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ACKNOWLEDGMENT

By attending this class, you acknowledge that you have read, understood, and will abide by the content of this syllabus. If you have not or have any questions, please visit with me or email me at your earliest convenience.

NOT A CONTRACT

This syllabus is not a contract. Accordingly, it is subject to change at any time with or without notice.
Hierarchy of Authority for IRS Guidance and Other Information Sources

- **Internal Revenue Code**: Legally binding statute
- **Treasury (tax) Regulations**: Legally binding interpretation of statute
- **Internal Revenue Bulletin**:
  - Revenue rulings
  - Revenue procedures
  - Notices
  - Announcements
  - Taxpayers can rely on it as authoritative and as precedent because IRS is bound by it
- **Written Determinations**:
  - Private letter rulings
  - Technical advice memoranda
  - Binding on the IRS as to the specific taxpayer and facts and can only be relied on as authoritative and as precedent by addressee taxpayer
- **Other IRS Publications and Information**:
  - Forms and publications
  - News releases and fact sheets
  - FAQs
  - Online help and resources
  - Videos
  - Source of general information, but taxpayers should not cite to sustain a position as authoritative and as precedent

Source: GAO analysis of IRS documents. | GAO-18-720
CASEBOOK:

Tax Code: Selected Federal Taxation Statutes & Regulations (2022 or newer)
COURSE DESCRIPTION

DESCRIPTION:
Federal Income Taxation is a basic tax course designed to introduce students to, and provide students with, a general understanding of the fundamental principles governing the federal income taxation of individuals.

OBJECTIVE:
At the conclusion of this course, students should have acquired the requisite critical thinking skills, problems solving skills, and overall technical competence to clearly solve hypothetical tax problems presented during class lectures and on examinations dealing with: (1) the scope of gross income, including income without receipt of cash; (2) the exclusion of gifts and inheritances; (3) the tax consequences of bequests, devises and inheritances; (4) the application of rules governing the taxation of employee benefits and the exclusion from gross income of certain fringe benefits; (5) application of the rules governing the exclusion of meals and lodging; (6) taxation of prizes and awards, including scholarships and fellowships; (7) tax consequences of gains from dealings in property; (8) computation of basis, amount realized, and gain realized; (9) the application of the principles of Crane v. Commissioner & Commissioner v. Tufts; (10) application of the tax rules governing property acquired between spouses incident to divorce; (11) tax consequences of property acquired from a decedent; (12) taxation of life insurance proceeds and annuities; (13) tax consequences of discharge of indebtedness; (14) taxation of recoveries from personal injuries; (15) taxation of separation and divorce payments, including alimony and separate maintenance payments; (16) tax consequences of gains from the sale of principal residence; (17) assignment of income doctrine, and the alternative minimum tax.
OBJECTIVE/STUDENT LEARNING OUTCOMES AND OUTCOME MEASURES

At the conclusion of this course, students should have acquired the requisite critical thinking skills, problems solving skills, and overall technical competence to clearly solve hypothetical tax problems presented during class lectures and on examinations dealing with:

(1) the scope of gross income, including income without receipt of cash
(2) the exclusion of gifts and inheritances
(3) the tax consequences of bequests, devises and inheritances
(4) the application of rules governing the taxation of employee benefits and the exclusion from gross income of certain fringe benefits
(5) application of the rules governing the exclusion of meals and lodging
(6) taxation of prizes and awards, including scholarships and fellowships
(7) tax consequences of gains from dealings in property
(8) computation of basis, amount realized, and gain realized
(9) the application of the principles of Crane v. Commissioner & Commissioner v. Tufts
(10) application of the tax rules governing property acquired between spouses incident to divorce
(11) tax consequences of property acquired from a decedent
(12) taxation of life insurance proceeds and annuities
(13) tax consequences of discharge of indebtedness
(14) taxation of recoveries from personal injuries
(15) taxation of separation and divorce payments, including alimony and separate maintenance payments
(16) tax consequences of gains from the sale of principal residence
(17) assignment of income doctrine, and the alternative minimum tax.

