

LAWS70331 Taxation of Mergers and Acquisitions

Credit Points:	12.50
Level:	7 (Graduate/Postgraduate)
Dates & Locations:	2010, Parkville This subject commences in the following study period/s: October, Parkville - Taught on campus.
Time Commitment:	Contact Hours: The total class time is between 24 and 26 hours. Total Time Commitment: Visit the Melbourne Law Masters website for more information about this subject.
Prerequisites:	Visit the Melbourne Law Masters website for more information about this subject.
Corequisites:	Visit the Melbourne Law Masters website for more information about this subject.
Recommended Background Knowledge:	Visit the Melbourne Law Masters website for more information about this subject.
Non Allowed Subjects:	Visit the Melbourne Law Masters website for more information about this subject.
Core Participation Requirements:	Visit the Melbourne Law Masters website for more information about this subject.
Coordinator:	Mr Aldrin De Silva
Contact:	For the most up-to-date information about this subject, contact the Melbourne Law Masters Office by email at law-masters@unimelb.edu.au or phone 8344 6190 or alternatively visit the subject website: www.masters.law.unimelb.edu.au
Subject Overview:	<p>This is an advanced company tax subject consisting of a detailed examination of the tax rules applied to corporate takeovers, mergers and acquisitions and disposals. The subject will focus on application of the rules to practical case studies for consolidated corporate groups in Australia.</p> <p>Principal topics will include:</p> <ul style="list-style-type: none"> # Key elements of Part 3-90 of the Income Tax Assessment Act 1997 (Cth) on tax of consolidated corporate groups, including: <ul style="list-style-type: none"> - Tax cost setting on entry - Rules for exit from a consolidated group - Modifications for restructures, group takeovers and acquisitions - Treatment of losses in mergers and acquisitions - Liability issues and tax sharing agreements # Capital gains tax rollovers for corporate mergers, acquisitions and disposals in Divisions 124, 125 and 126 of the Income Tax Assessment Act 1997 (Cth) in particular Div 124-M (scrip for scrip), Div 126-B and various corporate restructure rollovers # The interaction of other tax rules relating to mergers and acquisitions, including the imputation system and financing tax rules.
Objectives:	<p>A student who has successfully completed this subject should:</p> <ul style="list-style-type: none"> # Understand the detailed legal rules applicable in the taxation of corporate mergers and acquisitions, particularly as they apply to consolidated groups # Have a good knowledge of legal and tax structures used for corporate mergers and acquisitions in practice # Be aware of current problems and reforms in taxation of corporate mergers and acquisitions.
Assessment:	Assignment (30%) Take-home examination (70%) (3-6 December)
Prescribed Texts:	Visit the subject website for more information
Breadth Options:	This subject is not available as a breadth subject.

Fees Information:	Subject EFTSL, Level, Discipline & Census Date, http://enrolment.unimelb.edu.au/fees
Generic Skills:	Visit the Melbourne Law Masters website for more information about this subject.
Links to further information:	http://www.masters.law.unimelb.edu.au/