

San Jose State University
Seminar in Tax Planning and Practice
Summer 2011 Business 223D

Professor: Todd W. Robinson, CPA, MST
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Hours: By Appointment
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Class Times: Class meets off the main SJSU campus. All class sessions are at Techmart, 5201 Great America Parkway, Santa Clara. Class time is Wednesdays 6:00 pm to 10:00 pm, from June 22, 2011 through August 10, 2011. There will be two Saturday sessions on July 9 and July 30, from 9:00 am until 1:00 pm.

Required Text: This course does not have a text book. Various readings will be assigned in class or listed on the syllabus.

Course Description: This course is a capstone course for the MS in Taxation degree. It will integrate financial planning throughout the program, including sale of the business and estate planning, and will include a final written comprehensive project. Prerequisites include graduating standing and completion of at least 3 tax core courses. Completion of this course or Bus 223E satisfies the MST comprehensive project requirement.

Homework and Class Participation: Preparation for class includes completing all reading assignments and problems assigned. These assignments are critical to the learning process. If you are an active participant in class discussions and read assigned materials prior to class you should do well in this course.

The course will feature various outside speakers which will enhance the learning environment. These speakers will be professionals from Silicon Valley who will add a variety of issues and topics to our classroom experience, as well as aid in your research regarding the comprehensive project to be assigned.

Outside speakers and topics are expected to include:

Tom Bondi, CPA, Berger Lewis – “Selected Issues in Stock Transactions”
Jeff Faust, CVA, Berger Lewis – “Valuation of the Closely Held Business”
Margaret Critzer of KPMG – “Selected Transfer Pricing Issues”
Jason Hoerner, JD, KPMG – “Selected Issues in Cross Border Taxation”
Donald L. Potter, CPA – “Practice Issues”

Examination and Interim Papers: There will be a midterm examination and interim papers due in this class. No makeup exam will be given unless the student obtains the instructor’s consent before the scheduled test day. There is a scoring penalty if the exam is taken late.

Comprehensive Project: There will be a written comprehensive research project assigned in this class. The project will be presented the first few weeks of the course and will consist of a research paper component and a client letter component. There is a scoring penalty if the projects are turned in late.

Grading: Midterm Exam 50 points

Interim Paper (50 pts) & Presentation (50 pts)	100 points
Student critics of Interim Presentations	50 points
Comprehensive Project	
Research paper component	200 points
Client letter component	<u>100 points</u>
Total possible points	<u>500 points</u>

Course grades will be assigned on a cumulative point basis. For your reference an A is 92%, a B is 82%, and a C is 72%. Each student will be measured by their mastery of the course material, papers and presentations, not against the performance of the other students.

Honor Code: Honesty, reliability, and integrity are critical employee attributes. The business community depends upon information that is trustworthy. In this course, you are expected to be honest in all that you do. Your work must be your own. Only communication with the instructor is permitted during the exam (unless the instructor specifically assigns the exam or project allowing teamwork). Violations of the honor code have serious consequences.

University Policies

Academic Integrity: Students should know the University's Academic Integrity Policy that is available at http://www.sa.sjsu.edu/download/judicial_affairs/Academic_Integrity_Policy_S07-2.pdf. Your own commitment to learning, as evidenced by your enrollment at SJSU and the University's Integrity Policy, require you to be honest in all your academic course work. Faculty members are required to report all infractions to the office of Student Conduct and Ethical Development. The website for Student Conduct and Ethical Development is available at http://www.sa.sjsu.edu/judicial_affairs/index.html.

Campus Policy in Compliance with the American Disabilities Act: If you need course adaptations or accommodations because of a disability, or if you need to make special arrangements in case the building must be evacuated, please make an appointment with me as soon as possible, or see me during office hours. Presidential Directive 97-03 requires that students with disabilities requesting accommodations must register with the Disability Resource Center (DRC) to establish a record of their disability.

SJSU Writing Center: The SJSU Writing Center is located in Room 126 in Clark Hall. It is staffed by professional instructors and upper-division or graduate-level writing specialists from each of the seven SJSU colleges. The writing specialists have met a rigorous GPA requirement, and they are well trained to assist all students at all levels within all disciplines to become better writers. The Writing Center website is located at <http://www.sjsu.edu/writingcenter/>.

Syllabus is subject to change and sufficient notification will be provided students.

Session	Date	Topic	Notes & Reading assignments
1	Wed. June 22	Orientation and Administration; Introduction of Comprehensive Project	Additional homework and readings to be assigned in class for each session.
2	Wed. June 29	Student selection of comprehensive project;	Chapter 12 Tax Planning, <i>Federal Tax Research</i> , Raabe; or

		Accounting Changes; IRS Problem Resolution	Chapter 7 <i>Tax Research Techniques</i> , Gardner Helvering v. Gregory, 69 F2d. 809; Gregory v Helvering, 293 US 465
3	Wed. July 6	Midterm Preparation Selected issues in stock transactions	Guest Lecturer (Tom Bondi) Helvering v. Horst 311 US 112; Lucas v. Earl, 281 US 111; Chapter 13 Working with the IRS, <i>Federal Tax Research</i> , Raabe RIA Checkpoint United States Tax Reporter, EXP paragraphs: 76,559.7658; 76,559.7660; 76,559.7661; EXP 79.006
4	Sat. July 9	Personal Goodwill Midterm Exam	Martin Ice Cream, 110 TC No. 18; Norwalk, TC Memo 1998-279; <i>Separating Personal & Business Goodwill</i> , Arne and Hamill
5	Wed. July 13	Business Valuation Interim Presentations Begin	Guest Lecturer (Jeff Faust)
6	Wed. July 20	Interim Presentations	
7	Wed. July 27	Interim Presentations conclude	
8	Sat. July 30	Practice Management Entity Selection Issues Accounting changes	Guest Lecturer (Donald L. Potter) <i>The Choice-of-Entity Maze</i> , Porcaro; Rev. Proc 2010-32, Clarify Entity Classification <i>Correcting Accounting for Deferred Revenue</i> , Robinson & Liu Rev. Proc 96-30
9	Wed. August 3	International Issues and Transfer Pricing Standards for return positions	Guest Lecturer (Margaret Critzer & Nghi Huynh) Treasury Regulations as assigned; <i>Statements on Standards for Tax Services</i> , AICPA;
10	Wed. August 10	Final Project Due	Practice Management discussion continued Final project conclusion discussion