

Washington Institute for Graduate Studies

Continuing Professional/Legal Education

Credits Bulletin No. 2

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Washington Institute reserves the right to make changes in this Bulletin, and in its scheduling, regulations, subject offerings, policies, faculty, tuition and charges without advance notice. However, the School will pro-actively make such information available to students.

All correspondence, courses, course work and payments should be directed to

Washington Institute for Graduate Studies

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Washington Institute for Graduate Studies Mission Statement

Designed for attorneys, certified public accountants, financial advisors working in the field of taxation, and enrolled agents before the IRS, our mission is to provide a quality distance learning experience that is relevant, convenient and affordable.

A MESSAGE FROM WASHINGTON INSTITUTE

For more than 34 years, Washington Institute for Graduate Studies has been dedicated to delivering relevant, convenient and affordable content to busy tax professionals throughout the US, as well as other parts of the world. We offer a Master of Science in Taxation, as well as an outstanding research-based doctoral program, all achieved while earning required continuing professional education credits.

As Washington Institute's president since early 2008, I'm honored to build on this legacy of excellence, and enhance our institution's ability to serve all who wish to enrich their professional lives.

Not all CPE/CLEs are created equal! Our in-depth treatment of the topics go well beyond what a tax professional would find in a simple seminar. One of the advantages of our program is that the student can meet his/her CPE/CLE requirement at the same time he/she is working toward the requirements for a Master of Science in Taxation (M.S. Tax) – while still remaining competitively priced, when compared to other reputable CPE/CLE Providers.

We're convinced you'll be delighted with each and every course, whether you chose to pursue a MST, or not.

We look forward to welcoming you into the program!

Robert N. Hanson
President

WASHINGTON INSTITUTE...AN INTRODUCTION

Washington Institute for Graduate Studies enjoys a noble legacy that has continued since 1976. The tax courses offered by the school are accepted for continuing education credit by the US Department of the Treasury for Enrolled Agents before the Internal Revenue Service and by many State Boards of Accountancy and State Bar Associations.

Since its inception, the School has been registered with either the Utah State Board of Regents (United States of America) or under the Utah Postsecondary Proprietary School Act (Title 53B, Chapter 5, Utah Code Annotated 1953) as a degree-granting institution. In 2002, regulatory oversight of all non-accredited proprietary schools in the State of Utah (which includes the School) was transferred from the Utah State Board of Regents to the Utah Department of Commerce, Division of Consumer Protection, which currently serves as the registering and regulatory agency in Utah. Since that time, Washington Institute has successfully registered under the Utah Postsecondary Proprietary School Act (Title 13, Chapter 34, Utah Code). In late 2008, the School moved its base of operation to California to better meet the needs of future students and faculty, as well as take advantage of peer-institution collaborations.

The school provides advanced-level CPE/CLE credits, graduate studies leading to a Master's Degree in Taxation and a challenging research-based Doctorate Degree. *Individuals interested in our degree-granting programs should contact the School to obtain program-specific information.*

Washington Institute for Graduate Studies does not discriminate on the basis of any nationally recognized, protected status in its educational programs or in the provision of benefits and services to its students.

ADVANCED-LEVEL CPE/CLE CREDITS

Washington Institute for Graduate Studies has assisted busy tax professionals with their continuing professional education requirements for decades.

Our CPE/CLE credit hours are calculated in accordance with the standards of the National Registry of CPE Sponsors. Credits are granted based on a 50 minute hour for self-study classes that qualify for credit. Our courses are presented by professionals that have distinguished themselves within their chosen field. Washington Institute provides each student with the necessary certification for studies completed.

PROGRAM CERTIFICATION

Washington Institute believes that its courses are acceptable for professional continuing education credit by state accounting societies and bar associations.

Washington Institute is officially registered with the United States Treasury Department to offer continuing education credit for Enrolled Agents before the Internal Revenue Service (Sponsor Organization Number 358). Also, for our students employed with the IRS, our program has been approved for reimbursements.

Our courses are accepted for CLE purposes by the States of Florida, California and New York (the only three states to which the School has formally applied).

Historically, the courses have been registered for mandatory CPE credits and the Institute has been officially listed on the National Registry of the National Association of State Boards of Accountancy (NASBA). Because of a change in management, the School did not reapply; this is being remedied and the application is pending.

