1987

Master of Laws in Taxation Program (Admissions Brochure)

William & Mary Law School
MASTER OF LAWS
IN TAXATION
PROGRAM

THE COLLEGE OF
WILLIAM AND MARY
IN VIRGINIA

MARSHALL-WYTIE SCHOOL OF LAW
WILLIAMSBURG, VIRGINIA
THE COLLEGE OF
WILLIAM AND MARY

Founded in 1693 as the second institution of higher education in the country, the College of William and Mary in Virginia is today a small, residential, full-time, coeducational university. While it is a state university, it is also national and international in character and contribution, enrolling students with varied backgrounds from throughout the nation and many foreign countries.

William and Mary is a college community, small enough to provide for relationships that allow true teaching and learning, large enough to have the resources to achieve excellence. An important aspect of this community is the location of the College in the beautiful and historic city of Williamsburg, where it constitutes an integral part of the restoration of Colonial Williamsburg. The partnership of the College, the City and the Restoration and the educational, cultural and recreational opportunities afforded to all students at the College by this partnership adds to the quality of life and the quality of education at William and Mary.
The study of law at William and Mary rests upon venerable tradition. Antedated only by the Vinerian Professorship at Oxford, held by Sir William Blackstone, and by the Chair at Trinity College at Dublin, the Chair of Law at William and Mary is one of the oldest in the English speaking world and the oldest in the United States.

Through the efforts of Thomas Jefferson, the Board of Visitors of the College of William and Mary created a professorship of Law and Police on December 4, 1779. They chose as the first occupant of the Chair, George Wythe, in whose offices studied Thomas Jefferson, John Marshall, James Monroe and Henry Clay. Wythe, who had been a leader in the struggle for independence, both as a signer of the Declaration of Independence and as a member of the Federal Constitutional Convention, proved to be an inspirational force in the development of legal education. During the decade of his professorship, he developed a comprehensive course of study including courses in legislative drafting and moot court.

Today, the Marshall-Wythe School of Law enrolls 500 students from all regions of the nation. As a state-supported institution, the Law School must maintain a two-thirds Virginian, one-third non-Virginian student body. The legal education offered, however, is national in scope and prepares graduates to engage in the practice of law throughout the United States.
Recognizing that the increasing scope and complexity of the taxing system precluded mastery of its provisions during an undergraduate law school career, in 1954 William and Mary instituted one of the first graduate programs in taxation. The program leading to the degree of Master of Laws in Taxation is designed and viewed as a specialized extension of the academic inquiry begun in law school. To that end, the program predominantly consists of small classes taught by full-time faculty using various instructional methods. The curriculum of the program is revised continually to reflect the changing emphasis within the taxing system. The objective of the program is to enhance the competency of attorneys in the field of taxation whether their professional pursuits are in private, corporate or governmental practice or in teaching. In addition to exposing students to the substantive law of taxation, the program develops the critical analytical skills required of any lawyer. Substantial components of the program address the complex ethical questions that tax representation raises and examine the tax and public policies that fashion and have fashioned the taxing system.

THE ADMINISTRATION OF THE COLLEGE AND THE SCHOOL OF LAW

Paul R. Verkuil, President of the College of William and Mary and Professor of Law. A.B., College of William and Mary; LL.B., University of Virginia; M.A., The New School; LL.M., J.S.D., New York University.

Timothy J. Sullivan, Dean of the School of Law, Director of the Institute of Bill of Rights Law and John Stewart Bryan Professor of Jurisprudence. A.B., College of William and Mary; J.D., Harvard University.

Richard A. Williamson, Vice Dean and Professor of Law. B.B.A., Ohio University; J.D., Ohio State University.

Edmund P. Edmonds, Associate Professor of Law and Law Librarian. B.A., University of Notre Dame; M.L.S., University of Maryland; J.D., University of Toledo.

George L. Follansbee, Jr., Associate Dean for Alumni Affairs and Development. A.B., Princeton University; J.D., State University of New York at Buffalo.

Connie D. Galloway, Associate Dean for Administration. A.B., Randolph-Macon Woman's College; M.A., Ed.S., University of Virginia.

Robert E. Kaplan, Associate Dean for Placement. B.S., Northwestern University; J.D., University of Virginia.

Martha W. Rush, Associate Professor and Associate Law Librarian. B.A. and M.S.L.S., University of Kentucky; J.D., University of Louisville.

Faye F. Shealy, Associate Dean for Admissions. B.S., Virginia Polytechnic Institute and State University; M.S., Virginia Commonwealth University; Ed.D., Virginia Polytechnic Institute and State University.
GRADUATE TAX PROGRAM
FACULTY

GLENN E. COVEN, Jr., Director of the Graduate Tax Program and Professor of Law (Federal Tax Policy, Federal Income Tax, Corporate Tax, Taxation of Corporate Realignment, Business Planning, Professional Responsibility in Tax Practice). Professor Coven received his B.A. from Swarthmore and his LL.B. from Columbia, where he was a member of the editorial board of the *Columbia Law Review*. Prior to joining the faculty, he served as law clerk to the Honorable Harold R. Medina of the Second Circuit Court of Appeals, practiced law in New York City, and taught at the University of Tennessee College of Law. Professor Coven is the author of numerous publications, including articles in the *Michigan Law Review*, the *California Law Review*, and the *Tax Law Review*.

