



**New York University School of Law**  
**Summer Session 2017 Registration Instructions** (version date: 5/26/2017)

**GENERAL INFORMATION AND ACADEMIC POLICIES**

Each summer NYU School of Law offers a range of on-campus and online courses in taxation, primarily for the benefit of continuing students in our part-time programs.

We offer both on campus and online courses. Summer on-campus courses meet in a condensed schedule and their exams are held a few weeks after the end of the course meetings. We also record these on-campus courses and the online sections of these courses are on the same exam schedule as the on-campus sections. Our online-only courses are encore offerings of previously recorded courses, and students view lectures during June and July, with an exam early in August.

Many of these courses are in advanced topics, and aren't good choices if you have not previously studied tax with us or are not working in tax. We do offer some courses which, while still very challenging, are good starting points and do not have pre-requisites other than a basic course in income taxation. For example, Corporate Tax I, Taxation of Property Transactions, Estate and Gift Taxation, Tax Policy, and any of the Multistate Taxation courses are fitting courses to start with. Most courses do require a student to have completed a basic law school course in U.S. Federal Income Taxation.

Students who have been admitted to a degree program in the Fall 2017 semester may matriculate early and take summer classes, though we recommend you first speak with John Stephens at (212) 998-6394.

**Classes are open to:**

- NYU School of Law LLM, MSL, and Certificate students
- NYU School of Law alumni
- Attorneys who are not enrolled in a degree program, assuming they have taken pre-requisite courses, if any.

**Restrictions on enrollment:**

JD students may not register for an online section of a course for academic credit. Most law schools do not accept online courses work for academic credit towards a JD degree, though these courses often are transferrable for LLM students. JD students may only apply to take our on-campus courses, assuming they have taken the pre-requisites.

Additionally, students from the following states may not register for online courses: **Alabama, Alaska, Arkansas, Minnesota, Oregon, and Wisconsin.**

Students from the following states may enroll, but may not take examinations in these states: **Delaware, Kentucky, Rhode Island, and West Virginia.** Students from **Maryland** should contact us at (212) 998-6394 prior to enrolling for additional information. (NYU is in the process of joining a national accreditation reciprocity network that will soon remove many of these state restrictions, but for now these restrictions are still in place.)

**Auditing:** Most students take our courses for academic credit and earn a letter grade. However, it is also possible to audit a course. Auditing requires attending the class sessions and participating in-class, or alternatively, watching a course online. However, auditors do not sit for the exam and don't receive a grade or any academic credit. Auditing incurs the same cost as taking a class for credit. Auditors receive a transcript with a grade of "R." Online courses may have a lower standard of participation and attendance for auditors, but failing to attend or participate while auditing an on-campus course may result in a failing grade.

**Transfer Credit:** Students from other law schools should contact their home school to determine its transfer credit policy, including whether an online course will be accepted for credit. A non-matriculated student has the option to take summer classes for a letter grade, and if the student receives a C or better, he or she may apply to have the credits earned count towards an NYU School of Law degree or certificate, should the student be admitted into a degree or certificate program at a later date. (The first graduate tax course taken at NYU begins an admitted student's five year period of study for an LLM degree.)

**Credit limit:** Students may register for up to six credits, though realistically, most working students shouldn't register for more than 2-3 credits during the summer session. Our summer session is roughly 9 weeks long, which is just over half the length of our fall or spring semesters. It may be possible to take more credits if you have a light workload (or no work/time off) over the summer or take combined courses, which meet on a condensed schedule.

**Enrollment status for educational loans:** Students taking six credits are eligible to apply for federal educational loans, assuming other conditions are met. Students taking 5 credits may also call John Stephens at (212) 998-6394 to discuss eligibility for half-time enrollment status, which makes one eligible to apply for loans, though other conditions may also factor in. For the abbreviated summer semester only, we will also consider students who are taking four credits for half time status. For other information on student loans, both federal and private, please visit our student financial services website: <http://www.law.nyu.edu/financialaid/loansandlenders/index.htm>

**Exams:** Exam dates are listed below in the course descriptions. All summer students are required to take their exams as scheduled; in the rare situation when an exam must be rescheduled due to extreme extenuating circumstances, such as unforeseen hospitalization, there will be a make-up date. We schedule most summer exams in the first week of August. The combined on-campus/online courses feature earlier exam dates. Exams are administered during the daytime and are not given in the evening, with the exception of the state taxation classes taught by Professor Pomp, which will feature take-home exams. Exam start times are in eastern time, and all students are expected to begin at that time, absent an arrangement to the contrary. There is a very high threshold for requesting an exam postponement. Exams are never administered prior to the listed exam date. All students taking summer classes generally have jobs, so work conflicts are not a unique situation and we cannot fairly reschedule exams on that basis. Therefore, summer students should clear their exam schedules with their employers before finalizing course schedules. There are several options for examining:

