



**New York University School of Law**  
**Summer Session 2014 Registration Instructions** (version date: 5/13/2014)

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. Many of these courses are in advanced topics, and aren't good choices if you have not previously studied tax with us. We do offer some courses which, while still very challenging, are good starting points.

Summer session is open to:  
-NYU School of Law students  
-NYU School of Law alumni  
-Attorneys who are not enrolled in a degree program

Most courses do require a student to have completed a basic law school course in U.S. Federal Income Taxation. Current J.D. students from NYU or other law schools may apply to take our on-campus courses, assuming they have taken the pre-requisites.

**Restrictions on online study:**

J.D. 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 J.D. degree, though these courses often are transferrable for LL.M. students.

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

Students from the following four 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.

Summer on-campus courses meet in a condensed schedule and 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 will meet over June and July, with an exam early in August. Contrasted with our on-campus summer courses, the two month "online-only" courses meet over a much longer time period, the course evaluations for the specific offerings are already available, and students can frontload their course viewing, if desired.

Students who have been admitted to a degree program in the Fall 2014 semester may begin their studies in Summer 2014, though we recommend you first speak with John Stephens at (212) 998-6394.

**Auditing:** Most students take our courses for academic credit. 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 courses must be taken for a letter grade and, if applicable, 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 LL.M. 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 8.5 weeks long, which is slightly more than

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) 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 4 or 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 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:** 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 mac or a PC laptop. This is referred to as an “in-class” exam.
- 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, write an answer, and then upload it to our online take home exam system. Using either a Mac or PC is fine.
- 4). Students may purchase the remote proctor device and matching Securexam software for any class that is offered online. This software is different from our on-campus exam software, and can only be used with PC laptops/desktops. Students interested in using this option should contact us a.s.a.p. if they wish to purchase a remote proctor unit, which costs around \$180—i.e., those admitted in the fall who begin early by taking summer classes. In order to use the device, we suggest that you purchase it at least 6 weeks prior to the exam. Note that for our on-campus courses which meet towards the beginning of the summer session, there may not be enough time to order a remote proctor device prior to the exam date. In order to be registered to use the device, you must also contact us at [Robertson@exchange.law.nyu.edu](mailto:Robertson@exchange.law.nyu.edu) unless you are in the executive LL.M. program. We automatically register all admitted executive LL.M. students as potential users of the device, but do let us know if the summer is your first semester here.

**Again, all in-class exams must be taken on a laptop.** For all in-class exams, part-time students in the Taxation LL.M. program, alumni, and non-matriculants are expected to examine on-campus, while students in the Executive LL.M. program are eligible to examine using the remote proctor device. 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 474, (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 \$2,217.00 per credit and is assessed at the time of registration. Registration and services fees for the first credit are \$229 for students not enrolled in the Spring 2014 term and \$198 for students enrolled in the Spring 2014 term. There is also a non-refundable \$30 fee for each credit after the first credit for all students. Tuition and fees must be paid in full before the first class meeting. Registration and services fees are non-refundable once class begins.

<http://www.nyu.edu/bursar/tuition.fees/summer14/summer.tuitionlwsun.html>

## 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 Courses:

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

- Tax Deals
  - Prof. Lawsky
  - Meets June 16-19 from 6 pm-Exam held during the daytime 9:15 pm
  - Exam starts at 9:30 am on Wednesday, July 9
- Taxation of Subchapter S Corporations
  - Prof. Lawsky
  - Meets June-23-June 26 and June 30-July 3 from 6 pm-9:15 pm
  - Exam starts at 9:30 am on Friday, July 18
- Timing Issues and the Income Tax
  - Prof. Engler
  - Meets July 7-July 10 and July 14-July 17 from 5:45 pm-9 pm
  - Exam starts at 9:30 am on Friday, August 1

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 17 online-only summer 2014 courses (not including the courses listed above):

- Corporate Tax I (Prof. Schmolka)
- Corporate Tax II (Prof. Schmolka)
- 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 Tax (Prof. Schmolka)
- State Tax'n of Native Americans (Prof. Pomp)