In order to achieve the above objectives/outcomes and enhance your overall understanding of the subject matter, class lectures and assignments are structured to help students develop a mastery of the minimum tax competencies enumerated below.

The development and mastery of these competencies is essential to solving the hypothetical tax problems presented in class and on the examination. Consequently, your professor uses a problem approach in his in-class instruction and formative evaluation. Accordingly, you must work all the homework assignments before coming to class.

Minimum Tax Competencies

- Internal Revenue Code Critical Reading Comprehension skills through Paraphrasing. To help acquire this skill, you should restate in your own words the meaning of statutory provisions as you peruse through the Code. Internalize and write down meaning of provisions on the margin of the Code as you read it.

- Knowledge & Interpretation. Interpret meaning of terms and rules. As stated above, internalizing and writing down the meaning of the Code provisions you’ve read in your
own words will aid you in developing the requisite interpretive skills to progress through the course.

- Identify related Treasury Regulations. See initial class discussion regarding Treasury Regulations.

- Comprehension & Application. Use examples to test your understanding of the principles contained in the provision you’ve read. Compare and contrast rules. Work assigned problems.

- Distinguish & Differentiate between suits filed in Tax Court v. District Court

- Analytical and Critical Thinking. Compare tax principles and query similarities and/or dissimilarities. Query rationale for rule.


- Understand & Commit to Memory: Pervasive tax concepts of Amount Realized, determination of Basis, and Gain Realized.

- Develop Concise Written and Verbal skills by writing illustrative practice answers to practice questions under examination condition at the conclusion of each chapter and role play your answers with your classmates.

- Evaluation. Must work all assigned problems before each class and compare your answers with debriefed answers to see how well you are progressing along and seek assistance by visiting with your professor and tutor.

OUTCOME MEASURES

At conclusion of all summative assessments (midterm and final examinations), the average of the students taking each examination should attain a score of 70% or better
ASSESSMENT AND GRADING

FORMATIVE ASSESSMENT PROBLEMS

WHAT IS FORMATIVE ASSESSMENT?

Formative assessment refers to the formal and informal assessment procedures that I will use during the learning process in order to modify teaching and learning activities to improve your content attainment.

HOW WILL I BE FORMATIVELY ASSESSED?

Your syllabus reflects the reading assignments for each class. At the conclusion of each reading assignment is a set of formative assessment problems. You are to work these problems before coming to class to help reinforce your understanding of the material and assimilation of classroom instruction. As the chart above indicates, we will debrief all assigned problems in the classroom to enable you gauge your progress.

FORMATIVE & SUMMATIVE EXAMINATIONS

<table>
<thead>
<tr>
<th>Assessment Type</th>
<th>Weight</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mid-Term, October 13, 2022</td>
<td>30%</td>
</tr>
<tr>
<td>Non-Cumulative Final Exam, December 5, 2022, 2PM, RM 210</td>
<td>60%</td>
</tr>
<tr>
<td>In-Class Practice Quizzes/Practice Problems</td>
<td>*Extra credit points may be given at Professor’s discretion.</td>
</tr>
<tr>
<td>Attendance and Participation, respectively, each would make up 5% of your grade. Details in next section.</td>
<td>10%</td>
</tr>
</tbody>
</table>

Tentative (subject to change) letter grade distribution ranges TBD

The assessments utilized in this course are designed to evaluate the student’s critical thinking skills, problem solving skills, writing skills, and overall technical competence. To that end, there
will be two summative examinations in this course - a mid-term examination, valued at 30 percent and a non-cumulative final examination, valued at 60 percent.

The exam format is “problem-type” and the questions are substantially similar to the in-class handout problems/answers, and the homework problems contained in your casebook. The examinations will be CLOSED book.

**ACCOMMODATIONS**

For accommodations, please see Associate Dean of Students or her assistant in the Dean’s suite.

