

USC Leventhal

School of Accounting

ACCT 560T – Tax Theory and Ethics **Fall 2016 / Section # 14232/ Aug 22 – Dec 14**

Online Course Syllabus

The goal of this course is to provide a basic, but comprehensive, overview of the theory of the federal tax system (as opposed to accounting principles) and the ethics of working within the system.

RECOMMENDED PREPARATION: Introductory tax course

INSTRUCTOR: John J. Barcal, J.D., (CPA Certificate from Illinois)
California State Bar
-Certified Specialist – Taxation;
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EMERGENCY NUMBERS: USC Emergencies: 213-740-4321
USC Public Safety—Non Emergencies: 213-740-6000
USC Emergency Information Line 740-9233
USC Information Line 740-2311
KUSC Radio 91.5

TEXT: **Fundamentals of Federal Income Taxation**, 18th Edition.
Freeland, Lathrope, Lind and Stephens
Foundation Press (2016) **Prior editions are not acceptable**
<http://www.store.westacademic.com>

IMPORTANT DATES—Spring Semester 2016, Full semester classes

Aug. 22	Fall semester classes begin in Session 001
Sept. 5	Labor Day, university holiday
Sept. 9	Last day to register and add classes for Session 001
Sept. 9	Last day to drop a class without a mark of "W" except for Monday-only classes, and receive a 100% refund for Session 001
Sept. 13	Last day to drop a Monday-only class without a mark of "W"
Oct. 7	Last day to withdraw without a mark of "W" (no refund)
Nov. 11	Last day to drop a class with a mark of W for Session 001
Nov. 23-27	Thanksgiving recess
Dec. 2	Fall semester classes end
Dec. 3-6	Study days
Dec. 7-14	Final examinations
Dec. 15-Jan. 8	Winter recess

USC LEVENTHAL MASTERS PROGRAMS LEARNING OUTCOMES:

The following are the five Student Learning Outcomes developed for this program by the USC Leventhal faculty and administration and filed with the AACSB, the accrediting body for accounting and business schools.

1. *Technical, Conceptual, Problem-Solving Requirement*

Students will be competent in and be able to apply discipline-specific knowledge and skills in the fields of accounting or taxation. This learning outcome includes the development of critical thinking and problem-solving skills, as well as an understanding of the strategic role of accounting in business organizations and society.

- MBT specific—Apply critical thinking and problem-solving skills related to taxation of individuals, flow-through entities, and corporations. Recognize potential opportunities for tax savings and tax planning.

2. *Professional Development Requirement*

Students will be able to communicate clearly, and strategically, after considering the relevant audience, situation, and purpose of the communication. Students will develop the ability to work productively with others to accomplish established goals.

- MBT specific—Convert complex and technical tax terminology into language that translates to non-technical audiences. Demonstrate strong interpersonal communication skills that build relationships with clients over time. Document exchanges with careful attention to word choice, tone, and accuracy.

3. *Research/Life-Long Learning Requirement*

Students will be able to use relevant research databases and academic/professional literature to gain new knowledge and analyze business situations.

- MBT specific—Use computer-based and paper-based systems to thoroughly research tax codes, tax law, rulings and interpretations. Use knowledge to be able to adjust to changes in tax law over time.

4. *Ethical Principles and Professional Standards Requirement*

Students will be able to apply ethical principles and professional standards in analyzing situations and making informed decisions.

- MBT specific—Demonstrate understanding of and apply consistently the ethical principles and professional standards related to the profession. Show the ability to express and follow rules of independence and the highest sense of professional ethics.

5. *Globalization Requirement*

Students will be able to demonstrate an international perspective and appreciation for diversity and cultural differences, along with their significance in global business.

- MBT specific—Explain key differences in taxing policies related to expatriates and the countries they live and work in. Reflect on cultural and ethnic differences in approaches to business and taxation policies.

