

FORDHAM UNIVERSITY SCHOOL OF LAW

In-Person Exams

International Taxation, Spring 2022	Exam Date and Time : May 10, 2022; 1:30 p.m.
Professor Colon	Exam Type : OPEN BOOK
EXAM4 SOFTWARE MODE : Open Laptop + Network	

EXAM INSTRUCTIONS

- Be sure to include your Exam ID Number (begins with the letter "E") on **ALL** of your exam materials. **DO NOT** write your name, Fordham ID Number, or any personally identifiable information on any materials.
- Materials Allowed: **You may use any resource, except for a live, personal consultant, whatsapp, google chat, skype, instant messenger, smoke signals, winking, etc.**
- You may **not** consult with any other person or unauthorized materials while working on the exam and may not disclose the examination questions to any other individual until the exam period has concluded.
- You must type your answers to the exam.
- **NO OTHER** electronic devices (iPads, electronic dictionaries, smartwatch/smart glasses, or tablets) are permitted during the exam.
- **ALL MATERIALS MUST BE TURNED IN TO PROCTORS AT THE END OF THE EXAM** (exam questions, scrap paper, Pink Exam4 Submission Form and bluebooks if handwriting, etc.)
- **No Exam, no grade**
- Please be sure to thoroughly read all instructions before starting and submitting your exam.
- This examination consists of **12** questions and is **5** pages long (including the instruction page). Be sure you have them all.
- **Do not waste time paraphrasing the Code**; an accurate citation will suffice. Common abbreviations, e.g., SF, CFC, GILTI, NRA, WTH, LOL, etc., may (and should!) be used.
- Unless specifically stated, no person or entity is eligible for treaty benefits. Apply only the provisions of the IRC to the situation and the taxpayers, unless specifically requested; do not apply any proposed regulations unless specifically requested. When requested to apply the "Treaty," use the US-UK income tax treaty, including, if necessary, the Technical Explanation, Notes, and Protocol.
- It is unnecessary to make assumptions regarding how any foreign country, including the UK, will treat the transaction.
- If necessary, assume that the applicable U.S. rates are 40% for individuals and 21% for U.S. corporations.

EXAM COMPONENTS**100% short answer with 1 or 2 T/F****MULTIPLE CHOICE INSTRUCTIONS** (if applicable): **N/A****GOOD LUCK!**