COURSE MEETS: Thursdays, 6:00 p.m. – 8:30 p.m., BusAd D-101
August 29, 2018 through December 19, 2018

INSTRUCTOR: Kurt Kawafuchi, J.D., C.P.A., Masters of Laws in Taxation

OFFICE HOURS: Available immediately after the class, or please call Kurt at 688-8986 or e-mail at kkawafuchi@aol.com to schedule an appointment.

TEXTS: FEDERAL ESTATE & GIFT TAXATION & Supplement (2018 or later Edition) (Abridged Edition For Student Use Only);
Authors: Richard B. Stephens, Stephen A. Lind, Guy B. Maxfield, Dennis A. Calfee; Publisher: Thomson Reuters.

(Optional) FEDERAL ESTATE & GIFT TAXES: Code & Regulations Including Related Income Tax Provisions (As of December31, 2017 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, exams, class participation and attendance weighted as follows:

Homework Assignments, Attendance and Class Participation 20%
Mid-Term Examination 25%
Final Examination 40%
Tax Return Problems 15%
TOTAL 100%*

* - 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.

**Assignments, Attendance, and Participation.** 20% 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.

**Mid-Term Examination.** The Mid-Term Examination comprises 25% of each student's grade. It is currently scheduled to be ninety (90) minutes on **Thursday, October 10, 2019**. 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 **but no internet access**.

**Final Examination.** The Final Examination comprises 40% of each student's grade. It is scheduled for the one hundred fifty (150) minutes on **Thursday, December 12, 2018** or **December 12, 2019 (assuming all students agree); or December 19, 2019 if all students do not agree to switch to December 12, 2019**. 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 **but no internet access**.

**Handout Problems.** 15% of each student’s grade will be based on two handout tax return problems. The first gift tax return problem will be due on Thursday, September 12, 2019 and is worth 5% of the grade. The second tax return problem will be due on December 5, 2019, and is worth 10% of the grade. 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 and Problem Assignments</th>
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<tbody>
<tr>
<td>August 29</td>
<td>Introduction: Overview of Federal Transfer Taxation and Federal Gift Taxation: 9.01 – 9.03; IRC Sections 2501, 2502, 2504(c)/2001(f), 2505, 1015, 102; 9.04-9.04[2], [4],[6],[9] - [11]; 9.05[1]; 9.06; 10.01[1],[2],<a href="a">3</a>;</td>
<td>1.01 – 1.03</td>
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<td>September 5</td>
<td>Overview of U.S. Gift Taxation IRC §§ 2503, 2504, 2511, 2512, 2513, 2518, 2522, 2523, 6019, 6075(b), 6081 and 6151; Problems: 17 21, 44 (Gift Tax Q.), 45(a), 46(a); Federal Gift Taxation &amp; Computation of Gift Taxation; Nonresident Gift Taxation Review Form 709 and IRC Sections above Problems: Chapter 17: 4-5 , 35, 38</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 2.01[1]-[3], 2.02[1] – [2], 2.02[3] 3.01 –3.03[1], 3.04[1], 3.05[1],</td>
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<td>September 19</td>
<td>NO CLASS</td>
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<td>September 26</td>
<td>GUEST SPEAKER RICHARD PECSON</td>
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| October 3    | MARIE IADERTA   
   Administrative Judge,  
   State of Hawaii Board of Appeals, Worker’s Compensation Board  
   (Former Deputy Director, Hawaii Department of Taxation; and  
   Chief Labor Negotiator and Director of Human Resources, State of Hawaii) Review of Problems assigned to date and hand out suggested answers | |
| October 10   | Pre-Exam Final Review  
   MIDTERM EXAMINATION | |
| October 17   | OVERVIEW OF ESTATE TAX  
   IRC Sections 2031, 2032, 2032A, 2033, 2035, 2036, 2037, 2038, 2039, 2040 2041, 2042, and 2044. | 4.01 - 4.02[3], 4.03-4.03[1],[3], 4.04 –4.04[2], 4.05 – 4.05[2], 4.08 –4.08[[5][a], [5][a],[7][a] 10-4.10[2], 4.07-4.07[2][a],[3] |
October 31  
Gross Estate and Inclusions  
IRC §§ 2031, 2032, 2032A, 2033 
2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, and 2044  
Problems: Chapter 17: 32, 34, 37-39, 41(b), 42, 44, 48  

POSSIBLE GUEST SPEAKER DR. ALLEN ZECHA

November 7  
TENTATIVE-NO CLASS  
Off Campus Event: Attend Hawaii Tax Institute and Paper due 11/14

November 14  
Deductions from Gross Estate, 
Deductions from the Gross Estate 
and Credits: IRC §§ 2056, 2056A, 2057, 2053, 2054, 2055, 2058, 2010, 2011, 2013, 6161, and 6166; Wells case (handout); 
Reporting including Forms 3520 
Forms 3520-A IRC Sections 2601-2663  
Problems: Chapter 17: 50 54; 
Chapter 18-35, 50, 47  
(Problem 18-47, also answer: “How much is included in the gross estates?”)

November 21  
(1) Generation Skipping Transfer Tax; 
Including GST” Election; (2) Chapter 14;  
(3) Hawaii estate tax & inheritance taxes;  
(4) International Estate Planning (IRC §§2501(a), 2511, 2101 2108);  
(5) IRS Audits, Appeals, Litigation; and Collections; and Statute of Limitations (IRC §§6501, 6503(a)(1); 6511, 6321, 6323(a) and (f), 6324, 6901; and 31 U.S.C. §3713; 
Handout

November 28  NO CLASS – Happy Thanksgiving!

December 5  Finish above topics: Advanced Estate Planning Topics; Review for Final Exam

December 12  FINAL EXAMINATION (if all students agree to advance final exam)  
If all students do not agree, there will be a guest lecturer and we will cover additional advanced estate planning topics, and review for final exam

December 19  FINAL EXAMINATION (if all students do not agree to December 12, 2019)