COURSE LEARNING OUTCOMES:

By the end of this course, students will be able to:

- Separate relevant federal income tax issues in court opinions
- Examine Internal Revenue Code sections
- Analyze facts patterns and apply the applicable federal income tax rules
- Argue federal income tax positions on behalf of the taxpayer and on behalf of the IRS, with supporting facts, authority (code, cases, regulations, revenue rulings) and ethical considerations
- Develop a method to recognize facts and names of over 100 landmark federal income tax cases
- Evaluate ethical principles and professional standards in analyzing tax situations and making informed decisions
- Apply course concepts through interaction and discussion with other students

GRADES:

Participation; (MarshallTALK);	10%
Briefing of Cases; Assigned problems	
Matching Quizzes	25%
Midterm	25%
Final	40%

Total	100%

GRADING POLICIES

This course adheres to the USC Leventhal School of Accounting and Marshall School of Business grading standards for graduate programs. In general, final course grades at the graduate level in a core course average approximately B+ (3.3) but may vary based on class performance. For elective courses, the class average is usually higher--approximating 3.5, which is between a B+ and an A- You must receive a C or better to pass a required class, and you must have an

overall B average (3.0 minimum) in order to graduate from USC. The graded elements of this course are listed in this syllabus along with information about how they will be evaluated.

1. Participation in the MarshallTALK live video discussion forum is expected, and students should be present and prepared to engage with the class at the date and time indicated each week in order to earn participation credit for this activity.
2. Students must brief each case listed in the syllabus on their own and be prepared to show their work in MarshallTALK every week. In addition, students are expected to actively participate in study groups of 3 to 5 people in order to discuss their briefs of cases and ask questions of one another prior to class. **Students must brief cases in their textbook.**
3. Matching Quizzes will be administered online in Blackboard and will be timed. Make up quizzes will be given only if a student has received pre-approval from the instructor or has a doctor's excuse. Please make sure to start early to allow enough time to take each quiz – the session closes at 5:00 p.m. whether you have finished or not.
4. Mid-term and final exams are to be determined. Make up exams will be given only if a student has received pre-approval from the instructor or has a doctor's excuse.

RETENTION OF GRADED PAPERS:

Final exams and other graded work that affected the course grade will be kept for one year. Other papers or work that are handed back but that students fail to pick up will be held for one month. Discussion forums and other online work will be deleted at the end of the course.

ACADEMIC CONDUCT

Students enrolled in any class offered by the Leventhal School of Accounting are expected to uphold and adhere to the standards of academic integrity established by the Leventhal School of Accounting Student Honor Code. Students are responsible for obtaining, reading, and understanding the Honor Code System handbook. Students who are found to have violated the Code will be subject to disciplinary action as described in the handbook. For more specific information, please refer to the Student Honor Code System handbook, available in class or from the receptionist in ACC 101.

Plagiarism – presenting someone else's ideas as your own, either verbatim or recast in your own words – is a serious academic offense with serious consequences. Please familiarize yourself with the discussion of plagiarism in SCampus in Section 11 Behavior Violating University Standards <https://scampus.usc.edu/1100-behavior-violating-university-standards-and-appropriate-sanctions/>. Other forms of academic dishonesty are equally unacceptable. See additional information in SCampus and university policies on scientific misconduct, <http://policy.usc.edu/scientific-misconduct/>.

SUPPORT SYSTEMS

Students whose primary language is not English should check with the *American Language Institute* <http://dornsife.usc.edu/ali>, which sponsors courses and workshops specifically for international graduate students.

The Office of Disability Services and Programs

http://sait.usc.edu/academicsupport/centerprograms/dsp/home_index.html provides certification for students with disabilities and helps arrange the relevant accommodations.

If an officially declared emergency makes travel to campus infeasible, *USC Emergency Information* <http://emergency.usc.edu/> will provide safety and other updates, including ways in which instruction will be continued by means of blackboard, teleconferencing, and other technology.

Discrimination, sexual assault, and harassment are not tolerated by the university. You are encouraged to report any incidents to the Office of Equity and Diversity <http://equity.usc.edu/> or to the Department of Public Safety, <http://capsnet.usc.edu/departments/public-safety/online-forms/contact-us>.

This is important for the safety of the whole USC community. Another member of the university community – such as a friend, classmate, advisor, or faculty member – can help initiate the report or can initiate the report on behalf of another person. The Center for Women and Men <http://www.usc.edu/student-affairs/cwm/> provides 24/7 confidential support, and the sexual assault resource center webpage <https://sarc.usc.edu/reporting-options/> describes reporting options and other resources.

STUDENTS WITH DISABILITIES:

Any student requesting academic accommodations based on a disability is required to register with Disability Services and Programs (DSP) each semester. A letter of verification for approved accommodation can be obtained from DSP. Please be sure the letter is delivered to me as early in the semester as possible. DSP is located in STU 301 and is open 8:30 a.m. – 5:00 p.m., Monday through Friday. The phone number for DSP is (213) 740-0776. For more information, go to: http://sait.usc.edu/academicsupport/centerprograms/dsp/home_index.html.

