

Taxation

Fall 2021

Professor Abrams

All assignments are to the materials available on my web site entitled “Federal Income Taxation: A Systemic Approach,” by Howard E. Abrams (fall 2021 edition) (“the Book”). We will cover two assignments per class session. 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 bookstore 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 and the Tax Legislative Process: Wikipedia article on reconciliation; pp. 1-3.
2. Tax Base and Rates: 3 – 8.
3. Computation of Gain and Loss: 10-13.
4. Taxation of Dividends: 13-16.
5. Like-Kind Exchanges: 16 -20.
6. Implicit Nonrecognition and Gifts: pp. 20-33.
7. Divisions of Property: pp. 33 – 39.
8. Transfers at Death: pp. 39 – 44.
9. The Loss Deduction: pp. 44 – 52.
10. The Tax Benefit Rule/Recovery of Loss: pp. 53 – 58.
11. Current Expense or Capital Expenditure: pp. 58 – 67.
12. Repair and Maintenance: pp. 67 – 78.
13. Rent or Purchase/Depreciation Theory: 79 – 82.
14. Depreciation Practice: pp. 82 – 88.
15. Goodwill and Other Intangibles: pp. 88 – 94.
16. Education: 94 – 100.
17. Indirect or Unearned Benefits/Imputed Income: pp. 103 – 119.
18. Fringe Benefits: pp. 119 – 125.
19. Fringe Benefits/Economic Effects: pp. 125 – 128.
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21. Medium of Payment/Below-Market Loans: 134 – 140.
22. Transfer of Property Subject to Debt: 140 – 153.
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24. Illegal Income/Exempt Income: pp. 157 – 162.
25. Methods of Accounting/Accrual Accounting: pp. 169 – 181.
26. Cash Accounting: pp. 181 – 187.
27. *Commercial Security Bank*/Clear Reflection of Income: 187 – 200.
28. Open Transactions/Installment Sales: pp. 201 – 206.
29. Financial Instruments and Qualified Deferred Compensation: pp. 206 – 209.

30. Nonqualified Deferred Compensation: pp. 211 – 213.
31. Deferred Sales: pp. 213 – 217.
32. Itemized and Business Deductions: pp. 223 – 236.
33. More on Business Deductions: pp. 236 – 245.
34. Investments: pp. 245 – 251.
35. Personal Deductions: pp. 251 – 267.
36. Mixed-Motive Deductions: pp. 267 – 277.
37. The Home Office Deduction: pp. 277- 278.
38. Income from Labor: pp. 282 – 287.
39. Income from Capital/Mix of Labor and Capital: pp. 287 – 296.
40. Non-gratuitous Assignments of Income: pp. 296 – 301.
41. Capital Gains: Definitions: pp. 306 – 312.
42. Substitutes for Ordinary Income: 312- 317.
43. Sale of a Business: Service-Flavored Property: pp. 317 – 329.
44. More Definitions/Consequences: pp. 329 – 334.
45. Additional Implications: pp. 335 – 341.
46. Original Issue Discount: pp. 341 –344.
47. Coupon Stripping/Options: pp. 344 – 46.
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