State boards of accountancy and bar associations have final authority on the acceptance of individual courses for CPE/CLE credit. It is the responsibility of the student to check with their own State. Also, it is the student's responsibility to determine whether credits, degrees, or certificates from the institution will transfer to other institutions or meet employer's training requirements. This may be done by calling the prospective school or employer.

TAX DEDUCTION: IMPROVEMENT OF PROFESSIONAL SKILLS

Educational expenditures for the maintenance or improvement of existing professional skills are tax deductible under Section 162 of the Internal Revenue Code, Treasury Reg. Section 1.162-5 (a) (1). The expenditures cannot be used to satisfy the minimum educational requirements of the taxpayer's trade or business and cannot constitute a program of study that would qualify the taxpayer for a new trade or business, *Federal Tax Deductions*, Comerford and Sacks, P. 499. Under this test, Washington Institute believes that for lawyers, accountants, and tax practitioners, who are currently practicing in these professions, and only updating or furthering their knowledge to better perform in their professions, and NOT attempting to expand into a new field of practice, the payment of tuition in this program is a fully deductible business expense.

STUDENT BODY

Our CPE/CLE students are composed of 80% accountants (predominantly C.P.A.s), 15% lawyers, and about 5% have Bachelor's Degrees in other related subject areas. The following states and nations are represented in our current student body: American Samoa, Alabama, Alaska, Arizona, Arkansas, California, Canada, Colorado, Connecticut, Delaware, Dominican Republic, England, Florida, France, Germany, Georgia, Ghana, Hawaii, Hong Kong, Idaho, Illinois, Indiana, Iowa, Italy, Japan, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, South Dakota, Seychelles, Switzerland, Taiwan, Tennessee, Texas, Utah, Vermont, Virginia, Washington, Washington D.C., West Virginia, Wisconsin and Wyoming.

OBJECTIVES & TECHNIQUES OF THE CPE/CLE CREDIT PROGRAM

The objectives and techniques of our CPE/CLE Credit Program are as follows:

- To provide a **RELEVANT AND PRACTICAL EDUCATIONAL EXPERIENCE** which provides the student with critical tax knowledge and insights with the least cost in wasted time and resources. This is done through an integrated program of up-to-date texts and techniques which give advanced knowledge, expertise, and the fulfillment of state continuing education requirements all within one coherent educational whole.
- To provide a recognized and accepted **ADVANCED LEVEL EDUCATIONAL PROGRAM** covering U.S. taxation, consisting of approximately 15 subjects (with plans to add another 6 in-depth, highly specialized topics in the coming year).
- To make available an **INTEGRATED TEXT** of the utmost quality, Washington Institute has selected RIA, a division of Thomson Corporation. RIA is the premier provider of advanced research, practice materials, and compliance tools for tax, accounting and corporate finance professionals. RIA features titles by Warren, Gorham & Lamont (WG&L), one of the nation's most respected providers of analytical and legal taxation information.
- To provide an **INDEPENDENT STUDY PROGRAM** to students, recording the lectures of experienced tax practitioners, to enable students to learn at their convenience and without the burden and cost of disturbing their practice, going away to conferences or being pressured into an inflexible class schedule, and all at very **AFFORDABLE RATES**.

The CPE/CLE Program of Washington Institute is available to students through independent study and filmed lectures. Many lawyers, accountants and tax practitioners reside in areas where this type of program is unavailable. In traditional programs, students find the barriers and burdens of travel, time and expense incident to such traditional programs insurmountable. On the other hand, many providers offer credits via the internet, but the treatment of various topics is often too superficial. Students are given the opportunity to obtain their required CPE/CLE without sacrificing the development of their professional practice, without having to spend thousands of dollars to travel, and without unduly disturbing their family and social lives - all this at a rate which is considered to be the most affordable, when compared with other reputable CPE/CLE Providers.

The lectures, given by competent, practicing tax lawyers and accountants, are recorded in the realistic context of the classroom itself. The filmed lectures, the assigned texts, and the examination requirements, assure the student of a quality educational experience.

DVDs are provided to the student as part of the fee. All DVDs for one course are shipped at one time. The courses do not need to be returned to the School and may become the student's future resource materials. If there is difficulty viewing a DVD lecture, the student will need to contact the school to troubleshoot the problem or get a replacement. Courses are sent to the student by US Postal Service. Expect five to seven working days for shipment. The student must provide a physical mailing address, not a P.O. Box, for shipments. Courses may be requested through the school's website. The courses are copyrighted by the school and should not be duplicated without written permission. The school continually seeks the highest level of quality while updating its courses. The school plans to update the major subjects to keep pace with tax law changes (this has averaged every two to three years).