NO RECORDING AND COPYRIGHT NOTICE:

No student may record any lecture, class discussion or meeting with me without my prior express written permission. The word “record” or the act of recording includes, but is not limited to, any and all means by which sound or visual images can be stored, duplicated or retransmitted whether by an electro-mechanical, analog, digital, wire, electronic or other device or any other means of signal encoding. I reserve all rights, including copyright, to my lectures, course syllabi and related materials, including summaries, PowerPoints, prior exams, answer keys, and all supplementary course materials available to the students enrolled in my class whether posted on

Blackboard or otherwise. They may not be reproduced, distributed, copied, or disseminated in any media or in any form, including but not limited to all course note-sharing websites. Exceptions are made for students who have made prior arrangements with DSP and me.

BRIEFING CASES:

Students must brief each case on their own in their textbook prior to MarshallTALK. In Marshall TALK, I will ask students to show me one or more of their case briefs. You will not know which cases I will ask to see beforehand.

HOMEWORK PROBLEMS:

Assigned homework problems are not to be handed in and will not be graded. They may be discussed in Marshall TALK—often in a later session so it is suggested that you make notes in the textbook, or elsewhere, and that you have your notes readily available. Please remember that this counts as part of your class participation.

MANDATORY STUDY GROUPS:

In addition, students must form mandatory study groups of 3 to 5 students. See Blackboard for study group sign up. The purpose of the study groups is so that if you have a question, you discuss it with your study group first; and then, if a question still exists, I will be happy to help. However, prior to answering your question, I will automatically ask you if you discussed the question within your study group. If not, I will not discuss the question with you until you have done so. The reason for this requirement is that students benefit tremendously when discussing the cases or other questions within their group.

Students are expected to spend at least 30 minutes every week discussing the Briefs of Cases for that Module. Each group should elect one student to post a brief summary of their meeting in the Blackboard Discussion Forum for participation credit.

MATCHING QUIZZES:

Matching quizzes are to be taken on the same date as MarshallTALK sessions but prior to the MarshallTALK session. For example, Matching Quiz #1 may be taken from 1am to 5pm PT on Monday, September 12, 2016 which is before the MarshallTALK session from 5:30pm to 6:30pm PT. **Please make sure to start early to allow enough time to take each quiz – the session closes at 5:00 p.m. whether you have finished or not.**

MARSHALLTALK DATES:

MarshallTALK dates are on **MONDAYS** from 5:30pm to 6:30pm PT as follows:

Module 1	8/22/16		
Module 2	8/29/16		
Labor Day	9/5/16	LaborDay	NO MarshallTALK
Module 3	9/12/16	Reminder: Take Matching Quiz #1 before MarshallTALK	
Module 4	9/19/16		
Module 5	9/26/16		
Module 6	10/3/16	Reminder: Take Matching Quiz #2 before MarshallTALK	
Module 7	10/10/16		
Module 8	10/17/16		
Module 9	10/24/16	MIDTERM	NO MarshallTALK
Module 10	10/31/16		
Module 11	11/7/16	Reminder: Take Matching Quiz #3 before MarshallTALK	
Module 12	11/14/16		
Module 13	11/21/16	Reminder: Take Matching Quiz #4 before MarshallTalk	
Thanksgiving Break 11/23-27/16			
Module 14	11/28/16		
Module 15	12/12/16	FINAL	NO MarshallTALK

