

Graduate Tax Program Course Descriptions Trinity (May) Term 2012

Required Courses:

6034 - INCOME TAXATION (3 cr.)

An in-depth study of federal income taxation, including the concepts of income, identification of the proper taxpayer, deductions, characterization of income, and the timing, deferral and non-recognition of income.

Special Note: LL.M. Students may enroll in selected sections of the J.D. course 516 – Taxation in satisfaction of 6034 – Income Taxation. LL.M. Students enrolled in 516 – Taxation will be required to complete an exam and a paper and will be graded according to the LL.M. grading scale.

Please contact professor Torielli for available sections.

6036 - PARTNERSHIP TAXATION (3 cr.)

Examines the tax issues arising from the formation, operation and liquidation of partnerships. Includes a study of the consequences of acquisition and transfer of partnership interests, compensation and distributions to partners and basis adjustments.

Prof. Larson

Day & Time: Sunday, 12:30 p.m. – 4:00 p.m.

14 Weeks: 5/13/12 – 8/12/12; NO CLASS 5/27/12, 6/24/12

Section / Location / Room:

11	LAN	L12	(Orig)
12	AH	186	
13	GR	305	
14	AA	114	

Exam/Paper: TBA

Elective Courses:

6068 – ADVANCED ESTATE AND GIFT TAX PLANNING TECHNIQUES (1 cr.):

Seminar discussing advanced techniques in federal estate and gift tax planning, such as self-cancelling installment notes, grantor retained annuity trusts, generation-skipping transfers, intentionally defective grantor trusts, family limited partnerships and other devices.

Prerequisite: Estate Planning and Estate and Gift Taxation or approval of the Academic Director.

Prof. Seyferth

Day & Time: Saturday, 4:10 p.m. – 6:30 p.m.

4 Weeks: 7/21/12 – 8/11/12

Section / Location / Room:

11	LAN	L12	
12	AH	186	(Orig)
13	GR	305	

Exam/Paper: TBA

6010 - DIRECTED STUDY (up to 2 cr.)

Provides an opportunity for Master's students to submit a proposal for Directed Study project to the Program Director. Generally requires 15-20 pages of a written project for each credit hour earned.

Permission required prior to registration. Contact Professor Torielli for details.

6021 - EXTERNSHIP (up to 4 cr.)

Offers students the opportunity to practice tax law in a supervised setting. Master's students can complete tasks assigned by their attorney supervisors, with their learning guided by a Cooley faculty member. Students must apply and be approved for externship placements and all sites must be pre-approved.

Permission required prior to registration. Contact Professor Torielli for details.

6047 - INTERNATIONAL TAXATION – INBOUND (2 cr.):

Introduces the rules and regulations involved in the U.S. taxation of foreign persons and foreign investment in the United States. **Prerequisite:** Income Taxation and Corporate Taxation or the approval of the Academic Director.

Prof. Henson

Day & Time: Wednesday, 6:00 p.m. – 8:50 p.m.

10 Weeks: 5/9/12 – 7/11/12); NO CLASS 7/4/12

Section / Location / Room:

11	LAN	L12	
12	AH	186	(Orig)
13	GR	513	

Exam/Paper: TBA

Elective Courses (continued):

6015 - MASTER THESIS / RESEARCH PROJECT (2 cr.)

Students research and write on a topic selected by the student and approved by the Program Director.

Permission required prior to registration. Contact Professor Torielli for details.

6099 – PENSION AND EMPLOYEE BENEFIT PLANS (3 cr.):

Includes problems in the tax aspects of deferred compensation with particular emphasis on qualified pension and profit-sharing plans: minimum eligibility, participation, and vesting requirements; deductions, contributions, and benefits limitations; and, taxation of distributions.

Prof. Shaevsky

Day & Time: Saturday, 9:00 a.m. – 12:00 p.m.

14 Weeks: 5/12/12 – 8/11/12); NO CLASS 5/26/12

Section / Location / Room:

11	LAN	L13	
12	AH	186	(Orig)
13	GR	523	
14	AA	114	

Exam/Paper: TBA

6048 – STATE & LOCAL TAX (2 cr.):

Surveys the constitutional restrictions on state tax powers. Explores a variety of taxes imposed by state and local governments, including: income, corporation franchise, sales and use, property, and transfer taxes. Examines the fundamentals of state tax systems.

Prof. Houlf

Day & Time: Tuesday, 6:00 p.m. – 8:50 p.m.

10 Weeks: 5/8/12 – 7/10/12

Section / Location / Room:

11	LAN	L12	
12	AH	186	
13	GR	305	
14	AA	114	(Orig)

Exam/Paper: TBA

Elective Courses (continued):

6188 – TAX PLANNING AND DRAFTING FOR ESTATES (2 cr.):

Provides the practical skills needed to create a uniform estate plan. Includes special issues such as planning for the terminally ill, the elderly, and the disabled, as well as planning for the family with a closely-held business.

Prof. Seyferth

Day & Time: Saturday, 1:00 p.m. – 3:50 p.m.

10 Weeks: 5/12/12 – 7/14/12; NO CLASS 5/26/12

Section / Location / Room:

11	LAN	L12	
12	AH	186	(Orig)
13	GR	523	
14	AA	114	

Exam/Paper: TBA

6067 – TAX RESEARCH AND ARGUMENT TECHNIQUES (1 cr.):

Intensive hands-on workshop in tax matter research involving electronic and hard copy versions of primary and secondary materials, including discussion of the relative weight of authorities, rules of interpretation and techniques of persuasive argument.

Prof. Larson

Day & Time: Tuesday, 6:00 p.m. – 9:30 p.m.

4 Weeks: 7/17/12 – 8/7/12

Section / Location / Room:

11	LAN	L12	(Orig)
12	AH	186	
14	AA	114	

Prof. Gell

13	GR	305	Live Only/No DE
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Exam/Paper: TBA