**Title IX information for course syllabus**

Texas Southern University is committed towards encouraging and supporting a welcome inclusive university community where all community members enjoy a community free from sex discrimination, harassment and violence. As a result, you should know that university faculty members and staff are required to notify the University Title IX Coordinator of any instances of sex discrimination and harassment, sexual violence, dating violence, domestic violence, or stalking. Sharing this information ensures that those harmed are provided support resources. What this means is that as your professor, I am required to report any incidents that are directly disclosed to me, or of which I am somehow made aware. The University’s Counseling Center is available to you if you want to speak with someone confidentially. Please visit the University’s Counseling Center’s website www.tsu.edu/ucc for additional information.
HEALTH AND SAFETY ON CAMPUS

1. Students are expected to continuously self-screen for the symptoms of COVID-19. The Center for Disease Control has a list of COVID-19 symptoms: https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html. If you begin to show symptoms, notify your professor and leave the classroom. Limit contact with other individuals on campus and contact your healthcare provider for further guidance.

2. If, before coming to campus, a student starts exhibiting any symptoms of COVID-19 or does not feel well, the student should not attend class in person. The student should immediately notify the Assistant Dean for Student Development (virgie.mouton@tmslaw.tsu.edu) and attend classes online.

3. Students who have been sick with COVID-19 symptoms, tested positive for COVID-19, or have been potentially exposed to someone with COVID-19 should attend classes online until they are cleared by their healthcare provider. The following is taken from the TSU & Coronavirus FAQs, http://www.tsu.edu/about/administration/marketing-and-communications/coronavirus/faqs.html:

   Those who have recently traveled internationally or believe they have been exposed to the virus and are experiencing influenza-like illness, with fever greater than 100.3, and symptoms, including cough, body aches, severe sore throat or runny nose, should seek medical attention, especially if symptoms worsen.

   **Students should contact TSU Health Services (713-313-7173) and identify themselves as having flu-like symptoms to obtain further recommendations and guidance.** Students should also consult with their regular health care provider or seek treatment at a local health center if they are overseas. Please call ahead to your health care provider to notify them of the reason for your visit.

   For additional information about COVID-19, including signs and symptoms, transmission and risk of exposure, and what to do if you are exhibiting symptoms, please refer to the resources section. The CDC’s website and Texas Department of State Health Services (DSHS) will also issue guidance for those planning to travel or who have recently returned.
4. While on campus and in classrooms, students should observe the rules for social distancing, social health etiquette, and general cleanliness.
   a. Students should practice hand hygiene, cough etiquette, and general cleanliness.
   b. Students should maintain at least 6 feet separation in all directions from other individuals.
   c. Face coverings (over the nose and mouth) are required for all students. Students without a face covering will not be allowed to enter the classroom. Students with an approved exemption and who notify their professor before the start of class may be allowed to wear a face shield instead of a face mask.
   d. Students should wash or disinfect their hands before each class and after any physical interaction with other persons in the classroom.
   e. Students should maintain classroom cleanliness. Students should create a clean classroom environment by putting away unnecessary personal items and cleaning their seating area intermittently.
   f. Students should not expect to enter the Law Building on a day other than the designated day for in-person attendance for an enrolled course. Entry will be permitted only if administration can determine that the maximum occupancy for COVID-19 social distance protocol has not been exceeded.
   g. Students who do not comply with the rules for social distancing, social health etiquette, and general cleanliness may be subject to discipline up to expulsion from law school.

