

730-746 International Aspects of US Income Tax

Credit Points:	12.50
Level:	7 (Graduate/Postgraduate)
Dates & Locations:	2009, This subject commences in the following study period/s: July, - Taught on campus.
Time Commitment:	Contact Hours: 24 - 26 contact hours per subject. Total Time Commitment: The time commitment for this subject depends on the candidate's background and experience.
Prerequisites:	N.A.
Corequisites:	N.A.
Recommended Background Knowledge:	None
Non Allowed Subjects:	None
Core Participation Requirements:	N.A.
Coordinator:	Prof Yariv Brauer
Subject Overview:	<p>Objectives:</p> <p>A candidate who has successfully completed the subject should have:</p> <ul style="list-style-type: none"> # A general understanding of the basic principles of United States Federal income tax. The subject will highlight differences from, and similarities to, Australian income tax # An understanding of United States taxation of the corporation as a business entity, including rules for definition of the corporate tax base, corporate-shareholder transactions, mergers and acquisitions, and an introduction to the consolidated group rules # An understanding of United States international tax rules for inbound and outbound investment, including taxation of portfolio and business cross-border investment; transfer pricing; thin capitalisation; cross-border mergers; the foreign tax credit; and an introduction to the rules regarding controlled foreign corporations and foreign investment companies. <p>Syllabus:</p> <p>The United States 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). The subject will examine United States income tax, with particular reference to aspects that are relevant to Australians investing in the United States and to United States investment offshore in Australia.</p> <p>Principal topics will include:</p> <ul style="list-style-type: none"> # Basic principles of the United States Federal income tax # United States corporate tax # United States international tax.
Assessment:	Class assignment (30%) Take-home examination (70%) (12-15 September)
Prescribed Texts:	Core subject materials will be provided free of charge to all students. Some subjects require further texts to be purchased. Please visit the subject homepage on the Melbourne Law Masters website by following the link at the bottom of this subject entry.
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:	Please see the Subject Objectives for this information.

**Links to further
information:**

For the latest information on this subject, please visit: <http://www.masters.law.unimelb.edu.au/subject/730746>