



**Course** ACCT 6367.501, Multijurisdictional Taxation  
**Professor** John Gamino  
**Term** Spring 2017  
**Meetings** Thursdays, 7:00–9:45 p.m., JSOM 2.803

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### Professor's Contact Information

**Phone** (972) 883-5997, but e-mail is always the best way to reach me.  
**Office Location** JSOM 3.616  
**Email Address** john.gamino@utdallas.edu  
**Office Hours** T & Th, 4–7:00 p.m., or by appointment.

### General Course Information

**Pre-requisites** ACCT 6350 or equivalent  
ACCT 6353 or equivalent (or as co-requisite)

**Course Description** An introduction to the taxation of business entities and individuals by competing taxing jurisdictions. The first part of the course focuses on state taxation including nexus, allocation, and apportionment issues. The second part is an overview of cross-border and international tax issues emphasizing “outbound” investments and activities of U.S. taxpayers.

**Student Learning Objectives**

- (1) To understand interstate business nexus issues and to apply income allocation and apportionment formulas in the context of income/franchise and sales & use taxes.
- (2) To understand the approach of the states toward the taxation of resident and nonresident individuals.
- (3) To understand the federal income taxation of U.S. taxpayers' international investments and operations, emphasizing the effect of bilateral income tax treaties, the foreign tax credit, and intercompany transfer pricing.
- (4) To develop and practice relevant tax analytical skills.

**Required Texts & Materials** Nelson, *Multistate Income Tax* (AICPA 2016), AICPA Product No. 732473.  
Isenbergh, *International Taxation*, 3<sup>rd</sup> Ed. (Foundation Press / West Academic 2009), ISBN13:978-1-59941-6.

I will post or distribute additional required reading.

## Assignments & Calendar

Each student should understand from the outset that this is a reading-intensive course. Equally important is for each student to accept that self-study necessarily is the most important learning mechanism. The purpose of classroom time, by contrast, is to provide direction and support, to clarify the results of the self-study process, and to refine and sharpen understanding through the testing and exchange of ideas. Thus, I expect each student to have reasonably mastered the assigned reading *before coming to class*. Office hours are scheduled specifically for the purpose of allowing students to seek assistance toward resolving any lingering confusion.

Reading assignments will be designated in advance, usually at or shortly after each week's class sessions. Each weekly reading assignment will include both designated textbook material and item(s) posted in eLearning.

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| <b>Session 1</b>  | Course overview; overview of SALT systems and resources; overview of the Texas Tax Code (Jan. 12 <sup>th</sup> ).             |
| <b>Session 2</b>  | Limitations on state and local taxing authority (Jan 19 <sup>th</sup> ).  |
| <b>Session 3</b>  | The Multistate Tax Compact; interstate income allocation and apportionment in-depth (Jan. 26 <sup>th</sup> ).                 |
| <b>Session 4</b>  | The Texas Franchise Tax and competing state business entity tax systems (Feb. 2 <sup>nd</sup> ).                              |
| <b>Session 5</b>  | Sales and use taxes on traditional and electronic commerce (Feb. 9 <sup>th</sup> ).   |
| <b>Session 6</b>  | Miscellaneous state and local taxes including ad valorem taxes, severance taxes, and tax incentives (Feb. 23 <sup>rd</sup> ). |
| <b>Session 7</b>  | State and local taxation of individuals (March 2 <sup>nd</sup> ).   |
| <b>Session 8</b>  | <b>EXAM I</b> (March 9 <sup>th</sup> ).   |
| <b>Session 9</b>  | U.S. jurisdictional principles and source rules (March 23 <sup>rd</sup> ).  |
| <b>Session 10</b> | Taxation of foreign-source income of U.S. persons; the foreign tax credit (March 30 <sup>th</sup> ).                          |
| <b>Session 11</b> | Treatment of foreign business operations and investments by U.S. persons (April 6 <sup>th</sup> ).                            |
| <b>Session 12</b> | Transfer pricing (April 13 <sup>th</sup> ).   |
| <b>Session 13</b> | Income tax treaties (April 20 <sup>th</sup> ).  |
| <b>Session 14</b> | Foreign Account Tax Compliance Act (FATCA), etc. (April 27 <sup>th</sup> ).   |
| <b>Session 15</b> | <b>EXAM II</b> (TBD per UTD calendar).  |