Orientation Week	Introduction to Online Coursework
Learning Outcomes	<ul style="list-style-type: none"> • Access Blackboard (Bb) Course Materials • Navigate the Virtual Classroom • Introduce yourself using Bb Discussion Forum Attend a MarshallTALK session
Readings	Course Syllabus (found in Bb)
Activities	<p>MarshallTALK There will be two (2) online practice sessions offered prior to the first MarshallTALK session on Monday, August 22nd. Online students are expected to attend one session in order to become familiar with the course layout and to make sure they have the necessary equipment to actively participate in MarshallTALK discussions. Students may attend as many sessions as they need to become familiar with this platform.</p> <p>Session dates are:</p> <ul style="list-style-type: none"> • Monday August 15th —5:00pm (Pacific Time PT) • Wednesday August 17th—5:00pm (PT) <p>Blackboard Discussion Forum Post your bio or introduction in the Blackboard Discussion Board. In approximately 100 words, describe:</p> <ul style="list-style-type: none"> • who you are • what you do for a living • where you are located • what tax experience you have • what you hope to get out of this course <p>Read your peers' bios before signing up for your Study Groups (in Blackboard). Sign up in your Study Groups prior to the 1st week of class.</p> <p>In addition, attached to the Syllabus (last page) is a Student Information Sheet that the Professor would like you to fill out, scan, and submit to the Professor through Blackboard as an Assignment prior to the 1st week of class.</p>
Assessments	<p>Student Pre-Course Survey Students are asked to complete the pre-course survey found in Blackboard prior to the 1st week of class.</p>

Module 1: MarshallTALK 8/22/16	Orientation, Gross Income, Federal Tax Procedure, Professional Responsibility Issues and Tax Policy Considerations
Learning Outcomes	<ul style="list-style-type: none"> • Compare administrative and judicial procedures for federal tax matters • Brief cases • Analyze the nature of gross income • Interpret and apply income tax laws to fact patterns • Assess ethical principles and professional standards in analyzing tax matters and advising clients • Recall case names and key points
Readings	Ch. 1 Ch. 2 Ch. 28 Ch. 29 Ch. 30
Activities	Virtual Classroom Lesson 1 Review Content and Self-Assessment Exercises via Website link in Bb. Cases: <ul style="list-style-type: none"> • Cesarini • Old Colony Trust • Glenshaw Glass • Charley • Independent Life Insurance Co. • RR 79-24 • Dean Blackboard Discussion Forum – Due by 8/21/16 no later than 11:59 pm PT <i>Each group should elect <u>one</u> student to post a brief summary of their meeting in the Blackboard Discussion Forum for participation credit.</i> MarshallTALK will take place on Monday, August 22nd from 5:30pm to 6:30pm PT.
Assessments	Briefs of Cases Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK to demonstrate the briefing was done. Remember to “meet” with your study group to ask questions regarding the cases prior to class. Homework Problems (not to be handed in or graded but may be discussed in MarshallTALK): p. 62 ##1,2, 5 p. 66 ##1,2

Module 2: MarshallTALK 8/29/16	Exclusion of Gifts & Inheritances, Employee Benefits and Awards
Learning Outcomes	<ul style="list-style-type: none"> • Brief cases • Analyze gross income inclusion and exclusion rules relating to: gifts, employee benefits, inheritances, awards • Interpret and apply income tax laws to fact patterns • Recall case names and key points
Readings	Ch. 3 Ch. 4 Ch. 5
Activities	<p>Virtual Classroom Lesson 2 Review Content and Self-Assessment Exercises via Website link in Bb. Cases:</p> <ul style="list-style-type: none"> • Duberstein • Stanton • Lyeth v. Hoey • Wolder • Hatt • McDonell • Mayo Foundation <p>Blackboard Discussion Forum – Due by 8/28/16 no later than 11:59 pm PT <i>Each group should elect <u>one</u> student to post a brief summary of their meeting in the Blackboard Discussion Forum for participation credit.</i></p> <p>MarshallTALK will take place on Monday, August 29th from 5:30pm to 6:30pm PT.</p>
Assessments	<p>Briefs of Cases Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK to demonstrate the briefing was done. Remember to “meet” with your study group to ask questions regarding the cases prior to class.</p> <p>Homework Problems (not to be handed in or graded but may be discussed in MarshallTALK): p. 89 #1 p. 106 ##2,3,4 p. 117 ##1,2</p> <p>REMINDER: Matching Quiz #1 (Chap 2 to 5) on September 12th.</p>