JOHN E. DONALDSON, Ball Professor of Law (Taxation, Estate Planning, Trusts and Estates). Professor Donaldson received his B.A. from Richmond, his J.D. from William and Mary, where he was Editor of the *William and Mary Law Review*, and his LL.M. from Georgetown. Prior to joining the William and Mary faculty in 1996, he was with the Office of Chief Counsel of the Internal Revenue Service. Professor Donaldson is the author of numerous publications and papers, and lectures extensively at continuing legal education programs. He is an active participant in bar association activities, having served as Chairman of the Virginia Bar Association Committee on Eminent Domain and Chairman of the Virginia State Bar Section on Taxation. Professor Donaldson is a member of the Executive Committee of the Virginia Bar Association.

ADJUNCT TAX FACULTY

JOHN F. KELLY, Lecturer (Civil and Criminal Tax Procedure). Mr. Kelly received his B.A. and LL.B. from the University of Richmond and his M.L.&T. from William and Mary. He is a member of the law firm of Kelly & Lewis, P.C., in Richmond.

FRANK R. ORTOLANI, JR., Lecturer (International Law). Mr. Ortolani received his B.A. from the University of Delaware, his J.D. from Catholic University and his LL.M. in Taxation from New York University School of Law. He is presently associated with the law firm of McGuire, Woods, Battle and Boothe in Richmond.
EMERIC FISCHER, Professor of Law (State and Local Tax, Legal Accounting, Tax Accounting, Insurance). Professor Fischer received his B.S. from South Carolina, and his J.D. and M.L.&T. from William and Mary, where he was Editor of the William and Mary Law Review. He joined the William and Mary faculty in 1965 and has served as Coordinator of the annual William and Mary Tax Conference since 1970, and Director of the Summer School of Law in Exeter, England, since 1968. Professor Fischer has published articles in the Indiana Law Journal, the Practical Accountant, the National Tax Association – Tax Executives Institute Proceedings and the Tax Foundation Proceedings. He is a frequent lecturer at continuing legal education programs and has served as a consultant to the Virginia Legislative Committee on the Virginia Sales Tax and the Committee to Reduce Costs of Transfer of Real Estate. Professor Fischer is the editor of the Virginia Tax Reporter and Secretary of the Tax Section of the Virginia State Bar. Professor Fischer was Acting Dean of the Law School in 1975-76.

JOHN W. LEE, Associate Professor of Law (Corporate and Shareholder Taxation, Capital Transactions, Business Tax Problems, Tax Accounting, Taxation of Conduit Entities, and Tax Research Methods). Professor Lee received his A.B. from North Carolina, his LL.B. from Virginia and his LL.M. in Taxation from Georgetown. Prior to joining the William and Mary faculty in 1981, he served as a clerk for the Honorable C. Moxley Featherston, Judge of the United States Tax Court, and practiced tax law in Richmond for 11 years. Professor Lee is the author of numerous tax-related publications, including articles in the Tax Law Review, the Virginia Law Review and the Virginia Tax Review, is a collaborator with Professor Bittker on Federal Taxation of Income, Estates and Gifts, has been an editor of the Virginia Tax Conference since 1973, and is a frequent lecturer at continuing legal education programs.

ADJUNCT TAX FACULTY

JOHN M. PETERSON, Lecturer (Qualified Retirement Plans). Mr. Peterson received his B.A., J.D., and M.L.&T. from William and Mary. He is a member of the law firm of Scanelli & Shapiro in Norfolk.

E. DIANE THOMPSON, Lecturer (Estate Planning). Ms. Thompson received her B.S. and J.D. degrees from the College of William and Mary and her LL.M. in Taxation from New York University School of Law. She is presently associated with Kaufman & Canoles.
DEGREE REQUIREMENTS

Candidates holding a Juris Doctor degree from an approved law school, who have successfully completed eighteen credit hours of tax law courses and six credit hours of either tax or tax-related law courses with a quality point average of at least 2.5 will receive the degree of Master of Laws in Taxation. Students may enroll as full-time or, through the Evening Tax Program, as part-time students. Degree requirements must, however, be completed within three years of the beginning of the semester in which a student receives degree candidate status. Furthermore, candidates who have completed 24 hours of work in tax and tax-related courses and have failed to obtain an overall average of 2.5 will not be permitted to receive the degree nor to continue in the program. The courses numbered 709, 715, 716, 719 and 723 are required unless waived by reason of relevant professional experience or prior coursework. In the event of waiver, other tax and tax-related courses must be substituted.

GRADUATE TAX COURSES

1987-88

FALL

721 Capital Transactions
709 Corporate & Shareholder Tax
703 Federal Taxation of Estates, Gifts and Trusts
716 Federal Tax Policy
726 Independent Legal Writing
719 Professional Responsibility in Tax Practice
702 Qualified Retirement Plans
715 Tax Research Methods

SPRING

723 Civil & Criminal Tax Procedure
704 Estate Planning
726 Independent Legal Writing
725 International Tax
708 Tax Accounting
705 Taxation of Conduit Business Entities
712 Taxation of Corporate Realignments
**Master of Laws in Taxation Program Application for Admission (1988)**

[A Non-Refundable Processing Fee of $20.00 Must Accompany This Application]

**PLEASE TYPE OR PRINT IN INK**

1. Full Name: ________________________________
   
   Last   First   Middle

2. Sex: □ Male  □ Female

3. Date of Birth:* 
   
   Mo.  Day  Year

4. Social Security Number: __________________________ (not required)

5. Racial/Ethnic Category:*  
   (Check one)

   □ Asian or Pacific Islander  □ Black, not of Hispanic Origin  □ Hispanic

   □ Hispanic  □ American Indian or Alaskan Native  □ White, not of Hispanic Origin

   *Note: This information is needed by the school for statistical purposes. It will not be used in an unlawfully discriminatory manner. You are assured both by school policy and by the Family Educational Rights and Privacy Act that the information will be confidential and accessible only to school officials, government agencies and others with a legitimate educational interest in the information.