- Survey of Tax Procedure (Prof. Blank)
- Tax Aspects of Charitable Giving (Prof. Manny)
- Tax Exempt Organizations (Prof. Manny)
- Tax Policy (Prof. Lawsky)
- Tax'n of Intellectual Property (Prof. Engler)
- Tax'n of Mergers & Acquisitions (Prof. Schmolka)
- Tax'n of Prop Transactions (Prof. Engler)

Withdraw before June 10, 2014 <u>and</u> having viewed fewer than three class sessions	100% Tuition and registration fees
Withdraw <u>before</u> June 17, 2014 <u>and</u> having viewed fewer than four class sessions	100% Tuition, no refund of registration fees
Withdraw between June 17 and July 1, 2014 <u>and</u> having viewed fewer than 7 class sessions	55% Tuition, no refund of registration fees
Withdraw after July 1, 2014 <u>or</u> 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, 2014 or after watching seven 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 2014 Registration Form**

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**To all students taking summer courses: The Student Health Center automatically enrolls all degree-candidates taking summer courses in the NYU student health insurance plan.** Non-degree students are not automatically enrolled in health insurance and need not waive coverage. To waive this plan, you must log on to the SHC website at <http://www.nyu.edu/life/safety-health-wellness/student-health-center/insurance-patient-accounts/student-health-insurance/waive-coverage.html> no later than **June 5<sup>th</sup>, 2014**. Any waiver requests made after this date must be made in person at the SHC: 726 Broadway, 3<sup>rd</sup> floor. If you wish to register after June 5 and you intend to waive health insurance, you should contact the student health center prior to submitting this registration paperwork to see if it is still possible to waive coverage.

You can check your financial record via [home.nyu.edu](http://home.nyu.edu) (within the ALBERT subsystem) to see if there is a charge from the NYU Student Health Center. You are encouraged to submit your waiver as soon as possible to avoid complications. Once the plan is waived (assuming timely submission), all Student Health insurance charges will be dropped from your record.

**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 course they request, and 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.**

\_\_\_\_\_  
Name (Print)

\_\_\_\_\_  
University ID (SSN for non-NYU students.  
We can call you to request this information if  
you have reservations about entering it here.)

\_\_\_\_\_  
Date of Birth

\_\_\_\_\_  
Home Address

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

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

\_\_\_\_\_  
Work Address (if your home address is foreign, you must also provide a U.S. address)

\_\_\_\_\_  
Phone (Home)

\_\_\_\_\_  
Phone (Work)

\_\_\_\_\_  
Email

Type of Student:	<input type="checkbox"/> NYU Law Continuing LL.M. Student <input type="checkbox"/> NYU Law Fall 2014 Admit <sup>†</sup> <input type="checkbox"/> Current J.D. student	<input type="checkbox"/> NYU Law Alum <input type="checkbox"/> Other:
<b>I will take my course(s):</b>	<input type="checkbox"/> Audit (no exam, no grade)	<input type="checkbox"/> For a letter grade
<b>I have previously completed a law school course on U.S. Federal Income Taxation</b> (not all courses require this)	<input type="checkbox"/> Yes	<input type="checkbox"/> 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.)

<sup>†</sup> Recently admitted full-time LL.M. students: Please contact the admissions department if you are taking summer classes. They will matriculate you in our systems early. This will protect against two types of system errors--either being reclassified as a part-time student (not able to register for more than 6 fall credits) or accidentally being charged full-time tuition for the summer.

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

- Corporate Tax I (L. Schmolka, 2 credits, LAW-LW.11907.001) **ONLINE**
- Corporate Tax II (L. Schmolka, 2 credits, LAW-LW.10878.001) **ONLINE**
- Estate and Gift Taxation (M. Gans, 2 credits, LAW-LW.11893.001) **ONLINE**
- International Tax I (V. Zonana, 2 credits, LAW-LW.11920.001) **ONLINE**
- International Tax II (V. Zonana, 2 credits, LAW-LW.10082.001) **ONLINE**
- International Tax III (V. Zonana, 2 credits, LAW-LW.11865.001) **ONLINE**
  