REMINDER: NO CLASS/MARSHALLTALK on 9/5/16- Labor Day

Module 3: MarshallTALK 9/12/16	Gain from Dealings in Property, Life Insurance Proceeds & Annuities, Discharge of Indebtedness and Damages & Related Receipts, Separation and Divorce
Learning Outcomes	<ul style="list-style-type: none"> • Brief cases • Analyze factors in the determination of gain • Analyze determination of basis • Analyze gross income inclusion and exclusion rules relating to: life insurance, annuities, discharge of indebtedness, damages, marital separation and divorce • Interpret and apply income tax laws to fact patterns • Recall case names and key points
Readings	Ch. 6 Ch. 7 Ch. 8 Ch. 9 Skim Ch. 10
Activities	<p>Virtual Classroom Lesson 3 Review Content and Self-Assessment Exercises via Website link in Bb. Cases:</p> <ul style="list-style-type: none"> • Philadelphia Park Amusement • Taft v. Bowers • Farid-Es-Sultaneh • International Freighting Corp. • Crane • Tufts • Diedrich • Kirby Lumber • Zarin • RR 2008-34 • Raytheon • RR 79-313 • Young • Davis <p>Blackboard Discussion Forum – Due by 9/11/16 no later than 11:59 pm PT <i>Each group should elect <u>one</u> student to post a brief summary of their meeting in the Blackboard Discussion Forum for participation credit.</i></p> <p>MarshallTALK will take place on Monday, September 12th from 5:30pm to 6:30pm PT.</p>

Module 3 Assessments	<p>Briefs of Cases Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK to demonstrate the briefing was done. Remember to “meet” with your study group to ask questions regarding the cases prior to class.</p> <p>Homework Problems (not to be handed in or graded but may be discussed in MarshallTALK): p. 124 #1; p. 132 ##1,2; p. 137 #1; p. 158 ##1,2,3 p. 164 ##2,3; p. 188 #1,2,3; p. 203 #1</p> <p>Matching Quiz #1 – (Chap. 2 to 5) TAKE BEFORE MARSHALLTALK</p>

Module 4: MarshallTALK 9/19/16	Exclusions from Gross Income and Assignment of Income
Learning Outcomes	<ul style="list-style-type: none"> Analyze gross income inclusion and exclusion rules relating to: residences Identify who is the proper taxpayer to report a particular income or deduction item – assignment of income Interpret and apply income tax laws to fact patterns Recall case names and key points
Readings	Ch. 11 (IRC 121 only) Ch. 12
Activities	<p>Virtual Classroom Lesson 4 Review Content and Self-Assessment Exercises via Website link in Bb. Cases:</p> <ul style="list-style-type: none"> Lucas v. Earl Giannini RR 66-167 RR 74-581 Horst Blair Stranahan Susie Salvatore RR 69-102 <p>Blackboard Discussion Forum – Due by 9/18/16 no later than 11:59 pm PT <i>Each group should elect <u>one</u> student to post a brief summary of their meeting in the Blackboard Discussion Forum for participation credit.</i></p> <p>MarshallTALK will take place on Monday, September 19th from 5:30pm to 6:30pm PT.</p>
Assessments	<p>Briefs of Cases Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK to demonstrate the briefing was done. Remember to “meet” with your study group to ask questions regarding the cases prior to class.</p> <p>Homework Problems (not to be handed in or graded but may be discussed in MarshallTALK): p. 229 #1; p. 238 #1; p. 294 #1,2,3</p>

Module 5: MarshallTALK 9/26/16	Income Producing Entities
Learning Outcomes	<ul style="list-style-type: none"> • Brief cases • Compare how different types of income producing entities are taxed: trusts and estates, partnerships, corporations • Interpret and apply income tax laws to fact patterns • Recall case names and key points
Readings	Ch. 13
Activities	<p>Virtual Classroom Lesson 5 Review Content and Self-Assessment Exercises via Website link in Bb. Cases:</p> <ul style="list-style-type: none"> • Corliss v. Bowers • Morill • Clifford • Culbertson • Overton • Johnson • Borge <p>Blackboard Discussion Forum – Due by 9/25/16 no later than 11:59 pm PT <i>Each group should elect <u>one</u> student to post a brief summary of their meeting in the Blackboard Discussion Forum for participation credit.</i></p> <p>MarshallTALK will take place on Monday, September 26th from 5:30pm to 6:30pm PT.</p>
Assessments	<p>Briefs of Cases Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK to demonstrate the briefing was done. Remember to “meet” with your study group to ask questions regarding the cases prior to class.</p> <p>Homework Problems (not to be handed in or graded but may be discussed in MarshallTALK): p. 312 ##1,2; p. 320 ##1,2</p> <p>REMINDER: Matching Quiz #2 (Chap 2 to 12) next class on 10/3/16.</p>

