The Graduate Tax Program was created at the University of Denver in 1975 in response to the demand for trained tax specialists in both the legal and accounting professions. Initially an evening program catering to the needs of practicing attorneys and accountants employed in the Denver area, it has evolved into one of the few such programs to offer a curriculum designed for both the full- and part-time student. The Graduate Tax Program also offers its degrees in an online format, accommodating busy schedules of working professionals. The Program, accredited by the American Bar Association and the Association to Advance Collegiate Schools of Business (AACSB), is offered to highly qualified students who primarily possess backgrounds in law, accounting, or business. The program emphasizes experiential learning opportunities; for example, students have an ability to participate in the Low Income Taxpayer Clinic or enroll in externships/internships for zero or course credit.

The Graduate Tax Program prepares students for entry into professional tax practice in both the public and private sectors. Through the interdisciplinary nature of the program, the law graduate learns the accounting aspects of tax practice, and the accounting graduate acquires a thorough understanding of the legal process. To be competitive in the marketplace, non-lawyers should plan to earn the CPA designation.

The educational standards of the Program are rigorous; students are expected to be prepared for class each day, and grading is usually based on one final examination. The environment, however, is one of cooperation rather than competition, and the teaching attitude is both helpful and challenging. The Program is dedicated to the pursuit of superior professional competence, and students with similar aspirations find their studies in the Graduate Tax Program entirely rewarding.

Graduates of accredited law schools successfully completing the Program receive a Master of Laws (LL.M.) in Taxation. All other candidates receive the Master of Taxation (M.T.) degree. Both degrees are awarded upon the joint recommendation of the faculties of the Sturm College of Law and Daniels College of Business. A dual degree program is available, where a University of Denver Sturm College of Law student may pursue the J.D. and LL.M. in taxation concurrently graduating with a J.D./Tax LL.M.; flexible dual degree options with other DU graduate programs are available.

**Master of Laws in Taxation**

A candidate for the LLM must have earned a Juris Doctorate (JD) or equivalent degree from an accredited law school, or in the case of a foreign candidate, must have completed a primary law degree with high academic standards from a recognized foreign university.

Graduate Tax Program will conduct a holistic review of applicants, and will consider, among other things: JD or JD-equivalent GPA, TOEFL/IELTS (if applicable), work experience, academic records, letters of recommendation and personal statement of interest.

In order to be considered for admission, applicant must submit:

- a completed application (through LSAC LLM (http://www.lsac.org/llm) or DU Graduate Admissions (https://du-grad.edu.185r.net/application/login/?S=%2Fapplication%2F) application);
- $65 non-refundable application fee
- final official transcripts with Proof of Diploma/Certificate for all post-secondary coursework, including proof of JD or JD-equivalent degree; international transcripts not issued in English must be accompanied by a certified English translation
- personal statement/essay of interest and purpose that elaborates upon applicant's background and interest in taxation
- resume or CV
- at least one letter of recommendation;
- International applicants must submit an official TOEFL or IELTS score report directly to the Graduate Legal Studies department from ETS or other testing authority (institution code 4842-03). GTP English proficiency requirements for English language standards for International candidates are: 80 internet-based/550 paper-based TOEFL, or 6.0 IELTS; English Conditional Admission option http://www.du.edu/learn/graduates/internationalapplicants.html
  - Tuition Deposit: If accepted into the program, a $250 deposit is due to reserve your seat. This deposit is non-refundable and is credited toward your first tuition payment

Applications are accepted on rolling basis. Fall, Winter and Summer quarter start terms available (Spring term is available with departmental approval).

All required application materials must be received by the Graduate Legal Studies department with accordance with the following deadlines:

- 6 weeks prior to beginning of the quarter term for international applicants
- 3 weeks prior to beginning of the quarter term for domestic applicants
Master of Taxation

A candidate for the MT must have earned a Bachelor’s degree from an accredited institution, preferably in accounting or a business discipline.

Graduate Tax Program will conduct a holistic review of applicants, and will consider, among other things: GPA, TOEFL/IELTS (if applicable), work experience, academic records, letters of recommendation and personal statement of interest.

