SYLLABUS
ACCT 548
SPRING 2016

Instructor: Raymond F. Wacker
Office: 222 Rehn
Office Hours: W 5:00 or by appointment
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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:

<table>
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<tr>
<th>Topic</th>
<th>Subject</th>
<th>R &amp; L Reference</th>
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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
11 Repatriation of Earnings

R & L - § 7.06

12 Foreign Passive Income Corporations

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:

9 March 1st Examination
11 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.