ATTENDANCE POLICY
5. Students are required to attend classes consistent with the format of the enrolled course.
   a. Hybrid – instruction for courses in this format is delivered in person and simultaneously online. Enrolled students are divided into groups and required to attend weekly in-person classes on the weekday(s) predetermined by administration for the designated group. Students may only attend in-person classes on the administration-determined day to ensure that all enrolled students are guaranteed a physical seat for the class. Other class days for the week are to be attended online. Students who have COVID-related health and safety concerns in attending in-person classes must obtain a remote-instruction waiver from the Office of Student Affairs. The waiver can be requested for the entire semester or temporary, based upon the personal circumstance of the affected student.
   b. Online – instruction for courses in this format is delivered 100% online.
   c. For the 100% online course and the hybrid course online instruction component, both the American Bar Association and the Law School rules obligate the professor to obtain assurance that the person who logs into the course online, participates in class, takes
quizzes and exams, and engages in collaborative exercises, is the student enrolled in the course. Without being limited to the following methods of attendance verification, professors may require attendance to be contingent upon confirmation of identity via webcam or require webcams to remain on for the entire class period.
PARTICIPATION, ATTENDANCE & PROFESSIONALISM

CLASS PARTICIPATION

Class participation is mandatory. 5 percent of your final grade will be based on your class participation record. You accumulate class participation points pro rata throughout the semester by volunteering to brief cases during class and being prepared for every class including being able to respond correctly when called upon to answer a question. You earn zero class participation points during a particular class when you are unable to brief or respond correctly to questions asked. Do NOT wait till the end of the semester to try to earn your class participation points!

ATTENDANCE

Section 9 of the Students Rules & Regulations provide the following:
Class attendance is required of all students. Excessive absence from classes may result in the following: (a) administrative withdrawal from the course; or (b) grade reduction of up to two letter grades in courses required to be taken in sequence (where a student may not be withdrawn from a class). Excessive absence is defined as any absence in excess of the permitted absence. (See below) “Absence” shall be defined as either a failure to attend class, or a failure to be present at the commencement of class.”

Class meets 12.00 PM-1.15PM, TR, RM 105. 5 percent of your final grade is based on your class attendance record. To earn the 5 percentage points, you must not miss more than 3 classes. Also, a student who misses more than 3 classes may receive a grade reduction as provided in the students’ rules and regulations. You do not have to inform me of your absences or give any explanation for them. I may provide no other notice to you that you are in danger of a grade reduction.

IN-CLASS CONDUCT

You must turn off all of your cell phones during class. No side chat on Blackboard (amongst students) of any kind is permitted while the Professor is teaching or calling the class roll unless prior permission is sought and received from the Professor.
# FALL SEMESTER 2022

## FALL SEMESTER 2022 (SEVENTY DAYS OF CLASSES)

<table>
<thead>
<tr>
<th>Event</th>
<th>Date</th>
<th>Details</th>
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</thead>
<tbody>
<tr>
<td>Orientation</td>
<td>Monday-Friday</td>
<td>August 8-12, 2022</td>
</tr>
<tr>
<td>First Day of Class</td>
<td>Monday</td>
<td>August 15, 2022</td>
</tr>
<tr>
<td>Last Day to ADD/DROP</td>
<td>Wednesday</td>
<td>August 17, 2022</td>
</tr>
<tr>
<td>Labor Day (NO CLASSES)</td>
<td>Monday</td>
<td>September 5, 2022</td>
</tr>
<tr>
<td>Purge of all unpaid course selections</td>
<td>Thursday</td>
<td>September 8, 2022</td>
</tr>
<tr>
<td>Mid Term Examinations</td>
<td>Mon – Fri</td>
<td>October 10-14, 2022</td>
</tr>
<tr>
<td>Last Day to Drop a Class</td>
<td>Friday</td>
<td>November 4, 2022</td>
</tr>
<tr>
<td>Last Day of Classes</td>
<td>Tuesday</td>
<td>November 22, 2022</td>
</tr>
<tr>
<td>First Year Professors' Grades due</td>
<td>Tuesday</td>
<td>November 22, 2022</td>
</tr>
<tr>
<td>Thanksgiving Holiday</td>
<td>Thurs-Fri</td>
<td>November 24-25</td>
</tr>
<tr>
<td>Reading Period</td>
<td>Wed-Sun</td>
<td>November 23-27, 2022</td>
</tr>
<tr>
<td>Final Examinations</td>
<td>Monday - Friday</td>
<td>Nov 28 – Dec 9, 2022</td>
</tr>
<tr>
<td>Commencement Exercises</td>
<td>Saturday</td>
<td>December 10, 2022</td>
</tr>
</tbody>
</table>