6. Citizenship: ________________________________

7. Type of Visa (if any): ________________________

8. PRESENT MAILING ADDRESS: (where you wish admission correspondence sent)

   Street or Box

   City       State/County

   Zip Code   Telephone (incl. area code)

9. PERMANENT HOME ADDRESS: (through which you can be reached at any time)

   Street or Box

   City       State/County

   Zip Code   Telephone (incl. area code)

10. After what date should correspondence be sent to your permanent address?

11. Do you claim Virginia domiciliary status for tuition purposes?  Yes □  y  No □ n

12. What type of enrollment do you desire?  Full-Time □  f  Part-Time □  p

13. Have you taken courses in the Evening Tax Program?  Yes □  y  No □ n

14. Have you been admitted to the Bar?  □  If yes, where?

15. Identify the Law School from which you received a degree:

   Name: ___________________________  Dates of Attendance: from ___/___/___ to ___/___/___

   Rank in Class: ______ out of ______ (If class rank is not available, provide your best estimate.)

16. List in reverse chronological order all other colleges and universities attended:

   Name: ___________________________  Dates of Attendance: from ___/___/___ to ___/___/___

   Degree: ___________________________  Major: _______  Rank in Class: ______ out of ______

   Name: ___________________________  Dates of Attendance: from ___/___/___ to ___/___/___

   Degree: ___________________________  Major: _______  Rank in Class: ______ out of ______

   Name: ___________________________  Dates of Attendance: from ___/___/___ to ___/___/___

   Degree: ___________________________  Major: _______  Rank in Class: ______ out of ______
17. List all scholastic or academic honors you have received after secondary school including scholarships, fellowships, prizes, and honor societies:

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

18. List the extracurricular or community activities that have been important to you:

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

19. Were you employed during any academic year while a law student? ____ If yes, describe positions held:

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

20. State your last four positions of full-time employment, including summer employment. Do not list military service or part-time employment:

<table>
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<tr>
<th>Date</th>
<th>Employer</th>
<th>Position</th>
<th>Reason for Leaving</th>
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21. Have you served or are you now serving on full-time duty? ________________________________. If yes, complete the following:

Branch of Service: U.S.A. □ 1 U.S.A.F. □ 2 U.S.N. □ 3 U.S.M.C. □ 4 Other □ 5

Tour of Duty: From (mo./yr.) ___________ to ___________ Rank or Rate at Discharge/Separation

Type of Discharge/Separation: ___________ Reserve Status (Current): ___________

22. Will you be eligible for veteran's educational benefits while at William and Mary? ________________

IF THE ANSWER TO ANY OF QUESTIONS 23-27 IS YES, EXPLAIN FULLY ON A SUPPLEMENTARY SHEET

23. Were there any personal, cultural, or economic factors which, in your opinion, adversely affected your academic performance? ____________

24. Has your college, university, graduate, or professional school attendance been interrupted for one or more terms while you were enrolled in a degree program for any reason? ____________

25. Have you ever been separated from a branch of the Armed Services of the United States under conditions other than honorable? ____________

26. Have you ever been subject to disciplinary action for scholastic or other reasons in any of the colleges, universities or graduate or professional schools you have attended? ____________ Are there any disciplinary charges pending or expected to be brought against you? ____________

27. Have you ever been convicted of a crime other than minor traffic violations? ____________ Are there any criminal charges pending or expected to be brought against you? ____________

28. List the names of those who will be sending recommendations:

1. ____________

2. ____________

29. List all dates on which you have taken (or expect to take) the LSAT and the score(s):

________________________________________________________________________

I certify that the answers to the above are truthful and complete to the best of my knowledge and belief. Any omission or misstatement of a material fact on the application may be the basis for denial of admission, or if admitted, dismissal from the Law School.

Date __________________ Signature __________________
THE COLLEGE OF WILLIAM AND MARY

Student Application for Virginia In-State Tuition Rate

This form should be completed if you are claiming entitlement to Virginia in-state tuition rates pursuant to Section 23-7.4 Code of Virginia. All questions must be answered. Section A must be completed by the applicant. Section B of this form must be completed by the parent or legal guardian if the applicant is under the age of 19 and is not married or if the applicant is a dependent. Supporting documents and additional information may be requested.

SECTION A

1. Name of Applicant ____________________________

   Last First Middle

2. Social Security Number _________________________

   (requested)

   Degree Program ____________________________ Date of Enrollment __________

3. Date of Birth _________________________________

4. Citizenship: U.S. ______ Non U.S. ______ Visa Type ____________________________

   Home Telephone ____________________________ Work Telephone __________________

5. How long have you lived in Virginia? ____________

6. Where have you lived for the past two years? List current address first:

   From (mo/yr) To (mo/yr) Street City State Zip

   ________________________________________________________________
   ________________________________________________________________
   ________________________________________________________________
   ________________________________________________________________

7. List employment for the past two years.

   Employer __________________ City __________________

   Number of hrs/wk From (mo/yr) To (mo/yr)

   ________________________________________________________________
   ________________________________________________________________
   ________________________________________________________________
   ________________________________________________________________

8. Do your parents or legal guardian provide over half of your financial support or claim you as a tax dependent? (If yes, Section B must also be completed by parent or legal guardian.)

