
UNIVERSITY OF HAWAII AT MANOA
ACCOUNTING 639:
MULTIJURISDICTIONAL TAXATION
SUMMER SESSION II – 2020

COURSE MEETS: Monday and Wednesdays, 6:00 p.m. – 8:30 p.m., via Zoom

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/text @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") (To be distributed)

(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". No credit will be offered after the instructor once the instructor begins discussing the questions and/or distributes any answers, whichever is earlier. 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 ninety (90) minutes on **Monday, July 20, 2020**, 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 **Wednesday, August 12, 2020**. 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**

July 6	Introduction to International and Multistate Taxation
July 8	ITN Chapter 1 Introduction ITN Chapter 2 Basic U.S. Jurisdictional Tax Principles. ITN Chapter 3 Source Rules; TCJA §§730 and 780 Homework: 9: 1-4, 25, 27-29, 32
July 13	ITN Chapter 4 Taxing Rules for Non-U.S. Persons ITN Chapter 5 Role of Income Tax Treaties; Review treaty e.g. Homework: 9: 20-21, 31, 69-70, 75-77
July 15	ITN Chapter 6 Filing, Withholding, Reporting. TCJA§743 TCJA §§730, 750, 760, 765, 780; 705, 707, 710, 780 Forms W-8BEN, 1042, FIRPTA: Forms 8288, 8288A, 8288B. HRS Section 235-68; International Tax Reporting (PPT); Treaties, withholding, and problems; Midterm Review
July 20	MIDTERM EXAMINATION
July 22	ITN: Chapter 7 Intro to U.S. Business in Foreign Countries; ITN: Chapter 8 Introduction to Foreign Tax Credits (FTC) TCJA§§710, 735, 743, 745, 747 Homework: 9: 11-19, 22-23, 39, 44
July 27	ITN: Chapter 9 Taxation of U.S. Persons' For. Inc. Corp. Form IT8N: Chapter 10 Limitations on FTC and Indirect FTC TCJA: §§705, 707, 715, 720, 725 Homework 9: 24, 33-38, 45-46, 49, 52-57
July 29	ITN: Chapter 11 Intercompany Pricing ITN: Chapter 12 Foreign Currency' TCJA §§750, 755 Homework: 9: 6-9, 26, 30, 47-48, 50-51, 59-64
August 3	ITN: Chapter 13 Int'l Tax-Free Trans. TCJA §§760, 765 ITN: Chapter 14 Tax Arbitrage & Evolving Global Tax LSCP Tax Planning for Foreigners with U.S. (and Hawaii assets) Homework 9: 40-43
August 5	MULTISTATE CORPORATE TAXATION (Handout&PPT); Homework: 15-2-3, 6-9, 11-12, 15-20, 25-26, 28-29, 36, 43
August 10	HAWAII GENERAL EXCISE AND USE TAXES (PPT) HRS Chapters 237&238 generally; Review for Final Exam
August 12	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.