

# *International Tax - The Basics* ©

**Objective:** Many U.S. companies and individuals do business and invest outside the United States (outbound transactions). Many foreign companies and individuals do business or invest within the United States (inbound transactions). This course will provide an excellent introduction to international tax rules used by the United States governing these transactions.

## **Learning objectives:**

- Determine when a foreign company or alien is taxed by the United States
- Consider how U.S. companies and citizens can minimize their taxes when earning income outside the U.S.
- Identify the income and persons subject to the U.S. withholding tax rules
- Describe how U.S. shareholders of a foreign corporation are taxed
- Analyze when it is appropriate to create a foreign subsidiary
- Explain the rules applicable to a “controlled foreign corporation”
- Summarize the rules governing foreigners’ investment in U.S. real property (the FIRPTA rules)
- Explore the lessons to be learned from court cases and IRS rulings

**CPE:** 4 hours

**Level:** Basic

**Category:** Tax

**Prerequisites:** None

**Instructor:** Dennis J. Gerschick

**Code:** ITLT