COURSE MEETS: Tuesdays and Thursdays, 6:00 p.m. – 9:45 p.m., BusAd E-203
July 9, 2013 through August 15, 2013

INSTRUCTOR: Kurt Kawafuchi, J.D., C.P.A., Masters of Laws in Taxation
Stephen B. Yim, J.D., Masters of Laws in Taxation
Ian J. Young, J.D., Masters of Laws in Taxation

OFFICE HOURS: Available immediately after the class, or please call Kurt at 258-3383 (Cellular) or e-mail at kkawafuchi@aol.com; or call Ian at 382-4294 or email ian@ianjyoung.com to schedule an appointment.

TEXTS: FEDERAL ESTATE & GIFT TAXATION (Eight Edition)
(Abridged Edition For Student Use Only); Authors: Richard B. Stephens, Stephen A. Lind, Guy B. Maxfield, Dennis A. Calfee; Publisher: Warren, Gorham & Lamont (1996 Edition); and 2010 or later Supplement to Abridged Edition; Student Use Only

(Optional) FEDERAL ESTATE & GIFT TAXES: Code & Regulations
Including Related Income Tax Provisions (As of December, 2012 or later); Publisher: Commerce Clearing House (CCH)

COURSE PREREQUISITES Accounting 401: Federal Individual Income Taxation with C- or better, or consent.

TENTATIVE This Syllabus is tentative and subject to change.

ALTERNATIVE LOCATIONS In the case of a fire drill, bomb threat or other disturbance, please meet at the grassy area on the south side of George Hall.

STUDENTS WITH DISABILITIES Students with disabilities are encouraged to contact the Kokua Program for information and services. Services are confidential and students are not charged for them. Contact KOKUA at 956-7511, kokua@hawaii.edu, or Student Services Center, Room 13.

GRADING: There will be homework assignments, a Mid-Term Examination, a Final Examination, handout problems (2), class participation and
attendance weighted as follows:

<table>
<thead>
<tr>
<th>Component</th>
<th>Weightage</th>
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<tbody>
<tr>
<td>Homework Assignments</td>
<td>15%</td>
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<tr>
<td>Attendance and Class Participation</td>
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<tr>
<td>Mid-Term Examination</td>
<td>25%*</td>
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<tr>
<td>Final Examination</td>
<td>40%*</td>
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<tr>
<td>Tax Return Problems</td>
<td>20%</td>
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<tr>
<td><strong>TOTAL</strong></td>
<td><strong>100%</strong>*</td>
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* - The instructor reserves the right to curve any exam and the final grade to reflect a fair distribution of grades.

**COURSE GOALS:**

1. Acquire an understanding of federal estate & gift taxation;
2. Learn how to read and analyze the Internal Revenue Code;
3. Strengthen the ability to research and analyze Treasury Regulations, court cases, treatises, and articles relating to a particular code section;
4. Strengthen communication skills;
5. Identify estate & gift tax issues and planning opportunities;
6. Apply estate & gift tax principles to real life problems; and
7. Encourage independent thinking about economic and social implications of the estate and gift tax provisions.

**CLASSROOM APPROACH**

1. Please attend classes;
2. Please be on time; and
3. Please participate.

(1) **Assignments, Attendance, and Participation.** 15% of each student’s grade will be based on homework assignments, attendance, and class participation. Each student shall prepare solutions to the assigned problems. Written solutions will be graded, “Credit”, “Late” (1/2 credit), or “No Credit”. Each student is entitled to one pass where the student will receive full credit for missing 1 assignments.

(2) **Mid-Term Examination.** The Mid-Term Examination comprises 25% of each student's grade. It is tentatively scheduled to be ninety (90) minutes on **Tuesday, July 23, 2013**. The Mid-Term Examination will likely contain certain short answer questions including multiple choice, fill-in the blanks, and true-false questions and might contain one or more problem-solving and essay questions. The Mid-Term Examination is open book and notes.

