

Accounting
Course Number: 22:010:631
Course Title: International Tax II

COURSE DESCRIPTION

The United States Taxation of International Transactions is the most dynamic area in the field of Federal Income Taxation. It is also one of the most complex areas of U.S. Taxation. This course is an in depth study of “outbound” transactions-Subpart F and the Foreign Tax Credit. A student who completes the course will gain a strong understanding of the principles, issues and planning concerning the U.S. Taxation of Foreign Transaction. This is an important course to complete your tax knowledge.

COURSE MATERIALS

- Internal Revenue Code: To be discussed in the First Class
- Treasury Regulations: To be discussed in the First Class
- Instructor’s Handouts: Supplied to Student
- Kuntz & Peroni: U.S. International Taxation (Optional)-To be discussed the first day of class.

LEARNING GOALS AND OBJECTIVES

- This course is designed to help students develop skills and knowledge in the following area(s):

- **U.S. Taxation of “Outbound Taxation,” Subpart F and the Foreign Tax Credit.**

- Students who complete this course will demonstrate the following:

- **A student who completes the course will gain a strong understanding of the principles, issues and planning concerning the U.S. Taxation of Foreign Transaction.**

- Students develop these skills and knowledge through the following course activities and assignments:

Students will learn how to integrated the Internal Revenue Code, Treasury Regulations, IRS Pronouncements and Case Law regarding the subject matters taught in the course. The student will develop analytical skills on how to identify and resolve complex Federal International tax issues of “outbound” transactions.

PREREQUISITES

NONE

ACADEMIC INTEGRITY

I do NOT tolerate cheating. Students are responsible for understanding the RU Academic Integrity Policy (<http://academicintegrity.rutgers.edu/>).

I will strongly enforce this Policy and pursue *all* violations. On all examinations and assignments, students must sign the RU Honor Pledge, which states, “On my honor, I have neither received nor given any unauthorized assistance on this examination or assignment.” I will screen all written assignments through *SafeAssign* or *Turnitin*, plagiarism detection services that compare the work against a large database of past work. Don’t let cheating destroy your hard-earned opportunity to learn. See business.rutgers.edu/ai for more details.

ATTENDANCE AND PREPARATION POLICY

- Expect me to attend all class sessions. I expect the same of you. If I am to be absent, my department chair or I will send you notice via email and Canvas as far in advance as possible. If you are to be absent, report your absence in advance at <https://sims.rutgers.edu/ssra/>. If your absence is due to religious observance, a Rutgers-approved activity, illness, or family emergency/death and you seek makeup work, also send [me/TA] an email with full details and supporting documentation [within X days of your first absence]. [Explain other aspects of your absence policy in detail; it will save you trouble later.]
 - For weather emergencies, consult the campus home page. If the campus is open, class will be held.
 - Expect me to arrive on time for each class session. I expect the same of you. [If you are going to be tardy, then . . .]
 - Expect me to remain for the entirety of each class session. I expect the same of you. [If you are going to leave early, then . . .]
 - Expect me to prepare properly for each class session. I expect the same of you. Complete all background reading and assignments. You cannot learn if you are not prepared. The minimum expectation is that for each [X]-hour class session, you have prepared by studying for at least twice as many hours.
 - Expect me to participate fully in each class session. I expect the same of you. Stay focused and involved. You cannot learn if you are not paying attention.
-

CLASSROOM CONDUCT

I believe in a “seminar” style class with interchanges between the students and the instructor. I want students to ask questions and participate.

EXAM DATES AND POLICIES

There is a single final exam at the end of the course.

GRADING POLICY

Course grades are determined as follows:

How well a student does on the final exam.

Other Matters:

- Extra credit: **None**
- Grade distribution: **No Set Grade Distribution**
- Grade posting: **I will send to you by email your grade within 48 hours of completing the Exam.**
- Return of graded items: **I will send to you by email your grade within 48 hours of completing the Exam.**

COURSE SCHEDULE

TENTATIVE SCHEDULE:

1. U.S. Ownership of Foreign Corporations
2. U.S. Ownership of Foreign Corporations-CFC's Overview
- 2 CFC's Overview
- 3 Subpart F
- 4 Subpart F
- 5 §956/§1248
- 6 GILTI/FDII
- 7 GILTI/FDII/BEAT
- 8 Foreign Tax Credit-Basic Concepts
- 9 Foreign Tax Credit-Overall Limitations

Notes:

1. The Final Exam will be given out on () and will be due back ().
2. **Checking Email:** I send many things and notices out by email. YOU MUST CHECK YOUR EMAIL TWICE A DAY, ONE IN THE MORNING AND ONCE IN THE EVENING IF YOU WANT TO TAKE THIS CLASS AND KEEP UP TO DATE. I HAVE NO PATIENCE FOR PEOPLE WHO CANNOT CHECK THEIR EMAIL AND THEN STATE THAT THEY DID NOT

GET SOMETHING. ALSO, IF YOU THINK YOU ARE MISSING SOMETHING, CONTACT ME.