In order to be considered for admission, applicant must submit:

- a completed application (through DU Graduate Admissions application (https://du-grad.edu.185r.net/application/login/?S=%2Fapplication%2F));
- $65 non-refundable application fee
- final official transcripts with Proof of Diploma/Certificate for all post-secondary coursework; international transcripts not issued in English must be accompanied by a certified English translation
- GRE or GMAT scores required (some exceptions apply)

Official GRE must be sent from ETS to the Institution code 4842-03. GMAT score report sent directly to us from GMAC. Use GMAT code number MZR-GT-68 or select University of Denver/Daniels College of Business/Graduate Tax Program from the pull-down menus on GMAC.com.

The GRE or GMAT may be waived if the applicant meets one of the following conditions:

1) previously earned a master’s degree from an accredited institution; 2) has passed ALL parts of the CPA exam 3) has obtained a bachelor degree in accounting or business with a major in accounting with a GPA of at least 3.0.

Please contact Graduate Legal Studies to receive a waiver confirmation.

- personal statement/essay of interest and purpose that elaborates upon applicant’s background and interest in taxation
- resume or CV
- at least one letter of recommendation;
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Master of Laws in Taxation

Degree Requirements

All students must complete 45 quarter hours within the approved GTP curriculum.

<table>
<thead>
<tr>
<th>Required Courses</th>
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<tr>
<td>TAX 4200</td>
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<tr>
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<td>Corporate Taxation III</td>
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<td>TAX 4500</td>
<td>Consolidated Returns (3 quarter hours)</td>
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<tr>
<td>TAX 4300</td>
<td>Corporate Taxation II (4 quarter hours)</td>
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</table>
TAX 4470  Employment Tax (2 quarter hours)
TAX 4210  Estate & Gift Taxation (4 quarter hours)
TAX 4230  Estate Planning (3 quarter hours)
TAX 4430  Exempt Organizations (3 quarter hours)
TAX 4220  Fiduciary Income Taxation (4 quarter hours)
TAX 4420  International Taxation (4 quarter hours)
TAX 4120  Qualified Pension and Profit Sharing Plans (4 quarter hours)
TAX 4600  Seminar: Selected Topics (2-4 quarter hours; course topics vary)
TAX 4490  State & Local Taxation (2 quarter hours)
TAX 4240  Tax and Financial Planning (3 quarter hours)
TAX 4410  Taxation-Natural Resources (3 quarter hours)
TAX 4991  Independent Study (requires professor approval)
TAX 4315  Low Income Taxpayer Clinic (2 quarter hours; may take 4 quarter hours total)

Total Credits 45

Students must earn and maintain average of 77 (B) to remain in good standing.

A full-time student is expected to earn the degree in one year or over four quarters; a part-time student can earn the degree in 2 years. Program time limit is 5 years from the time of matriculation. Fall, Winter or Summer quarter matriculation is permitted; Spring quarter matriculation is available by departmental permission.

Dual J.D./LL.M. in Taxation degree available to those pursuing a J.D. at the Sturm College of Law

Master of Taxation
Degree Requirements

All students must complete 45 quarter hours within the approved GTP curriculum.

Required Courses
TAX 4200  Corporate Taxation I 4
TAX 4330  Corporate Taxation III 4
TAX 4310  Civil & Criminal Tax Procedure 4
TAX 4020  Individual Tax Problems 4
TAX 4320  Partnership Taxation 4
TAX 4110  Property Transactions 4
TAX 4100  Tax Accounting 4
TAX 4010  Tax Principles, Research and Writing 2

Elective Courses
Select 15 quarter hours from the following: 15

TAX 4500  Consolidated Returns (3 quarter hours)
TAX 4300  Corporate Taxation II (4 quarter hours)
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Courses

TAX 4010 Tax Principles, Research and Writing (2 Credits)
Research sources, techniques, and practice; in-depth research of selected areas. Emphasis on argument and communication of conclusion; evaluation of legislative history and administrative authorities.

TAX 4020 Individual Tax Problems (4 Credits)
Using the Internal Revenue Code and the Federal Income Tax Regulations as a basis, substantive issues relating to individual taxation are covered. Areas are included are general concepts of gross income, individual employee benefits and deductions, charitable deductions, alternative minimum tax, deductibility and classes of interest, office in home and vacation homes, and a general overview of the interrelationships of various statutory and non-statutory principles. Cross listed with LAWS 4292.