- Multistate Taxation: Income Taxation (R. Pomp, 2 credits, LAW-LW.11055.001) **ONLINE**
- Multistate Taxation: Sales and Gross Receipts Tax'n (R. Pomp, 2 credits, LAW-LW.10943.001) **ONLINE**
- Partnership Taxation (L. Schmolka, 3 credits, LAW-LW.11776.001) **ONLINE**
- State Tax of Native Americans (R. Pomp, 2 credits, Kaw-LW.12163.001) **ONLINE**
- Survey of Income Taxation (2 credits tuition charge, no exam; credits not applicable to any program, LAW-LW.11954.001) **ONLINE**
- Survey of Tax Procedure (J. Blank, 1 credit, LAW-LW.10707.**002**) **ONLINE** (section 001 was cancelled)
- Tax Aspects of Charitable Giving (J. Manny, 1 credit, LAW-LW.11589.001) **ONLINE**
- Tax Deals (S. Lawskey, 1 credit, LAW-LW.11274.001) **ON-CAMPUS**
- Tax Deals (S. Lawskey, 1 credit, LAW-LW.11274.**002**) **ONLINE**
- Tax Exempt Organizations (J. Manny, 2 credits, LAW-LW.11754.001) **ONLINE**
  
- Tax Policy (S. Lawskey, 2 credits, LAW-LW.12027.001) **ONLINE**
- Taxation of Intellectual Property (M. Engler, 2 credits, LAW-LW.12270.001) **ONLINE**
- Taxation of Mergers and Acquisitions (L. Schmolka, 2 credits, LAW-LW.11728.001) **ONLINE**
- Taxation of Property Transactions (M. Engler, 3 credits, LAW-LW.11871.001) **ONLINE**
- Taxation of Subchapter S Corporations (S. Lawskey, 2 credits, LAW-LW.11878.001) **ON-CAMPUS**
- Taxation of Subchapter S Corporations (S. Lawskey, 2 credits, LAW-LW.11878.**002**) **ONLINE**
- Timing Issues and the Income Tax (Engler, 2 credits, LAW-LW.10811.001) **ON-CAMPUS**
- Timing Issues and the Income Tax (Engler, 2 credits, LAW-LW.10811.**002**) **ONLINE**

**Continuing and newly admitted NYU Law students will be billed for summer classes by the Bursar through their NYU Statement of Account. All others are required to pay at time of registration. (Submit payment using the form on the next page.)**

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

**New York University School of Law  
Summer Session 2014  
Tuition and Fee Payment Information for Non-Degree Students or Alumni**

**Who should fill out this form? Anyone who wishes to register for a class and is not a current NYU student. Current NYU students may pay online via their student account.**

Current NYU students may pay tuition via the Bursar’s Office and may access their bill online. Current NYU students need not fill out this form and may instead visit: <http://www.nyu.edu/bursar/payment/info/> Please do complete this form if you are a non-degree student registering for the NYU School of Law summer session. (Use the tuition and fees schedule below to calculate your charges.) Non-degree students who have not fully paid tuition and fees before the first class meeting will **not** be permitted to attend class.

	Tuition: \$2217 per credit. Be sure to note the refund schedule for each course and whether it is live or online.	Enter number of credits x \$2217:
<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: Enter \$229 if not enrolled in the spring 2014 semester. Enter \$198 if enrolled here in the spring 2014 semester.		\$ _____
Registration Fee For Each Credit <b>After</b> the First Credit: \$30 each		\$ _____
<b>Insurance Charge*</b> (ALL degree candidates are assessed health insurance for the summer, regardless of prior waivers. If you have insurance, you must waive coverage by June 5) \$611 Basic; \$942 Comprehensive (Individual). Non-degree students need not waive insurance. To waive coverage visit: <a href="http://www.nyu.edu/life/safety-health-wellness/student-health-center/insurance-patient-accounts/student-health-insurance/waive-coverage.html">http://www.nyu.edu/life/safety-health-wellness/student-health-center/insurance-patient-accounts/student-health-insurance/waive-coverage.html</a>		\$ _____
Technology Fee:		\$99
<b>Total:</b>		\$ _____

\* Students who were enrolled in NYU student health insurance in Spring 2014 are likely covered through 8/20/14.  
Note: NYU cannot accept credit cards for tuition payments.