- 1). Take an exam on-campus at our Greenwich Village campus at the scheduled date/time using a laptop which meets our specs and is running our Exam4 examination software. You can use a Macintosh (Mac) or a PC laptop. This is referred to as an "in-class" exam taken on campus.
- 2). Examine "in absentia" at another law school at the scheduled date/time on a laptop which meets our specs and using Exam4 software. Again, Mac or PC is fine. You must approach the host university to arrange this and then coordinate with NYU's exam administrators. Small variations in exam start time are allowed in the case of a student in another time zone (i.e., west coast.) Students in other countries often find that our exam schedule differs from other countries' universities, and it may be difficult to arrange.
- 3). Take home exams: The three classes taught by Professor Pomp on state and local tax issues are the only classes which use this exam format. Take home exams require the exam to be taken on a computer. It can be a desktop or a laptop, and no special software is required, other than word processing software. Students download the questions, type an answer, and then upload it to our online take home exam system. Using either a Mac or PC is fine.
- 4). Students enrolled in an online degree program or located outside of the greater NYC area may also examine remotely via video proctoring. A remote proctoring service will monitor you via your computers webcam. If your computer does not already have a web camera, you will need to purchase one to use this method. (Most are relatively inexpensive.) Students can use either Mac or PC computers. Note that all exam start times refer to the eastern time zone. Students in other time zones can request an alternate start date on the same date, e.g. a student in California can request to start their exam at 9:30 am local time rather than 9:30 am eastern time. These requests can be made via <http://examreporter.law.nyu.edu/> This is referred to taking an "in-class exam" online. Somewhat confusingly, we use the term "in-class" to note that an exam is proctored, regardless of whether the exam is proctored online or on campus.

**Again, all in-class exams must be taken on a laptop.** For all in-class (proctored) exams, part-time students in the Taxation LLM program, alumni, and local non-matriculants are expected to examine on-campus, while students in the Executive LLM or MSL programs are eligible to examine using the remote proctor service, ProctorU. We can also accommodate out of town students upon request who wish to examine online. For more information on Exam4 (used for on-campus exams) please visit <http://www.law.nyu.edu/technology/students/exams/exam4/>. For information on how to configure your laptop, please visit <http://www.law.nyu.edu/technology/students/requirements> You may also contact the Office of Academic Services, 245 Sullivan Street, Furman Hall, Room 400, (212) 998-6020 or [law.exams@nyu.edu](mailto:law.exams@nyu.edu) with exam policy questions and Information Technology Services (ITS) at [law\\_helpdesk@nyu.edu](mailto:law_helpdesk@nyu.edu) with technology questions.

**REGISTRATION:**

Registration and refund deadlines will differ for many of the classes. Once registered for a class, summer session students may only drop or withdraw from a class by submitting a drop form, or by emailing us at: [law.taxprograms@nyu.edu](mailto:law.taxprograms@nyu.edu). Please do not wait until the deadline to request a drop. **Students have until the last meeting of the class to withdraw without receiving a WD on their transcript, though refunds are calculated on a separate schedule.**

**Tuition:**

Tuition is \$2,482 per credit and is assessed at the time of registration. Registration and services fees for the first credit are \$517. There is also a non-refundable \$45 fee for each credit after the first credit. There is a technology fee of \$105. In past years, summer health insurance was automatically assessed to all degree candidates. We have asked the health insurance office to not assess this insurance charge for students taking fewer than six credits. Tuition and fees must be paid in full before the first class meeting. Registration and services fees are non-refundable once class begins.

**REFUNDS OF TUITION:**

Please note that registering for a class incurs tuition and fee liability. When we use the term “refund” we are referring to a reduction in that liability, not just the situation where we return some portion of the money we have already received from you. Thus, if you register for a class and have not yet paid for the class, you are still liable for the cost of the course. Please do not register for a course without familiarizing yourself with the rules and deadlines regarding refunds, i.e., reducing tuition and fee liability.

Refunds of tuition for dropped classes will be granted according to the following schedules.

**Combined Course:**

For this combined courses only, which has both an online and on-campus section:

- **Value Added Taxation** (Prof. Ainsworth, 1 credit)
  - This course will meet on campus from June 5-8 from 9 am-12:15 pm

Withdraw prior to the first class meeting or the first posting of video	100% Tuition and registration fees
Withdraw before the 2nd meeting/video posting* of the class	100% Tuition, no refund of registration fees
Withdraw after the 2nd but before the 3rd meeting/video posting* of class	55% Tuition, no refund of registration fees
Withdraw after the 3rd meeting/video posting* of class	<b>NO REFUND</b>

\*Refunds for the online sections of these classes are given relative to how many videos have been posted, and not relative to whether students have watched that video or not. Note that no refunds will be given for the online sections of these three courses once the fourth class has met and has been posted, even if a student has not watched any class sessions.

**Online-only courses:**

For the following online-only summer 2017 courses (not including the courses listed above):

- Corporate Tax I (Prof. Blank)
- Corporate Tax II (Prof. Blank)
- Estate & Gift Tax’n (Prof. Gans)
- International Tax I (Prof. Zonana)
- International Tax II (Prof. Zonana)
- International Tax III (Prof. Zonana)
- Multistate Tax: Income Tax’n (Prof. Pomp)
- Multistate Tax: Sales and Gross Receipts Tax’n (Prof. Pomp)
- Partnership Taxation (Prof. Cunningham)
- Private Foundations and Their Alternatives (Prof. Manny)
- State Tax’n of Native Americans (Prof. Pomp)
- Tax Aspects of Charitable Giving (Prof. Manny)

- Tax Policy (Prof. Blank)
- Tax-Exempt Organizations (Prof. Manny)
- Taxation of Intellectual Property (Prof. Engler)
- Taxation of Prop Transactions (Prof. Engler)
- Timing Issues and the Income Tax (Prof. Engler)

Withdraw <b>before</b> June 9, 2017 <b>and</b> having viewed fewer than three class sessions	100% Tuition and registration fees
Withdraw <b>before</b> June 16, 2017 <b>and</b> having viewed fewer than four class sessions	100% Tuition, no refund of registration fees
Withdraw between June 16 and July 5, 2017 <b>and</b> having viewed fewer than 7 class sessions	55% Tuition, no refund of registration fees
Withdraw after July 5, 2017 <b>or</b> after watching 7 or more class sessions	<b>NO REFUND</b>

### Survey of Income Taxation:

Refunds will be granted on the basis of how many videos have been watched.