Module 6: MarshallTALK 10/3/16	Business Deductions
Learning Outcomes	<ul style="list-style-type: none"> • Brief cases • Analyze business deductions allowed in the computation of taxable income – IRC 162 • Interpret and apply income tax laws to fact patterns • Recall case names and key points
Readings	Ch. 14
Activities	<p>Virtual Classroom Lesson 6 Review Content and Self-Assessment Exercises via Website link in Bb. Cases:</p> <ul style="list-style-type: none"> • Welch • Midland Empire • INDOPCO • Norwest corp. • Morton Frank • Harold's Club • Exacto Spring Corp. • Rosenspan • Andrews • RR 99-7 • Starr's Estate • Hill • Coughlin • Sharp • Simon <p>Blackboard Discussion Forum –Due by 10/2/16 no later than 11:59pm PT <i>Each group should elect <u>one</u> student to post a brief summary of their meeting in the Blackboard Discussion Forum for participation credit.</i></p> <p>MarshallTALK will take place on Monday, October 3rd from 5:30pm to 6:30pm PT.</p>
Assessments	<p>Briefs of Cases Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK to demonstrate the briefing was done. Remember to “meet” with your study group to ask questions regarding the cases prior to class.</p> <p>Homework Problems (not to be handed in or graded but may be discussed in MarshallTALK): p. 383 #1; p. 403 #5; p. 416 #1; p. 424 ##1,2,3; p. 490 #1,3; p. 501 ##1,2</p> <p>Matching Quiz #2 – (Chap. 2 to 5) TAKE BEFORE MARSHALLTALK</p>

Module 7: MarshallTALK 10/10/16	Business Deductions (cont'd), and Deductions for Profit-Making, Nonbusiness Activities
Learning Outcomes	<ul style="list-style-type: none"> • Brief cases • Analyze business deductions allowed in the computation of taxable income – IRC 162 • Analyze deductions from profit making non business activities allowed in the computation of taxable income – IRC 212 • Interpret and apply income tax laws to fact patterns • Recall case names and key points
Readings	Ch. 14 (continued) Ch. 15
Activities	<p>Virtual Classroom Lesson 7 Review Content and Self-Assessment Exercises via Website link in Bb. Cases:</p> <ul style="list-style-type: none"> • Higgins • Bowers v. Lumpkin • Surasky • Meyer J. Fleischman • William C. Horrmann • Lowry <p>Blackboard Discussion Forum – Due by 10/9/16 no later than 11:59 pm PT <i>Each group should elect <u>one</u> student to post a brief summary of their meeting in the Blackboard Discussion Forum for participation credit.</i></p> <p>MarshallTALK will take place on Monday, October 10th from 5:30pm to 6:30pm PT.</p>
Assessments	<p>Briefs of Cases Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK to demonstrate the briefing was done. Remember to “meet” with your study group to ask questions regarding the cases prior to class.</p>

Module 8: MarshallTALK 10/17/16	Deductions Not Limited to Business or Profit-Seeking Activities, Restrictions on Deductions and Deductions for Individuals Only
Learning Outcomes	<ul style="list-style-type: none"> • Brief cases • Explore tax avoidance limitation • Compare deductions for individuals • Interpret and apply income tax laws to fact patterns
Readings	Ch. 16, Ch. 17 Ch. 18 (read Cases & Rev Rulings only)
Activities	<p>Virtual Classroom Lesson 9 Review Content and Self-Assessment Exercises via Website link in Bb. Cases:</p> <ul style="list-style-type: none"> • RR 69-188 • J. Simpson Dean • RR 2010-25 • Sophy • Cramer • Engdahl • Tellier • Raymon Gerard • RR 2002-18 • Montgomery • Banks <p>Blackboard Discussion Forum – Due by 10/16/16 no later than 11:59 pm PT <i>Each group should elect <u>one</u> student to post a brief summary of their meeting in the Blackboard Discussion Forum for participation credit.</i></p> <p>MarshallTALK will take place on Monday, October 17th from 5:30pm to 6:30pm PT.</p>
Assessments	<p>Briefs of Cases Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK to demonstrate the briefing was done. Remember to “meet” with your study group to ask questions regarding the cases prior to class.</p> <p>Homework Problems (not to be handed in or graded but may be discussed in MarshallTALK): p. 545 ##1-4; p. 575 # #1,2,3,4</p> <p>Reminder: MIDTERM and matching next class 10/24/16 (Chap. 2-14)</p>