   Yes _____ No _____

9. Will you have filed a tax return or paid income taxes to any state other than Virginia during the past year? Yes _____ No _____

10. For at least one year prior to the term in which you will enroll, will you have

   a) filed a tax return or paid income taxes to Virginia on all earned income? Yes _____ No _____

       had Virginia taxes withheld from your wages or salary? Yes _____ No _____

   b) been a registered voter in Virginia? Yes _____ No _____

       If yes, date of last voter registration ____________________________
c) held a valid Virginia driver's license?  

Yes ____  No ____

Date of current Virginia License

11. Do you own or operate a motor vehicle?  

Yes ____  No ____

Date of Virginia Registration

12. Are you or any member of your immediate family presently in the military?  

Yes ____  No ____

IF NO, GO TO QUESTION 13

If yes, check: self ____ spouse ____ parent/legal guardian ____

a) Will Virginia income taxes have been paid on all military income for one year prior to the term in which you will enroll?  

Yes ____  No ____

Date Virginia Withholding Began

b) If your spouse is in the military, will you have resided in Virginia, been employed, earned at least $6,700, and paid income taxes to Virginia for at least one year prior to the term in which you will enroll?  

Yes ____  No ____

Name of Employer  
Dates of Employment

13. Answer this question only if you live outside Virginia but work in Virginia:

Will you have lived outside Virginia, worked in Virginia, earned at least $6,700, and paid Virginia income taxes on all taxable income earned in this Commonwealth for at least one year prior to the term in which you will enroll?  

Yes ____  No ____

I certify that all the information provided is true.

Signature

Date

Return no later than July 15
by separate mail to:
Office of the Registrar
College of William and Mary
Williamsburg, Virginia 23185
THE COLLEGE OF WILLIAM AND MARY

Parent/Legal Guardian Application for Virginia In-State Tuition Rate

SECTION B

1. Name of Parent/Legal Guardian ________________________________

2. Relationship to Student ________________________________

   Name of Student ________________________________
   Last       First       Middle

   Student’s Social Security Number ________________________________ (requested)

3. Your Citizenship: U.S. _____ Non U.S. _____ Visa Type ________________________________

   Your Home Telephone ________________________________ Your Business Telephone ________________________________

4. How long have you lived in Virginia? ________________________________

5. Where have you lived for the past two years? List current address first:

   From (mo/yr) To (mo/yr) Street City State Zip

6. List employment for the past two years:

   Employer City Number of hrs/wk From (mo/yr) To (mo/yr)

7. Will you have filed a tax return or paid income taxes to any state other than Virginia during the past year? Yes _____ No _____

8. Will you have claimed the student as a dependent on your federal and Virginia income tax returns for the tax year prior to the term in which the applicant will enroll? Yes _____ No _____

9. Will you have provided over half of the student's financial support for at least one year prior to the term in which the applicant will enroll? Yes _____ No _____

10. For at least one year prior to the term in which the student will enroll, will you have

    a) filed a tax return or paid income taxes to Virginia on all earned income? Yes _____ No _____

    had Virginia taxes withheld from your wages or salary? Yes _____ No _____

    b) been a registered voter in Virginia? Yes _____ No _____

    Date of current Virginia Voter Registration ________________________________

    c) held a valid Virginia driver's license? Yes _____ No _____

11. Do you own or operate a motor vehicle? Yes _____ No _____

    If yes, has it been registered in any state other than Virginia during the past year? Yes _____ No _____

    Date of Virginia Registration ________________________________
12. Are you or your spouse in the military?  

Yes ____  No ____

IF NO, GO TO QUESTION 13

If yes, check: Self ______ Spouse ______

a) Will Virginia income taxes have been paid on all military income for one year prior to the term in which the student will enroll?  

Yes ____  No ____

b) If the answer to (a) is NO, will the student’s non-military parent/legal guardian have resided in Virginia, been employed and earned at least $6,700, paid Virginia income taxes and claimed the applicant as a dependent for federal and Virginia income tax purposes for at least one year prior to the term in which the applicant will enroll?  

Yes ____  No ____

<table>
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<tr>
<th>Name of Employer</th>
<th>Dates of Employment</th>
</tr>
</thead>
</table>

13. Answer this question only if you or your spouse live outside Virginia but work in Virginia:

a) Will you or your spouse have lived outside Virginia, been employed in Virginia, earned at least $6,700, and paid Virginia income taxes on all taxable income earned in this Commonwealth for at least one year prior to the term in which the applicant will enroll?  

Yes ____  No ____

b) If the answer to (a) is YES, will the parent employed in Virginia have claimed the applicant as a dependent for federal and Virginia income tax purposes for at least one year prior to the term in which the applicant will enroll?  

Yes ____  No ____

I certify that all the information provided is true.

Signature of parent/legal guardian

Date

Return no later than July 15 by separate mail to:
Office of the Registrar
College of William and Mary
Williamsburg, Virginia 23185
RECOMMENDATION FORM
MARSHALL-WYTHE SCHOOL OF LAW
MASTER OF LAWS IN TAXATION

Name of Applicant ___________________________ Law School ___________________________
(print) (print)

TO THE APPLICANT:

Recommendations in support of your application for admission must be submitted on, or accompanied by, this form. You must complete either section A or B below prior to giving the form to the person asked to submit the recommendation. In the event your school uses a composite form, be sure this form, with A or B signed by you, accompanies the composite recommendation.