Withdraw before having viewed any class sessions	100% tuition and registration fees
Withdraw after having viewed between one and three class sessions	100% Tuition, no refund of registration fees
Withdraw after having viewed between four and six class sessions	55% Tuition, no refund of registration fees
Withdraw after July 1, 2017 or after watching seven or more class sessions	<b>NO REFUND</b>

### Survey of Tax Procedure

These course videos will be made available on approximately June 15<sup>th</sup>.

Withdraw <b>before</b> June 19, 2017 <b>and</b> having viewed fewer than three class sessions	100% Tuition and registration fees
Withdraw <b>before</b> June 26, 2017 <b>and</b> having viewed fewer than three class sessions	100% Tuition, no refund of registration fees
Withdraw between June 26 and July 5, 2017 <b>and</b> having viewed fewer than three class sessions	55% Tuition, no refund of registration fees
Withdraw after July 5, 2017 <b>or</b> after watching three or more class sessions	<b>NO REFUND</b>

Registration and drop forms may be submitted by email or in person. Regardless, forms must be received during business hours or they will be deemed to be received on the following business day. Please note: Courses with insufficient enrollment will be cancelled with a full refund of tuition and fees.

**New York University School of Law  
Summer Session 2017 Registration Form**

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To request a class for this summer, please fill out this form. NYU reserves the right to refuse enrollment for students who are not enrolled in a degree program here. Degree candidates at NYU School of Law will be enrolled in the courses they request, up to a total of six credits. **Tuition liability is incurred when you submit this form. Tuition is due even if you attend/view no classes, once the refund period has passed.** You should carefully note the refund schedule for any class you are considering adding.

For students taking six or more credits in the summer: the Student Health Center automatically enrolls degree-candidates taking six credits or more of summer courses in the NYU student health insurance plan. Most students take fewer than six credits in the summer and thus they and all non-degree students will not be automatically enrolled in health insurance and need not waive coverage. To request a waiver of this plan, complete the form at: [https://nyu.consolidatedhealthplan.com/student\\_health/new\\_york\\_university.html](https://nyu.consolidatedhealthplan.com/student_health/new_york_university.html) no later than **June 5<sup>th</sup>, 2017**. You can check your student account via [home.nyu.edu](http://home.nyu.edu) within the ALBERT subsystem.

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Name (Print First Middle and Last)

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University ID (current students only)

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Date of Birth

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Email

We cannot enroll students for online study from within: **Alabama, Alaska, Arkansas, Minnesota, Oregon, and Wisconsin.**

Students may not examine from within: **Delaware, Kentucky, Rhode Island, and West Virginia.**

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Address (if your address is outside the U.S., you must also provide a U.S. address)

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Phone (Home)

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Phone (Work)

**I will take my course(s):**

Audit (no exam, no grade)

For a letter grade

**I have previously completed a law school course on U.S. Federal Income Taxation** (not all courses require this)

Yes

No. (If no, please provide attach a short statement of how an exception is warranted. NYU reserves the right to deny enrollment to students without the prerequisite course.)

Type of Student (please check all that apply):

- NYU LLM, ELLM or Adv. Prof. Certificate in Taxation
- NYU MSL Student
  - Also a NYU Law Fall 2017 entering student
- Current JD student
- NYU Law Alum
- Other:

**I will take my course(s):**

- On an Audit basis** (No exam is administered and the transcript denotes a grade of “R”.)
- For a letter grade** (The exam is administered and a letter grade assigned.)
- High Pass/Pass/Fail** (This grading scale applies to MSL students only)

**I would like to take the following course(s): (Please check each course you wish to apply to take)**

- Corporate Tax I (J. Blank, 2 credits) **ONLINE**
- Corporate Tax II (J. Blank, 2 credits) **ONLINE**
- Estate and Gift Taxation (M. Gans, 2 credits) **ONLINE**
- International Tax I (V. Zonana, 2 credits) **ONLINE**
- International Tax II (V. Zonana, 2 credits) **ONLINE**
- International Tax III (V. Zonana, 2 credits) **ONLINE**
- Multistate Taxation: Income Taxation (R. Pomp, 2 credits) **ONLINE**
- Multistate Taxation: Sales and Gross Receipts Tax’n (R. Pomp, 2 credits) **ONLINE**
- Partnership Taxation (N. Cunningham, 3 credits) **ONLINE**
- Private Foundations and Their Alternatives (J. Manny, 1 credit) **ONLINE**
- State Tax of Native Americans (R. Pomp, 2 credits) **ONLINE**
- Survey of Income Tax’n (2 credits, no exam; credits not applicable to any program) **ONLINE**
- Survey of Tax Procedure (J. Blank, 1 credit) **ONLINE**
- Tax Aspects of Charitable Giving (J. Manny, 1 credit) **ONLINE**
- Tax Exempt Organizations (J. Manny, 2 credits) **ONLINE**
- Tax Policy (J. Blank, 1 credit) **ONLINE**
- Taxation of Property Transactions (M. Engler, 3 credits) **ONLINE**
- Taxation of Intellectual Property (M. Engler, 2 credits) **ONLINE**
- Timing Issues and the Income Tax (Engler, 2 credits) **ONLINE**
- Value Added Taxation (Ainsworth, 1 credit) **ON CAMPUS**
- Value Added Taxation (Ainsworth, 1 credit) **ONLINE**

