

Timothy R. Koski, CPA, LL.M. (Tax), Ph.D.

Accounting Alumni Board Distinguished Professor of Accounting

Phone: 615-898-5529

E-mail: Tim.Koski@mtsu.edu

Education:

Doctor of Philosophy in Accounting, 1998
University of Missouri - Columbia

Masters of Law in Taxation, 1986
Southern Methodist University

Juris Doctor, 1985
University of North Dakota

Bachelor of Science in Business Administration, 1982
Arizona State University

Academic Experience:

Middle Tennessee State University, Murfreesboro, TN
Professor of Accounting (2007 – Present)
Associate Professor of Accounting (2002 – 2007)

University of Southern Indiana, Evansville, IN
Assistant Professor of Accounting (1998 – 2002)

Westminster College, Fulton, MO
Visiting Instructor of Accounting (1996 – 97)

Columbia College, Columbia, MO
Adjunct Professor of Accounting and Business Law (1994 – 1996)

Courses:

ACTG 6510 – Federal Income Tax Research and Planning

ACTG 6530 – Taxation of Pass-Through Entities

ACTG 6540 – Taxation of Business Entities

ACTG 6560 – Special Topics in Taxation

ACTG 4550 – Introduction to Federal Income Taxes

Research:

Journal Articles:

“Home Mortgage Debt Limits Apply on a Per Residence Basis,” *Tax Notes* (November 16, 2015)

“Taxation of Bitcoin – Tax Planning in the Uncertain World of Virtual Currency,” *Practical Tax Strategies*,” (December 2014)

“Optional Home Office Safe Harbor Method,” *Tax Notes* (April 15, 2013)

“Planning for the New 2013 Medicare Taxes on Higher-Level Earned and Investment Income,” *Federal Taxes Weekly Alert*,” (May 3, 2012)

“Planning for the New Medicare Taxes,” *Practical Tax Strategies*,” (April 2012)

“Enhanced Section 179 Deduction and 100% Bonus Depreciation,” *Practical Tax Strategies*,” (October 2011)

“Partners of Law Firm Organized as LLP Held Liable for Self-Employment Tax on Distribution Share of Earnings – Uncertainty on How SE Tax Applies to LLPs and LLCs Remains,” *Taxes* (August 2011)

“Tighter Rules for Excluding Gain on Principal Residence Sales,” *The CPA Journal* (February 2010).

“Supreme Court Limits Trust’s Deduction of Investment Advisory Fees to Two-Percent Floor,” *Taxes* (May 2008).

“A New Twist on the Substitute for Ordinary Income Doctrine: Third Circuit Adopts ‘Family Resemblance’ Test to Characterize Sale of Lottery Proceeds as Ordinary Income,” *The North Dakota Law Review*, Vol. 83, No. 1 (2007).

“The Application of Self-Employment Tax to Limited Liability Companies: A Critical Analysis,” *The Journal of Applied Business Research*, Vol. 23, No. 3 (2007).

“Use Tax Planning to Soothe the Sting of Senior Citizen Medical Expenses,” *Practical Tax Strategies*, (December 2007)

“The Application of Employment Taxes to S Corporation Shareholders – What is ‘Unreasonably Low’ Compensation? *Taxes* (January 2007).

“Uniform Definition of ‘Child’ Alters Tax Benefits Eligibility,” *Federal Taxes Weekly Alert* (November 30, 2006). (An adaptation of an article previously published in *Practical Tax Strategies* (February 2006)).

“Uniform Definition of ‘Child’ Alters Tax Benefits Eligibility,” *Practical Tax Strategies* (February 2006).

“Self-Employment Tax and Limited Liability Companies: When Are LLC Earnings Subject to Self-Employment Tax?” *Taxes* (September 2005).

“Proposed Regulations on Unutilized Basis in Stock Redemption Characterized as a Dividend: Is the Cure Worse than the Disease?” *The Journal of Accounting and Finance Research*, Vol 13, No. 1 (Spring 2005).

“Planning for the New Sales Tax Deduction,” *Today’s CPA* (March/April 2005).