A. I authorize release of a candid evaluation to assist in the admission selection process and, should I enroll, for counseling or other educational purposes of the Marshall-Wythe School of Law. I understand that the material will be kept confidential both from me and the public and I waive any right of access that I might have by law. I further understand that the Marshall-Wythe School of Law does not require me to execute this waiver and is willing to review my application without such a waiver.

DATE ____________________ SIGNATURE ________________________

[OR]

B. I authorize the release of a candid evaluation but I choose not to waive my right to examine this letter of recommendation should I enroll as a student at the Marshall-Wythe School of Law.

DATE ____________________ SIGNATURE ________________________

TO THOSE ASKED TO SUBMIT RECOMMENDATIONS:

It is important that recommendations be frank and detailed. Brief letters in general terms are of little value. The letter should state the extent of the writer’s acquaintance with the applicant and the writer’s opinion of the applicant’s aptitude for the study and practice of law. Any specific knowledge concerning the applicant’s intellectual ability, character, or personality should be discussed.

Provided the applicant has signed the above waiver, you may be assured that your letter will be kept confidential from both the applicant and the public. If the applicant has chosen not to waive his or her right of access, please be advised that following enrollment as a student at this law school, he or she, upon request, may have access to your letter.

Your recommendation may be written directly on this form using the reverse side or on additional sheets if necessary. Should you choose to write a letter, this form must be attached when the letter is mailed to us.

Return directly to: Office of Admissions, Marshall-Wythe School of Law, College of William and Mary, Williamsburg, VA 23185.

NO ACTION CAN BE TAKEN ON THIS STUDENT’S APPLICATION UNTIL THIS FORM IS RETURNED.

ADMISSIONS OFFICE
College of William and Mary
Marshall-Wythe School of Law
Williamsburg, Virginia 23185

Recommender’s
Name ___________________________

Address ___________________________

City __________________ State ___________ Zip __________________
Thank you for your recommendation of

for admission to the Marshall-Wythe School of Law. We appreciate having your comments, and you may be assured that they will be taken into consideration when the candidate's application is reviewed.

Faye F. Shealy
Associate Dean
Marshall-Wythe School of Law
TO THE APPLICANT:

Recommendations in support of your application for admission must be submitted on, or accompanied by, this form. You must complete either section A or B below prior to giving the form to the person asked to submit the recommendation. In the event your school uses a composite form, be sure this form, with A or B signed by you, accompanies the composite recommendation.

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DATE ______________ SIGNATURE ______________________________

[OR]

B. I authorize the release of a candid evaluation but I choose not to waive my right to examine this letter of recommendation should I enroll as a student at the Marshall-Wythe School of Law.

DATE ______________ SIGNATURE ______________________________

TO THOSE ASKED TO SUBMIT RECOMMENDATIONS:

It is important that recommendations be frank and detailed. Brief letters in general terms are of little value. The letter should state the extent of the writer’s acquaintance with the applicant and the writer’s opinion of the applicant’s aptitude for the study and practice of law. Any specific knowledge concerning the applicant’s intellectual ability, character, or personality should be discussed.

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NO ACTION CAN BE TAKEN ON THIS STUDENT’S APPLICATION UNTIL THIS FORM IS RETURNED.
Thank you for your recommendation of

for admission to the Marshall-Wythe School of Law. We appreciate having your comments, and you may be assured that they will be taken into consideration when the candidate’s application is reviewed.

Faye F. Shealy
Associate Dean
Marshall-Wythe School of Law
We have recently received your application for the Master of Laws in Taxation Program. This card will tell you what items we still need to receive.

- Missing LSAT score.
- Missing law transcript.
- Missing undergraduate degree transcript.
- (1) (2) Letter(s) of recommendation not received from 

Please be certain these documents are forwarded to the Admissions Office quickly.

Review of your application file for admission to the Marshall-Wythe School of Law discloses it is incomplete in the particular(s) checked below.

- Missing LSAT score.
- Missing law transcript.
- Missing undergraduate degree transcript.
- (1) (2) Letter(s) of recommendation not received from 

Please be certain these documents are forwarded to the Admissions Office as soon as possible.

Your application to attend the Marshall-Wythe School of Law, College of William and Mary, is complete. Every effort will be made to notify you of the action taken on your application by 

Although the application volume may cause a delay in this scheduling, be assured that you will be notified promptly once a decision has been reached.
INSTRUCTIONS

1. Print your name (last name first) and mailing address in the three indicated places on this side.

2. Complete items 1-5 on the reverse side.

   Item 1-last name first
   Item 2-yes, no

3. Return entire card with application form.

DO NOT DETACH ANY SECTION

WILLIAMSBURG, VIRGINIA 23185
MARSHALL-WYTHE SCHOOL OF LAW
COLLEGE OF WILLIAM AND MARY
ADMISSIONS OFFICE

WILLIAMSBURG, VIRGINIA 23185
MARSHALL-WYTHE SCHOOL OF LAW
COLLEGE OF WILLIAM AND MARY
ADMISSIONS OFFICE

WILLIAMSBURG, VIRGINIA 23185
MARSHALL-WYTHE SCHOOL OF LAW
COLLEGE OF WILLIAM AND MARY
ADMISSIONS OFFICE
REQUdED COURSES

723 Civil and Criminal Tax Procedure. Spring (3), Mr. Kelly.
A study of the procedural problems encountered in the administration of the Internal Revenue laws in both civil and criminal proceedings. The topics covered will include audit and collection procedures, refund and deficiency procedures and litigation, the elements of fraud and tax crimes, internal revenue summonses, privileged communications and policy considerations.