Please note that the calendar events and /or dates are subject to change.
# READING ASSIGNMENTS

## AND FORMATIVE ASSESSMENT PROBLEMS

The following assignments & problems have been broken down by topic. Preparing to discussion a topic means you have both (1) Read all of the content within that topic chart and (2) completed the assigned problems within that topic chart.

<table>
<thead>
<tr>
<th>#1 Read Orientation</th>
<th>Meet and greet. Opening remarks by professor regarding various aspects of tax practice as a career choice.</th>
</tr>
</thead>
</table>

- **Check Here When You Have Completed the Above Assignment**

| Topic #2 Gross Income | The Scope of IRC §61. Read pg. 43-49  
Equivocal Receipt of Financial Benefit  
IRC §61  
Treas. Reg. §§ 1.61-1, -2(a)(1), -2(d)(1), -14(a)  
Cesari v. United States, pg. 44-59  
Old Colony Trust Co. v. Commissioner, pg. 49-51  
Commissioner v. Glenshaw Glass Co., pg. 52-55  
Charley v. Commissioner, pg. 55-60.  
Problems 1-6, pg. 60-61 |
|----------------------|--------------------------------------------------------------------------------------------------|

- **Check Here When You Have Completed the Above Assignment**

| Topic #3 Income Without Receipt of Cash or Property | IRC § 61  
Treas. Reg. §§ 1.61-2(a)(1), -2(d)(1)  
Helvering v. Independent Life Ins. Co. pg. 61.  
Rev. Rul. 79-24, pg. 61.  
Dean v. Commissioner, pg. 62  
Prob. 1-2, pg. 63 |
|----------------------|--------------------------------------------------------------------------------------------------|

- **Check Here When You Have Completed the Above Assignment**

<table>
<thead>
<tr>
<th>Topic #4.1</th>
<th>Read the following &amp; work problems</th>
</tr>
</thead>
</table>
### The Exclusion of Gifts and Inheritances

(i) IRC § 102(a) and (b) first sentence. Treas. Reg. § 1.102-1(a), (b)
(iv) Commissioner v. Duberstein, Pg. 66-76.
(v) Prob. 1-2 pg. 76

### Check Here When You Have Completed the Above Assignment

- **Read the following & work problems**

  (i) IRC §§ 102(c); 274(b); Glance IRC §§74(c); 132(e); 274(j). Proposed Reg. §§1.102-1(f). Read bottom pg. 76-78.
  (ii) Work Problems 1-3 pg. 78.

### Check Here When You Have Completed the Above Assignment

- **Read the following & work problems**

  **Topic #5 Bequests, Devises, and Inheritances**

  IRC §§102(a), (b) first sentence, (c).
  Treas. Reg. §§1.102-1(a), (b).
  
  **A.** *Lyeth v. Hoey*, pg. 78-83
  **C.** Prob. 1-3, pg. 86-87.

### Check Here When You Have Completed the Above Assignment

- **Read the following & work problems**

  **Topic #6 Employee Benefits**

  **Exclusions for Fringe Benefits**
  Skim thru IRC § 132 (skip (j)(2) and (5), (m), and (n))
  Glance thru IRC §§61(a)(1); 79; 83; 112; 125.
  Read Treas. Reg. § 1.61-1(a); -21(a)(1); and (2); (b)(1); and (2)
  Read pg. 89-98.
  Work Problems 1(a-p), pg. 99-100

  **Exclusions for Meals and Lodging**
  Read IRC §§ 107; 119(a); 119(d)
  Treas. Reg. § 1.119-1
  *Hatt v. Commissioner*, pg. 100-103(Top)
### Topic #7
**Awards & Prices**

**Prizes**
- IRC§ 74; 102(c); 132(a)(4); (e); 274(j)
- Treas. Reg. § 1.74-1; Prop. Reg. 1.74-1(b)
- Read pg. 109.
- Read *McDonell v. Commissioner*, pg. 105-110.
- Work Prob. 1, pg. 110.

