1. Overview
2. Academic Program
3. Curriculum
4. Scholarships
5. Professional Development
6. Faculty
GEORGETOWN’S GRADUATE TAX PROGRAM 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 tax 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, a short walk from Congress and the Supreme Court, and a dozen blocks from the Internal Revenue Service, the Treasury Department, and the Department of Justice. Our Tax Program draws upon these unique resources to enrich our students’ educational experience.
In the current world economy, tax professionals must think globally. Georgetown is an ideal place to learn these skills, with its unparalleled array of international tax courses and a student body that is truly multi-national. **Charles H. Gustafson**

*Professor of Law*
A Rich Academic Life

Georgetown’s top-ranked Tax LL.M. program offers students the opportunity to choose from more than 75 courses and seminars dealing with every aspect of tax law. The courses range from basic corporate, partnership, and international tax to taxation of derivatives and securitization transactions, structuring complex venture capital arrangements, consolidated returns, and such advanced international topics as transfer pricing and the foreign tax credit.

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 one’s job search. Externships can be secured, not only with government agencies and non-profit organizations, but also with for-profit entities like law firms and accounting firms.

Students may 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 grow into publishable articles. Students who plan to pursue an academic career or have a strong interest in tax policy are particularly encouraged to apply for Graduate Tax Scholarships (see page 10), which carry partial tuition remission and require the completion of a substantial research paper.

A Distinctive Faculty

The breadth of our full-time and adjunct faculty — numbering more than 100 professors all told — enables us to offer an exceptionally large and specialized array of tax courses, taught by professors who bring to the classroom their varied experiences in the government, the private sector, the academy, and the non-profit community. Our adjunct faculty include officials from all branches of Government: the Tax Court, the tax-writing Committees of Congress, the Treasury Department, and the Internal Revenue Service. At Georgetown, you will have the opportunity to be taught by people who are actually making U.S. tax policy and enforcing and interpreting U.S. tax laws.
A DIVERSE AND TALENTED STUDENT BODY

Georgetown’s Tax LL.M. program typically enrolls more than 160 students annually, roughly 70% of whom attend full-time. The student body includes recent law-school graduates as well as tax professionals currently working at law firms, accounting firms, the Internal Revenue Service, and other government agencies. Students are drawn from more than 80 universities in the United States and abroad.

Because of the strength of our international tax program, the class typically includes 15-20 foreign-trained lawyers, many of whom have practiced in law firms or governmental tax agencies in their home countries. Imagine a course in comparative international taxation composed of students from six different countries, taught by a professor who has lectured about tax law on three different continents. This kind of enriching multinational experience happens every day at Georgetown.

AN UNPARALLELED LOCATION

Georgetown University Law Center is located in the heart of Washington, D.C., between Capitol Hill and downtown. Just blocks from the National Mall, the Law Center is a short walk to the major institutions of the federal government, as well as the National Gallery of Art, the Smithsonian Institution, and other cultural landmarks. The Verizon Center, home to Washington’s professional hockey and basketball teams, is a five-minute walk to the west. The Law Center is also within walking distance of many fine restaurants and entertainment venues.

A CAMPUS FOR THE 21ST CENTURY

The urban campus of the Law Center comprises five buildings around a grassy quadrangle at the foot of Capitol Hill. The complex includes two libraries, state-of-the-art classrooms, a student residence hall, a sport and fitness center, cafés and dining facilities, and ample spaces for students to gather, chat, or study.
THE TAX LL.M. PROGRAM IS OPEN BOTH TO U.S.-TRAINED LAWYERS AND TO LAWYERS WHO RECEIVED THEIR LEGAL TRAINING IN FOREIGN COUNTRIES. TO ATTAIN THEIR DEGREE, U.S.-TRAINED ATTORNEYS MUST COMPLETE 24 ACADEMIC CREDITS, 20 OF WHICH MUST BE IN TAX COURSES. FOREIGN-TRAINED ATTORNEYS MUST COMPLETE 20 ACADEMIC CREDITS, 16 OF WHICH MUST BE IN TAX COURSES.

MASTER OF LAWS (LL.M.) IN TAXATION

Students may pursue the Tax LL.M. degree on a full-time or a part-time basis. Full-time students must normally complete their degree requirements within one year. Part-time students must generally complete their degree requirements within three years, with possible extensions (for up to two additional years) for good cause.

