

# LLM IN TAXATION OF CROSS-BORDER INVESTMENT

## Overview

This degree program is ideal for students who expect international tax law to play an important role in their professional careers, have a solid foundation in their own domestic tax system, and have enough experience to bring their own questions to the program.

Specifically, the degree benefits foreign attorneys who:

- Are practicing, or intend to practice, in or with Latin America in order to develop the niche market of structuring investments in and by Latin America.
- Are ready to delve into a more sophisticated tax practice and looking to understand enough U.S. tax law to work well with U.S. tax lawyers.

The LL.M Degree is 28 course credits, some required and some elective, and students are also required to take a course introducing them to the U.S. legal system.

## Admission Requirements

The Taxation of Cross-Border Investment LL.M. Program is for foreign lawyers. We are prepared to work with students from diverse legal system backgrounds to facilitate a successful transition to studying law in the United States.

- International applicants must hold a J.D. degree or its equivalent from a foreign institution.
- Applicants whose native language is not English must take the Test of English as a Foreign Language (TOEFL) (<http://www.ets.org/toefl/>). A score of 580 on the written, 237 on the computer based or 92 on the internet based TOEFL test is required to be considered for admission. The minimum required IELTS score for admission is 7.0.
- Applicants must have an official TOEFL score report sent to the Graduate Program in Taxation from the Educational Testing Service (ETS)—School Code 5815, Department Code 03.

## Curriculum Requirements

Code	Title	Credit Hours
<b>Required Courses</b>		<b>16 -9</b>
TAX 140	Taxation of Business Entities	2-3
or TAX 905	Corporate Tax I	
or TAX 948	Corporate Tax	
or TAX 950	Partnership Tax	
TAX 915	International Inbound	2
TAX 916	International: Outbound	2
LAW 105	Federal Income Tax I	4
TAX 946	Federal Wealth Transfer Tax	2
TAX 949	Property Transactions	1-2
TAX 973	Income Tax Treaties	1
LAW 999	Introduction to U.S. Law	2
<b>Elective Courses <sup>1</sup></b>		<b>9-12</b>
TAX 901	Introduction to U.S. International Policy	
TAX 906	U.S. Tax Policy: Current Topics	
TAX 910	Income Tax of Trusts and Estates	
TAX 917	Representing High Net Worth Individuals	
TAX 918	International Trans Europe	
TAX 926	Taxation of Athletes and Entertainers	
TAX 927	Taxation of Global Shipping Operations	
TAX 928	Tax Issues Relating to Cryptocurrency and Blockchain	
TAX 930	International Transactions Latin America	
TAX 931	Investing in Sports: Private Equity and Emerging Industry Trends	
TAX 932	The Digital Economy and International Taxation - National and International Responses	
TAX 943	Federal Tax Procedure	
TAX 954	Federal Criminal Tax Practice	
TAX 958	Estate Planning	

TAX 968	Tax Accounting	
TAX 984	Introduction to Financial Instruments	
TAX 990	Corporate Tax II	
TAX 991	Partnership and Property II	
TAX 920	Advanced Intl Tax Planning	
TAX 907	Advanced Individual Tax Issues: Families and Lower Income Taxpayers	
TAX 965	Tax Issues relating to Movement of Foreign Tech Founders into Miami in the 21st Century	
TAX 962	Tax Policy	
TAX 963	Tax Research and Writing	
<b>Total Credit Hours</b>		<b>28</b>

<sup>1</sup> Not all elective courses may be offered every year.

This is a sample Plan of Study. Your actual course sequence may vary depending on your previous academic experience as well as current course offerings. Students should meet with their academic advisor each semester to determine the appropriate course selection.

## Sample Plan of Study

### 1-Year Program

<b>Year One</b>		
<b>Summer</b>		<b>Credit Hours</b>
LAW 105	Federal Income Tax I	4
<b>Credit Hours</b>		<b>4</b>
<b>Year Two</b>		
<b>Fall</b>		
TAX 905	Corporate Tax I	2
TAX 915	International Inbound	2
TAX 946	Federal Wealth Transfer Tax	2
TAX 949	Property Transactions	1
LL.M. Elective Credits		5
<b>Credit Hours</b>		<b>12</b>
<b>Spring</b>		
TAX 916	International: Outbound	2
TAX 973	Income Tax Treaties	1
LL.M. Elective Credits		9
TAX 140	Taxation of Business Entities	2-3
<b>Credit Hours</b>		<b>14</b>
<b>Total Credit Hours</b>		<b>30</b>

## Mission

To foster the intellectual discipline and analytical skills that will prepare graduates of the Graduate Program in Taxation of Cross-Border Investment to develop cross-border investment structures that satisfy the business, tax, and legal demands of multiple jurisdictions.

To provide non-U.S. tax lawyers, particularly those from civil law countries, with an understanding of the intellectual framework for the U.S. practice of law in order to facilitate productive future interactions and collaborations with U.S. tax lawyers.

To provide to non-U.S. tax lawyers an introduction to the U.S. legal and tax system that will allow them to develop a more sophisticated cross-border practice in their home countries

In fulfilling this mission, the Graduate Tax Program is committed to supporting students as they develop an advanced substantive knowledge of international tax law, cross-border investment structures, and the professional responsibilities of international tax lawyers.

## Student Learning Outcomes

1. Students will demonstrate an ability to engage in complex and creative legal reasoning within the context of the U.S. common law system and to produce legal writing that bridges differences between legal systems.
2. Students will demonstrate an understanding of the U.S. tax rules that affect cross-border tax planning.

3. Students will demonstrate a facility with cross-border tax planning techniques that take into account the business, tax, and legal demands of multiple jurisdictions.