COURSE OFFERINGS

In addition to this *Bulletin*, the website includes the most current course listing for CPE, CLE (and Semester Unit credit), as well as the suggested text for each course. Some courses have handouts and/or outlines, which may also be accessed on the website.

TAX 601—TAXATION OF INDIVIDUALS, (40 CPE & 30 CLE Credits). Computing the tax, return filing, filing status, exemptions, assignment of income, gross income, interest, divorce considerations, insurance, exclusions from gross income, business-related expenses, personal deductions, medication deductions, charitable deductions, casualty and theft losses, credits, alternative minimum tax, community property, and bankruptcy.

TAX 602—BUSINESS EXPENSES, DEDUCTIONS AND CREDITS, (34 CPE & 30 CLE Credits). Trade or business expenses, start-up and organizational expenses, activities and not engaged in for profit, expenses incurred for the production of income, depreciation, amortization and depletion, introduction to tax shelters-basis, at-risk and passive activity losses, transportation and travel expenses, standard deductions, and personal exemption deductions, itemized deductions and tax credits.

TAX 603—TAX ACCOUNTING, (10 CPE & 9 CLE Credits). A study of federal taxation as it applies to tax accounting with an emphasis on: methods of accounting, installment methods, changes in accounting methods, accounting periods, rules regarding cost recovery methods, basis, capital gains and losses, alternative minimum tax, accounting for income taxes, financial statement accruals for deferred taxes, selected provisions of the internal revenue code, treasury regulations, administrative rulings, and judicial interpretations.

TAX 604—TAXATION OF PARTNERSHIPS AND LIMITED LIABILITY COMPANIES, (30 CPE & 25 CLE Credits). Partnership characteristics, tax year, contributions to partnerships, partnership interest in exchange for services, basis, liabilities, loss limitations, family partnerships, partnership income, allocations of partner's distributive shares, shifting distributive shares, termination, partner-partnership transactions, disproportionate distributions, current distributions, liquidating distributions, transfer of partnership interests, transfer of interests in partnerships with unrealized receivables, basis adjustments, death and retirement of partners, and taxation of limited liability companies.

TAX 605—TAXATION OF CORPORATIONS AND SHAREHOLDERS, (39.5 CPE & 33 CLE Credits). Corporate characteristics, corporate deductions, transfers to corporations, losses on small business stock, dividends, earnings and profits, the accumulated earnings tax, stock redemptions and partial liquidations, preferred stock bail-outs, complete liquidations, taxable purchases of stock, reorganizations, carryover of tax attributes in corporate acquisitions, acquisitive reorganizations, corporations, collapsible corporations, personal holding companies, multiple corporations, and controlled groups, and consolidated returns.

TAX 606—COMPENSATION, BENEFITS AND RETIREMENT PLANNING (25 CPE & 21 CLE Credits). This course provides a comprehensive introduction to the laws governing the operation and administration of employee benefit plans. We explore the Internal Revenue Code ("Code") tax-qualification rules applicable to retirement plans, as well as those provisions of the Code which govern health and welfare arrangements, COBRA, HIPAA and other laws. The course also provides a comprehensive review of the Employee Retirement Income Security Act of 1974, including employee benefit plan reporting and disclosure, fiduciary duties and prohibited transactions, employer withdrawal liability, the defined benefit plan termination process and regulatory investigations. The course covers issues relating to deferred compensation arrangements, stock options, fringe benefits, nondiscrimination rules, employee welfare benefits plans, medical plans, life insurance and death benefits, cafeteria plans, beneficiary associations, defined contribution plans, defined benefit plans, general plan qualifications, accrued benefits, vesting, top-heavy rules, integration, funding, limitations on benefits and contributions, distributions, and benefits issues in mergers and acquisitions.

TAX 607—ESTATE TAXES, GIFT TAXES, TRUST TAXATION AND ESTATE PLANNING (21 CPE & 12 CLE Credits). Generation-skipping transfer tax, gifts, gift tax exclusions, gift-splitting, gifts to minors, gross estate, lifetime estate transfers, powers of appointment, jointly held property, community property, valuation, administrative deductions, marital deduction, charitable deduction, estate tax credits, basis of property from decedent, income taxation of trusts, estates and beneficiaries, income in respect of a decedent, deductions and credits, distributable net income, simple trusts, complex trusts, throwback rules, grantor trust rules, and powers retained by grantor.

