



COURSE DESCRIPTION - FACULTY OF LAW

COURSE NUMBER: LAW 603:X01 **COURSE NAME:** INTERNATIONAL TAXATION

PREREQUISITE COURSES: TAXATION

PREREQUISITE FOR: NONE

CREDITS: 3 **HOURS PER TERM:** 3 **TERM:** 1ST **MAXIMUM ENROLLMENT:** 40

PROFESSORS: DON R. SOMMERFELDT

METHOD OF PRESENTATION: LECTURE X SEMINAR OTHER

METHOD OF EVALUATION:

The **primary** method of evaluation in this course is an examination worth 90% of the Grade.

The remainder of the grade in the course will be made up of class participation worth 10%

Examination will be: Open Book

COURSE DESCRIPTION:

Canadians who participate in foreign business ventures or hold foreign investments and non-Canadians who receive income from Canadian sources are affected by the manner in which Canada taxes international transactions. International taxation involves issues concerning the transnational relocation of taxpayers, the taxation of income derived from the movement of goods and services between countries and the taxation of cross-border investment income.

This course will explore the concepts of residence and non-residence for tax purposes; the taxation of non-residents of Canada who are employed in Canada, who carry on business in Canada or who dispose of taxable Canadian property; the taxation of non-residents of Canada who derive investment or other passive income from sources in Canada; the taxation of Canadian residents who derive income from foreign sources; the taxation of foreign affiliates, non-resident trusts and foreign investment entities; Canada's network of tax treaties; principles of tax treaty interpretation; the use or misuse of tax havens; international tax planning; transfer pricing; and methods to counter international tax evasion.

***SPECIAL COMMENTS:**

EVENING CLASS: X

SPECIAL ATTENDANCE:

OTHER:

REQUIRED TEXTS (IF ANY): Current copy of the Income Tax Act
Further text or materials to be announced