



[TAXATION.png](#)

INTRODUCTION

Brief Description: This course is an introduction to the U.S. income tax system and international Taxation. We will be studying selected topics in the taxation of individuals' personal, investment, and business activities.

- **Titulación:** Anglo-American Law Program, International Business Law Program, Grado en Derecho, Grado en Relaciones Internacionales
- **Módulo y materia de la asignatura:** Optatividad, Derecho angloamericano, Derecho internacional de los negocios
- **ECTS:** 3
- **Course and semester:** Fourth course, second semester
- **Character:** Optativa
- **Professor responsible of the course:** Prof. Alberto Muñoz
- **Visiting Professor:** Prof. Leandra Lederman (Indiana University)
- **Idioma:** Inglés
- **Schedule and location:** The course will be delivered in an intensive format every morning from 11:00 am to 14:00 pm- The exact dates and classrooms are yet to be determined. Please, check WebUntis timetable for this information.
- Please note that the schedule is subject to changes due to reasons beyond our control.

COMPETENCIAS

De acuerdo con la **Memoria del Grado en Derecho**, las competencias que los estudiantes deben llegar a dominar asociadas a la asignatura American Law Program del que forma parte esta asignatura son las siguientes:

Competencias básicas

CB1 -

Que los estudiantes hayan demostrado poseer y comprender conocimientos en un área base de la educación secundaria general, y se suele encontrar a un nivel que, si bien se apoya en libros de texto avanzados, inclu

CB2 -

Que los estudiantes sepan aplicar sus conocimientos a su trabajo o vocación de una forma que permita la resolución de problemas dentro de su área de estudio.

CB3 -

Que los estudiantes tengan la capacidad de reunir e interpretar datos relevantes (normas) para emitir juicios que incluyan una reflexión sobre temas relevantes de índole social, económica, jurídica o científica.

CB4 - Que los estudiantes puedan transmitir información, ideas, problemas y soluciones a un público tanto especializado como no especializado.



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CB5 -

Que los estudiantes hayan desarrollado aquellas habilidades de aprendizaje necesarias

Competencias generales

CG1 - Poseer un conocimiento general de la disciplina y la metodología jurídicas que permita el ejercicio de actividades de carácter profesional en el ámbito del Derecho o la adquisición de los títulos complementarios exigidos por la ley para determinadas act

CG2

- Expresar y transmitir adecuadamente ideas complejas que permitan comunicar, de manera oral y escrita, soluciones fundadas en Derecho a un público especializado o no.

CG3

- Localizar y gestionar correctamente las fuentes jurídicas, tanto legales, jurisprudencia

Competencias específicas

CEE1 Conocer los conceptos jurídicos básicos de la tradición jurídica angloamericana de

SYLLABUS

The topics of this course will generally be the following:

1. Introduction to income tax
2. Concept of Gross Income
3. Loans; Effect of an obligation to repay
4. Basis; Computing realized and recognized gains from dealings in property
5. Gifts, bequests, part gift/part sale
6. Discharge of indebtedness
7. Introduction to deductions
8. Business and profit-seeking expenses
9. The Interest Deduction and the Deduction for Taxes
10. Losses

The more detailed Syllabus and reading assignments can be found in Contents in the "Syllabus & Handouts" folder. Please access it there and read it before the first class. Here is the rest of the assignment for the first class session:

- Access the scans of the first few chapters of the 12th edition of the Burke & Friel casebook in the Contenidos area of Adi. (The scans are in their own folder.) In the 12th edition scans, read the following:
 - The Preface (pp.lxxvii-lxxviii).
 - Pages 3-21 of Ch. 1 (read but do not do the Problem).
 - Appendix 1 (Researching the Tax Law).
 - Read the Welcome Page for this course on Adi.
 - Look over the Table of Code and Regulations Sections (scanned document in the Handouts folder).
 - Look over the structure and content of [Rev. Proc. 2020-45](#) .



- According to that Rev. Proc., what would the 2021 standard deduction be for Caroline Taxpayer in the Problem on page 1 if she were married and filing a joint return with her husband?
- Look over the “Road Map of a Tax Return” handout (the last page of the Syllabus).
- Look over pages 1-2 of the Bidens’ 2020 federal income tax return (Form 1040) (scanned document in the Handouts folder).

You will also need the 11th edition of the casebook from Patricia Palomino but, in the first 3 classes, we will be using scans from the 12th edition.

EDUCATIONAL ACTIVITIES

Methodology:

How to Excel in this Class: I recommend doing all of the assigned reading, working the assigned problems carefully before class, participating in class, and reworking the problems prior to the exam. The key to performing well on the exam will be your ability to solve problems.

This course includes both synchronous class sessions and asynchronous materials on Adi. There is a “Page” on Adi for each topic. The methodologies include problem-solving, lecture, and class discussion. Students are expected to participate in class.

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| The Distribution of the student's workload measured in hours is the following: | |
| Theory in class periods | 15 hours |
| Practical in-class periods | 15 hours |
| Seminars and personal tutoring | 10 |
| Evaluation | 3 |
| Personal study | 40 |
| | |

ASSESSMENT

CONVOCATORIA ORDINARIA



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How to Excel in this Class: I recommend doing all of the assigned reading, working the assigned problems carefully before class, participating in class, and reworking the problems prior to the exam. The key to performing well on the exam will be your ability to solve problems.

Evaluation & Requirements: Grade: Participation: 20 points. Timely completion of quizzes on Adi: 5 points. Final Exam: 75 points.

Class Participation: You are expected to attend class each day and to be prepared to participate in class. Attendance will be taken each day using Zoom records. Participation is 20% of your grade in this course. Consistent, thoughtful participation is highly encouraged! Your participation score will be lowered by 1/2 point for each 30 minutes of class you are absent, unless the absence is excused by Patricia Palomino. At my discretion, your participation grade may also be lowered for lack of preparation.

Final Exam: The final exam will be three hours and will be given during the time scheduled by the law school. The exam will test your knowledge of the assigned reading and the related class discussion. The final exam will be in multiple choice format and will be open book.

CONVOCATORIA EXTRAORDINARIA

Your grade in June will come completely from your exam performance.

OFFICE HOURS

Please contact Prof. Brauner via email for an appointment.

BIBLIOGRAPHY

- Burke & Friel, TAXATION OF INDIVIDUAL INCOME, 11th ed. & scans of chapters in the 12th ed. [Find it in the library \(10 th ed.\)](#)
- Code & Regulations handouts.
- Other handouts posted on this site.