“Deducting Interest on a Qualified Education Loan,” *Tax Notes* (November 29, 2004) (With John Baker).

“Service Quality in Accounting Firms: The Relationship of Service Quality to Client Satisfaction and Firm/Client Conflict,” *The Journal of Business and Economics Research*, Vol. 2, No. 11 (November 2004) (With Craig R. Ehlen and Carl L. Saxby).

“The Impact of Communication on the Accounting Firm/Client Relationship,” *The Journal of Applied Business Research*, Vol. 20, No. 3 (Summer 2004) (With Craig R. Ehlen and Carl L. Saxby).

“Does Change in MACRS Classification Require IRS Consent?” *Practical Tax Strategies* (March 2004).

“R & D Expenditures: Business – Not Investor – Status Helps Develop R & D Deductions,” *Practical Tax Strategies* (January 2004).

“Are Investment Advice Fees Paid by Estates and Trusts Subject to the AGI Two Percent Floor?” *Taxes* (November 2003).

“Qualifying for the Home Sale Safe Harbor,” *Tax Notes* (March 10, 2003).

“The Relationship of Service Quality to Client Satisfaction in an Accounting Firm Setting,” *International Business and Economics Research Journal*, Vol. 1, No. 3 (March 2003). (With Craig R. Ehlen and Carl L. Saxby).

“When Are Prepaid Expenses Deductible?” *The CPA Journal* (February 2003).

“New Passive Activity Regulations Stick to Self-Charged Interest,” *Tax Ideas* (December 18, 2002). (An adaptation of an article previously published in *Practical Tax Strategies* (November 2002)).

“Self-Charged Interest: New Passive Activity Regs. Stick to Self-Charged Interest,” *Practical Tax Strategies* (November 2002).

“Communication Between an Accounting Firm and Its Clients: What Do Clients Prefer?” *The Journal of Accounting and Finance Research*, Vol 10, No. 3 (2002). (With Craig R. Ehlen and Carl L. Saxby).

“The Influence of Prospect Theory and Psychological Commitment on the Tax-Reporting Aggressiveness of Professional Tax Return Preparers,” *International Business and Economics Research Journal*, Vol. 1, No. 4 (2002). (With Craig R. Ehlen).

“IRS Exempts Small Taxpayers from Inventory Accounting,” *The CPA Journal* (December 2001).

“Stock Redemptions: Regulations Clarify Tax on Stock Redemptions Incident to Divorce,” *Practical Tax Strategies* (November 2001).

“S Corporation Shareholders Allowed Tax Windfall: Supreme Court Resolves Controversy Regarding The Impact of Cancellation of Indebtedness Income on S Corporation Shareholders,” *The North Dakota Law Review*, Vol. 77, No. 2 (2001).

“S Corporation Can Deduct Suspended PALs Incurred While a C Corporation,” *The Tax Adviser* (August 2001).

“Should Clients Escape Tax on Lawsuit Proceeds Retained by Attorneys?” *Tax Notes* (July 2, 2001).

“The Influence of Global Framing on the Tax-Reporting Aggressiveness of Non-Professional Taxpayers and Professional Tax Return Preparers,” *The Journal of Accounting and Finance Research* (Summer 2001). (With Craig R. Ehlen and Carl L. Saxby).

“IRS Expands and Clarifies Small Taxpayer Exception to Inventory Accounting,” *Tax Notes* (January 29, 2001).

“How ‘Ignorant’ Must Innocent Spouse Be for Tax Relief?” *Practical Tax Strategies* (January 2001).

“Contingent Fee Paid to Attorney Can Be Income to Client,” *Tax Ideas* (November 15, 2000). (An adaptation of an article previously published in *Practical Tax Strategies* (September 2000)).

“Uncertainty Over Contingent Legal Fees: Contingent Fee Paid to Attorney Can Be Income to Client,” *Practical Tax Strategies* (September 2000).

“Tax Court Splits on Divorce-Related Stock Redemptions,” *Tax Ideas* (July 19, 2000). (An adaptation of an article previously published in *Practical Tax Strategies* (June 2000)).