REMINDER: NO CLASS/MARSHALLTALK on 3/14/16 – Spring Break 3/14-20/16

Module 9: MarshallTALK 10/24/16	MIDTERM
Learning Outcomes	
Readings	Review Ch. 2 – 14
Activities	NO MarshallTALK will take place on Monday, October 24th
Assessments	Mid-Term Exam (Chap. 2 to 14)– 10/24/16 <ul style="list-style-type: none">• Matching (Chap. 2-14) and• Essay Questions (Chap. 2 to 14) DETAILS TO BE PROVIDED AT A LATER TIME

Module 10: MarshallTALK 10/31/16	Fundamental Timing Principles
Learning Outcomes	<ul style="list-style-type: none"> • Brief cases • Compare deductions relating to home mortgages (interest, points) – IRC 163 • Analyze basic timing issues • Interpret and apply income tax laws to fact patterns
Readings	Ch. 19
Activities	<p>Virtual Classroom Lesson 10 Review Content and Self-Assessment Exercises via Website link in Bb. Cases:</p> <ul style="list-style-type: none"> • Charles F. Kahler • Williams • Cowden • Hornung • Boylston Market • Cathcart • RR 87-22 • RR 54-465 • Vander Poel • Spring City Foundry • RR 70-151 • North American Oil • New Capital Hotel • Artnell • RR 57-463 • Schuessler • RR 2007-3 <p>Blackboard Discussion Forum – Due by 10/30/16 no later than 11:59 pm PT <i>Each group should elect <u>one</u> student to post a brief summary of their meeting in the Blackboard Discussion Forum for participation credit.</i></p> <p>MarshallTALK will take place on Monday, October 31st from 5:30pm to 6:30pm PT.</p>

Module 10 Assessments	<p>Briefs of Cases Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK to demonstrate the briefing was done. Remember to “meet” with your study group to ask questions regarding the cases prior to class.</p> <p>Homework Problems (not to be handed in or graded but may be discussed in MarshallTALK): p. 672 ##1,2; p. 704 ##1,2,3,4</p> <p>REMINDER: Matching Quiz #3 (Chap 2 to 18) next class.</p>

Module 11: MarshallTALK 11/17/16	Taxable Year and Capital Gains & Losses
Learning Outcomes	<ul style="list-style-type: none"> • Brief cases • Analyze the taxable year, the tax benefit rule and the claim of right doctrine • Analyze characterization of income • Analyze how different types of income are taxed • Distinguish between business, investment and personal activities • Distinguish deductible expenses from non deductible capital expenditures • Interpret and apply income tax laws to fact patterns
Readings	Ch. 20 (omit p. 724-733) Ch. 21
Activities	<p>Virtual Classroom Lesson 11 Review Content and Self-Assessment Exercises via Website link in Bb. Cases:</p> <ul style="list-style-type: none"> • Lewis • Van Cleave • Alice P. Sullivan • Mauldin • Malat v. Riddell • Kenan • Hudson • RR 66-7 • RR 66-97 • Hort • Metropolitan Bldg. • Watkins • Arrowsmith • Skelly Oil • Wasnok • McGowan <p>Blackboard Discussion Forum – Due 11/6/16 no later than 11:59 pm PT <i>Each group should elect <u>one</u> student to post a brief summary of their meeting in the Blackboard Discussion Forum for participation credit.</i></p> <p>MarshallTALK will take place on Monday, November 7th from 5:30pm to 6:30pm PT.</p>

Module 11 Assessments	<p>Briefs of Cases Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK to demonstrate the briefing was done. Remember to “meet” with your study group to ask questions regarding the cases prior to class.</p> <p>Matching Quiz #3 – (Chap. 2 to 18) TAKE BEFORE MARSHALLTALK</p>

Module 12: MarshallTALK 11/14/16	Characterization on the Sale of Depreciable Property and Deductions Affected by Characterization Principles
Learning Outcomes	<ul style="list-style-type: none"> • Brief cases • Analyze characterization of income on the sale of depreciable property • Analyze when a bad debt or worthless security is deductible and its characterization • Examine charitable deductions • Examine casualty and theft losses • Interpret and apply income tax laws to fact patterns
Readings	Ch. 22 Ch. 23
Activities	Virtual Classroom Lesson 12 Review Content and Self-Assessment Exercises via Website link in Bb. Cases <ul style="list-style-type: none"> • Parker • RR 69-487 • Bugbee • Haslam • RR 83-104 • RR 67-246 • RR 63-232 • Pulvers • Mary Frances Allen • Owens <p>Blackboard Discussion Forum – Due 11/13/16 no later than 11:59 pm PT</p> <p><i>Each group should elect <u>one</u> student to post a brief summary of their meeting in the Blackboard Discussion Forum for participation credit.</i></p> <p>MarshallTALK will take place on Monday, November 14th from 5:30pm to 6:30pm PT.</p>
Assessments	Briefs of Cases Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK to demonstrate the briefing was done. Remember to “meet” with your study group to ask questions regarding the cases prior to class. REMINDER: Matching Quiz #4 (Chap 2 to 21) next week.

