Welcome to International Tax I

The aim of this course is to gain an understanding of the principal U.S. tax rules that apply to investment and business activity in the United States by non-U.S. persons (so-called “inbound taxation”). It is the first of a trilogy of courses that focus on the U.S. tax rules that apply to international activities. The other courses address “outbound taxation”, i.e., the rules that apply to U.S. persons who conduct activities abroad, and the issues that arise from cross-border corporate transactions (acquisitions and reorganizations).

Course Materials

The required books for this course are:


There is one recommended, but not required book for this course:


Syllabus and Class Assignments

See below.

Final Exam

There will be an in-class, open-book, multiple-choice final exam.

Class Meeting Schedule

The class meets on Wednesdays from 6:10 PM to 8:00 PM.

Office Hours

Please coordinate with me in person or by email (fadi.shaheen@nyu.edu).
SYLLABUS AND CLASS ASSIGNMENTS

RESIDENCE AND RELATED ISSUES

Assignment 1
Steines: I.A

Bittker & Lokken (B&L): 65.1.1 - 65.1.3
65.2.1 - 65.2.4; 65.2.8

PORTFOLIO INCOME AND OTHER INCOME NOT CONNECTED WITH A U.S. TRADE OR BUSINESS

Assignment 2

*Interest, Disposition of Debt Obligations, and Related Constraints on Deductibility of Interest Payments*
Steines: I.B.1 & Problem 1; I.B.5 & Problem 5

B&L: 67.1
67.2.1; 67.2.2
73.1; 73.2
67.4.1 - 67.4.4
Skim: 65.7 (FATCA); 66.6 (Earnings Stripping Rules)

Assignment 3

*Dividends and Stock Dispositions*
Steines: I.B.2; Problems 2 & 5

B&L: 67.2.3 (Sections 1, 4, 5 & 6); 67.2.10
73.3; 73.6.1

Assignment 4

*Substitute and Derivative Payments*
Steines: I.B.3; Problems 3 & 5

B&L: 67.2.3 (Sections 1, 1a & 1b); 73.9 (Section 2)
Assignment 5

*Other Income*

Steines: I.B.4; Problems 4 & 5

B&L: 67.2.4; 67.2.5; 67.2.8

73.5.1

**BUSINESS INCOME**

Assignment 6

*Effectively Connected Income*

Steines: I.C.1; Problem 6

B&L: 67.6.1 – 67.6.4 (skip 67.6.5 & 67.6.7)

Assignment 7

*Real Estate Dispositions*

Steines: I.C.2; Problem 7

B&L: 73.6.2

67.7

Assignment 8

*Compensation for Services, Pensions, Etc.*

Steines: I.C.3; Problem 8

B&L: 73.4.1; 73.4.2
Assignment 9

Sale of Goods

Steines: I.C.4; Problem 9
B&L: 73.6.3 – 73.6.5

Income from Intellectual Property, Electronic Commerce, and Other Geographically Unattached Activities

Assignment 10

Steines: I.D
B&L 73.5.2

Treaty Override, Treaty Shopping, Discrimination, Hybrid Entity, Selectivity, and Discrimination Issues

Assignment 11

Steines: I.E; Problem 10
B&L: 65.4; 67.3

Branch Taxes

Assignment 12

Steines: I.F; Problem 11
B&L: 67.8