“Qualifying for the Cash Basis under Rev. Proc. 2000-22,” *Tax Notes* (June 12, 2000).

“Tax Court Splits on Divorce-Related Stock Redemptions,” *Practical Tax Strategies* (June 2000).

“Consumer Attitudes Regarding Income Tax Services,” *The Journal of Accounting and Finance Research* (Summer 2000). (With Craig R. Ehlen and Carl L. Saxby).

“Should a Home Office Deduction Always be Taken?” *Tax Notes* (February 7, 2000). A condensed version of this article also appeared in *The Monthly Digest of Tax Articles* (May 2000).

“Divine Tax Opportunities for Members of the Clergy,” *Tax Ideas* (November 17, 1999). (An adaptation of an article previously published in *Practical Tax Strategies* (October 1999)).

“Parental Support Tax Savings Opportunities,” *The Tax Adviser* (November 1999).

“Taxation of Clergy: Divine Tax Opportunities for Members of the Clergy,” *Practical Tax Strategies* (October 1999).

“IRS Abandons Bausch & Lomb Doctrine,” *The Tax Adviser* (October 1999).

“Individual Taxpayers Disallowed Deficiency Interest Deduction,” *The Tax Adviser* (August 1999).

“Partnership Liabilities when Converting to a Limited Liability Company,” *The CPA Journal* (July 1999).

“Single Member LLCs: Guidance for Former and Future Single-Member LLCs” *Practical Tax Strategies* (March 1999).

“Planning Opportunities with Education Tax Credits,” *Tax Notes* (December 21, 1998).

“IRS Sheds Light on the Soliman Decision,” *The National Public Accountant* (March 1996).

Presentations and Proceedings:

“Increase in Medicare Tax Base on the Horizon: Higher Income Taxpayers Subject to New 3.8% Tax on Unearned Income and Additional 0.9% Tax on Earned Income Beginning in 2013” *Applied Business Research Conference* (January 2012)

* Winner of Best Paper Award

“Social Security Benefits and Early Retirement: Analyzing the Optimal Age to Begin Collecting Social Security Benefits” *Applied Business Research Conference* (January 2008)

“The Application of Self-Employment Tax to Limited Liability Companies: A Critical Analysis,” *Applied Business Research Conference*, (January 2006)

* Winner of Best Paper Award

“An Analysis of Internal Revenue Code Section 221: Qualified Education Loan Interest,” *American Academy of Accounting and Finance Proceedings*, (AAAF annual meeting, December 2004).

“Proposed Regulations on Unutilized Basis in Stock Redemptions Characterized as a Dividend: Is the Cure Worse than the Disease?” *American Academy of Accounting and Finance Proceedings*, (AAAF annual meeting, December 2003).

“The Relationship of Service Quality to Client Satisfaction in an Accounting Firm Setting,” *American Academy of Accounting and Finance Proceedings*, (AAAF annual meeting, December 2002). (With Craig R. Ehlen and Carl L. Saxby).

“Communication Between an Accounting Firm and Its Clients: What Do Clients Prefer?” *American Academy of Accounting and Finance Proceedings*, (AAAF annual meeting, December 2001). (With Craig R. Ehlen and Carl L. Saxby).

“The Influence of Prospect Theory and Psychological Commitment on the Tax-Reporting Aggressiveness of Professional Tax Return Preparers,” *International Business and Economics Research Conference*, (October 2001). (With Craig R. Ehlen).

*Winner of Present Paper Award

“The Influence of Global Framing on the Tax-Reporting Aggressiveness of Non-Professional Taxpayers and Professional Tax Return Preparers,” *American Academy of Accounting and Finance Proceedings*, (AAAF annual meeting, December 2000). (With Craig R. Ehlen and Carl L. Saxby)

“Consumer Attitudes Regarding Income Tax Services,” *American Academy of Accounting and Finance Proceedings*, (AAAF annual meeting, December 1999). (With Craig R. Ehlen and Carl L. Saxby).