**Scholarships and Fellowships**
- IRC § 117; 127(a), (b)(1), (c)(1)
- Prop. Reg. §1.117-6(b), (c)(1) –(4), (d)(1) –(3)
- Read pg. 110-113.
- Work Probs. 1-2 pg. 113-114.

### Topic #8
**Gains from Dealings in Property**

**Factors in the Determination of Gain**
- IRC §§ 1001(a), (b) first sentence, (c); 1011(a); 1012

**A. Determination of Basis**
- Cost as Basis
- IRC §§ 109; 1011(a); 1012(a); 1016(a)(1); 1019
- Treas. Reg. § 1.61-2(d)(2)(i); 1.1012-1(a)

*Philadelphia Park Amusement Co. v. United States* 116-120.

Prob. 1–2, pg. 120-121.

**B. Property Acquired by Gift**
- IRC §§ 1015(a); 1015(d)(1)(A), (4), and (6)
- Treas. Reg. § 1.1015-1(a).
- *Farid-Es-Sultaneh v. Commissioner*, pg. 124-127
- Work Prob. 1-2, pg. 128.
| Topic #9-1 | IRC § 1041(a), (b)  
|            | Treas. Reg. § 1.1041-1T(a) and (d)  
|            | Read pg. 128-130  
|            | Work Prob. Pg. 1(a) – (e), pg. 130-131.  
| Topic #9-2 | IRC §§ 1014(a), (b)(1), and (6), (e);  
|            | Treas. Reg. §1.1014-3(a); 20.2031-1(b)  
|            | Read pg. 131-133  
|            | Work Prob. 1 pg. 133  
| Topic #9-3 | IRC § 1001(b)  
|            | Treas. Reg. § 1.1001-1(a), -2(a), (b), (c) Ex (1) and (2)  
|            | *International Freighting Corp v. Commissioner*, pg. 133-136  

☐ Check Here When You Have Completed the Above Assignment

| Topic #10 | *Crane v. Commissioner*, pg. 136-146  
|           | *Commissioner v. Tufts*, 145-154  
|           | Work Prob. 1-3, pg. 154-155  

☐ Check Here When You Have Completed the Above Assignment

| Topic #11 | IRC§§ 61(a)(12); 102(a); 108(a), (b)(1)-(3), (d)(1)-(5), (e)(1) and (5); 1017(a), Treas. Reg. § 1.61-12(a); 1.1001-2(a), 2(c) Ex (8)  
|           | Rev. Rul. 2008-34, pg. 181-183  
|           | Work Prob. 1-4 pg. 184-185 |
## Topic #12
**Separation and Divorce**

### A. Alimony and Separate Maintenance Payments

- IRC §§ 71(a), (b)(1); 215(a); and (b)
- Read pg. 201-202
- Work Problems 1(a-c) pg. 202-203

### B. Property Settlements, 203 – 206

- Read IRC §1041; See §1015(e)
- Treas. Reg. §§1.1041-T(b)
- *Young v. Commissioner*, pg. 206-211
- Work Prob. 1-2 pg. 211-212

☐ Check Here When You Have Completed the Above Assignment

## Topic #13
**Other Exclusions from Gross Income**

### Gain from Sale of a Principal Residence

- IRC §§ 121 (omit (d)(4) and (5), (e))
- Treas. Reg. §§ 1.121-1(a), (b)(1), (2), and (4) Ex. 1, (c)(1), (d), -2(a)(1) - (4) Ex. 2, -3(b), (c)(1)-(4) Ex 1, (d)(1)-(3) Ex 1, (e)(1) and (2), (f), (g)(1)-(2) Ex 1.
- Read pg. 213-218
- Work Prob. 1-4, pg. 218-220.