The Law Center offers the most comprehensive tax curriculum of any graduate tax program in the country. The curriculum thoroughly covers core subjects like corporate taxation, partnership taxation, income tax accounting, and taxation of property transfers, offering several sections of most classes to give students maximum flexibility in planning their schedules. Two of these core courses are required for the LL.M. degree — Income Tax Accounting and Corporate Income Tax Law I. (Students who have taken substantially similar courses at the J.D. level may petition the Director of the Graduate Tax Program for waiver of one or both of these pre-requisites).

After acquiring the basic building blocks of tax practice, students are free to design their academic program to suit their individual career goals. Students desiring to concentrate in particular areas of tax will encounter a wide range of course selections. For example, the Law Center offers a dozen courses in international tax and a dozen courses in employee benefits. Myriad advanced courses in such specialties as transfer pricing, financial products, tax litigation, the foreign tax credit, and consolidated returns enable students to raise their level of expertise as they complete the degree. All in all, the curriculum typically includes about 75 distinct tax courses annually, something that few other schools can match. Most courses are offered in the evening or late afternoon, thus accommodating the schedules of both full-time and part-time students.

CERTIFICATE PROGRAMS

Students desiring to concentrate in a specific area of tax practice may choose among four Certificate programs. The Certificates described below may be completed in conjunction with the LL.M. degree or on a stand-alone basis (i.e., without being a degree candidate).

CERTIFICATE IN EMPLOYEE BENEFITS LAW

This growing practice area spans everything from pensions and health plans to stock options and deferred compensation. Retirement assets constitute a high percentage of total domestic
wealth, and the intersection between tax law and health plans has gained even greater prominence with passage of the Affordable Care Act. Georgetown’s Certificate in Employee Benefits Law is the best known and most comprehensive program of its kind in the country. It comprises 16 distinct courses that equip students to understand the complex issues at the intersection of tax law, employment law, and the regulatory requirements imposed by multiple government agencies. Adjunct faculty from the private sector, the IRS, the Treasury Department, the Department of Labor, and the Pension Benefit Guaranty Corporation bring to their teaching extensive practical experience in this area.

CERTIFICATE IN ESTATE PLANNING

Top-notch estate planners must acquire not only technical expertise but also the client-relations skills essential to this individualized area of practice. Adjunct faculty, all leading practitioners in their fields, draw on their wealth of experience to equip our students with the requisite knowledge of tax law, trusts and estates, and charitable giving. During the spring semester, working in teams under a faculty mentor, students develop a comprehensive estate plan to address a complex, real-life, family situation. Students enrolled in the Tax LL.M. program may complement their Certificate studies with courses focusing on partnership taxation, S Corps and LLCs, employee benefits, tax-exempt organizations, and other fields germane to an estate planning practice.

CERTIFICATE IN INTERNATIONAL TAXATION

Cross-border taxation constitutes the bread and butter of multinational taxpayers and the professional service firms that represent them, many headquartered in Washington, D.C. Georgetown’s Certificate program comprises a dozen international tax courses, all taught by top experts from law practices and Big Four accounting firms. The core curriculum concentrates on inbound and outbound U.S. international tax, transfer pricing, and tax treaties. Students may then choose among electives addressing cross-border tax controversies, EU Tax Law, value-added taxation, the foreign tax credit, and a variety of courses addressing cross-border corporate tax planning. Several courses are taught in a “workshop” format, entailing weekly practice-based writing assignments.

CERTIFICATE IN STATE & LOCAL TAXATION

For many large companies, the tax and administrative burdens imposed by state and local taxes significantly exceed those imposed by the Internal Revenue Code. As multinational companies and metro-area businesses expand their operations into additional States and nations — via the Internet and otherwise — the need for skilled SALT practitioners has never been greater. Georgetown’s SALT program, unique in the country, is taught by a distinguished faculty comprised of leading practitioners from professional service firms, Fortune 500 companies, and organizations representing the interests of state Governments and corporate taxpayers. During the Fall Semester, students learn the basics of state income taxation (including formulary apportionment), sales and use taxes, property taxes, and specialized business taxes. During the Spring, the focus shifts to federal constitutional limitations on state taxation, SALT controversy practice, and the complex intersection between federal and state corporate tax regimes. Students enrolled for the Tax LL.M. degree may supplement this curriculum with elective courses addressing value added tax, municipal bonds, and public finance.
The Georgetown LL.M. was a big part of how I was able to get a job teaching law. Washington D.C. is the hub of the tax policy universe and during my year, I had the opportunity to attend a dozen conferences, panels and other events where I could hear from and meet leaders in the field. I think Georgetown is the ideal place to prepare for a teaching career. **Brian Galle**

*Associate Professor | Boston College Law School*
Eric Solomon served as the Assistant Secretary for Tax Policy at the Treasury Department from late 2006 to early 2009, prior to which he held the positions of Deputy Assistant Secretary for Tax Policy and Deputy Assistant Secretary for Regulatory Affairs. Before joining the Treasury Department in 1999, Solomon was a partner at Ernst & Young LLP and a member of the Mergers and Acquisitions Group of the National Tax Department in Washington, D.C. He also served as Assistant Chief Counsel (Corporate) for the Internal Revenue Service, heading the IRS legal division with responsibility for corporate tax issues. At the Law Center he teaches Corporate Income Tax Law II.