“The Effect of Deferred Tax Assets and Liabilities on Security Prices of Public Utilities,” *Midwest American Accounting Association Proceedings*, (Midwest AAA meeting, April 1999).

Teaching Related Publications:

Study Guide for *Taxation of Business Entities*, South-Western Taxation (2013 edition)
Study Guide for *Taxation of Business Entities*, South-Western Taxation (2012 edition)
Study Guide for *Taxation of Business Entities*, South-Western Taxation (2011 edition)
Study Guide for *Taxation of Business Entities*, South-Western Taxation (2010 edition)
Study Guide for *Taxation of Business Entities*, South-Western Taxation (2009 edition)

Other Publications:

Minnesota Sales and Use Tax, National Business Institute, Inc. (1992).

Service:**University Service:**

- College of Business – Faculty Development Committee (2015-2016)
- College of Business – Faculty Governance Committee (2014-2015; 2013-2014; 2012-2013; 2011-2012)
- College of Business – Faculty Committee (2011-2012)
- College of Business Student Committee (2010-2011; 2009-2010; 2008-2009; 2007-2008; 2006-2007)
- College of Business Intellectual Contributions Committee (2002-2003).
- Department of Accounting and Business Law Jacobs Chair in Accounting Excellences Search Committee (2015-2016 (Chair))
- Department of Accounting and Business Law Undergraduate Curriculum Committee (2011-2012; 2010-2011; 2009-2010; 2005-2006)
- Department of Accounting and Business Law Graduate Curriculum Committee (2015-2016; 2014-2015; 2013-2014; 2012-2013; 2009-2010; 2008-2009; 2007-2008; 2006-2007)
- Department of Accounting and Business Law Peer Review Committee (2015-2016; 2014-2015 (Chair); 2012-2013; 2011-2012; 2010-2011; 2009-2010; 2008-2009; 2007-2008; 2006-2007, 2005-2006)
- Department of Accounting and Business Law Faculty Recruitment Committee (2012-2013; 2011-2012; 2010-2011; 2006-2007, 2005-2006, 2004-2005, 2003-2004)
- Department of Accounting and Business Law Accreditation Committee (2003-2004, 2002-2003).
- Department of Accounting and Business Law Mission, Goals, Assessment, and Objectives Committee (2004-2005, 2003-2004)
- Department of Accounting and Business Law Newsletter Committee (2004-2005).
- Department of Accounting and Business Law Journal List Committee (2006-2007)

Community Service:

- Coordinator of Volunteer Income Tax Assistance Program (2004 – 2010) – Arranged and supervised a partnership between the MTSU accounting department and the Mid-Cumberland Community Action Agency whereby MTSU accounting students volunteer to prepare income tax returns for low-income taxpayers through the Internal Revenue Service’s Volunteer Income Tax Assistance program.

Presentations and Speaking Engagements:

- “2015 Tax Update” (December 2015, Mylan, TN)
- “Employer Shared Responsibility and Reporting” (MTSU CPE Day, December 2015)
- “Individual Shared Responsibility and PTC” (MTSU CPE Day, December 2015)
- “Health Care Reform and Employers” (MTSU Alumni Appreciation Day, April 2015)