**You will be billed for summer classes by the Bursar through your NYU Statement of Account. [Payment information can be found here.](#) Please note that we cannot accept credit card payments.**

I accept full responsibility for the information submitted on this form and agree to abide by the policies and procedures of New York University and NYU School of Law. I also agree to the rules regarding fees and refunds published within this packet. I agree that I am available to take the exam for this course at the prescribed time.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

(You needn't submit this worksheet, which is provided to help you calculate tuition and fees.)

**New York University School of Law  
Summer Session 2017  
Tuition and Fee Payment Information**

**Note: You may [pay online](#) via your student account.**

Students may pay tuition via the Bursar's Office and may access their bill online. This form will help you calculate the cost of your course(s). Non-degree students who have not fully paid tuition and fees before the first class meeting will **not** be permitted to attend class. For those students whose employers are funding their studies (and who do not require completion of the course or a specific grade to be earned), an employer may use the [third party payment instructions](#).

Tuition: \$2482 per credit. Be sure to note the refund schedule for each course.	Enter number of credits x \$2482:
<input type="checkbox"/> List course and number of credits here:	
<input type="checkbox"/>	
<input type="checkbox"/>	
<input type="checkbox"/>	

Total tuition:	\$ _____
<b>Add: Registration Fees</b>	
First Credit Registration Fee: \$517	<u>\$517</u>
Registration Fee For Each Credit <b>After</b> the First Credit: \$45 each	\$ _____
<b>Insurance Charge*</b> (Degree candidates taking six or more credits are assessed health insurance for the summer. If you have insurance, you must waive coverage by June 5) \$732 Basic; \$1129 Comprehensive ( <a href="#">rates</a> are for individual coverage). Non-degree students need not waive insurance.	\$ _____
<b>Technology Fee:</b>	\$105
<b>Total:</b>	\$ _____

\* Students who were enrolled in NYU student health insurance in Spring 2017 are likely covered through 8/20/17.

Note: NYU cannot accept credit cards for tuition payments.

Registration should be submitted to:  
Office of Records & Registration, NYU School of Law 245 Sullivan Street, Room 400,  
New York, NY 10012 Fax: (212) 995-4523 Phone: (212) 998-6040 Email: [law.registration@nyu.edu](mailto:law.registration@nyu.edu)

## Course Descriptions:

### Corporate Tax I (Online)

**J. Blank, 2 credits, LAW-LW.11907.001 (LLM) and LAW-LW.11907.002 (MSL)**

**Course Description:** This course is an introduction to a classical corporate tax system, including the dividends-received deduction, reduced rates on dividends, corporate liquidations and a thorough examination of the taxation of corporate distributions, including cash distributions, stock redemptions, stock transfers between related corporations, and stock dividends.

**Pre/Co-requisite:** A Basic U.S. Federal Income Tax Course

**Exam:** Wednesday, August 2, beginning at 9:30 a.m. eastern time

This online course is a previously recorded class from the Fall 2016 semester. Video access begins on 05/30/2017. The deadline to add this class is 6/15/2017. The deadline for a full tuition refund is June 15, and registration fees are non-refundable after June 8. Students must watch 80% of the videos by Monday, July 24, 2017 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Friday, July 28, 2017. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

### Corporate Tax II (Online)

**J. Blank, 2 credits, LAW-LW.10878.001 (LLM) and LAW-LW.10878.001 (MSL)**

**Course Description:** This course will cover Parent-Subsidiary liquidations (§§ 332/337); § 351 exchanges; acquisitive reorganizations (Types A, B, C, and Triangular); and divisive reorganizations (Type D, spin-offs, Split-offs, and Split-ups)

**Prerequisite:** Required: A Basic U.S. Federal Income Tax Course. Recommended: Corporate Tax I or equivalent practice experience.

**Exam:** Wednesday, August 2, beginning at 9:30 a.m. eastern time

This online course is a previously recorded class from the Fall 2016 semester. Video access begins on 05/30/2017. The deadline to add this class is 6/15/2017. The deadline for a full tuition refund is June 15, and registration fees are non-refundable after June 8. Students must watch 80% of the videos by Monday, July 24, 2017 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Friday, July 28, 2017. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

### Estate and Gift Tax (Online)

**Prof. Gans, 2 credits, LAW-LW.11893.001 (LLM) and LAW-LW.11893.002 (MSL)**

**Course Description:** The transfer-tax system is the focus of this course. It will include an examination of the estate-tax and gift-tax systems and how these two systems interact. The following issues will be included in the discussion: the inclusions in the gross estate; the deductions permitted in arriving at the taxable estate; the determination and timing of taxable gifts; and the exclusions and deductions permitting in arriving at taxable gifts. In each area, a consideration of the underlying policy implications will be considered. The course is designed for students who do not have a working knowledge of the basic estate and gift provisions.

**Prerequisite:** None

**Exam:** Tuesday, August 1, beginning at 2 pm eastern time

This online course is a previously recorded class from the Fall 2016 semester. Video access begins on 05/30/2017.



