

Taxation

Spring 2019

Professor Abrams

All assignments are to the materials distributed via Canvas entitled “Federal Income Taxation: A Systemic Approach,” by Howard E. Abrams (spring 2019 edition) (“the Book”). We will cover one assignment per class session, 36 sessions in all. You will need to bring the relevant portions of the Book to class as well as a 2018 or later copy of the Internal Revenue Code and Income Tax Regulations (selected provisions). The Code and Regs. are available as a single volume at the campus book store as well as through on-line sellers. There are freely available versions of the Code and Regulations accessible through a web browser, but you will find such access too cumbersome. There is an excellent paid app available for both Android and iOS called TouchTax.

1. Introduction: pp. 1-8.
2. Computation of Gain pp. 9-14.
3. Nonrecognition Under Section 1031: pp. 15-17 (including problems 1 – 6).
4. Further Nonrecognition: pp. 17-23.
5. Gifts: pp. 21-31 (including problem 7).
6. Divided Interests: pp. 31-42.
7. The Loss Deduction/The Tax Benefit Rule: pp. 42-53 (including problem 8).
8. Recovery of Loss: pp. 54-56.
9. Capitalization: pp. 56-65.
10. Repair or Maintenance: pp. 65-77.
11. Rent or Purchase/Depreciation Theory: pp. 77-80.
12. Depreciation Practice: pp. 80-92.
13. Start-Up Costs/Education: pp. 92-98.
14. Indirect or Unearned Benefits: pp. 99-107.
15. Fringe Benefits/Economic Effects: Pp. 108-117
- 16: Cancellation of Debt/Medium of Payment (including problem 1): pp. 117-128
17. Below Market Loans/Transfer of Property: 128-142
18. Excess Debt/Illegal Income: pp. 142-151
19. Exempt Income/Personal Injuries/Life Insurance: pp. 151-154.
20. Methods of Accounting: pp. 155-170
21. Clear Reflection of Income: pp. 171-178
22. Open Transactions/Installment Sales: pp. 179-183
- 23: Deferral: pp. 183-187
24. Deferral/Deferred Sales: pp. 188-197
25. Attribution of Income: The Foundational Cases: pp. 199-211
26. Attribution of Income: A More Nuanced Approach: pp. 211-218
27. Capital Gains and Losses: The Inventory Exception: pp. 219-228
28. Capital Gains and Losses: Other Definitions: pp. 228-235.
29. Capital Gains and Losses: Benefits and Burdens: pp. 235-244.

30. Implicit Interest and the OID Rules: pp. 245-248.
31. Business Deductions: pp. 249-271
32. The Interest Deduction and Investment Deductions: pp. 271-79.
33. Personal Deductions: pp. 279-295.
34. Mixed-Motive Deductions: pp. 295-307.