

Washington Institute for Graduate Studies

Continuing Professional/Legal Education

CPE/CLE Credits Taxation Bulletin No. 1

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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, enrolled agents and financial advisors working in the field of taxation, our mission is to provide a quality distance learning experience that is relevant, convenient and affordable.

A MESSAGE FROM WASHINGTON INSTITUTE

Washington Institute for Graduate Studies celebrated its 33rd Anniversary in 2009. Washington Institute offers a quality distance learning tax program to students throughout the United States as well as over 20 countries throughout the world.

The Institute has designed its tax program to meet the needs of students who desire an effective and convenient way to acquire advanced knowledge in the field of taxation. The school is proud of its ability to assist so many tax practitioners who desire to enhance their professional skills through distance learning. Washington Institute offers advanced-level CPE/CLE Credits, a Master of Science in Taxation as well as an outstanding research-based doctoral program.

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 one of the most comprehensive distance learning US Tax programs available!

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.

In its 33 year history, the School has never sought national accreditation. However, beginning in late 2008, the School began seeking national accreditation through an agency endorsed by the US Department of Education (this process typically takes 24 months). 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). In 2008, because of changing management, the School did not reapply; this is being remedied in 2009 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.

Regarding the degree-granting program, the Institution is not accredited by a regional or national accrediting agency recognized by the U.S. Department of Education. Unlike some countries, the U.S. does not require institutions of higher learning to be accredited. However, the institution is currently pursuing national accreditation through an agency endorsed by the U.S. Department of Education (a process that typically takes 24+ months).

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. Our program is meant to serve the needs of these students by providing an accessible, convenient, affordable and thorough program, but offered through independent study and filmed lectures. 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 entire program can be taken through independent study, at the student's own pace and in the convenience of their own home or office.

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 UPS Ground. Expect five to seven working days for shipment. The student must provide a physical mailing address, not a P.O. Box, for UPS 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 *Taxation 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. The School reserves the right to make additions, deletions, changes and or to increase or decrease semester units. However the school will pro-actively notify the students of the changes.

TAX 601—TAXATION OF INDIVIDUALS, (Core Course – 3 Semester Units; 40 CPE Credits; 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. This course is considered a core course and is covered in the Final Comprehensive Exam.

TAX 602—BUSINESS EXPENSES, DEDUCTIONS AND CREDITS, (Core Course – 3 Semester Units; 34 CPE Credits; 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. This course is considered a core course and is covered in the Final Comprehensive Exam.

TAX 603—TAX ACCOUNTING, (Core Course – 1 Semester Unit; 10 CPE Credits; 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. This course is considered a core course and is covered in the Final Comprehensive Exam.

TAX 604—TAXATION OF PARTNERSHIPS AND LIMITED LIABILITY COMPANIES, (Core Course – 3 Semester Units; 30 CPE Credits; 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. This course is considered a core course and is covered in the Final Comprehensive Exam.

TAX 605—TAXATION OF CORPORATIONS AND SHAREHOLDERS, (Core Course – 3 Semester Units; 39.5 CPE Credits; 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. This course is considered a core course and is covered in the Final Comprehensive Exam.

TAX 606—COMPENSATION, BENEFITS AND RETIREMENT PLANNING (2 Semester Units; 25 CPE Credits; 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 (2 Semester Units; 21 CPE Credits; 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 (1 Semester Unit; 9 CPE Credits; 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 (3 Semester Units; 37 CPE Credits; 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 (3 Semester Units & 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. This course requires a separate set of books.

TAX 709—INTERNATIONAL TAX (3 Semester Units; 32 CPE Credits; 27 CLE Credits). The tax 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 profits 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; international tax treaties; and transfer pricing rules.

TAX 710—SALES, EXCHANGES AND REAL ESTATE TAXATION (3 Semester Units; 31.5 CPE Credits; 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 (3 Semester Units; 43 CPE Credits; 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 (1 Semester Unit; 10 CPE Credits; 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

At a cost of \$40 per credit hour, the student pays for each course, one at a time, and receives all lectures relating to that specific course shortly after complete payment is received.

Periodically, the School offers a monthly payment option – not exceeding six months. If available, the student is allowed to make interest free, monthly installments for no more than 6 months until fully paid. The monthly payments begin once the student has provided the necessary information. Payments to the School are received or processed on the 1st or 15th of the month, depending upon which date arrives first after receiving the student's application.

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, many courses have 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 and the Director of Graduate Programs is Lori Anderson. 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 Washington Institute is as follows:

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., C.P.A., advisory faculty member Washington Institute, B.S. (Acct., Cum Laude, Saint Joseph's 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 at Arcadia University, formerly with Coopers & Lybrand and Arthur Young & Co.

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.

SUNITA DOOBAY is an advisory faculty member of Washington Institute for Graduate Studies PhD program, Tax Product Development Manager with one of the largest legal publisher in the world. In her role as Manager and Senior Editor, she is chiefly responsible for working with leading tax practitioners and scholars to oversee the development of tax treatises for publication. Previously, Ms. Doobay advised Fortune 500 companies on corporate and international tax law and compliance for 10 years. Ms. Doobay holds a JD from Queen's University and an LL.M. in Taxation from NYU School of Law. She is a member of the bars of New York State, and Ontario, Canada.

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. In addition, frequent

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