TAX 608—TAXATION OF EXEMPT ORGANIZATIONS (9 CPE & 8 CLE Credits). Charitable, religious, scientific, literary or educational organizations, prohibited activities, acquiring and maintaining tax-exempt status, business activities and tax on unrelated business income, unrelated debt-financed income, private foundations, private foundation taxes, and termination of private foundation status.

TAX 611—FEDERAL TAX PRACTICE AND PROCEDURE (37 CPE & 31 CLE Credits). Organization of the IRS, practice before the IRS, filing requirements, other return requirements, time for filing returns, tax payments, return preparers, disclosure of information, regulations, and rulings, examinations, administrative summons, administrative tax appeals, deficiencies and assessments, refunds, closing agreements, compromises, interest, penalties, collection of taxes, tax liens, levy and distraint, jeopardy assessments, bankruptcy, fiduciary liability, criminal investigations, fraud, tax crimes, tax court litigation, and district court refund litigation.

TAX 619—TAX PLANNING STRATEGIES (33.5 CPE Credits). This is an overview course which presents the major tax planning strategies involved in personal and business tax planning. Most of the tax techniques that are presented in-depth in the other graduate tax subjects are spotlighted here. This is the most popular of the tax subjects because it allows for an overview of advanced taxation techniques within a short period of time, thus clarifying and expanding the student's understanding, evaluation and implementation of those techniques.

TAX 709—INTERNATIONAL TAX (32 CPE & 27 CLE Credits). The definition of resident; the distinction between domestic and foreign entities; taxation of business income and non-business income of foreign persons and foreign corporations; branch profit rules; special rules on investments in U.S. real property interests; the foreign tax credit; special rules on controlled foreign corporations; cross-border non recognition transactions; int'l tax treaties & transfer pricing rules.

TAX 710—SALES, EXCHANGES AND REAL ESTATE TAXATION (31.5 CPE & 26 CLE Credits). Sales and exchanges, basis, gain or loss, discharge of indebtedness, capital gains and losses, Section 1031 exchanges, intangible property transactions, non-recognition transactions, like-kind exchanges, sale of a business, installment sales, related party transactions, leases, securities transactions, commodities, tax-exempt bonds, acquisition of real estate, financing, condominiums, rent, disposition of real estate, real estate investment trusts, and real estate mortgage investment conduits.

TAX 716&717—TAX COURT LITIGATION AND REFUND LITIGATION (43 CPE & 36 CLE Credits).

Federal Tax Court Litigation: This Course is an introduction to litigation that can be filed in the U.S. Tax Court. The Course will cover several important areas such as: (i) the Court's subject matter jurisdiction; (ii) the location of the Court; (iii) common pleadings used in resolving Tax Court cases; (iv) judgments and the types of decisions which can be entered; (v) the effect of res judicata and collateral estoppel as applied in the U.S. Tax Court; (vi) small tax case proceedings; (vii) composition of the Court; (viii) trials and post-trial pleadings; (ix) the statutory notice of deficiency; (x) trial preparation; (xi) the Court required Stipulation of the parties; (xii) motion matters; (xiii) trial location; (xiv) admission to practice before the Court; and (xv) burden of proof.

Federal Tax Refund Litigation: This introductory Course deals with the federal laws and civil procedures relating to the filing of refund suits in the refund courts in order to adjudicate a taxpayer's tax liability. The Course topics including the following: (i) refund procedures; (ii) administrative refund claims; (iii) time limits for filing refund claims; (iv) time limits for filing refund suits; (v) subject matter jurisdiction of the Court; (vi) subject matter jurisdiction of the U.S. Bankruptcy Court as it relates to tax litigation; (vii) judgment for liability; (viii) the requirement of an overpayment; (ix) the recovery of attorney's fees; (x) important case law; (xi) burden of proof on issues; (xii) appeals; (xiii) consequences of other proceedings involved in tax matters as it relates to refund claims; (xiv) computation of tax refund and claims for credit for funds paid by third parties.