Eric Solomon

Adjunct Professor of Law  |  Director of National Tax, Ernst & Young, LLP  |  Former Assistant Secretary, U.S. Department of the Treasury  
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**GENERAL TAX PRACTICE**
- Income Tax Accounting
- Tax Lawyering and Professional Responsibility in Federal Tax Practice
- Tax Research and Writing
- Taxation of Property Transactions
- Tax Penalties and Tax Opinions

**CORPORATE TAXATION**
- Corporate Income Tax Law I
- Corporate Income Tax Law II
- Tax Planning for Corporate Acquisitions Seminar
- Consolidated Returns: Principles and Planning
- Business Planning Seminar
- Venture Capital, Private Equity, and Entrepreneurial Transactions
- Federal Taxation of Bankruptcies and Workouts
- Taxation of Intellectual Property
- Taxation of Energy Markets
- Tax Issues Affecting Investment Banks
- Financial Accounting, Corporate Governance, and Securities Law Issues for Corporate Tax Advisors

**INTERNATIONAL TAXATION**
- U.S. Taxation of International Transactions
- International Tax: U.S. Taxation of Cross-Border Activities and Income
- U.S. Taxation of Domestic Persons with Activities Outside the United States
- U.S. Taxation of Foreign Persons in the United States
- Introduction to Transfer Pricing
- Transfer Pricing Controversy Seminar

**TRANSFER PRICING**
- Transfer Pricing: Selected Topics
- Tax Treaties
- Tax Treaties: A Practical Approach to Interpretation and Application
- Tax Treaties: Advanced Topics and Strategic Planning
- EU Tax Law
- Global Indirect Tax: The VAT
- International Business Planning Workshop
- Advanced International Taxation
- The Foreign Tax Credit

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

**TAX CONTROVERSIES AND PROCEDURE**
- Tax Practice and Procedure (Administrative Practice)
- Tax Practice and Procedure (Ligation)
- Tax Practice Workshop
- Cross-Border Tax Controversy Workshop
- Litigation of Individual Income Tax Issues Workshop
- Tax Fraud and Tax Crimes
- Logic and the Law: Taxation, Rhetoric and Legal Argument

**EMPLOYEE BENEFITS**
- Introduction to Employee Benefits Law
- Retirement Income: Taxation and Regulation
- Retirement Plan Qualification Requirements
- Retirement Plans: Design and Taxation
- ERISA: Fiduciary Provisions
- ERISA: Plan Termination and Withdrawal Liability
- Employee Benefits in Corporate Transactions
- ERISA: Avoiding and Managing Employee Benefits Litigation
- Executive Compensation: Equity and Cash-Based Incentives
- Executive Pay and Loyalty: From Design to Enforcement
- Employee Benefits and Executive Pay: Securities, Tax, and Corporate Governance
- Taxation of Nonqualified Deferred Compensation
- Taxation of Fringe Benefits
- ESOPs and Employer Stock in ERISA Plans
- Health & Welfare Benefit Plans: Tax and ERISA Aspects
- Health & Welfare Plans: Essential Concepts and Emerging Issues
- Tax Treatment of Cross-Border Compensation
- Current Issues in Employee Benefits Seminar

**STATE AND LOCAL TAX**
- State and Local Taxation: Income and Franchise Taxes
- State and Local Taxation: Sales & Use Taxes
- State and Local Taxation: Other Business Taxes
- Federal Limitations on State & Local Taxation
- Special Topics in State & Local Taxation
- Public Finance: Tax and Securities Aspects

**TAX-EXEMPT ORGANIZATIONS**
- Tax Treatment of Charities and Other Nonprofit Organizations
- Political and Lobbying Activities of Tax-Exempt Organizations
- Unrelated Business Income Tax
- Joint Ventures Involving Non-Profits and For-Profits

**FINANCIAL PRODUCTS**
- Financial Derivatives Taxation
- Taxation of Debt Instruments and Securitization Transactions
- Advanced Topics in the Taxation of Debt Instruments

**PUBLIC FINANCE**
- Tax Policy Seminar
- Tax Policy and Legislative Process
- Tax and Development Seminar
- Tax Policy Colloquium
- Current Issues in Tax Law and Policy Seminar
Tom Field is the founder of Tax Analysts, a non-profit publisher in Arlington, Virginia. He holds advanced degrees in law and economics from Harvard, Georgetown and Oxford Universities. Before founding Tax Analysts in 1970, he was a trial attorney in the Justice Department’s Tax Division — 1961 to 1966 — an attorney-advisor in the U.S. Treasury’s Office of Tax Legislative Counsel — 1966 to 1970 — before serving as Executive Director and, later, as President and Publisher of Tax Analysts from 1970 to 2005. At the Law Center he teaches “Tax Policy Overview.”  