☐ Check Here When You Have Completed the Above Assignment

## Topic #14
**Exclusion and Other Tax Benefits Related to the Costs of Higher Education**

- Read pg. 221-229, but focus would be IRC §25A only
- Work Prob. 1-2, pg. 229

☐ Check Here When You Have Completed the Above Assignment
### Topic #15-1
#### Life Insurance Proceeds and Annuities

**A** Life Insurance Proceeds  
IRC §§ 101(a), (c), (d), (g)  
Treas. Reg. §§ 1.101-1(a)(1), (b)(1), -4(a)(1(i), (b)(1), (c)  
Read pg. 157-160  
Work Prob. 1-3, pg. 160-161

**B** Annuity Payments  
IRC §§ 72(a)(1), (b), (c)  
Treas. Reg. § 1.72-4(a), -9 (Table V)  
Read pg. 161 – 165.  
Work Prob. 1(a)–(d), pg. 165-166.

☐ Check Here When You Have Completed the Above Assignment

### Topic #16-1
#### Damages and Related Receipts

**A** Introduction, pg. 187

### Topic #16-2
#### Damages and Related Receipts

**B** Damages in General  
*Raytheon Production Corp. v. Commissioner*, pg. 188-190  
Work Prob. 1(a)-d, pg. 190-191

### Topic #16-3
#### Damages and Related Receipts

**C** Damages and Other Recoveries For Personal Injuries  
IRC §§ 104(a), 105(a) – (c) and (e); 106(a)  
Treas. Reg. § 1.104-1(a), (c), (d), 1.105-1(a), 1.106-1.  
Read Pg. 191-197  
Rev. Rul. 79-313, pg. 197-198  
Work Prob. 1-3, pg. 199-200

☐ Check Here When You Have Completed the Above Assignment

### Topic #17-1
#### Assignment of Income

**A** Introduction, pg. 237-239

### Topic #17-2

**B** Income from Services  
*Lucas v. Earl*, pg. 239-240
<table>
<thead>
<tr>
<th>Assignment of Income</th>
<th>Commissioner v. Giannini, pg. 240-246.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Rev. Rul. 66-167, pg. 246-247</td>
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<tr>
<td></td>
<td>Rev. Rul. 74-581, pg. 248-250</td>
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<tr>
<td></td>
<td>Work Problem 1(a) – (d), pg. 250.</td>
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- **Check Here When You Have Completed the Above Assignment**

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<th>Topic #17-3</th>
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<tbody>
<tr>
<td></td>
<td><strong>Rev. Rul. 66-167, pg. 246-247</strong></td>
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<tr>
<td></td>
<td><strong>Rev. Rul. 74-581, pg. 248-250</strong></td>
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<tr>
<td></td>
<td><strong>Work Problem 1(a) – (d), pg. 250.</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Topic #18</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Income From Property</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Helvering v. Horst, pg. 250-254</strong></td>
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<tr>
<td></td>
<td><strong>Blair v. Commissioner, pg. 254-256</strong></td>
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<td><strong>Estate of Stanahan v. Commissioner, pg. 260-264</strong></td>
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<td><strong>Susie Salvatore, pg. 285-288</strong></td>
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<td><strong>Rev. Rul. 69-102, pg. 264-269</strong></td>
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<td><strong>Work Problems 1-3, pg. 269-270</strong></td>
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- **Check Here When You Have Completed the Above Assignment**

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<tr>
<th>Topic #19</th>
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<tr>
<td>Income Producing Entities</td>
<td>(A) <strong>Introduction, pg. 271-277</strong></td>
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- **Check Here When You Have Completed the Above Assignment**

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<td>IRC §§ 701; 704(e); 761(b)See 1(g); 707(c)</td>
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<td>Treas. Reg. § 1.704-1(e)(1), (2)(i).</td>
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<td><strong>Commissioner v. Culbertson, pg. 278-284</strong></td>
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- **Check Here When You Have Completed the Above Assignment**