TAX 718—BANKRUPTCY TAX PLANNING (10 CPE & 9 CLE Credits). This is an introductory course as to the treatment of federal taxes in a bankruptcy proceeding. The course topics include such things as: (i) types of bankruptcy proceedings; (ii) the treatment of the government's tax claim as a priority claim, secured claim, or non-priority claim; (iii) eligibility of state and federal taxes to be discharged as part of a bankruptcy proceeding; (iv) planning for non-dischargeable taxes; (v) the status of the federal tax lien; (vi) minimizing tax collection in any post-bankruptcy proceeding; (vii) alternatives to bankruptcy proceedings, (viii) the effect of the automatic stay; (ix) the discharge order and its affect on tax collections; (x) collection of attorney's fee for violations of the automatic stay and the Bankruptcy Discharge Order; and (xi) short tax years for a Debtor. This is not an accounting course for the income tax liability of the bankruptcy estate as a separate legal entity.

PROGRAM FEES

Washington Institute offers two convenient payment plans for CPE/CLE purchases.

Pay in Full – At a cost of \$40 per credit hour, the student pays for each course and receives all lectures relating to that specific course shortly after complete payment is made.

Monthly Installments – Under this option, a 5.26% Finance Charge will be assessed and added to the course balance upon initial order confirmation. The student is allowed to make equal, monthly installments for no more than 6 months until fully paid. The initial monthly payment is due once the student has placed the order and the order has been confirmed, specifically prior to shipment of course materials. Subsequent monthly installments are processed on the 1st of each month (if paid by credit card) or the 15th of each month (if paid by ACH. . .automatic bank account debit).

Other fees include:

- | | |
|--------------------------|---------|
| • Texts | Cost(*) |
| • Shipping and handling | Cost |
| • Insufficient funds fee | \$25 |

NOTE: All payments must be made in US dollars.

(*) Since many of our students already have texts, the cost of the text is separate from the cost of the DVD lectures (see *Text & Reference Materials* later in this publication).

CERTIFICATE REQUIREMENTS

Because a student may elect to eventually enroll in the degree-granting program at Washington Institute, our completion requirements are higher than those established for typical CPE/CLE credits.

COURSE EXAM. At the completion of each course, the student must take a final on-line exam and achieve a score of no less than 70% to pass. These exams are taken on a secure testing site through the school's website. Each exam consists of multiple choice and true or false type questions. Exams are open book and are not timed. The student may access an exam multiple times before final submission. Instructions for the on-line exams are found in the Student Area of the website.

Also, each course has a review exam which qualifies the course for CPA-CPE credit. Some State Boards of Accountancy do not require review exams for CPA-CPE credit.

Review Exam: The review exam is designed to prepare the student for the final exam by providing valuable feedback. The score on the review exam is not counted towards the final grade of the course. The review exam is not mandatory if CPA-CPE credit is not needed or is not required, but it is highly recommended.

Final Exam: The final exam will evaluate whether learning objectives have been met by assessing the student's comprehension of the course content and accompanying text.

If a course does not have an on-line exam available, the student must choose from one of the options below:

1. **Questions & Answers:** The student designs and answers a number of questions requiring thoughtful answers (not one-word, not fill-in-the-blank and not true-false questions). They do not need to be typed. There is a presumption that less than four lines in an answer is not "thoughtful." After each answer, the student must cite the

appropriate paragraph number in the text where that principle is covered. Each question must be numbered consecutively (i.e., 1, 2, 3, 4, etc.). Subjects having 1 semester unit require a minimum of 50 questions. Subjects having more than 1 semester unit require a minimum of 100 questions. The questions and answers must be in the student's own words. *For an example, go to the website www.wsltax.org in the student area and click on exams. Scroll down and click on example Questions & Answers.*

2. **Outline:** The student types a sentence outline of the tax subject, single spaced, which consists of 15 pages minimum per semester unit, which outline may be taken from the text or from any suitable tax reference materials. Each page must be numbered consecutively (i.e., 1, 2, 3, 4, etc.). The student must cite the appropriate paragraph number in the text where that principle is covered. Appearing to copy from a table of contents is not acceptable. The outline must be in the student's own words. *For an example, go to the website www.wsltax.org in the student area and click on exams. Scroll down and click on example Outline.*

WHAT TO SUBMIT FOR CREDIT. The course examination requirement for the **On-Line Exam** must be submitted to the school exactly in the following format: 1) cover sheet on top, 2) print out of test results, 3) and all the self-proctorial notes in DVD numerical/section order. They must be submitted at one time, and not in separate mailings. Do not staple or bind the papers together.