SUPPORT SERVICES

If you need accommodation for a *disability*, obtain a Letter of Accommodation from the Office of Disability Services. The Office of Disability Services at Rutgers, The State University of New Jersey, provides student-centered and student-inclusive programming in compliance with the Americans with Disabilities Act of 1990, the Americans with Disabilities Act Amendments of 2008, Section 504 of the Rehabilitation Act of 1973, Section 508 of the Rehabilitation Act of 1998, and the New Jersey Law Against Discrimination. More information can be found at ods.rutgers.edu.

[Rutgers University-New Brunswick ODS phone (848)445-6800 or email dsoffice@echo.rutgers.edu]

[Rutgers University-Newark ODS phone (973)353-5375 or email ods@newark.rutgers.edu]

If you are *pregnant*, the Office of Title IX and ADA Compliance is available to assist with any concerns or potential accommodations related to pregnancy.

[Rutgers University-New Brunswick Title IX Coordinator phone (848)932-8200 or email jackie.moran@rutgers.edu]

[Rutgers University-Newark Office of Title IX and ADA Compliance phone (973)353-1906 or email TitleIX@newark.rutgers.edu]

If you seek *religious accommodations*, the Office of the Dean of Students is available to verify absences for religious observance, as needed.

[Rutgers University-New Brunswick Dean of Students phone (848)932-2300 or email deanofstudents@echo.rutgers.edu]

[Rutgers University-Newark Dean of Students phone (973)353-5063 or email DeanofStudents@newark.rutgers.edu]

If you have experienced any form of *gender or sex-based discrimination or harassment*, including sexual assault, sexual harassment, relationship violence, or stalking, the Office for Violence Prevention and Victim Assistance provides help and support. More information can be found at <http://vpva.rutgers.edu/>.

[Rutgers University-New Brunswick incident report link: <http://studentconduct.rutgers.edu/concern/>. You may contact the Office for Violence Prevention and Victim Assistance at (848)932-1181]

[Rutgers University-Newark incident report link:

https://cm.maxient.com/reportingform.php?RutgersUniv&layout_id=7 . You may also contact the Office of Title IX and ADA Compliance at (973)353-1906 or email at TitleIX@newark.rutgers.edu. If you wish to speak with a staff member who is confidential and does **not** have a reporting responsibility, you may contact the Office for Violence Prevention and Victim Assistance at (973)353-1918 or email run.vpva@rutgers.edu]

If students who have experienced a temporary condition or injury that is adversely affecting their ability to fully participate, you should submit a request via <https://temporaryconditions.rutgers.edu> .

If you are a military **veteran** or are on active military duty, you can obtain support through the Office of Veteran and Military Programs and Services. <http://veterans.rutgers.edu/>

If you are in need of **mental health** services, please use our readily available services.

[Rutgers University-Newark Counseling Center: <http://counseling.newark.rutgers.edu/>]

[Rutgers Counseling and Psychological Services–New Brunswick: <http://rhscaps.rutgers.edu/>]

If you are in need of **physical health** services, please use our readily available services.

[Rutgers Health Services – Newark: <http://health.newark.rutgers.edu/>]

[Rutgers Health Services – New Brunswick: <http://health.rutgers.edu/>]

If you are in need of **legal** services, please use our readily available services: <http://rusls.rutgers.edu/>

Students experiencing difficulty in courses due to **English as a second language (ESL)** should contact the Program in American Language Studies for supports.

[Rutgers–Newark: PALS@newark.rutgers.edu]

[Rutgers–New Brunswick: eslpals@english.rutgers.edu]

If you are in need of additional **academic assistance**, please use our readily available services.

[Rutgers University-Newark Learning Center: <http://www.ncas.rutgers.edu/rlc>

[Rutgers University-Newark Writing Center: <http://www.ncas.rutgers.edu/writingcenter>]

[Rutgers University-New Brunswick Learning Center: <https://rlc.rutgers.edu/>]

[Optional items that many faculty include:

- Students must sign, date, and return a statement declaring that they understand the RU Academic Integrity Policy.

- Students must sign, date, and return a statement declaring that they understand this syllabus.]