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<td>IRC §§ 11(a) and (b); 482; See §269A</td>
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<td><strong>Johnson v. Commissioner, pg. 288-291</strong></td>
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<td><strong>Borge v. Commissioner, pg. 291-294</strong></td>
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<td><strong>Prob. 1, pg. 295</strong></td>
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- **Check Here When You Have Completed the Above Assignment**
## Topic #22
Trusts and Estates

- IRC §§ 671; 672(a), (b), (e); 673; 676; 677
- Treas. Reg. §§ 1.671-1(a)-(c); 1.676(a)-1
- Corliss v. Bowers pg. 295 -296
- Helvering v. Clifford, pg. 296-304
- Work problems 1-2, pgs. 3-4-305

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## Topic #23
Business Deductions

### (A) Introduction, pg. 309-311
IRC §§ 1, 63

### (B) Ordinary and Necessary Business Deductions
IRC §§ 162(a)
Treas. Reg. § 1.162-1(a)

*Welch v. Helvering*, pg. 311-314

Work Prob. 1-2, pg. 314.

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## Topic #24
Business Deductions Cont’d

IRC §162(a); 263(a)
Treas. Reg. §§ 1.162-4; 1.263(a)-2, -4(a) through (c)(1), (d)(1), (e)(1)(i), (2), (3), (4)(i), -5(a), (b)(1).

*Midland Empire Packing Co. v. Commissioner*, pg. 318-324

*Indopco, Inc. v. Commissioner*, pg. 325-334
Work Prob. 1 – 3, pg. 334

“Carrying On” Business
IRC §§ 162(a); 195; 262
Treas. Reg. § 1.195-1(a)

*Morton Frank v. Commissioner*, pg. 334-342

Work Prob. 1-2, pg. 342.

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<td>Introduction pg. 394-404</td>
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<td>IRC §§ 167(a), (c); 168(a)-(c), (e)(1); (f)(1); (g)(1)(E), (2) and (7); 1016(a)(2). See §§62(a)(1) and (4); 168(d); 263(a); 263A(a); (b); (c)(1) Treas. Reg. §§ 1.162-4; 1.167(a)-1(a), -10; 1.167(b)-o(a), -1(a), -2(a).</td>
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<th>Topic #26</th>
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<td>IRC §§ 167(a), (c)(1); 168(a)-(c), (d)(1); (4)(A); (e)(1), (g)(1)(E), (2), (3)(D), and (7), (k)(1), (2)(A), (E)(ii), and (F)(i), (6)(A), and (7); 179, (d)(4)-(10), (e), (f); 280F(a), (b), (d), (9), and (10) Read pgs. 418-426 Work Problems 1-4, pgs. 426-428</td>
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<tr>
<td></td>
<td>IRC §§ 168(a), (b)(3)(A), (B), and (G), (4), (c), (d)(2) and (4)(B), (e)(2) and (6), (g)(1)(E), (2), and (7); 179(f). Read pgs. 428-431 Work problems 1(a-f).</td>
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<tr>
<th>Topic #28</th>
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B. The Mechanics of Capital Losses  
C. IRC §§ 1211(b); 1212(b)(1); (2)(A)(i); 1222(10).  
Read pg. 696-701  
Work Prob. 1, pg. 701 |
| --- | --- |
| Topic #30 The Meaning of “Capital Asset” | IRC §§ 1221(a)(1)-(4)  
*Mauldin v. Commissioner*, pg. 701-705.  
| Topic #31 The Sale or Exchange Requirement | IRC § 1222  
*Kenan v. Commissioner*, pg. 709-713  
*Hudson v. Commissioner*, pg. 714-716  
Work Prob. 1, pg. 717 |
| Topic #32 The Holding Period | IRC §§ 1223(1), (2), (9)  
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