Tom Field

Adjunct Professor of Law  |  Founder of Tax Analysts  |  B.A., M.A., Oxford; J.D., Harvard; LL.M.
(Taxation), Georgetown
EACH YEAR THE LAW CENTER DESIGNATES UP TO TEN 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.

GEORGETOWN GRADUATE TAX SCHOLARSHIPS

All Scholars receive full or partial tuition awards and participate in an enrichment program with leading tax scholars, practitioners, and government officials. The number and size of scholarships awarded each year depends on applicants’ prior academic achievements.

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 limited to applicants who will be matriculating as full-time students. Scholars generally may not accept paid employment outside 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 Taxation (COST), the Law Center invites applications for two annual Fellowships in State and Local Taxation, one of the fastest-growing tax disciplines. COST is a membership organization comprised of approximately 50 corporations engaged in multistate and multinational 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 preparation of amicus briefs and analysis of state legislation.

KPMG TAX SCHOLARSHIP

This $7,500 scholarship 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.
Leonard Terr is a partner in the Washington, D.C., office of Baker & McKenzie specializing in international tax. He holds an A.B. from LaSalle College, a Ph.D. from Brown and a J.D. from Cornell. He served as International Tax Counsel to the U.S. Treasury Department from 1987 to 1989 where he headed the U.S. delegation in negotiating the current U.S.-Germany tax treaty and a dozen other U.S. tax treaties and protocols. He served as a consultant to the ALI Project on Tax Treaties and has chaired numerous ABA subcommittees specializing in many areas of international tax. At the Law Center he teaches the “International Business Planning Workshop.”

Leonard Terr
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INTERVIEW PROGRAMS

Early in the Spring Semester, the Taxation Interview Program (TIP), a job fair hosted jointly with New York University, provides Tax LL.M. students with an opportunity to interview with employers from national and regional law firms, major accounting firms, corporations, and government agencies. The IRS appears frequently on campus, participating in TIP during the Spring and in informational panels and the Government Interview Program during the Fall. Major law and accounting firms host on-campus receptions and post job openings on the Law Center’s computerized job listing.

EXTERNSHIPS

Because of Georgetown’s location in the Nation’s Capital, students have numerous opportunities for externships at government agencies, NGOs, international organizations, and professional service firms. Although most students apply for externships in the Spring Semester, externships can also be arranged during the Fall. Students completing externships receive no compensation, but earn two academic credits on a pass/fail basis. Tax LL.M. students in recent years have been awarded externships at the Internal Revenue Service, the Senate Finance Committee, the House Ways and Means Committee, the Joint Committee on Taxation, the Pension Benefit Guaranty Corporation, the Securities and Exchange Commission, and numerous law and accounting firms. Successful externships can pave the way for permanent job offers following graduation.

CLERKSHIPS

A Tax Court clerkship is one of the most useful credentials that a young tax lawyer can acquire. Over the years, numerous students have secured clerkships at the Tax Court, which is located two blocks from the Law Center. Many of its Judges have strong ties to our school: seven hold Tax LL.M. degrees from Georgetown, and several teach or have taught here as adjunct professors. Students interested in applying should do so in early summer before they matriculate at the Law Center. Interviews are usually conducted in the Fall.
The Tax LL.M. was exactly the kind of program that I was seeking. Following graduation I returned to the Tax Administration of my country, where my studies enabled me to participate in many important international tax matters and contribute new proposals and points of view. **Silvia M. Munoz**

*Lima, Peru | LL.M. in Taxation*
THE LAW CENTER’S TAX FACULTY COMPRIDES A UNIQUE GROUP OF SCHOLAR-TEACHERS, POLICY MAKERS, AND PROMINENT TAX PRACTITIONERS THAT COULD BE ASSEMBLED ONLY IN WASHINGTON, D.C.
Tax policy is the bread and butter of Washington tax professionals, and there is no better place to study tax policy than Georgetown. Ronald A. Pearlman

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