TAX 4100 Tax Accounting (4 Credits)
Adoption of and change in accounting periods; income recognition and deduction allowance under the cash and accrual methods, including discussion of the time value of money; prepaid and contested income and expenses; income and deduction reversals; accounting method and practice changes; installment sales; long-term contractors; inventory accounting method and practice changes; installment sales; long-term contractors; inventory accounting, including LIFO and manufacturing's inventories and net operating losses; income tax allocation for financial reporting.

TAX 4110 Property Transactions (4 Credits)
Basis of property; expenditures and current expense comparison; depreciable status; amortization of intangible property; depreciation methods; property casualties and losses; profit or loss computation and characterization for taxable property dispositions; limitations on passive losses; lessor and lessee reporting; tax-deferred dispositions.

TAX 4120 Qualified Pension and Profit Sharing Plans (4 Credits)
An in-depth study of ERISA, labor departments rules, and Internal Revenue Code provisions relating to qualified deferred compensation. The course is geared toward an understanding of all the pension and profit sharing rules required for plan qualification, with emphasis on qualified plan planning for both incorporated and unincorporated forms of business.

TAX 4200 Corporate Taxation I (4 Credits)
The federal income taxation of corporations and their shareholders with emphasis on the creation of the corporation, establishment of its capital structure, operational alternatives, distributions to shareholders, stock dividends and redemptions, personal holding company, and accumulated earning tax.

TAX 4210 Estate & Gift Taxation (4 Credits)
Taxation of gratuitous transfers under the federal estate and gift tax codes, including taxable inter vivos gifts, annual exclusion, gift-splitting, gift tax charitable deduction, gift tax on powers of appointment, estate tax on owned interests, property transferred inter vivos with retained interests and powers, property subject to powers of appointment or transferred in contemplation of death, jointly owned property, life insurance proceeds, annuities and employee death benefits, marital deduction, charitable deduction, estate tax credits, estate tax deductions, valuation problems.

TAX 4220 Fiduciary Income Taxation (4 Credits)
Federal income taxation of estates and trusts. Included is a discussion of the concept of an estate or trusts; trust accounting income for a simple and complex trust; calculation of taxable income, including special rules on the calculation of distributable net income, capital gains, personal exemptions, and charitable contributions; the separate share rule and trapping distributions; income in respect of a decedents; the grantor trust rules under Section 671-678; and the calculation of the alternative minimum tax.

TAX 4230 Estate Planning (3 Credits)
Estate analysis, including fact gathering and the analysis of data; the psychological aspects of "role playing" in estate planning; the members of the team (the attorney, the CPA, the life underwriter, the trust officer); life insurance in an estate and business planning context; planning with trusts. Including revocable, short-term, and irrevocable; the transfer of a closely held business interest from one generation to the next, including full and partial stock redemptions, cross purchase agreements, private annuity, installment sale, retirement, recapitalization, qualified and nonqualified plans of deferred compensation; special estate planning considerations for the professional corporation, the highly paid executive, and the farmer and rancher; specific cases analyzed. Prerequisite: TAX 4210.

TAX 4240 Tax and Financial Planning (3 Credits)
This is an introductory, integrated course focusing on personal financial planning. Topics covered include cash flow projections and budgeting, annual and multiple period income tax planning, an introduction to taxation of investments, an insurance and liability coverage insurance and liability coverage survey, retirement planning, and estate and succession planning.
TAX 4300 Corporate Taxation II (4 Credits)
A continuation of Corporate Taxation I with emphasis on corporate reorganizations, operation, liquidation of subsidiary corporations and corporate division, and carryover of tax attributes. Prerequisite: TAX 4200.

TAX 4310 Civil & Criminal Tax Procedure (4 Credits)
Statute of limitations on assessment/collection of deficiencies, definition of deficiency, restrictions on assessment and collection; statute of limitations on overpayments, claims and suits for refund, and limitations for criminal prosecutions; regulations and rulings-- retroactive revocation; administrative settlements, closing agreements and compromises; civil penalties; tax return preparer penalties; civil litigation--injunctions, jurisdiction of Tax Court, District Court and Court of Claims, small claims procedure, authority to increase deficiencies, choice of forum; jeopardy assessments and termination of taxable years; criminal tax investigations-- administrative summons, document production (taxpayer and third party), constitutional protections, common law privileges, strategies; professional responsibilities and ethics for the tax practitioner.

