UNIVERSITY OF HAWAII AT MANOA
ACCOUNTING 639:
MULTIJURISDICTIONAL TAXATION
SUMMER – 2006 (1st Session)

COURSE MEETS: Tuesdays and Thursdays, 6:00 p.m. - 9:30 p.m.*, BusAd: D-201
(*- On 6/1/06, Class will meet from 7:30 pm to 9:30 pm)
May 22, 2006 through June 29, 2006

INSTRUCTOR: Kurt Kawafuchi, J.D., C.P.A., Masters of Laws in Taxation

OFFICE HOURS: Available immediately after class, e-mail Kurt at
“kkawafuchi@aol.com,” or call 587-1513 (Office) or 258-3383
(Cell.) to schedule an appointment.

TEXTS: INTERNATIONAL TAXATION – IN A NUT SHELL. Author:

INTERNATIONAL TAX PRIMER. Author: Brian J. Arnold,
Michael J. McIntyre Kluwer Law International (Second Edition)
(“IT”).

INTERNATIONAL TAXATION. Author: Joseph Isenbergh

CCH’s INTERNATIONAL TAXATION CODE &
REGULATIONS – SELECTED SECTIONS. Editor: Richard
Crawford Pugh. (Or comparable access to Internal Revenue Code and
Treasury Regulations).


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 tax 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 presentations of the solutions.
GRADING

Attendance 15%
Homework Assignments 15%
Participation 10%
Mid-Term Examination 30%*
Final Examination 30%*

100%*

* - The instructor reserves the right to curve any exam and the final grade to reflect a fair distribution of grades.

(1) Attendance, Assignments, and Participation. Attendance, assignments, and class participation will comprise 15%, 15%, and 10%, respectively, or a combined 40% 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 in each class. 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 homework problem for the following week will be assigned to one student to present the solution to his or her assigned problem for the following week.

(2) Mid-Term Examination. The Mid-Term Examination comprises 30% of each student's grade. It is tentatively scheduled to be ninety (90) minutes on Tuesday, June 13, 2006. 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.

(3) Final Examination. The Final Examination comprises 30% of each student's grade. It will generally emphasize the materials and topics after the Mid-Term Examination. It is scheduled to be ninety (90) minutes on Thursday, June 29, 2006. The Final 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.

<table>
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<tr>
<th>DATE</th>
<th>ASSIGNMENTS*</th>
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<tr>
<td>May 23</td>
<td>IT: Chapter 1. Introduction.</td>
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May 30
ITN Chapter 3 Taxing Rules;
ITN Chapter 4 Source Rules;
Problems 9: to be determined.
Homework: 9-2, 16, 18, 19, 20,

June 1
(Class meets 7:30 p.m. – 9:30 p.m.)
ITN Chapters 5 The Role of Income Tax Treaties;
ITN: Chapter 6 Filing, Withholding, and Reporting Requirements;
IT: Chapter 6. Tax Treaties;
Homework: 9: 1, 14, 15, 42, 43

June 6
ITN: Chapter 9 – Intercompany Pricing;
IT: Chapter 4. Transfer Pricing;
Homework: Combined with 7/21 Homework and Due 7/21.

June 8
ITN: Chapter 7 Introduction to U.S. Business Activity in Foreign Countries;
ITN: Chapter 8 The Foreign Tax Credit;
IT: Chapter 3. Double Taxation Relief;
Homework: 9-4, 12, 13, 30, 31, 33, 34, 35, 36, 37
Review for Mid-term Exam

June 13
MID-TERM EXAMINATION

June 15
ITN: Chapter 10. Controlled Foreign Corporations and Related Provisions;
ITN: Chapter 11. Foreign Currency;
ITN: Chapter 12. International Tax-Free Transactions;
IT: Chapter 5. Anti-Avoidance Measures;
Homework: 9-5, 6, 8, 10, 11, 39

June 20
ITN: Chapter 13 Tax Arbitrage and Economic Substance;
ITN: Chapter 14 Foreign Sales Corporations;
IT: Chapter 7. Emerging Issues:
Homework: 9-7, 21, 23, 24, 25, 27, 28

June 22
MULTISTATE CORPORATE TAXATION (Handout);
Homework: 15-3, 5, 7, 8, 9, 11, 12, 18

June 27
HAWAII GENERAL EXCISE TAX (Handout);
Homework: 15-20, 22, 25, 26, 28, 29, 36, 43
Review for Final Exam.

June 29
FINAL EXAMINATION

Problems: The number is the chapter number followed the assigned problems. The problems are due on the assigned class.