COURSE SYLLABUS

Required Text: Gustafson, Peroni and Pugh, Taxation of International Transactions, Fourth Edition (Publisher: West Publishing)

Required Text: Selected Sections of Internal Revenue Code and Regulations, International Income Taxation (Publisher: CCH)


Class Lecture: The lecture will cover topics as described in the Course Outline.

Class Preparation: Each student is expected to do the reading from the text, as well as the Code and Regulations associated with the reading for that class, before the class. If an IRS Form is referenced for the class, students are expected to bring a copy of the form and instructions to the class. The students will be expected to be able to discuss aspects of the reading in the class when called upon in the class. Students should bring a calculator to class for some of the in-class work, class tests and major class test.

Grading: Grades will be based upon class participation (20%), results of pop quizzes/class tests (30%), class presentation (20%) and a major class test (30%). All pop quizzes/class tests and the class test will be open book. The class test will consist of completing a case study encompassing the learning from the course.

Contact details: narelle.mackenzie@goodrich.com
Telephone: (619) 691-3043
Class: BA249
Class days: Monday and Wednesday
Class time: 6.00pm - 9.40pm
Student Learning Outcomes:

Learning Objectives:

The MSA program has six student learning objectives. This course is intended to address the following program level objectives:

SLO4 Research

Desired level: Analysis (4)

Students will be able to use relevant research tools and academic/professional literature to analyze or take a position in business situations.

SLO5 Problem Solving/Critical Thinking/Technical Competence

Desired level: Synthesis (5)

Students will be able to address unstructured problems in the areas of taxation. Unstructured problem solving involves using discipline-specific technical knowledge and skills to anticipate issues, formulate hypotheses, problem solve, develop conclusions, or recognize the strategic role of accounting in business organizations and society.

SLO6 International

Desired Level: Comprehension [2]

Students will be able to comprehend an international perspective and appreciate the significance of diversity and cultural differences in the global business environment.

At the end of this course students should be able to:

- Identify and describe key US international tax concepts
- Apply tax law by performing income tax calculations on international transactions
- Research US international tax law and apply to transactions to comply with the law while maximizing after tax cash flows
- Describe how U.S. and foreign taxes are interrelated in calculating total US tax liabilities and payments
## Course Outline

<table>
<thead>
<tr>
<th>Class</th>
<th>Topic</th>
<th>Reading</th>
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<tbody>
<tr>
<td>1</td>
<td>Introduction&lt;br&gt;Course Overview&lt;br&gt;Residency, Sec. 911</td>
<td>Code: 871-877, 881-885, 911 and Regs</td>
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<td>2</td>
<td>Jurisdiction to Tax&lt;br&gt;Scheme of Taxation</td>
<td>Code: 7701(b) and Regs. &lt;br&gt;Text: pp 16-60 (¶ 1070-1225)</td>
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<td>4</td>
<td>Trade or Business&lt;br&gt;FDAP&lt;br&gt;Withholding</td>
<td>Code: 871-875, 881-885, 1441-2 and Regs. &lt;br&gt;Text: pp 141-179, 228-241, 260-276 &lt;br&gt;(¶ 3000-3140, 4000-4045, 4110-4180) &lt;br&gt;Case: SDI Netherlands (¶ 4151) &lt;br&gt;IRS Form(s): W8-BEN, 1042</td>
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<td>5</td>
<td>FDAP&lt;br&gt;Earnings stripping&lt;br&gt;Branch Profits Tax,</td>
<td>Code: 163(j), 884(a), 897 and Regs. &lt;br&gt;Text: pp 222-227, 277-292 &lt;br&gt;Sec. 897 (¶ 3230-3240, 4185-4275) &lt;br&gt;IRS Form(s): 1120-F, 5472</td>
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<td>7</td>
<td>Class test 2 (30 minutes)&lt;br&gt;Tax Treaties</td>
<td>Code: 894 &lt;br&gt;Text: pp 62-75, 181-220, 242-259, 417-484 &lt;br&gt;(¶ 1235-1295, 3160-3220, 4050-4102, 5380-5390) &lt;br&gt;IRS Form(s): 8833</td>
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<td>8</td>
<td>Class test 3 (30 minutes)&lt;br&gt;CFC, Subpart F, 956</td>
<td>Code: 951-958 &lt;br&gt;Text: pp 485-581(¶ 6000-6190)</td>
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<td>Class</td>
<td>Topic</td>
<td>Reading</td>
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| 9     | CFC-continued, 959, 1248   | **Code:** 898, 959, 964, 1248, 6038, 6046  
**Text:** pp 584-602, 603-608  
(¶ 6200-6230, 6240-6245)  
**Cases:** Fischbein, Ashland Oil (¶ 11095, 11110)  
**IRS Form(s):** 5471 |
| 10    | **Major class test** (120 minutes) |
| 11    | Section 482                | **Code:** 482 and Regs  
**Text:** pp 710-760 (¶ 8000-8175) |
| 12    | **Class presentations**    |                                   |