(3) **Final Examination.** The Final Examination comprises 40% of each student's grade. It is scheduled for the one hundred fifty (150) minutes on **Thursday, August 15, 2013**. The Final Examination will likely contain certain short answer questions including multiple choice, fill-in the blanks, and true-false questions and might contain one or more
problem-solving and essay questions. The Final Examination is open book and notes.

(4) **Handout Problems.** 20% of each student’s grade will be based on two handout tax return problems including at least one (1) tax return problem. Each tax return problem is worth 10% of each student's grade. The first tax return problem will be due on Thursday, July 18, 2013. The second tax return problem will be due on August 8, 2013. Each student shall prepare solutions to the assigned handout problems. Written solutions will be graded, “Credit”, “Late” (1/2 credit), or “No Credit”.

<table>
<thead>
<tr>
<th>Date</th>
<th>Topic, IRC Secs. And Homework</th>
<th>Text Assignments for Class</th>
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<tbody>
<tr>
<td>July 9</td>
<td>Introduction: Overview of Federal Transfer Taxation and Federal Gift Taxation</td>
<td>1.01 – 1.03</td>
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<td>July 11</td>
<td>Federal Gift Taxation: IRC Sections 2501, 2502, 2504(c)/2001(f), 2505, 1015, 102; Problems: 17-4, 5, 35, 38, 41(a), 43(a) (Homework due 07/11/13)</td>
<td>9.01 – 9.03; 9.04-9.04[2], [4],[6],[9] - [11]; 9.05[1]; 9.06; 10.01[1],[2],<a href="a">3</a>;</td>
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<td><strong>Stephen B. Yim and Ian J. Young</strong></td>
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<td>July 16</td>
<td>IRC Sections 2503, 2504, 2511, 2512, 513, 2518, 2522, 2523, 6019, 6075(b), 6081 and 6151; Problems: 17-21, 44 (Gift Tax Q.), 45(a), 46(a);</td>
<td>10.01[4], <a href="a">5</a>; 10.02(1)(a); 10.03[1], 10.07[1], [2], 11.01, 11.02[1], 11.03[1]–[3],[5], 11.04</td>
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<td><strong>Stephen B. Yim and Ian J. Young</strong></td>
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<td>July 18</td>
<td>(Hand In Form 709 Problem No. 1). Review Form 709 Gift Problem No. 1 Review for the Midterm Examination</td>
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<td>July 23</td>
<td><strong>MID-TERM EXAMINATION</strong></td>
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July 30  Gross Estate and Inclusion 4.01 - 4.02[3], 4.03-4.03[1],[3],
IRC Sections 2031, 2032, 2032A, 2033
2035, 2036, 2037, 2038. 2039, 2040,
2041, 2042, and 2044 Problems: 17-11, 17,
32, 34, 36, 37, 39-41, 18-20.
Problems:17-32, 36, 39-41, 42, 44, 48

August 1  Gross Estate, Inclusions, & Deductions 4.09-4.09[2]; 4.11-4.11[2][a],
Problems: 17-42, 44, 48, 54, 55,
18-35, 50, 47 (Problem 18-47, also answer
How much is included in the gross estates?)

August 6  Deductions from the Gross Estate 5.06-5.06[3][a], [d],[h], [9],
and Credits: IRC §§ 2056, 2056A, 2057,
Problems: 17-50, 51, 52, 53; and
Wells case (handout)

August 8  Generation-Skipping Transfer Tax; 1.04, 19.01-19.02[1];
Chapter 14; IRC Sections 2601-2663;
and 2701-2704.
Hand in Form 706 Problem No. 2
Review Form 706 Problem No. 2
Advanced Estate Planning (Possible
topics): FLPs, FLLCs, QPRTs, et al.

August 13  IRS Audits, Appeals, Litigation and Handouts
Collections, & International Estate Planning (International Estate Planning &
IRC Sections 6501(a) – (c), 6503(a)(1),
6511, 6321, 6323(a) and (f), and 6324;
Sections 2501(a), 2511, and 2101-2108;
Review Form 706
REVIEW FOR FINAL EXAM.

August 15  FINAL EXAMINATION