The course examination requirement for **Questions and Answers or Outline** must be submitted to the school exactly in the following format: 1) cover sheet on top, 2) then the questions and answers or outline, 3) and all the self-proctorial notes in DVD numerical/section order. They must be submitted at one time, and not in separate mailings. Do not staple or bind the papers together.

SELF-PROCTORIAL NOTES. The two major objective criteria used by the School for conferral of the degree are (1) class attendance (though "class" may be in the comfort of your own home or office) and (2) the examination requirement. Class attendance for all students is measured by the submission of self-proctorial notes taken while viewing the lectures. Submission of no less than one full sheet per lecture is required. These are the student's notes of the content of the lecture and must show the entire lecture was viewed. All self-proctorial notes for one course must be submitted at one time and must be submitted with the on-line exam, questions and answers or outline. A recommended self-proctorial sheet form is supplied to the student when he or she is accepted into the program. The sheets should be duplicated for later use. Self-proctorial notes are taken into consideration and may increase the final exam score.

COURSE GRADING SCALE. The exam is graded using the following scale:

94% – 100%	A
90% – 93%	A-
86% – 89%	B+
82% – 85%	B
78% – 81%	B-
74% – 77%	C+
70% – 73%	C

CERTIFICATE OF COMPLETION. A certificate of completion will be issued for each course completed as soon as the exam requirement is fulfilled. This will include the CPE or CLE hours for the course and grade.

ADMINISTRATION AND FACULTY

The Chairman and President of Washington Institute for Graduate Studies is Robert N. Hanson. Mr. Hanson brings over two decades of business expertise to his role at the school and holds a BBA in Finance (NC Central University) and an MBA (University of New Haven). Through a distinguished career, Mr. Hanson's work has exposed him to some of the most progressive organizations in the country, including:

- Utah Valley University, as Executive Director of the UVU Foundation, overseeing all aspects of fundraising for the State's 2nd largest public university.
- Ohio State University's James Cancer Hospital planning/executing a \$600m capital expansion.
- DCH Health System (Alabama) overseeing all aspects of a capital campaign for a new \$40m Cancer Treatment Center.
- Arts councils and other health & human service organizations.
- United Ways in multiple states (NC, CT & OH).
- Laser Entertainment of the Carolinas, dba Ultrazone (Founder & CEO)

Mr. Hanson has been sought for a variety of boards (i.e., YMCA, NC Governor's SmartStart Initiative, Tuscaloosa's 211 Initiative, etc) and has chaired regional/national conferences and workshops around the country - primarily for fundraising professionals embarking upon complicated capital campaigns. Mr. Hanson is proud of his honorable service with the US Army's 82nd Airborne Division (3 years), as well as a mission for his church (2 years).

Other key personnel include: Kathryn Hanson (Academics and Admin), Wes Howell (Course Creation), Arthur McKinlay (Marketing), Bill Bridges (Program Accreditation/Certifications), Vincent Fordiani (Enrollment), Drew Williams (Program Expansion), Tim Schaap (Enrollment), Terri Hanson (Student Services) and Kyleigh Brashares (Student Services).

Washington Institute for Graduate Studies enjoys the close association of tax professionals that offer suggestions regarding curriculum, instructional techniques, and strategic direction/focus for the school. The adjunct faculty of the Graduate Tax Program of Washington Institute is as follows (in alphabetical order):

KULWANT SINGH BOORA is an Adjunct Professor of International Law with Washington Institute for Graduate Studies. Mr. Boora studied law at Sutton Coldfield College where he completed his Professional Diploma in Law and Higher Professional Diploma in conjunction with the Institute of Legal Executives Tutorial College of Law. After completing his law studies with Sutton Coldfield College, he furthered his legal education and went onto complete his Graduate Diploma in Law/CPE (Law Society of England and Wales Common Professional Examinations) with Hertfordshire University School of law. He also earned a Bachelor of Arts with Honors (B.A. Hons) from Staffordshire University. He has been a visiting lecturer at the University of Toledo, Ohio, and has served as a law tutor with ICLS and the National Association of Licensed Paralegals, England. He has also served as a judicial intern to a United States District Court Federal Judge and is also admitted as a Fellow and Legal Executive lawyer in the United Kingdom. Mr. Boora is also on the Washington Institute's International Advisory Board, where he advises on international regulations and policy.

