Instructor: Raymond F. Wacker

Office: 222 Rehn

Office Hours: W 5:00 or by appointment

Telephone: Office 453-1403

E-mail: wacker@siu.edu

Course Materials:

Required:
  Lecture Outlines

Reference Materials in Law School Library:

Rhoades and Langer, Income Taxation of Foreign Related Transactions. 5 Vols. (R & L)

Course Requirements:

  2 examinations and 1 paper and presentation.

Grade Determination:

  Paper and presentation - 20%
  1st examination - 40%
  2nd examination - 40%

Forthcoming events:

  Topic   Subject          R & L Reference

Part 1: U.S. Income of Foreign Nationals

  1  Residency          R & L - § 1A
2 Nonresident Aliens and Foreign Corporations
   R & L - § 2

3 Branch Profits Tax
   R & L - § 2.32(6)

4 Foreign Investment in U.S. Real Estate (FIRPTA)
   R & L - § 2A

5 Foreign Trusts and Estates; Gift and Estate Tax
   R & L - § 2B

Part 2: Taxation of Foreign Income of U.S. Taxpayers

6 Income Sourcing Rules
   R & L - § 2.11

7 U.S. Taxpayers Working Abroad
   R & L - § 1B

Part 3: Foreign Tax Credit

8 General Operation of the Foreign Tax Credit
   R & L - § 5

9 Foreign Tax Credit Limitations
   R & L - § 5

Part 4: Special Corporations

10 Controlled Foreign Corporations
   R & L - § 3
Part 5: Special Problems

13 Taxation of U.S. Territories
   R & L - § 4.11-4.16

14 Transfer Pricing
   R & L - § 7.11 - 7.14

15 Foreign Currency Translations
   R & L - § 6

16 Tax Free Exchanges
   R & L - § 7.01 - 7.05

17 Bribes and Boycotts
   R & L - § 4.31 - 4.34

Part 6: Tax Treaties

18 Standard Provisions of Tax Treaties
   R & L - § 9 - 14

19 Specific Example of a Tax Treaty

20 FATCA

Examination Dates:

4 March 1st Examination
13 May 2nd Examination
Paper and Presentation:

Each student must select a foreign nation’s tax system. The selection is on a first come first serve basis. The humble instructor must approve the selection. The student must summarize the tax system of the foreign nation involved. Presentation will be given in class on the last day of class. The student must also submit a written report on that nation’s tax system. This paper is due at the beginning of the second examination.

Statement Regarding Cheating:

Any student determined to be cheating on any examination or assignment or whose conduct is determined to aid in the commission of cheating will receive an F in this course and be referred to the University for disciplinary action in accordance with University regulations. The humble instructor will insist that the maximum penalty possible be enforced for each and every infraction. Plagiarism is considered cheating.

Statement Regarding Possible Amendments to Syllabus:

The humble instructor reserves the right to amend this syllabus in any manner at any time. Such amendments will be announced in class.

Other Announcements:

None at this time.
IMPORTANT DATES *

Semester Class Basics ........................................... 01/10/2015
Last day to add a class (without instructor permission) ........... 01/25/2015
Last day to withdraw completely and receive a 100% refund ....... 02/03/2015
Last day to drop a course using SakaiNet ......................... 04/06/2015
Last day to file appeals application (for name to appear in Commencement) .................................. 05/18/2015
Final exam period: .............................................. 5/11-5/15/2015

Note: For outreach, internet, and short course drop/add dates, visit Registrar’s Academic webpage: http://www2.siu.edu/registrar/admit/.