Signature \_\_\_\_\_

Registration and payment forms 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**

**L. Schmolka, 2 credits** LAW-LW.11907.001

**Course Description:** This course examines the federal income tax treatment of corporations and their shareholders arising from various transactions including transfers to controlled corporations, distributions, redemptions and liquidations.

**Prerequisite:** A Basic U.S. Federal Income Tax Course

**Exam:** Tuesday, August 5 at 9:30 am eastern time

This **online** course is a previously recorded class from the Fall 2013 semester. Video access begins on 06/02/2014. The deadline to add this class is 6/13/2014. Students must watch 80% of the videos by Thursday, July 24, 2014 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Thursday, July 31, 2014, before 5 pm. This is the deadline to withdraw from the course without receiving a "WD" on one's transcript.

### **Corporate Tax II**

**L. Schmolka, 2 credits** LAW-LW.10878.001

**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:** Tuesday, August 5 at 9:30 am eastern time

This **online** course is a previously recorded class from the Fall 2013 semester. These videos are of the second half of a four credit Corporate Tax I & II on-campus offering. This course was split into two segments so that we could offer it online in 2 credit segments. Video access begins on 06/02/2014. The deadline to add this class is 6/13/2014. Students must watch 80% of the videos by Thursday, July 24, 2014 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Thursday, July 31, 2014, before 5 pm. This is the deadline to withdraw from the course without receiving a "WD" on one's transcript.

### **Estate and Gift Tax**

**Prof. Gans, 2 credits** LAW-LW.11893.001

**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:** Monday, August 4 at 2:00 pm eastern time

This **online** course is a previously recorded class from the Fall 2013 semester. Video access begins on 06/02/2014. The deadline to add this class is 6/13/2014. Students must watch 80% of the videos by Thursday, July 24, 2014 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Thursday, July 31, 2014, before 5 pm. This is the deadline to withdraw from the course without receiving



a “WD” on one’s transcript.

### **International Tax I**

**V. Zonana, 2 credits** LAW-LW.11920.001

**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.

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

**Exam:** Monday, August 4 at 9:30 am eastern time

This online course is a previously recorded class from the Fall 2013 semester. Video access begins on 06/02/2014. The deadline to add this class is 6/13/2014. Students must watch 80% of the videos by Thursday, July 24, 2014 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Thursday, July 31, 2014, before 5 pm. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

### **International Tax II**

**V. Zonana, 2 credits** LAW-LW.10082.001

**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:** Wednesday, August 6 at 2:00 pm eastern time

This online course is a previously recorded class from the Spring 2014 semester. Video access begins on 06/02/2014. The deadline to add this class is 6/13/2014. Students must watch 80% of the videos by Thursday, July 24, 2014 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Thursday, July 31, 2014, before 5 pm. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

### **International Tax III**

**V. Zonana, 2 credits** LAW-LW.11865.001

**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). (International Tax I and II are pre-requisites unless waived by the instructor).

**Prerequisite:** A Basic U.S. Federal Income Tax Course; International Tax I and International Tax II, or permission of the instructor)

**Exam:** Monday, August 4 at 9:30 am eastern time

This **online** course is a previously recorded class from the Spring 2013 semester. Video access begins on 06/02/2014. The deadline to add this class is 6/13/2014. Students must watch 80% of the videos by Thursday, July 24, 2014 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Thursday, July 31, 2014, before 5 pm. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

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

**R. Pomp, 2 credits** LAW-LW.11055.001

**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 July 25 at 9:00 am and ending August 1 at 5:00 pm eastern time

This **online** course is a previously recorded class from the Fall 2013 semester. Video access begins on 06/02/2014. The deadline to add this class is 6/13/2014. Students must watch 80% of the videos by Tuesday, July 22, 2014 or they will be withdrawn from the course without a refund.

### **Multistate Tax: Sales and Gross Receipts Taxation**

**R. Pomp, 2 credits** LAW-LW.10943.001

**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 mail order sales. We will study recent developments involving Amazon and other Internet vendors.

