

University of California
Hastings College of the Law

Fall 2017

**FINAL EXAMINATION:
US TAXATION OF FOREIGN
TRANSACTIONS AND INVESTMENTS
(Course # 54411)**

PROFESSOR DANIEL J. LATHROPE

Exam Date: December 4, 2017

TIME: THREE (3) HOURS

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MATERIALS ALLOWED IN THE EXAM ROOM

Internet research is **NEVER** allowed during an in-class exam per UC Hastings exam regulations. Students **ARE** allowed to use a simple (non-PDA) calculator for this exam.

This is a **Limited Open Book exam**. The following materials are allowed in the exam room:

1. Class materials (casebook and Internal Revenue Code and Regulations);
2. Anything prepared by the student (including notes and an outline)

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This Exam has one part consisting of four (4) essay questions.

GENERAL EXAM INSTRUCTIONS FOR STUDENTS

If you are using bluebooks, please write on **one side only** of each page and **double-space** your responses. Please write legibly. If your response cannot be deciphered, it cannot be given full credit. Number your bluebooks.

If you are using Exemplify on a computer, your exam will be formatted automatically to double-space.

If the exam calls for a scantron, use score sheet side & #2 pencil. For ID# use your 4-digit EXAM#, flush left, no 0s. Test form: A. Exam#: 1. For Name: print your professor's name. Subject: course name. Leave date blank. Erase incorrect answers completely.

ALL exam materials including scratch paper must be turned in to the proctor at the end of the exam.

After the exam has been graded, the exam questions and answers will be retained by the college.

INSTRUCTIONS

1. Enter your exam number in the space provided above.
2. This is a **Limited Open Book exam**. You may use the course materials and anything prepared by you (including class notes). Simple calculators are permitted.
3. The examination and scratch paper must be returned with your answers.
4. This is a one part exam with a total time limit of 3 hours. The exam consists of four questions. The suggested time allocated to the four questions is 3 hours. For grading purposes, each question is given a weighting approximately equal to its time allocation.
5. The questions should be answered using approved exam software or written in bluebooks.
6. Please take time to read the facts of each question and organize your answers. In any case where you need further facts, indicate what sort of facts you want to know and what difference they would make in the answer to the question.
7. Reasons should be given for the essay answers.
8. Good luck!

ALL EXAMINATION QUESTIONS AND SCRATCH PAPER MUST BE TURNED IN AT THE END OF THE EXAMINATION.