
UNIVERSITY OF HAWAII AT MANOA
ACCOUNTING 639:
MULTIJURISDICTIONAL TAXATION
SUMMER SESSION I – 2019
(Revised 06/03/19)

- COURSE MEETS:** Monday and Friday, 6:00 p.m. – 8:30 p.m., Crawford Hall 115
- INSTRUCTOR:** Kurt Kawafuchi, J.D., C.P.A., *Masters of Laws in Taxation (LL.M.)*
- OFFICE HOURS:** Available immediately after class, e-mail Kurt at kkawafuchi@aol.com or call 688-8986 to schedule an appointment.
- TEXTS:** INTERNATIONAL TAXATION – IN A NUT SHELL. Author: Richard L. Doernberg West Group (9th Edition) ("ITN").
- 2017 TAX LEGISLATION: Tax Cuts and Jobs Act (2018); Wolters Kluwer; ISBN 978-0-8080-4677-6 ("TCJA").**
- (Optional Text)**
CCH's INTERNATIONAL TAXATION CODE & REGULATIONS – SELECTED SECTIONS. Richard Crawford Pugh, Coordinating Editor. ISBN: 0-8080-1308-4
- (Optional Supplemental Text)**
SOUTH-WESTERN FEDERAL TAXATION: Corporations, Partnerships, Estates, and Trusts. Authors: Hoffman Raabe Smith Maloney South-Western Cengage Learning(2012 Edition).
- COURSE PREREQUISITES** Accounting 401 with a grade of at least "C-" or better.
- TENTATIVE** **This Syllabus is tentative and subject to change.**
- ALTERNATIVE LOCATIONS** In the case of a fire drill, bomb threat or other disturbance, please meet at the grassy area on the south side of George Hall.
- STUDENTS WITH DISABILITIES** Students with disabilities are encouraged to contact the Kokua Program for information and services. Services are confidential and students are not charged for them. Contact KOKUA at 956-7511, kokua@hawaii.edu, or Student Services Center, Room 13.
- COURSE OBJECTIVES:** The purpose of this course is to provide students with an overview of the international, state, and local income taxation and reporting issues. Topics include inbound and outbound U.S. international taxation transactions, sourcing of income and deductions, state corporate income taxation, nexus, and Hawaii taxes. The course also emphasizes the development of the student's critical analysis through problems and in class presentations of the solutions.

GRADING

<i>Attendance, Class Participation and Assignments</i>	<i>20%</i>
<i>Mid-Term Examination</i>	<i>40%*</i>
<i>Final Examination</i>	<i><u>40%*</u></i>
	<i><u>100%*</u></i>

* - The instructor reserves the right to curve any exam and the final grade to reflect a fair distribution of grades. The instructor has also invited a number of guest speakers whose topics will likely be part of the midterm and final exams.

(1) **Attendance, Assignments, and Participation.** Attendance, assignments, and class participation will comprise 20% of each student's grade. Students are expected to attend class, be prepared for class, and participate in class discussions and activities. Each student shall prepare written solutions to the assigned homework problems that will be turned via email to kkawafuchi@aol.com prior to start of each class. Unless a student receives prior approval from the instructor, homework turned in after the solutions are emailed to the class will not receive any credit. Each student is entitled to one "pass" during the semester, which can be utilized when the student is scheduled to make his or her presentation, or for any other class. For the "pass," the student will be treated as if the student turned in a "credit" homework assignment. Written solutions will be graded, "Credit", "Late" (1/2 credit), or "No Credit". Every week, each student should be prepared to present his or her recommended solution, when called upon, before the entire class.

(2) **Mid-Term Examination.** The Mid-Term Examination comprises 40% of each student's grade. It is scheduled for eighty (80) minutes on **Monday, June 10, 2017**, and will be followed by a lecture. The Mid-Term Examination is most likely to contain short answer, computational, and one or more problem-solving and essay questions. The Mid-Term Examination is open book and notes. There may be 1-2 extra credit questions **but no internet access.**

(3) **Final Examination.** The Final Examination will now comprise 40% of each student's grade. It will generally emphasize the materials and topics after the Mid-Term Examination. It is scheduled for ninety (90) minutes to be on **Friday, June 28, 2017**. The Examination is most likely to contain short answer, computational, and one or more problem-solving and essay questions. The Final Examination is open book and notes. There may also be 1-2 extra credit questions **but no internet access.**

DATE**ASSIGNMENTS¹**

May 20 (Class ends by 8:00pm)	Introduction
May 24 (Class 6:00 pm to 9:00pm)	ITN Chapter 1 Introduction; and ITN Chapter 2 Basic U.S. Jurisdictional Tax Principles. ITN Chapter 4 Taxing Rules; Homework: 9: 1-4, 20-21, 25, 27-29, 32
May 27	NO CLASS- MEMORIAL DAY
May 31 (Class 7:30-9:15pm)	ITN Chapter 3 Source Rules; ITN Chapter 5 The Role of Income Tax Treaties; Homework: 9: 6, 11-14, 69-70, 75-77
June 3 (Class 6:00pm to 9:00pm)	ITN Chapter 5: Income Tax Treaties (Cont'd) TCJA ¶¶730, 750, 760, 765, 780; 705, 707, 710, 780 ITN: Chapter 7 Intro to U.S. Business in Foreign Countries; ITN: Chapter 8 Tax of U.S. Persons Bus. Inc. from CFCs etc. Homework: 9: 12-13, 15-19, 24, 39-46
June 7 (Class 6:00 pm to 8:45pm)	ITN Chapter 6 Filing, Withholding, Reporting, etc. ITN Chapter 9 Foreign Tax Credits ITN Chapter 10 Intercompany Pricing TCJA¶¶735, 741, 743, 745, 747; Midterm Review
June 10	MIDTERM EXAMINATION International Tax Reporting (PPT)
June 14 (Class 6:00pm to 9:00 pm)	TCJA: ¶¶715, 720, 725 ITN: Chapter 11. Foreign Currency ITN: Chapter 12. International Tax-Free Transactions; TCJA ¶707 (Ending: Active trade or business exception) 9: 4-5, 7-10, 33-40, 49-57
June 17	ITN: Chapter 13 Tax Arbitrage and Government's Response; Homework: 9: 22-24, 26, 30-31, 46-51, 59-64
June 21	MULTISTATE CORPORATE TAXATION (Handout&PPT); Homework: 15-2-3, 6-9, 11-12, 15-20, 25-26, 28-29, 36, 43
June 24 (Class 7:30pm -9:15pm)	HAWAII GENERAL EXCISE AND USE TAXES (PPT) HRS Chapters 237&238 generally; Review for Final Exam
June 28	FINAL EXAMINATION

¹ Homework problems: The first number is the chapter followed by the assigned problems. The problems are due on the assigned class and should be handed in at the beginning of each class. If you are unable to attend, please email to kkawafuchi@aol.com prior to the class. These assignments are subject to change.