**Prerequisite:** None

**Exam:** A downloadable “take home” exam, beginning July 25 at 9:00 am and ending August 1 at 5:00 pm eastern time

This **online** course is a previously recorded class from the Spring 2014 semester. Video access begins on 06/02/2014. The deadline to add this class is 6/13/2014. Students must watch 80% of the videos by Tuesday, July 22, 2014 or they will be withdrawn from the course without a refund.

### **Partnership Taxation**

**L. Schmolka, 3 credits** LAW-LW.11776.001

**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 tax consequences of formation of a partnership; allocation of partnership income and deductions among partners; problems created by partnership liabilities, contributions, distributions; and acquisitions and dispositions of partnership interests.

**Prerequisite:** A Basic U.S. Federal Income Tax Course

**Exam:** Wednesday, August 6 at 9:30 am eastern time

This **online** course is a previously recorded class from the Spring 2014 semester. Video access begins on 06/02/2014. The deadline to add this class is 6/13/2014. Students must watch 80% of the videos by Thursday, July 24, 2014 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Thursday, July 31, 2014, before 5 pm. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

### **State Taxation of Native Americans**

**R. Pomp, 2 credits, LAW-LW. 12163.001**

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:** None.

**Exam:** A downloadable “take home” exam, beginning July 25 at 9:00 am and ending August 1 at 5:00 pm eastern time

This **online** course is a previously recorded class from the Summer 2012 semester. Video access begins on 06/02/2014. The deadline to add this class is 6/13/2014. Students must watch 80% of the videos by Tuesday, July 22, 2014 or they will be withdrawn from the course without a refund.

### **Survey of Income Taxation**

**D. Schenk, two credits (*not applicable towards degree progress*), no exam LAW-LW.11954.001**

**Course Description:** This course is intended for students who will be enrolling in the LL.M. (tax) program who have not previously taken a course in Basic Income Taxation. We no longer require LL.M. 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 LL.M. 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 LL.M. 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 LL.M. or Advanced Professional Certificate student is part-time or full-time, and is incurred in addition to other tuition charges. J.D. students may not enroll in this class and should instead take the four credit Income Taxation course. 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.10707.002

**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:** August 5, 9:30 am

This online course is a previously recorded class from the Summer 2012 semester. Video access begins on 06/02/2014. The deadline to add this class is 6/13/2014. Students must watch 80% of the videos by Thursday, July 24, 2014 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Thursday, July 31, 2014, before 5 pm. 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

**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 6 at 2:00 pm eastern time

This online course is a previously recorded class from the Summer 2013 semester. Video access begins on 06/02/2014. The deadline to add this class is 6/13/2014. Students must watch 80% of the videos by Thursday, July 24, 2014 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Thursday, July 31, 2014, before 5 pm. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

### **Tax Deals (On-campus)**

**S. Lawsky, 1 credit** LAW-LW.11274.001

**Course Description:** This course studies tax-related provisions in corporate acquisition agreements, including representations, covenants, indemnification, and elections. Deals covered include taxable asset acquisitions, taxable stock acquisitions (including 338(h)(10) elections), and tax-free acquisitive reorganizations.

**Prerequisites:** Corporate Tax I and II

**Exam:** Wednesday, July 9 at 9:30 am eastern time

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. This course will meet on-campus from June 16-19, 2014 in the evenings from 6:00 pm-9:15 pm. The deadline to add this course is before the second class meeting occurs on June 17, 2014. Students enrolled in the on-campus section must attend all class meetings and may not substitute viewing online classes, should the professor elect to make them available for review. The last day the class meets, set at June 19, 2014, 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.

### **Tax Deals (Online)**

**S. Lawsky, 1 credit** LAW-LW.11274.002

**Course Description:** This course studies tax-related provisions in corporate acquisition agreements, including representations, covenants, indemnification, and elections. Deals covered include taxable asset acquisitions, taxable stock acquisitions (including 338(h)(10) elections), and tax-free acquisitive reorganizations.