## Course Policies

<b>Grading</b>	<p>Each student will earn a final letter grade for this course based on the total of her or his (i) quiz scores, (ii) Exam I score and (iii) Exam II score. <u>The highest achievable number of points is 100.</u></p> <p><u>Quizzes</u> will occur promptly at the beginning of each regular class session after Session 1 and quiz scores do count toward each student's final grade for the course. Each quiz will be limited in scope to the assigned reading for that class session and will consist of 12 questions, generally but not necessarily in multiple-choice format. Appropriately annotated quizzes are intended as an important component of each student's course notes. Quizzes will be scored as follows:</p> <p>12 correct responses = 4 points  11 correct responses = 4 points  10 correct responses = 4 points  9 correct responses = 3 points  8 correct responses = 2 points  7 correct responses = 1 point</p> <p>Less than seven correct responses will result in no (zero) points earned.</p> <p><b>NOTES:</b> (1) There will be <u>no</u> "make-ups" for missed quizzes. (2) Each student is responsible for monitoring quiz points and alerting me to posting errors in real time. Any issues with respect to posted quiz scores must be communicated <u>no later than May 1<sup>st</sup> (Reading Day)</u>.</p> <p><u>Exam I</u> (March 9<sup>th</sup>) will consist of approximately 25 questions worth one point each. It will be comprehensive with respect to SALT topics studied from Session 1 forward.</p> <p><u>Exam II</u> (per UTD Final Exam schedule) also will consist of approximately 25 questions worth one point each. It will be comprehensive with respect to foreign / cross-border taxation issues studied from Session 9 forward.</p> <p>Exams may include questions in any traditional format (calculation-based problems, multiple-choice, short answer, etc.) and will be geared in terms of level of difficulty to CPA Exam questions. Exam questions generally (but not necessarily) will be worth one point each. The respective class sessions immediately prior to Exam I and Exam II will include an "exam review."</p> <p><u>Curve, Rounding</u> In the event that the highest numeric score achieved by any student in the class is less than 100, all final scores will be curved against that highest score in order to determine each student's final score on a percentage basis. <b>Example:</b> your final numeric score = 88; class high score = 98; <math>88/98 = 89.8</math>, rounded to 90 (.50 or higher rounded up to the next whole point, .4999 or lower rounded down). <b>Note:</b> This curve will not involve a denominator of less than 95 regardless of what the class-high score may be.</p> <p><u>Final Grades</u> Each student's final letter grade for the course, based on her or his final (curved) numeric score, will be determined using the following scale:</p>
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	<table> <tr> <th>Score</th><th>Grade</th></tr> <tr> <td>93-100</td><td>A</td></tr> <tr> <td>90-92</td><td>A-</td></tr> <tr> <td>87-89</td><td>B+</td></tr> <tr> <td>83-86</td><td>B</td></tr> <tr> <td>80-82</td><td>B-</td></tr> <tr> <td>77-79</td><td>C+</td></tr> <tr> <td>70-76</td><td>C</td></tr> <tr> <td>Less than 70</td><td>F</td></tr> </table>	Score	Grade	93-100	A	90-92	A-	87-89	B+	83-86	B	80-82	B-	77-79	C+	70-76	C	Less than 70	F
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<b>Make-up Exam</b>	(Only in very rare circumstances and in the Professor's sole discretion.)																		
<b>Class Attendance</b>	Attendance as such is neither recorded nor rewarded. Lack of attendance, however, predictably will have an adverse impact on a student's final grade.																		
<b>Classroom Citizenship</b>	<p>There are a number of actions that will be treated as violations of the Student Code of Conduct and referred to the Office of Community Standards and Conduct with a recommendation for appropriate disciplinary action. The following are illustrative (and non-exclusive) examples:</p> <ol style="list-style-type: none"> <li>1. Any submission of work (quiz answer sheets, for example) under a name other than a student's own;</li> <li>2. Any collaboration or communication between or among students during quizzes or Exams;</li> <li>3. Any consulting of the textbook, notes, or other reading material during quizzes or Exams; and</li> <li>4. Any attempts (or apparent attempts) to view another student's work during quizzes or Exams.</li> </ol>																		
<b>UT Dallas Syllabus Policies and Procedures</b>	<p><i>The information contained in the following link constitutes the University's policies and procedures segment of the course syllabus. Please go to <a href="http://go.utdallas.edu/syllabus-policies">http://go.utdallas.edu/syllabus-policies</a> for these policies.</i></p>																		

**NOTE:** *The descriptions and dates contained in this syllabus are subject to change.*