I. **TEXT AND TREATISES**

**Required:**

Boris I. Bittker & Lawrence Lokken, *Fundamentals of International Taxation*

Lawrence Lokken, *Fundamentals of International Taxation - Study Problems* (5th ed.)

Supplemental Materials, *International Taxation II*

**Highly Recommended:**


II. **GRADING**

1. **Final Exam.** There will be one final examination at the end of the quarter. The exam will be three hours long. During the exam, you may consult any written materials.

2. **Problem Assignments.** Students will be assigned problems in groups, for which they will be responsible for presenting in class. A total of .2 (two-tenths) will be deducted from the final exam grade for inadequate preparation and presentation for the assigned problems, or failure to attend class when the student’s group is presenting. Inadequate preparation includes not reviewing the cited authorities in the problems and assigned materials or not determining the answers to the questions asked. Bonus points will not be awarded for participation, as all students are expected to be prepared and participate in class, with greater participation and preparation for days on which the student has been assigned problems to present. If you are unable to attend class the day you have assigned problems to present, you are responsible for switching your assignment with another student in the course and letting me know of the change in advance.
III. PREPARATION

It is essential that students in International Taxation II come to class prepared, whether or not they have assigned problems to present that day. The material is difficult and cannot be learned and absorbed without attending class and being prepared throughout the quarter. In addition, the material builds from class to class; the units are not isolated areas of learning. A key part of learning the material is to determine the solutions to the problems yourselves. I do not provide written answers to the problems. We will thoroughly go over the answers to the problems in class, and we can meet individually as often as you need to for further explanations and answers to questions.

IV. COMPUTERS

Computers may be used during class only for note taking. Please do not access the internet during class, which is distracting to you and students around you. If you cannot refrain, please sit in the back row so as to not disturb others.

V. CLASS SCHEDULE

Classes meet on Thursday evenings from 6:10 p.m. - 8:50 p.m. We will cover the subjects listed on the following pages under "Outline of Course"; dates are estimates only.

OUTLINE OF COURSE

January 10

OVERVIEW OF OUTBOUND INTERNATIONAL TAXATION

Materials: Monica Gianni, Outbound International Tax

FOREIGN TAX CREDIT: Generally

Problems: UNIT VII.A

FOREIGN TAX CREDIT: Definition of Foreign Income Tax and Taxpayer

Problems: Unit VII.B - Nos. 1, 2, 3, 4(a)-(c), 5

Wilson v. CIR, 7 TC 1469 (1946)
January 17

FOREIGN TAX CREDIT: Credit Limitation

Problems: Unit VII.C

FOREIGN TAX CREDIT: Indirect Credit

Problems: Unit VII.D – Nos. 1, 4, 5

January 24 and 31

DEFERRAL OF U.S. TAXES: Subpart F Generally

Problems: Unit VIII.A – Nos. 1-8

Materials: Textron, Inc. v. CIR, 117 TC 67
Steps to Compute Subpart F Income Inclusion
Notice 2007-13

February 7

DEFERRAL OF U.S. TAXES: CFC Ownership of U.S. Property

Problems: Unit VIII.B – Nos. 2-3

ADDITIONAL ISSUES: Effects of Losses

Problems: Unit IX.A – Nos. 1-4

February 14

ADDITIONAL ISSUES: Sales of Goods Produced by Taxpayer

Problems: Unit IX.C

PASSIVE FOREIGN INVESTMENT COMPANIES

Problems: Unit X
February 21

TRANSFER PRICING

Problems: Unit XI.A – Nos. 1, 2, 6 and 7; Unit XI.C

OECD Model and Transfer Pricing Guidelines (2010), Preface, Glossary, Chapters 1 and 6

February 28

FOREIGN ENTITIES: Outbound Transfers

Problems: Unit XIV.A – Nos. 1-7

FOREIGN ENTITIES: Taxable Dispositions of Foreign Corporations

Problems: Unit XIV.B - Nos. 1(a), 1(b), and 2(a)

March 7

FOREIGN ENTITIES: Nonrecognition Transfers

Problems: Unit XIV.C - Nos. 1 and 2

March 14 - REVIEW