- “2014 Tax Update, (December 2014, Mylan, TN)
- “The Affordable Care Act – Individual Shared Responsibility and Premium Tax Credit (MTSU CPE Day, December 2014)
- “Issues in Taxation,” (MTSU Alumni Appreciation Day, May 2013, Murfreesboro, TN)
- “2012 Tax Update,” (December 2012, Shelbyville, TN)
- “2012 Business Tax Update,” (December 2012, Martin, TN)
- “2012 Tax Update,” (MTSU CPE Day, December 2012)
- “New Medicare Taxes for Higher Income Taxpayers,” (MTSU CPE Day, December 2012)
- “Selected Schedule C Issues,” (MTSU CPE Day, December 2012)
- “Section 179 and Bonus Depreciation,” (MTSU CPE Day, December 2012)
- “Tax Benefits of Home Ownership,” (MTSU CPE Day, December 2012)
- “2011 Tax Update,” (December 2011, Shelbyville, TN)
- “2011 Tax Update,” (December 2011, Martin, TN)
- “2011 Tax Update,” (MTSU CPE Day, December 2011)
- “Issues in Taxation,” (MTSU Alumni Appreciation Day, April 2011)
- “2010 Tax Update,” (December 2010, Shelbyville, TN)
- “2010 Tax Update,” (December 2010, Martin, TN)
- “2010 Tax Update,” (MTSU CPE Day, December 2010)
- “Issues in Taxation,” (MTSU Alumni Appreciation Day, April, 2010)
- “2009 Tax Update,” (December 2009, Shelbyville, TN)
- “2009 Tax Update,” (MTSU CPE Day, December 2009)
- “2008 Tax Update,” (December 2008, Shelbyville, TN)
- “2007 Tax Update,” (December 2007, Shelbyville TN)
- “Tax Planning” (MTSU Alumni Depreciation Day, April 2007)
- “2006 Tax Update,” (December 2006, Shelbyville, TN).
- “Current Tax Issues,” (MTSU Alumni Appreciation Day, May 2004).
- “Current Tax Issues,” (MTSU Alumni Appreciation Day (May 2003).
- “2002 Tax Update,” (November 2002, Tullahoma, TN).
- Becker CPA Review - Instructor for Becker CPA Review Course at MTSU (2007 – 2011).
- Guest speaker at the 2002 Indiana CPA Society’s Southwestern Indiana Accounting Career Conference (Evansville, IN).
- Guest speaker at the 2000 Indiana CPA Society’s Southwestern Indiana Accounting Career Conference (Evansville, IN).
- “Tax Update – The Economic Growth and Tax Relief Reconciliation Act of 2001,” (December 2001, Jasper, IN).
- “1999 Tax Update,” (October 1999, Evansville, IN).
- “1998 Tax Update,” (October 1998, Evansville, IN).
- Taught a seminar entitled “Taxes and Practices Framework” as part of the “Mini MBA” Program presented by the Indiana University School of Medicine Evansville Center and the Vanderburgh County Medical Society (1999).

Academic Reviews:

- Paper reviewer for the American Academy of Accounting and Finance (2003 – 2009).
- Book review of *Principles of Taxation for Business and Investment Planning*, 2011 edition.
- Book review of *West Federal Taxation: Corporations, Partnerships, Estates & Trusts*, 2008 edition.
- Book review of *West Federal Taxation: Corporations, Partnerships, Estates & Trusts*, 2007 edition.
- Book review of *West Federal Taxation: Taxation of Business Entities*, 2004 Edition. The book review was published in the Spring 2004 edition of *The Journal of the American Taxation Association*.
- Book Review of *Prentice Hall's Federal Taxation 2004: Individuals* (2004).
- Book review of *Prentice Hall's Federal Taxation 2004: Corporations, Partnerships, Estates and Trusts* (2004).

Service as Session Chair:

- 2012 *Applied Business Research Conference* (January 2012, Orlando, FL)
- 2008 *Applied Business Research Conference* (January 2008, Orlando, FL)
- 2006 *Applied Business Research Conference* (January 2006, Orlando, FL).
- 2001 *International Business and Economics Research Conference* (October 2001, Reno, NV).
- 2001 *American Academy of Accounting and Finance Conference* (December 2001, New Orleans, LA).

Professional Experience:

Timothy R. Koski Consulting Service (1/93 – present)

Self-employed consultant in all areas of income tax planning and compliance.

Hall, Byers & Hanson, St. Cloud, MN

Attorney (11/88 - 11/89 & 7/90 - 12/92)

Practice in all areas of business law, with an emphasis in contracts, business formation, estate planning, and income taxation.

Eide Helmeke & Co., Sioux Falls, SD

Tax Manager (11/89 - 7/90)

Responsible for all areas of income tax planning and compliance.

Touche Ross & Co., Minneapolis, MN

Tax Consultant (6/86 - 10/88)

Research and compliance in all areas of taxation.