709 Corporate and Shareholder Tax. Fall (3), Mr. Lee.
The taxation of corporations and their shareholders including the organization of corporations, the tax attributes of corporate securities, dividends, redemptions, corporate divisions, the accumulated earnings tax, personal holding companies, collapsible corporations, and the problems of multiple corporate structures. Prerequisite: Law 311 Federal Income Tax or the equivalent.

716 Federal Tax Policy Seminar. Fall (2), Mr. Coven.
Study of basic policies underlyng the evolution and present structure of modern U.S. income taxation, with emphasis on current policy problems and legislative proposals. Coverage includes such areas as the policy considerations and legislative mechanics of tax reform and simplification, proposals for modifications of the corporate income tax structure, and the use of tax systems in promotion of social and economic goals. Production of a significant written work on a tax policy subject of the student's choice is a major course requirement. Students who are not degree candidates may take this course only with the permission of the instructor.

719 Professional Responsibility in Tax Practice. Fall (1), Mr. Coven.
An examination of the rules of conduct and ethical practice that are of particular importance to tax professionals. Through discussion of hypothetical situations, this course is designed to produce a sensitivity to the ethical problems that may arise in a tax practice.

715 Tax Research Methods. Fall (2), Mr. Lee.
Advanced instruction in federal income tax research materials and methodology, with emphasis on problem analysis, the interpretative uses of legislative, administrative, judicial and technical source materials, and the preparation of legal memoranda, opinion letters, and other written forms of presenting the research product.

ELECTIVE COURSES

A problem analysis of frequent transactions in business practice including choice of entity (partnership, S Corporation or C Corporation) for domestic and foreign ventures, including professional practice; problems arising upon incorporation, including taxable sales, holding back of assets, and capital structure; cost basis and carryover basis corporate acquisitions; buy/sell agreements; and pitfalls in related party transactions. Prerequisite: Law 438 Corporate Tax or Law 709 Corporate and Shareholder Tax I.

721 Capital Transactions. Fall (2), Mr. Lee.
Problem oriented analysis of computational capital gains rules; dealer issue and planning techniques; capital vs. ordinary expenditures; common law of capital gains; deferred payment techniques (installment sales and wrap around mortgages, and open transaction and cash equivalency doctrines); non-recognition sales, exchanges and involuntary conversions; tax preference and alternative tax limitations.

Selected problems and techniques in estate planning with clinical type exercises involving closely held businesses, generation skipping trusts, and problems in formulating integrated dispositive arrangements involving insurance, pension benefits, trusts and other devices. Prerequisite: Law 703 Federal Taxation of Estates, Gifts and Trusts or consent of the instructor.

703 Federal Taxation of Estates, Gifts and Trusts. Fall (2), Mr. Donaldson.
Estate, gift and income taxation of gratuitous transfers including taxation of grantor, simple and complex trusts and a consideration of basic planning techniques. Prerequisite or corequisite: Law 311 Federal Income Taxation and Law 305 Trusts and Estates.

726 Independent Legal Writing. Fall (2), Spring (2), Staff.
Research and writing of a significant scholarly paper. In order to enroll, the student must have the approval of a member of the tax faculty, who will supervise the work, and permission from the Dean or Associate Dean for Administration. The course may be taken only once for credit toward the degree of Master of Law in Taxation.

725 International Tax. Spring, (3) Mr. Ortolani.
A study of United States taxation of multinational business operations. The topics covered may
include a comparison of branch and subsidiary operations, the sourcing rules, controlled foreign corporations, foreign tax credits, tax treaties, transfer pricing, and the taxation of nonresident aliens and foreign corporations.

702 Qualified Retirement Plans. Fall (3), Mr. Peterson.
A study of pension, profit sharing, 401(k), IRA and ESOP plans; qualification requirements with respect to discrimination, participation, vesting, funding, joint annuities and limitations on contributions and benefits; integration with Social Security; taxation of benefits. Determination procedure, reporting and disclosure requirements and fiduciary responsibility. Group insurance and other fringe benefit programs. Prerequisite: Law 311 Federal Income Tax.

Limitations under the commerce, due-process and equal protection clauses of the Federal Constitution, state and local franchise, income, sales and property taxes are considered.

708 Tax Accounting. Spring (3), Mr. Lee.
Treatment of traditional tax methods of accounting (cash, accrual, hybrid, and inventories) and limitations on their use; change of accounting methods; deferred payments; tax accounting for interest paid and received including time value of money principles; cost recovery and recapture of tax benefits; and clear reflection of income including assignment of income.

705 Taxation of Conduit Business Entities. Spring (3), Mr. Lee.
A study of the tax problems encountered in the use of partnerships and S corporations including the formation, operation and dissolution of these entities and the specialized uses for which conduit entities are used.

712 Taxation of Corporate Realignments. Spring (3), Mr. Coven.
An analysis of taxable and tax free acquisitive techniques, including limitations on the carryover on tax attributes, and corporate divisions. Some consideration will be given to the special problems involved in restructuring foreign branches and subsidiaries and to the effect of the consolidated return regulations. Prerequisite: Law 709 Corporate & Shareholder Tax.

TAX RELATED COURSES

432 Business Planning. Spring (3), Mr. Coven.
A study of advanced corporate law, securities regulation and some treatment of corporate tax. Discussion of specific transactions that face business lawyers: formation and financing business organizations; restructuring ownership interests; financing distributions; share repurchases; sales and purchase of businesses; business combinations; reorganizations; and dissolutions. Prerequisites: 303 Corporations and 311 Federal Income Tax.