TAX 4315 Low Income Taxpayer Clinic (2-4 Credits)

TAX 4320 Partnership Taxation (4 Credits)
Tax treatment of partnership income in the hands of the partner; the conduit rule; problems associated with the formation, operation, and dissolution of the partnership; sales of the partnership interest; withdrawal and retirement of partners; basis adjustments, unrealized receivables, and substantially appreciated inventory.

TAX 4330 Corporate Taxation III (4 Credits)
Advanced corporate taxation problems with emphasis on collapsible corporations; liquidations; detailed study of sections 305, 306, 307; loss carryovers and Subchapter S corporations. Prerequisite: TAX 4300.

TAX 4410 Taxation-Natural Resources (3 Credits)
Tax problems encountered in the acquisition, operation, and disposition of natural resources properties; pre-production expenditures, depletion, depreciation, and ad valorem taxes; emphasis on overall tax planning for natural resource ventures.

TAX 4420 International Taxation (4 Credits)
Introduction to U.S. international taxation with an equal emphasis on inbound and outbound transaction. Resident and nonresident alien taxation, withholding taxes, effectively connected (business) income, foreign investment in U.S. real estate, tax treaties, branch taxes, earnings stripping, conduit financing rules, foreign personal holding companies, controlled foreign entities, foreign tax credit, foreign personal holding companies, controlled foreign corporations, passive foreign investment companies, export transactions, Subpart F manufacturing rules, outbound property transfers, and transfer pricing. Cross listed with LAWS 4344.

TAX 4430 Exempt Organizations (3 Credits)
The statutory exemption for "charities," social welfares and social clubs, homeowners' associations fraternal orders, employee benefit organizations, mutual or cooperative companies, business and professional leagues, labor unions, exempt organizations, property title companies, federally organized or chartered organizations, and political organizations' activities, funds, and lobbying activities; prohibited transaction rules; the private foundation; the unrelated business and debt-financed income tax exposures; excise tax exemptions; administrative appeal and declaratory judgment procedures; anti-discrimination considerations; discrimination considerations; charitable contributions.

TAX 4470 Employment Tax (2 Credits)
Explore existing employment tax risks, recognize employment tax planning opportunities through appropriate compensation and entity structuring techniques, analyze proper worker classification, and highlight preventative techniques to avoid personal liability.

TAX 4490 State & Local Taxation (2 Credits)
Taxable incidents, privilege tax, discrimination, and multiple taxation under the Commerce Clause of the United States Constitution; taxation based on class legislation and Equal Protection Clause; nexus or jurisdictional due process allocation and apportionment formulas; business versus nonbusiness income; multi-state tax compact; unitary concept; residence definitions; nonresident income sources; tax credits and short- period returns for individual income tax payers; sales of tangible personal property; retail and wholesale sales; taxable and nontaxable leases; contractors rule, exemptions, and resale certificates under sales and use tax statutes; valuation techniques for real personal property; and administrative and judicial appeal of property tax valuations and assessments.

TAX 4500 Consolidated Returns (3 Credits)
Methods used by multiply related corporations to report income and losses; impact of corporate combination and separation; timing problems.

TAX 4600 Seminar: Selected Topics (2-4 Credits)
Recognition of tax problems and opportunities for a broad range of transactions encountered by individuals. Areas include family income splitting and other tax reduction and avoidance techniques; portfolio transactions, including short sales, puts and calls, and commodity futures; structuring agreements in contemplation of marriage or arising out of separation or divorce; personal insurance; charitable contributions; net operating losses; alternative minimum tax; various year-end planning techniques.

TAX 4980 Internship (0 Credits)
The Graduate Tax Program (GTP) encourages students to gain practical experience and to develop professional skills in the field of taxation. Internships are supervised by faculty who interact with the eligible student and the employer or organization that provides the internship. The internship should provide a new learning experience for the student intern and must be related to taxation. Satisfactory completion of the internship results in a passing grade for the internship. The GTP Director or a full time GTP faculty member may serve as Faculty Supervisor for GTP Interns. Students must obtain approval from the GTP Director or a full-time GTP faculty member.
TAX 4991 Independent Study (1-5 Credits)
Opportunity to study and write in any area agreed upon between the student and a member of the faculty. The student is required to produce a written work of publishable quality to receive a final grade for the course. The 4-quarter-hour maximum may be applied toward graduation requirements with no more than 2 quarter hours in any one quarter.