer pricing

(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)
Taxation of Property Transactions (2 credits)
U.S. Taxation of Domestic Persons (2 credits)
U.S. Taxation of Foreign Persons (2 credits)
Survey of Transfer Pricing (2 credits)
Demystifying Finance (0 credits)

**Spring Semester**

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

(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 Herry Eickelberg, the Faculty Advisor for the Certificate in Employee Benefits program, by e-mail at hce3@law.georgetown.edu or by telephone at (703) 876-3745.

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8 A list of international tax courses that qualify for the Certificate can be found at http://apps.law.georgetown.edu/curriculum/tab_schedules.cfm?Status=Schedule&Typetype=Cluster&Program=LLM&Year=39&Term=2016C&Cluster=89 (Fall semester) and http://apps.law.georgetown.edu/curriculum/tab_schedules.cfm?Status=Schedule&Typetype=Cluster&Program=LLM&Year=39&Term=2017A&Cluster=89 (Spring semester). Please note that the courses US Taxation of International Transactions and International Tax Law are not courses that count toward the completion of the Certificate in International Taxation for U.S.-trained students.

9 This course may include: (1) Survey of Transfer Pricing (Fall semester) or (2) Transfer Pricing: Selected Topics (Spring semester).
(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)
- Taxation of Property Transactions (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)

**Spring Semester**
- Taxation of Partnerships (2 credits)
- Tax Practice & Procedure (Admin) (2 credits)
- US Taxation of International Transactions (3 credits)
- Employee Benefits Practicum (4 credits)
- Externship/Elective (2 credits)\(^ {10} \)

(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 smileys@law.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) **Income Taxation of Trusts, Estates & Beneficiaries** (Fall semester);
(ii) **Estate & Gift Tax** (Fall semester);
(iii) **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**

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\(^ {10} \) Students may choose to supplement their curriculum by writing a paper on a topic examining some area of employee benefits law. Professor Eric Serron has agreed to supervise all Graduate Independent Research papers written by students in the Employee Benefits Certificate program. Please contact him by e-mail ([eserron@steptoe.com](mailto:eserron@steptoe.com)) for more information.
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)

**Spring Semester**
- Taxation of Partnerships (2 credits)
- US Taxation of International Transactions (3 credits)
- Tax Practice & Procedure (Admin) (2 credits)
- Advanced Private Wealth Seminar (4 credits)
- Externship/Elective (2 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@law.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 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)
- Taxation of Property Transactions (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)

**Spring Semester**
- US Taxation of International Transactions (3 credits)
- Taxation of Partnerships (2 credits)
- Tax Practice & Procedure (Admin) (2 credits)
- Federal Limitations on SALT (2 credits)
- Special Topics in SALT (2 credits)
- Externship/Elective (2 credits)