SPRING SEMESTER HOLIDAYS

Martin Luther King, Jr.’s Birthday 01/19/2015
Spring Break 03/07-03/11/2015

WITHDRAWAL POLICY – Undergraduate only

Students who officially register for a session may not withdraw merely by the stopping of attendance. An official withdrawal form needs to be initiated by the student and processed by the University. For the procedures to follow when dropping courses and when withdrawing from the University, please visit http://www2.siu.edu/admissions/academic村村民 hairy duckling.html

INCOMPLETE POLICY – Undergraduate only

An INC is assigned when, for reasons beyond their control, students are unable to complete all class assignments. An INC must be changed to a completed grade within one semester following the term in which the course was taken, or graduation, whichever occurs first. Should the student fail to complete the course within the time period designated, that is, by no later than the end of the semester following the term in which the course was taken, or graduation, whichever occurs first, the incomplete will be converted to a grade of F and the grade will be computed in the student’s grade point average. For more information please visit: http://www2.siu.edu/admissions/academic村村民 hairy duckling.html

REPEAT POLICY

An undergraduate student may, for the purpose of raising a grade, enroll in a course for credit no more than two times (two total enrollments) unless otherwise noted in the course description. For students receiving a letter grade of A, B, C, or F, the course repetition must occur at Southern Illinois University Carbondale. Only the most recent (last) grade will be calculated in the overall GPA and count toward hours earned. See full policy at http://www2.siu.edu/admissions/academic村村民 hairy duckling.html

GRADUATE POLICIES

Graduate policies often vary from Undergraduate policies. To view the applicable policies for graduate students, please visit http://www2.siu.edu/admissions/academic村村民 hairy duckling.html

DISABILITY POLICY

Disability Support Services provides the required academic and programmatic support services to students with permanent and temporary disabilities. DSS provides centralized coordination and referral services. To utilize DSS services, students must come to the DSS to open cases. The process involves interviews; review of student-supplied documentation, and completion of Disability Accommodation Agreements. http://www2.siu.edu/disabilityservices/index.html

PLAGIARISM CODE

http://www2.siu.edu/admissions/academic村村民 hairy duckling.html

MORRIS LIBRARY HOURS
http://morris.library.siu.edu/about

SAFETY AWARENESS FACTS AND EDUCATION

Title IX makes it clear that violence and harassment based on sex and gender is a Civil Rights offense subject to the same kinds of accountability and the same kinds of support applied to offenses against other protected categories such as race, national origin, etc. If you or someone you know has been harassed or assaulted, you can find the appropriate resources here: http://safe.siu.edu

SALUKI CARES

The purpose of Saluki Cares is to develop, facilitate, and coordinate a university-wide program of care and support for students in any type of distress—physical, emotional, financial, or personal. By working closely with faculty, staff, students, and their families, SIU will continue to display a culture of care and demonstrate to our students and their families that they are an important part of the community. For Information on Saluki Cares, (618) 453-3714, or saluki.cares@siu.edu, http://salukicare.siu.edu/index.html

EMERGENCY PROCEDURES

Southern Illinois University Carbondale is committed to providing a safe and healthy environment for study and work. We ask that you become familiar with the SIU Emergency Response Plan and Building Emergency Response Team (BERT) programs. Please reference the Building Emergency Response Protocols for Saluki attachments on the following pages. It is important that you follow these instructions and stay with your instructor during an evacuation or sheltering emergency.

INCLUSIVE EXCELLENCE

SIU contains people from all walks of life, from many different cultures and sub-cultures, and representing all strata of society, nationalities, ethnicities, lifestyles, and affiliations. Learning from and working with people who differ is an important part of education as well as an essential preparation for any career. For more information please visit: http://www2.siu.edu/housing/officeScheduler/index.html

LEARNING AND SUPPORT SERVICES

Help is within reach. Learning support services offers free tutoring on campus and math labs. To find more information please visit the Center for Learning and Support Services website:
Tutoring: http://tutorial.siu.edu/
Math Labs: http://tutorial.siu.edu/math_tutoring/index.html

WRITING CENTER

The Writing Center offers free tutoring services to all SIU students and faculty. To find a Center or Schedule an appointment please visit: http://www2.siu.edu/write.siu.edu

AFFIRMATIVE ACTION & EQUAL OPPORTUNITY

Our office’s main focus is to ensure that the university complies with federal and state equity policies and handles reporting and investigating of discrimination cases. For more information visit: http://diversity.siu.edu/#

Additional Resources Available:

SALUKINet: https://salukinet.siu.edu/no/home/displayLogin
ADVISMENT: http://advisement.siu.edu/
SIU ONLINE: http://online.siu.edu/

Spring 2015 E.O./EEO