RYAN BORNSTEIN is an advisory faculty member of Washington Institute for Graduate Studies PhD program. B.S. (Accounting, University of Delaware), LL.M. (Villanova Graduate Tax Program). He is a member of the law firm of Harvey Ballard & Bornstein, LLC and concentrates on estate and income tax planning in addition to estate administration. He focuses particularly on certain federal tax aspects of planning for substantial estates, including generation skipping transfer tax. He works with clients on tax-advantaged opportunities, analyzing stock option plans. He is Professor of Law with the Adjunct Faculty of the Graduate Tax Program at the Villanova University School of Law where he teaches Taxation of Property Dispositions. He has written a number of timely tax articles. He is admitted to the United States Tax Court and practices before the Internal Revenue Service, and is licensed to practice law in Pennsylvania and New Jersey.

THOMAS M. BRINKER, Jr., J.D., LL.M., C.P.A./PFS, ChFC, CFE, AEP, advisory faculty member Washington Institute, B.S. (Acct., Cum Laude, Saint Joseph's University), JD (International Law, Columbia Pacific University), M.S. (Acct., Widener University), M.S. (Taxation, Widener University), LL.M. (International Taxation, Regent University School of law), D.B.A. program (Acct. and Taxation, University of Sarasota), Ph.D. (Taxation, Washington Institute), professor of accounting and coordinator for the accounting program at Arcadia University, formerly with Coopers & Lybrand and Arthur Young & Co. Mr. Brinker is a member of the American and Pennsylvania Institutes of CPAs, the International Bar Association, and the Caribbean Bar Association. In addition to presenting nationally and internationally on various tax topics, he has published dozens of articles in numerous journals, including *The Journal of International Taxation*, *The Tax Advisor*, *The CPA Journal*, *The Journal of Practical Estate Planning*, and *The Journal of Financial Services Professionals*.

ROBERT S. BURDETTE, CPA, B.A. (Acct., Univ. of Utah), M.S. (Taxation, Washington Institute), Assistant Professor of Accounting at Salt Lake Community College, former member UACPA Taxation Committee, Who's Who in Finance and Industry, received the Teaching Excellence Award for Region 7 from the ACBSP in 2004, the Technology in Education Award in 2005 for work in developing distance education classes for SLCC and the Teaching Excellence Award from SLCC in 2006.

DARREN T. COLE holds a JD from Creighton University Law School (1994) and has taught as an adjunct professor at New Mexico State University, Purdue University, Indiana University and Columbia State College. His courses include Evidence, Constitutional Law, Criminal Law as well as Spanish Contract Language and Survival Spanish for Law Enforcement. He has also lectured or taught over 80 tax seminars in corporate or educational settings. Mr. Cole has served as Chief Legal Officer for Pioneer Title and Search Initiatives. Mr. Cole is currently the CEO of Strategica BPO Worldwide.

RICHARD M. EDMUNDS, C.P.A., B.S. (Acct., B.Y.U.), M. Acct. (Financial Audit, B.Y.U.), MBT (Taxation, University of Southern California), Sole Practitioner specializing in individual and closely-held company taxation.

CHRISTOPHER M. HARVEY, J.D., CPA, LL.M Taxation, managing member in the law firm of Harvey Ballard & Bornstein, LLC, Counsel to the law firm of Harvey, Casterline & Vallini, L.L.P. Formerly the managing partner of Harvey & Mortensen handling estate and tax planning for closely-held business owners and high net worth individuals. Worked as a certified public accountant for Price Waterhouse, L.L.P. in New York City and Chase Manhattan Bank. Bachelor of Science in Accounting (cum laude) from the University of Delaware and his Juris Doctor (magna cum laude) and Master of Laws in Taxation from the Villanova University School of Law where he was Associate Editor of the Law Review, Certified Public Accountant, admitted to the Pennsylvania and New Jersey bars and the United States Tax Court. Adjunct professor at Villanova University School of Law's Graduate Tax Program teaching Taxation of Property Dispositions, Income Taxation of Trusts and Estates, Post Mortem Estate Planning and Estate Planning for Small Business Owners.

BONITA L. HATCHETT, LL.M. (Labor and Employment and Certificate in Employee Benefits Law, Georgetown University Law Center), J.D. (Rutgers University Law Center), B.A. (Religious Studies, University of Michigan), partner in the Employee Benefits practice at the law firm of Bell, Boyd & Lloyd LLC, Chicago, Illinois.

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