**Prerequisites:** Corporate Tax I and II

**Exam:** Wednesday, July 9 at 9:30 am eastern time

This is a combined on-campus/online course. There are two sections for this course This section (002) is an online section and requires students to watch course videos. The other section (001) is an on-campus section which requires in-person attendance. This course will be recorded as it meets on-campus from June 16-19, 2014 in the evenings from 6:00 pm-9:15 pm. The deadline to add this course is before the second class meeting occurs on June 17, 2014. 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 80% of the videos by the attendance deadline of Monday, July 7, 2014. The last day the class meets, set at June 19, 2014, 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 two sections of this course, the section in which you are enrolled effects your responsibilities. For example, students who are enrolled in the other section (section 001, which meets on-campus) must attend a minimum of 80% of the class meetings in person and may not substitute viewing online classes, should the professor elect to make them available for review. (Faculty are also free to set more stringent attendance rules.)]

### **Tax Exempt Organizations**

**J. Manny, 2 credits** LAW-LW.11754.001

**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:** Tuesday, August 5 at 2:00 pm eastern time

This online course is a previously recorded class from the Spring 2014 semester. Video access begins on 06/02/2014. The deadline to add this class is 6/13/2014. Students must watch 80% of the videos by Thursday, July 24, 2014 or they will be withdrawn from the course without a refund. The last class day of the summer session

before the exam period is Thursday, July 31, 2014, before 5 pm. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

### **Tax Policy**

**S. Lawsky, 2 credits** LAW-LW.12027.001

**Course Description:** This course examines legal, economic, and political considerations relevant to formulating tax policy. Topics include the concept of income and the tax base; economic efficiency; equity and distributive justice; tax expenditures; fundamental tax reform; wealth transfer taxation; tax compliance and enforcement, including tax shelters; and current tax policy legislative initiatives.

**Prerequisites:** None

**Exam:** Wednesday, August 6, 9:30 am eastern time

This **online** course is a previously recorded class from the Summer 2012 semester. Video access begins on 06/02/2014. The deadline to add this class is 6/13/2014. Students must watch 80% of the videos by Thursday, July 24, 2014 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Thursday, July 31, 2014, before 5 pm. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

### **Taxation of Mergers and Acquisitions**

**L. Schmolka, 2 credits** LAW-LW.11728.001

**Course Description:** This course will explore a wide variety of merger and acquisition transactions and techniques from a practitioner's perspective, including tax-free reorganizations, § 351 transactions, spin-offs, various tax-efficient dispositions of appreciated assets, private equity transactions, contingent stock acquisitions and taxable § 338 transactions. There will be a session on negotiating an acquisition agreement from a tax perspective, as well as a session focusing on critical accounting aspects of merger and acquisition transactions.

**Recommended prerequisites:** Very strongly recommended, although not technically a pre-requisite: Corporate Taxation, especially acquisitive & divisive reorganizations (these topics are covered in NYU’s Corporate Tax II course.)

**Exam:** Tuesday, August 5 at 2:00 pm eastern time

This **online** course is a previously recorded class from the Spring 2014 semester. Video access begins on 06/02/2014. The deadline to add this class is 6/13/2014. Students must watch 80% of the videos by Thursday, July 24, 2014 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Thursday, July 31, 2014, before 5 pm. 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

**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:** Income Taxation

**Exam:** Wednesday August 6 at 9:30 am eastern time

This **online** course is a previously recorded class from the Summer 2013 semester. Video access begins on 06/02/2014. The deadline to add this class is 6/13/2014. Students must watch 80% of the videos by Thursday, July 24, 2014 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Thursday, July 31, 2014, before 5 pm. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

### **Taxation of Property Transactions**

**M. Engler, 3 credits, LAW-LW.11871.001**

**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.

**Recommended prerequisite:** None

**Exam:** Monday, August 4 at 2:00 pm eastern time

This **online** course is a previously recorded class from the Fall 2013 semester. Video access begins on 06/02/2014. The deadline to add this class is 6/13/2014. Students must watch 80% of the videos by Thursday, July 24, 2014 or they will be withdrawn from the course without a refund. The last class day of the summer session before the exam period is Thursday, July 31, 2014, before 5 pm. This is the deadline to withdraw from the course without receiving a “WD” on one’s transcript.