A study of economic and legal issues in financing decisions of publicly held corporations, including valuation of the enterprise and its securities, determination of the securities structure, dividend and investment policy and mergers.

422 Legal Accounting. Fall (3), Mr. Fischer.
A study of the basic principles of accounting as related to law. Topics which will be covered include the accrual and deferral of income, asset reevaluation as a source of dividends, and accounting for business combinations. Prerequisite: 303 Corporations. Enrollment limited to students with no previous accounting course in college or law school.

420 Modern Land Finance. Spring (2), Mr. McKenney.
A study of the practical problems and mechanics involved in modern land transfer, financing and development transactions; contracts and conveyances of real property; tax and non-tax factors in selecting the ownership entity with an emphasis on the real estate limited partnership; the commercial lending cycle, including an examination of the mortgage loan commitment letter, building loan agreement, mortgages and deeds of trust; forms of secondary financing including the wrap-around mortgage; leasehold mortgages; installment land contracts; sale-leaseback transactions; mortgagee's remedies including foreclosure and usury; government intervention and risk spreading in the mortgage market; subdivisions and detached housing developments; planned unit developments, condominiums and cooperatives; income-producing property. Not a prerequisite but recommended: 311 Federal Income Tax Law.

An examination of the federal and state laws governing the issuance and sale of securities, both in initial public offerings and in the secondary securities markets. This course explores the concepts of due diligence in the preparation of financial disclosure documents, market manipulation, insider trading, and fraud and deception in the purchase and sale of securities. It discusses the obligations and liabilities of corporations, officers and directors, underwriters, brokers and shareholders in the context of day-to-day trading, takeovers and contests for control. Prerequisite: 303 Corporations.
TUITION AND FEES

The tuition and general fee ($1,593.00 per semester for full-time, Virginia students and $3,835.00 for full-time, out-of-state students) is a payment towards the general maintenance and operating costs of the College including recreational and health facilities. Board and room charges are additional. Any student registered for nine hours or more is considered to be a full-time student and will be charged these full-time rates.

A Law School activities fee of $6.00 per semester is used for funding of non-social services coordinated through the Student Bar Association. In addition, there is a printing fee of $10.00 per semester to cover the costs of duplicating materials not covered in casebooks. Both of these fees are included in the full-time tuition charge.

The rate for part-time, Virginia students is $105.00 per semester hour. The rate for part-time, out-of-state students is $253.00 per semester hour. Regularly enrolled degree-seeking students at the College will be charged these rates during the regular session for part-time work, based on their established domiciliary status.

Part-time students who are not regularly enrolled at the College of William and Mary and for whom, therefore, no domiciliary status previously has been determined, will be charged on the basis of their satisfactorily established domiciliary status.

Auditing fees are the same as those specified for part-time students, unless the auditor is a full-time student.

FINANCIAL ASSISTANCE

Recognizing that many students are unable to pay the full cost of their education, the College administers a financial assistance program. The primary financial responsibility for legal education rests with the student and/or the student's family. However, to the extent that it can, the College attempts to bridge the gap between individual resources and the cost of legal education by assisting students financially.

Financial aid for full-time graduate tax students is available in the form of scholarships, assistantships, Guaranteed Student Loans (GSL), and other educational loan programs. The Law Access Program provides Supplementary Loans to Students (SLS) of up to $4000.00 regardless of calculated need. The Law School also offers a number of scholarships based on demonstrated financial need and/or merit. The probability of receiving aid through the College depends on several factors: the number of applicants seeking aid, availability of funds, and the extent of an individual's qualifications and financial need in comparison to others.

The Marshall-Wythe School of Law participates in the College Scholarship Service. To be considered for financial assistance administered by the Law School, students must file the 1988-89 Financial Aid Form (FAF) by May 1, 1988. The form is filed with the College Scholarship Service and is the only form necessary to apply for assistance administered by the Law School. Financial need is established through the analysis of this report. Calculated family contribution takes into account not only income but assets, number of siblings and whether or not other children are in school.

FAF forms are available from most financial aid offices or by sending a request directly to: College Scholarship Service, CN 6300, Princeton, New Jersey 08541.

Standardized student budgets are distributed by the Office of Student Financial Aid.

A limited number of graduate assistantships are made annually to candidates for the Master of Laws in Taxation degree. Recipients of these assistantships are assigned duties as tax faculty research assistants.
SCHOLARSHIPS

The J.D. Carneal Scholarship

This scholarship is awarded on an annual basis to a candidate for the degree of Master of Laws in Taxation who shows unusual promise in the practice of tax law. It has been made possible by the continuing generosity of Mrs. J.D. Carneal of Richmond, Virginia, who established the scholarship in memory of her husband, the late J.D. Carneal.

The Paul M. Shapiro Memorial Scholarship

The family and friends of the late Paul M. Shapiro, '63, have funded this scholarship in his memory for an annual award to a William and Mary law student who, upon completion of the requirements for the Juris Doctor degree, intends to continue in residence in the Master of Laws in Taxation program.

ADMISSION INFORMATION

Full-time students are admitted only in the fall of each year. All candidates for admission to the Graduate Tax Program must have received a baccalaureate degree and a professional degree in law from approved colleges or universities. Admission is based upon a careful evaluation of the student's law school performance, LSAT score, recommendations from law school instructors, employment experience and similar relevant factors. In general, admission is limited to students who rank in the upper 50% of their law school class. Candidates whose law degrees are from foreign countries may be asked to supply supplemental data before their applications are accepted for review.