The deadline to add this class is 6/15/2017. The deadline for a full tuition refund is June 15, and registration fees are non-refundable after June 8. Students must watch 80% of the videos by Monday, July 24, 2017 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Friday, July 28, 2017. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

### **International Tax I (Online)**

**V. Zonana, 2 credits, LAW-LW. 11920.001 (LLM) and LAW-LW. 11920.002 (MSL)**

**Course Description:** This is the first of three courses addressing US international taxation rules and policy. The principal focus is on “inbound” US taxation, i.e., the taxation of income from investments or business activities in the United States by nonresident aliens and foreign corporations. Investment income considered includes payments on debt and equity instruments, substitute and derivative payments, royalties and other income. As to business income, we focus on real estate operations, securities trading, income from the performance of services and the sale of goods. We also consider the treatment of income from intellectual property, electronic commerce and similar activities. Throughout, we analyze the impact of the application of income tax treaties, draw attention to special US income tax rules, and consider the role of international tax policy.

**Prerequisite(s) or Corequisite(s):** A Basic U.S. Federal Income Tax Course;

**Exam:** Wednesday, August 2, beginning at 2 p.m. eastern time

This online course is a previously recorded class from the Fall 2016 semester. Video access begins on 05/30/2017. The deadline to add this class is 6/15/2017. The deadline for a full tuition refund is June 15, and registration fees are non-refundable after June 8. Students must watch 80% of the videos by Monday, July 24, 2017 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Friday, July 28, 2017. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

### **International Tax II (Online)**

**V. Zonana, 2 credits, LAW-LW.10082.001 (LLM) and LAW-LW.10082.002 (MSL)**

**Course Description:** This is the second of three courses addressing US international taxation rules and policy. In conjunction with International Tax III, the principal focus is on “outbound” US taxation, i.e., the taxation of US taxpayers with overseas investments or operations. The emphasis in this course will be on developing a deep understanding of the policy and intricacies of the foreign tax credit system (including the rules related to eligibility and creditable taxes, the section 904 limitation, the deemed-paid credit, and the potential for planning), the allocation of interest and other expenses, the treatment of overseas losses, some aspects of transfer pricing, and the use of hybrid entities in tax planning by US taxpayers. (This course may be taken at the same time as International Tax I)

**Prerequisite(s) or Corequisite(s):** A Basic U.S. Federal Income Tax Course; International Tax I

**Exam:** Thursday, August 3 beginning at 2 p.m. eastern time

This online course is a previously recorded class from the Fall 2016 semester. Video access begins on 05/30/2017. The deadline to add this class is 6/15/2017. The deadline for a full tuition refund is June 15, and registration fees are non-refundable after June 8. Students must watch 80% of the videos by Monday, July 24, 2017 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Friday, July 28, 2017. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

### **International Tax III (Online)**

**V. Zonana, 2 credits, LAW-LW.11865.001 (LLM) and LAW-LW.11865.001 (MSL)**

**Course Description:** This is the third of three courses addressing US international taxation rules and policy. The focus is on other important “outbound” international tax topics including the "anti-deferral" provisions of the international tax system applicable to U.S. persons with overseas investments or operations. Emphasis is placed on the Subpart F rules and the PFIC regime. We also consider the rules applicable to various forms of international reorganizations (including liquidations, asset and stock transfers, and cross-border spin-offs).

**Prerequisite(s) or Corequisite(s):** A Basic U.S. Federal Income Tax Course; International Tax I and II

**Exam:** Tuesday, August 1, beginning at 9:30 am eastern time

This **online** course is a previously recorded class from the Spring 2017 semester. Video access begins on 05/30/2017. The deadline to add this class is 6/15/2017. The deadline for a full tuition refund is June 15, and registration fees are non-refundable after June 8. Students must watch 80% of the videos by Monday, July 24, 2017 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Friday, July 28, 2017. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

### **Multistate Tax: Income Taxation**

**R. Pomp, 2 credits, LAW-LW.11055.001 (LLM) and LAW-LW.11055.002 (MSL)**

**Course Description:** This course studies how the changing world of deregulation, electronic commerce, and globalization has affected state taxation. The course focuses on the economic, administrative, political, and constitutional constraints on state income taxation. The course does not concentrate on the laws of any particular state nor is any prior course in taxation required. The emphasis is on corporate taxation but some attention will be placed on individual taxation. We will study the Uniform Division of Income for Tax Purposes Act (UDITPA), which serves as a model for most states.

**Prerequisite:** None

**Exam:** A downloadable “take home” exam, beginning August 1 at 8:00 a.m. and ending August 8 at 5:00 pm.

This **online** course is a previously recorded class from the Fall 2016 semester. Video access begins on 05/30/2017. The deadline to add this class is 6/15/2017. The deadline for a full tuition refund is June 15, and registration fees are non-refundable after June 8. Students must watch 80% of the videos by Monday, July 24, 2017 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Friday, July 28, 2017. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

### **Multistate Tax: Sales and Gross Receipts Taxation (Online)**

**R. Pomp, 2 credits, LAW-LW.10943.001 (LLM) and LAW-LW.10943.002 (MSL)**

**Course Description:** This course studies how the changing world of deregulation, electronic commerce, and globalization has affected state taxation. Part of the course focuses on the economic, administrative, political, and constitutional constraints on state sales taxation. The course does not concentrate on the laws of any particular state nor is any prior course in taxation required. This course focuses on the sales tax, gross receipts tax, and the taxation of electronic commerce and mail order sales. We will study recent developments involving Amazon and other Internet vendors.

