

Income Taxation Spring 2018 Professor Abrams

Assignments (revised 1/21/2018) ¹

1. Policy Introduction I: BSSK 1-40 (read for background)
2. Policy Introduction II: BSSK 48-60, 40-48
3. Basis and Income: Stock, Dividends and Stock Dividends: §§61, 1001-1012
4. Nonrecognition Provisions I: BSSK 264-74
5. Nonrecognition Provisions II: BSSK 253-64
6. Gifts: BSSK 140-52, 160-61 (notes 1 & 3), 164-69, 171 (Questions)
7. Split Interests: Reg. §1.1011-2(b), BSSK 95-98, 169-71, *Irvin v. Gavit*
8. Losses: *Zakon, Rev. Rul. 84-145*. §165(a)-(g), BSSK 460-64; §166
9. Recovery of Loss: *Alice Phelen Sullivan Corp.*; BSSK 203-06, 100-05
10. Capitalization: §§162(a), 212, 263; *Indopco*; BSSK 413-25
11. Repair & Maintenance: BSSK 425-32, *Norwest Corp.*
12. Inventory; Rent vs. Installment Purchase: BSSK 432-33; *Starr's Estate*; §467 (skim)
14. Depreciation Theory: BSSK 445-49
14. Depreciation Practice: BSSK 449-51
15. Good Will/Education: §197; BSSK 433-37, 451-52, 465-73
16. Compensation: *Old Colony*; BSSK 132-40, 69-80
17. Fringe Benefits: BSSK 80-89
18. Discharge of Indebtedness: BSSK 315-22, 355-58
19. Relief of Indebtedness: BSSK 332-54
20. Nonrecourse Indebtedness: BSSK 250-53, 491-96, 502-03 (Note on "at-risk" investment)
21. Illegal Income: BSSK 123-28; *Tellier*; §§162(c), (f) & (g), §280E
22. Exempt Income: BSSK 365-72, 503 (Note on §265)
23. Recovery for Injury/Life Insurance: BSSK 105-23, 372-76
24. Methods of Accounting: BSSK 206-28 (and especially Reg. §§1.446-1, 1.451-2)
25. Constructive Receipt/Open Transactions: BSSK 284-90, 274-79, 282-84
26. Nonqualified Deferred Compensation: BSSK 290-305, §83 (skim)
27. Qualified Deferred Compensation II: BSSK 306-13
28. Deferred Sales: *Alstores Realty Corp.*
29. Charitable Contributions: BSSK 598-620
30. Interest and Taxes/AMT: BSSK 620-28
31. Mixed Outlays I: BSSK 513-29
32. Mixed Outlays II: BSSK 529-44
33. T&E/Legal Expenses/Hobby Losses: BSSK 544-52, 562-74
34. Assignment of Income -- Earned Income: BSSK 385-97

¹BBSK references are to Joseph Bankman, Daniel N. Shaviro, Kirk J. Stark & Edward D. Kleinbard, *Federal Income Taxation* (17th ed. 2017). All assignments include code sections referenced in the text as well as regulations promulgated under those code sections; sources in italics are in the supplementary materials. *We will cover two assignments per class.* Each class, please bring the casebook and a recent copy of the Internal Revenue Code and Income Tax Regulations (2013 or later edition).

35. Assignment of Income -- Unearned Income: BSSK 397-406
36. Nongratuitious Assignments of Income: *Cotlow; Stranahan*
37. Taxation of Capital Gain: BSSK 641-65
38. Capital Gain v. Ordinary Income I: §§1245, 1250, 170(e)(1)
39. Capital Gain v. Ordinary Income II: BSSK 674-79, 683-88
40. Correlation with Prior Transactions: BSSK 712-16, §1234A
41. Original Issue Discount I: BSSK 358-65; §§1271(a)(1), 1272(a), 1273, 1275
42. Original Issue Discount II: §§1276-78, 1286
43. Tax Rates: §1, 11, 199A
44. Tax Shelters I: BSSK 475-91
45. Tax Shelters II: BSSK: 498-512
46. EITC: BSSK 633-40
47. TBD
48. TBD