Admission Procedures

1) Complete the enclosed application form and other materials and return them with the application fee ($20.00) not later than July 15, 1988, to: Admissions Office, Marshall-Wythe School of Law, College of William and Mary, Williamsburg, VA 23185. There is an advantage to completing the application early in the year, since applications are considered in light of existing openings at the time the application is complete. Only under extraordinary circumstances will an application received after July 15 be considered.

2) Submit two letters of recommendation from law faculty members. If you have been out of law school for more than three (3) years, one letter submitted by an individual who is able to evaluate your potential for success in the tax program is sufficient. Letters of recommendation are to be returned to: Admissions Office, Marshall-Wythe School of Law, College of William and Mary, Williamsburg, Virginia 23185. Both letters must be returned as early as possible, but no later than July 15, 1988.

3) Have official transcripts of all undergraduate, graduate and law work submitted directly to the Marshall-Wythe School of Law. An official transcript of all but the final semester of your law work must be on file before your application will be considered complete.

4) Make arrangements to have an official copy of your LSAT score sent to the Marshall-Wythe School of Law (code #5115) by submitting this request in writing to:

   Law School Admission Council/  
   Law School Admission Services  
   Box 2000  
   Newtown, PA 18940-0998  
   Attn: Test Administration

   Be sure to include your name (and the name under which you originally registered with this service if different from your current name), your social security number, birthdate, date of test administration(s) and a check in the amount of $20.00 made payable to LSAS.

5) If admitted, have a transcript showing conferral of a professional degree in law forwarded directly to the Marshall-Wythe School of Law.

6) Applicants seeking financial aid must file the Financial Aid Form (FAF) through the College Scholarship Service (CSS).

7) Applicants claiming entitlement to in-state educational privileges in accordance with Section 23-7.4 of the Code of Virginia must submit the Application for Virginia In-State Tuition Rate when initially applying for admission to the Law School.
GENERAL INFORMATION

THE LAW LIBRARY

The Law Library offers an excellent setting for research and study and occupies three floors covering the entire south wing of the Law School building. Seating includes a combination of carrels, tables, and lounge areas totaling 458 locations. The collection of over 230,000 volumes provides a strong combination of primary and secondary material in Anglo-American Law. The library’s equipment includes numerous microform readers and readers-printers, cassette players, audio-visual decks and monitors, photoc copiers equipped with the Venda Card System, personal computers and printers which are available for computer-assisted instruction, as well as student word processing. The library also subscribes to the LEXIS, NEXIS, PHINET and DIALOG databases.

OFFICE OF CAREER PLANNING AND PLACEMENT

The Law School Office of Career Planning and Placement assists Marshall-Wythe students in obtaining positions in law practice, government service or as judicial clerks. Numerous law firms, government agencies and other employers interview students on campus. Many other law firms and government agencies request that interested law and graduate tax students write directly to arrange interviews. The Law School, a member of the Southeastern Law Placement Consortium, participates in an annual placement conference in Atlanta.

EVENING TAX PROGRAM

The objective of the Evening Tax Program is to enable eligible members of the bar and the accounting profession to improve or refresh their tax knowledge. The program is designed to help those who must work during the day in the legal and accounting professions to keep pace with rapidly changing tax laws. It is expected that two courses from the Graduate Tax curriculum will be offered in the evening in each semester. Courses will be rotated each year; approximately 10 credit hours of different tax courses will be offered each year. Continuation of evening offerings in the tax program is, however, dependent upon satisfactory enrollment levels.

Admission to the Evening Tax Program is open to attorneys having degrees from approved law schools or certified public accountants having degrees from approved undergraduate institutions. Classes may be taken either for grade credit or audited. Students enrolling as auditors will not take final examinations and will not receive grades. Attorneys who complete more than eight credit hours of graded work with an overall average of 3.0 for all courses taken are eligible to apply for admission to the degree program as part-time students. If accepted as degree candidates the courses taken will be credited towards degree requirements.
The Annual William and Mary Tax Conference was begun in 1955. The proceedings of the first conference, devoted to the History and Philosophy of Taxation, have been reprinted several times and still attract wide readership. After three decades of successive conferences, the annual proceedings have become a regular publishing event and now are distributed to several thousand law and accounting firms, law libraries and other interested individuals. The Tax Conference makes available to law students and practitioners timely and important factual information on current developments in state and federal tax law, regulations and procedures. The Tax Conference is usually held on the first weekend in December.
GENERAL STATEMENT
OF POLICY

It is the policy of the College of William and Mary not to discriminate on the basis of sex, handicap, race, color, religion, ethnic or national origin in its educational programs, educational policies, financial aid or other school administered programs. Age discrimination in employment is prohibited by the Age Discrimination in Employment Act. This policy is enforced by federal law under Title IX of the Educational Amendment of 1972, Title VI and VII of the Civil Rights Act of 1964, and Section 504 of the Rehabilitation Act of 1973. Inquiries regarding compliance with the College's equal opportunity and affirmative action programs and procedures may be directed to Mr. Dale B. Robinson, Thiemes House, College of William and Mary, Williamsburg, Virginia 23185.

The College reserves the right to make changes in the regulations, charges, and curricula listed herein at any time.
MASTER OF LAWS IN TAXATION PROGRAM

THE COLLEGE OF WILLIAM AND MARY

MARSHALL-WYTHE SCHOOL OF LAW

WILLIAMSBURG, VIRGINIA

NON-PROFIT ORGANIZATION

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