**Prerequisite:** None

**Exam:** A downloadable “take home” exam, beginning August 1 at 8:00 a.m. and ending August 8 at 5:00 pm.

This **online** course is a previously recorded class from the Spring 2017 semester. Video access begins on 05/30/2017. The deadline to add this class is 6/15/2017. The deadline for a full tuition refund is June 15, and registration fees are non-refundable after June 8. Students must watch 80% of the videos by Monday, July 24, 2017

or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Friday, July 28, 2017. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

### **Partnership Taxation**

**N. Cunningham, 3 credits, LAW-LW.11776.001 (LLM) and LAW-LW.11776.002 (MSL)**

**Course Description:** This course examines the federal income tax consequences arising from the operation of an enterprise that is treated as a partnership for tax purposes. Topics include the allocation of partnership income and deductions among partners as well as the various problems created by contributions, distributions, and acquisitions and dispositions of partnership interests.

**Prerequisite:** A basic course in income taxation

**Exam:** Thursday, August 3 beginning at 9:30 a.m. eastern time

This online course is a previously recorded class from the Spring 2017 semester. Video access begins on 05/30/2017. The deadline to add this class is 6/15/2017. The deadline for a full tuition refund is June 15, and registration fees are non-refundable after June 8. Students must watch 80% of the videos by Monday, July 24, 2017 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Friday, July 28, 2017. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

### **Private Foundations and Their Alternatives (Online)**

**J. Manny, 1 credit, LAW-LW.12536.001 (LLM) and LAW0LW.12536.002 (MSL)**

**Course Description:** This course covers the tax rules governing private foundations (including grantmaking / nonoperating foundations and operating foundations) and “private foundation alternatives”, including donor advised funds (commercial, institutional, and community foundation DAFs), supporting organizations, and for-profit structures (like those used by Omidyar, Zuckerberg / Chan, and Laurene Powell Jobs).

**Prerequisite:** none

**Exam:** Tuesday, August 1, 2017 beginning at 9:30 am.

This online course is a previously recorded class from the Summer 2016 semester. Video access begins on 05/30/2017. The deadline to add this class is 6/15/2017. The deadline for a full tuition refund is June 15, and registration fees are non-refundable after June 8. Students must watch 80% of the videos by Monday, July 24, 2017 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Friday, July 28, 2017. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

### **State Taxation of Native Americans (Online)**

**R. Pomp, 2 credits, LAW-LW.12163.001 (LLM) and LAW-LW.12163.002 (MSL)**

**Course Description:** The focus of this course is on the exploding field of state taxation of American Indians and Indian Tribes, as well as on the taxation of those doing business with them. Included is the taxation of Indians residing on and off a reservation, and non-Indians doing business with Indians on and off a reservation. Specific topics addressed will include the taxation of motor fuels, mineral resources, cigarettes, income, property, and retail sales. Special attention will be placed on treaties and unique Indian canons of construction. No prior tax courses are required.

**Prerequisite:** Income Taxation

**Exam:** A downloadable “take home” exam, beginning August 1 at 8:00 a.m. and ending August 8 at 5:00 pm.

This online course is a previously recorded class from the Summer 2012 semester. Video access begins on

05/30/2017. The deadline to add this class is 6/15/2017. The deadline for a full tuition refund is June 15, and registration fees are non-refundable after June 8. Students must watch 80% of the videos by Monday, July 24, 2017 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Friday, July 28, 2017. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

### **Survey of Income Taxation (Online)**

**D. Schenk, 2 credits**, (*not applicable towards degree progress*), LAW-LW.11954.001

**Course Description:** This course is intended for students who will be enrolling in the LLM (tax) program who have not previously taken a course in Basic Income Taxation. We no longer require LLM students to have previously enrolled in a basic U.S. federal income tax course, however we assume students will acquire that knowledge prior to starting our program. (For example, a fall semester tax course may immediately jump into advanced discussions of original issue discount.) Some students choose to self-study, often by reading the Chirelstein book on basic income taxation. This survey course was created in 2009, when we still required all tax students to have previously enrolled in a basic tax course. That formal requirement has since been removed.

This survey course was intended to meet the need for a flexible online course which covered the basic material in less than 4 credits. The course covers the material that you will be expected to know before you enroll in LLM tax courses. Among the topics covered are definition of the tax base (what is income and what is deductible), timing issues, and the taxation of property transactions (including basis, amount realized, character of gains and losses and nonrecognition). Please note that though this course does not count towards the LLM program, though it does incur a tuition charge equivalent to two credits of tuition and fees as would be charged on a per-credit basis. This charge applies regardless of whether an LLM or Advanced Professional Certificate student is part-time or full-time, and is incurred in addition to other tuition charges. JD students may not enroll in this class. NYU JD students should instead take the four credit Income Taxation course, ideally before their third year. The refund schedule for this course differs from the typical online course refund schedule due to the unique nature of this course. Please contact the graduate tax program with questions about registering for this course.

Continuing students have no need of this course. There is no exam for this course and students may add the course at any time. Students buy the recommended texts, watch the videos, and this course differs from our other online courses in that there is no discussion board or faculty interaction—the course and materials are very basic and self-explanatory. Refunds are based on the number of videos watched. This is a two credit course, but the credits for this course do not count towards any degree program at the school.

