

LAWS70124 US Corporate and International Tax

Credit Points:	12.50
Level:	7 (Graduate/Postgraduate)
Dates & Locations:	2011, Parkville This subject commences in the following study period/s: July, Parkville - Taught on campus.
Time Commitment:	Contact Hours: The total class time is between 24 and 26 hours. Total Time Commitment: Not available
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.
Contact:	For more information, contact the Melbourne Law Masters office. Email law-masters@unimelb.edu.au (mailto:law-masters@unimelb.edu.au) or phone +61 3 8344 6190. Alternatively, visit our website: www.masters.law.unimelb.edu.au (http://www.masters.law.unimelb.edu.au/)
Subject Overview:	The US federal income tax is contained in the Internal Revenue Code (Title 26 of the United States Code), together with regulations, cases, rulings and other documents produced by Treasury and the Internal Revenue Service (IRS). This subject will examine US international income tax rules, with particular reference to aspects that are relevant to Australians investing in the US and to US investment offshore in Australia. Principal topics will include the US tax rules on: <ul style="list-style-type: none"> # US international tax # Cross-border portfolio investment # US tax treaties # Transfer pricing # Foreign tax credit # Controlled foreign company (CFC) rules.
Objectives:	International taxation has an extensive reach and its relevance to cross-border business is pervasive. The United States (US) has been a leader in this field for many years, and its laws and principles are important both in themselves and for other countries. This subject provides a detailed understanding of US international tax rules for inbound and outbound investment, including: <ul style="list-style-type: none"> # Taxation of portfolio and business cross-border investment # Transfer pricing # Thin capitalisation # Cross-border mergers # The foreign tax credit # An introduction to the rules regarding controlled foreign corporations and foreign investment companies.
Assessment:	Visit the Melbourne Law Masters website for more information about this subject.

Prescribed Texts:	Core subject materials will be provided free of charge to all students. Some subjects require further texts to be purchased. Visit the Melbourne Law Masters website for more information about this subject.
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