### **Taxation of Subchapter S Corporations (on-campus)**

**S. Lawsky, 2 credits LAW-LW.11878.001**

**Course Description:** The course is a detailed examination of the taxation of Subchapter S corporations and their shareholders. Topics include choice of entity, eligibility requirements, organization, pass-through regime, limitation on losses, and interaction with Subchapter C, including reorganizations. Some attention will be given to planning issues. Portions of the course depend on some knowledge of corporate tax.

**Recommended prerequisite:** Corporate Tax

**Exam:** Friday, July 18, 2014, beginning at 9:30 am eastern time.

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. This course will meet on-campus from June-23-June 26 and June 30-July 3, 2014 in the evenings from 6:00 pm-9:15 pm. The deadline to add this course is before the second class meeting occurs on June 24, 2014. Students enrolled in the on-campus section must attend all class meetings and may not substitute viewing online classes, should the professor elect to make them available for review. The last day the class meets, July 3, 2014, 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.

### **Taxation of Subchapter S Corporations (Online)**

**S. Lawsky, 2 credits LAW-LW.11878.002**

**Course Description:** The course is a detailed examination of the taxation of Subchapter S corporations and their shareholders. Topics include choice of entity, eligibility requirements, organization, pass-through regime, limitation on losses, and interaction with Subchapter C, including reorganizations. Some attention will be given to planning issues. Portions of the course depend on some knowledge of corporate tax.

**Recommended prerequisite:** Corporate Tax

**Exam:** Friday, July 18, 2014, beginning at 9:30 am eastern time

This is a combined on-campus/online course. There are two sections for this course. This section (002) is an online section and requires students to watch course videos. The other section (001) is an on-campus section which requires in-person attendance. This course will be recorded as it meets on-campus from June-23-June 26 and June 30-July 3, 2014 in the evenings from 6:00 pm-9:15 pm. The deadline to add this course is before the second class meeting occurs on June 24, 2014. 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 80% of the videos by the attendance deadline of Monday, July 14, 2014. The last day the class meets, July 3, 2014, 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 two sections of this course, the section in which you are enrolled effects your responsibilities. For example, students who are enrolled in the other section (section 001, which meets on-campus) must attend a minimum of 80% of the class meetings in person and may not substitute viewing online classes, should the professor elect to make them available for review. (Faculty are also free to set more stringent attendance rules.)]

### **Timing Issues and the Income Tax (On campus)**

**M. Engler, 2 credits LAW-LW.10811.001**

**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:** Friday, August 1, 2014 at 9:30 am eastern time

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. This course will meet on-campus from July 7-July 10 and July 14-July 17, 2014 in the evenings from 5:45 pm-9:00 pm. The deadline to add this course is before the second class meeting occurs on July 8, 2014. Students enrolled in the on-campus section must attend all class meetings and may not substitute viewing online classes, should the professor elect to make them available for review. The last day the class meets, July 17, 2014, 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.

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

**M. Engler, 2 credits LAW-LW.10811.002**

**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 (Foundation Press). First class assignment (same as in spring 2013): <https://its.law.nyu.edu/faculty/coursepages/data/NYUTimingFirstAssignment2013.pdf>

**Prerequisite:** None

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



This is a combined on-campus/online course. There are two sections for this course. This section (002) is an online section and requires students to watch course videos. The other section (001) is an on-campus section which requires in-person attendance. This course will be recorded as it meets on-campus from July 7-July 10 and July 14-July 17, 2014 in the evenings from 5:45 pm-9:00 pm. The deadline to add this course is before the second class meeting occurs on July 8, 2014. 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 80% of the videos by the attendance deadline of Monday, July 28, 2014. The last day the class meets, July 17, 2014, 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 two sections of this course, the section in which you are enrolled effects your responsibilities. For example, students who are enrolled in the other section (section 001, which meets on-campus) must attend a minimum of 80% of the class meetings in person and may not substitute viewing online classes, should the professor elect to make them available for review. (Faculty are also free to set more stringent attendance rules.)]