**Prerequisite:** None

**Exam:** None

### **Survey of Tax Procedure (Online)**

**J. Blank, 1 credit**, LAW-LW.10707.001 (LLM) and LAW-LW.10707.002 (MSL)

**Course Description:** In this short course, we will study critical rules that power the administration of our tax system. Perhaps to your surprise, you may find that these rules are relevant and interesting not only to the future tax litigators, but also to future transactional tax attorneys, and even to future tax policy thinkers. Specific topics we will discuss include taxpayer privacy, deficiency assessments, statutes of limitations, litigation in U.S. Tax Court and U.S. District Court and tax penalties.

**Prerequisite:** None

**Exam:** Thursday, August 3, beginning at 9:30 am eastern time

Note: Video access for this course will begin on approximately June 15. The deadline to add this class is 6/26/2017. The deadline for a full tuition refund is June 25, and registration fees are non-refundable after June 18. Students must watch 80% of the videos by Monday, July 24, 2017 or they will be withdrawn from the course without a

refund. The last class day of the summer session before the exam period is Friday, July 28, 2017. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

**Tax Aspects of Charitable Giving (Online)**

**J. Manny, 1 credit, LAW-LW.11589.001 (LLM) and LAW-LW.11589.002 (MSL)**

**Course Description:** This course will provide an in-depth analysis of income tax issues affecting donations to charity. The course will begin with an introduction to policy, technical, and computational issues arising under the principal income tax provision (I.R.C. section 170). It will conclude with consideration of substantiation and valuation requirements for the charitable contribution deduction.

**Recommended (not required) prerequisites:** Income Taxation of Trusts and Estates; Estate and Gift Taxation

**Exam:** Wednesday, August 2, beginning at 2 p.m. eastern time

This **online** course is a previously recorded class from the Spring 2017 semester. Video access begins on 05/30/2017. The deadline to add this class is 6/15/2017. The deadline for a full tuition refund is June 15, and registration fees are non-refundable after June 8. Students must watch 80% of the videos by Monday, July 24, 2017 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Friday, July 28, 2017. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

**Tax Exempt Organizations (Online)**

**J. Manny, 2 credits, LAW-LW.11754.001 (LLM) and LAW-LW.11754.002 (MSL)**

**Course Description:** This course focuses on the tax treatment of public and private charities exempt under I.R.C. section 501(c)(3), as well as business leagues, social clubs, and other types of tax-exempt organizations. The course begins with an analysis of the requirements for exemption from federal income tax, including the prohibition on private inurement, excess benefit, and private benefit, and the restrictions on lobbying and political campaign activities. It continues with a discussion of commercial activities and the unrelated business income tax and private foundation status and its repercussions.

**Prerequisites:** None

**Exam:** Thursday, August 3 beginning at 2 p.m. eastern time

This **online** course is a previously recorded class from the Spring 2017 semester. Video access begins on 05/30/2017. The deadline to add this class is 6/15/2017. The deadline for a full tuition refund is June 15, and registration fees are non-refundable after June 8. Students must watch 80% of the videos by Monday, July 24, 2017 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Friday, July 28, 2017. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

**Tax Policy (Online)**

**J. Blank, 1 credit, LAW-LW.12027.001 (LLM) and LAW-LW.12027.002 (MSL)**

**Course Description:** In this seminar, we will explore fundamental policy issues that influence our choice of tax law. We will not focus in any significant detail on the mechanics of the tax law currently in effect. Rather, we will spend our time thinking about what the tax law could be and should be. Specific topics we will discuss include: (i) theories of distributive justice and progressivity; (ii) income versus consumption taxation; (iii) tax compliance and enforcement; and (iv) corporate tax incidence, integration and abuse. The grade for this course will be based on a final exam, which will consist of several short essay questions.

**Recommended prerequisites:** Income Taxation

**Exam:** Tuesday, August 1, beginning at 2 pm eastern time

This **online** course is a previously recorded class from the Summer 2016 semester. Video access begins on 05/30/2017. The deadline to add this class is 6/15/2017. The deadline for a full tuition refund is June 15, and registration fees are non-refundable after June 8. Students must watch 80% of the videos by Monday, July 24, 2017 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Friday, July 28, 2017. This is the deadline to withdraw from the course without receiving a "WD" on one's transcript.

### **Taxation of Intellectual Property (Online)**

**M. Engler, 2 credits, LAW-LW.12270.001 (LLM) and LAW-LW.12270.002 (MSL)**

**Course Description:** This course covers the tax treatment applicable to the sales, purchases, licensing and transfers of intellectual property (IP), such as patents, trade secrets, trademarks, copyrights, and computer software. It will begin with a brief introduction to the field of intellectual property for those unfamiliar with this area of law. Specific tax areas then covered will include some or all of the following: the different tax treatment afforded to the development, acquisitions, and transfer of IP; IP litigation in taxation; the use of IP holding companies and R&D limited partnerships; International Tax Planning for IP; Multi-State Tax Planning for IP; and Estate Planning for IP.

**Prerequisite(s):** Federal Income Tax

**Exam:** Thursday, August 3 beginning at 2 p.m. eastern time

This **online** course is a previously recorded class from the Spring 2016 semester. Video access begins on 05/30/2017. The deadline to add this class is 6/15/2017. The deadline for a full tuition refund is June 15, and registration fees are non-refundable after June 8. Students must watch 80% of the videos by Monday, July 24, 2017 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Friday, July 28, 2017. This is the deadline to withdraw from the course without receiving a "WD" on one's transcript.