Module 13: MarshallTALK 11/21/16	The Interrelationship of Timing & Characterization and Disallowance of Losses
Learning Outcomes	<ul style="list-style-type: none"> • Brief cases • Analyze the interrelationship of timing and characterization issues relating to installment sales transactions under IRC 453 • Interpret and apply income tax laws to fact patterns
Readings	Ch. 24 (omit pp. 921-931) Ch. 25
Activities	<p>Virtual Classroom Lesson 13 Review Content and Self-Assessment Exercises via Website link in Bb. Cases:</p> <ul style="list-style-type: none"> • Burnet v. Logan • Inaja Land Co. • Warren Jones • McWilliams <p>Blackboard Discussion Forum – Due 11/20/16 no later than 11:59 pm PT <i>Each group should elect <u>one</u> student to post a brief summary of their meeting in the Blackboard Discussion Forum for participation credit.</i></p> <p>MarshallTALK will take place on Monday, November 21st from 5:30pm to 6:30pm PT.</p>
Assessments	<p>Briefs of Cases Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK to demonstrate the briefing was done. Remember to “meet” with your study group to ask questions regarding the cases prior to class.</p> <p>Homework Problems (not to be handed in or graded but may be discussed in MarshallTALK): p. 910 ##1,2,3 Matching Quiz #4 –(Chap 2 to 21) TAKE BEFORE MARSHALLTALK</p>

Module 14: MarshallTALK 11/28/16	Nonrecognition Provisions
Learning Outcomes	<ul style="list-style-type: none"> • Brief cases • Examine disallowance of losses issues • Analyze non recognition provisions • Interpret and apply income tax laws to fact patterns
Readings	Ch. 26 Omit Ch. 27
Activities	<p>Virtual Classroom Lesson 14 Review Content and Self-Assessment Exercises via Website link in Bb. Cases:</p> <ul style="list-style-type: none"> • Bloomington Coca-Cola • Crichton • Leslie Co. • RR 77-297 • Masser • Clifton • RR 76-319 • RR 67-254 • RR 71-41 <p>Blackboard Discussion Forum – Due 11/27/16 no later than 11:59 pm PT <i>Each group should elect <u>one</u> student to post a brief summary of their meeting in the Blackboard Discussion Forum for participation credit.</i></p> <p>MarshallTALK will take place on Monday, November 28th from 5:30pm to 6:30pm PT.</p>
Assessments	<p>Briefs of Cases Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK to demonstrate the briefing was done. Remember to “meet” with your study group to ask questions regarding the cases prior to class.</p> <p>Reminder: FINAL exam and matching (Chap. 2-30 (omit Chap 27)) on 12/12/16.</p>

Module 15: FINAL 12/12/16	FINAL
Readings	Review Ch. 1 to 30 (omit Ch. 27)
Activities	NO MarshallTALK will take place on Monday, December 12th
Assessments	Final Exam (Chap. 2 to 30 (omit Chap. 27))– 12/12/16 <ul style="list-style-type: none"> • Matching (Chap. 2-30 (omit Chap. 27)) and • Essay Questions (Chap. 2 to 30 (omit Chap. 27)) DETAILS TO BE PROVIDED AT A LATER TIME

STUDENT INFORMATION SHEET

LAST NAME: _____ OFFICE PHONE: _____

FIRST NAME: _____ HOME PHONE: _____

CELL PHONE: _____

email: _____

EXPERIENCE

POSITION: _____

FIRM NAME: _____

FIRM ADDRESS: _____

HOME ADDRESS: _____

PRIOR TAX COURSES:

UNIVERSITY	CLASS TITLE	INSTRUCTOR	GRADE
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UNDERGRAD UNIVERSITY AND MAJOR: _____