### **Taxation of Property Transactions (Online)**

**M. Engler, 3 credits, LAW-LW.11871.001 (LLM) and LAW-LW.11871.002 (MSL)**

**Course Description:** This course surveys several fundamental areas relating to the income taxation of property transactions. The topics include mortgages, depreciation, like-kind exchanges, leasing transactions, installment sales, and characterization of gains and losses.

**Prerequisite:** None

**Exam:** Tuesday, August 1, beginning at 2 pm eastern time

This **online** course is a previously recorded class from the Fall 2016 semester. Video access begins on 05/30/2017. The deadline to add this class is 6/15/2017. The deadline for a full tuition refund is June 15, and registration fees are non-refundable after June 8. Students must watch 80% of the videos by Monday, July 24, 2017 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Friday, July 28, 2017. This is the deadline to withdraw from the course without receiving a "WD" on one's transcript.

### **Timing Issues and the Income Tax (Online)**

**M. Engler, 2 credits, LAW-LW.10811.001 (LLM) and LAW-LW.10811.001 (MSL)**

**Course Description:** Timing Issues and the Income Tax begins with a detailed consideration of the cash and accrual methods of accounting. The second unit closely examines time value of money principles and interest, focusing on "original issue discount" and other areas of imputed interest. We will be using

McDaniel, McMahon, Simmons & Polsky, Federal Income Taxation (6th edition, along with current supplement). The course will also require a copy of the code and regs. The first class assignment and problems can be found here: <http://www.law.nyu.edu/academics/courses/coursesyllabiandassignments>

**Prerequisite:** None

**Exam:** Thursday, August 3 beginning at 9:30 a.m eastern time

This **online** course is a previously recorded class from the Summer 2016 semester. Video access begins on 05/30/2017. The deadline to add this class is 6/15/2017. The deadline for a full tuition refund is June 15, and registration fees are non-refundable after June 8. Students must watch 80% of the videos by Monday, July 24, 2017 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Friday, July 28, 2017. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

### **Value Added Taxation (On Campus)**

**R. Ainsworth, 1 credit, LAW- LW.10068.001**

This course undertakes a detailed examination of global consumption tax regimes, with a primary focus on Value Added Taxation (VAT) in the European Union. It will however, not be limited to the EU VAT, as important variations outside the EU will also be considered. The Canadian and New Zealand GSTs as well as the Israeli and Brazilian VATs will provide important contrasts. The Japanese consumption tax, an annual non-invoice VAT, will also be considered, as will the technology elements in the Chinese VAT (Golden Tax Project). Students will be able to apply their understanding of VAT to the GOP's corporate tax reform in *A Better Way*, which many considered to be more akin to a subtraction VAT than an income tax.

This course will teach, and measure the internalization of professional responsibilities consistent with the defense of individuals being extradited from the US for criminal and civil violation of VAT statutes overseas. The instructor’s role in two such extraditions and the ethical issues that were raised will be considered. Notably, the role of VAT fraud in the funding of terrorist organizations will be considered in this context. Student will be expected to assess the impact of an unsupported terrorist funding allegation in a VAT extradition. – This course will also introduce students to current research efforts directed at solving (with technology and statutory reforms) some of the major frauds (Missing Trader frauds) in the EU and similar VATs. The course will also consider potential fraud problems in various current US consumption tax policy proposals.

During the full two-credit course offered in the regular year (typically taught in the spring semester) comparative analysis is heightened. We are able to consider variables from more VAT jurisdictions (notably the East African Community VATs, and the new VATs in the six Arab gulf states) but also through detailed consideration of difficult problems that arise when real estate, insurance, gambling, and financial transactions are made subject to VAT.

The final exam will determine the course grade.

**Prerequisite:** None

**Exam:** Thursday, June 22, beginning at 9:30 am eastern time

This course will meet on campus from June 5-8 from 9 am to 12:15. This is a combined on-campus/online course. There are two sections for this course. This section (001) is an on-campus section which requires in-person attendance and the other section (002) is online.

The deadline to add this course is before the second class meeting occurs on June 6, 2017. Students enrolled in the on-campus section must attend all class meetings and will not be granted access to the course videos. The last day the class meets, June 8, 2017, is the deadline to withdraw from the course without receiving a “WD” on one’s transcript. The refund schedule for this course differs from other courses. For more details, see page 3 of this guide.

**Value Added Taxation (Online)**

**R. Ainsworth, 1 credit, LAW- LW.10068.002 (LLM) LAW-LW.10068.003 (MSL)**

(See above for course description, prerequisite, and exam details which are the same for all summer sections of this course.)

This is a combined on-campus/online course. There are two sections for this course. The online sections (002 or 003) require students to watch course videos. The other section (001) is an on-campus section which requires in-person attendance. The deadline to add this course is before the second time the class meets on campus on the morning of June 6, 2017. This online section will have videos posted shortly after each class has met on-campus. Students who are enrolled in this section (online) must watch all of the videos by the attendance deadline of Monday, June 19, 2017. June 8 is the deadline to withdraw from the course without receiving a “WD” on one’s transcript. The refund schedule for this course differs from other courses. For more details, see page 3 of this guide. [As there are several sections of this course, the section in which you are enrolled effects your responsibilities. For example, students who are enrolled in the on campus section (section 001) must attend a minimum all of the class meetings in person and may not view online classes.