

# USC Leventhal

## School of Accounting

### **ACCT 560T – Tax Theory and Ethics**

**Spring 2018 Jan 8 – May 9, 2018**

**Section # 14221D M 5:30 – 7:00 p.m. MarshallTALK**

**Section # 14231R M 7:30 – 9:00 p.m. JFF 241**

### **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

#### **COURSE STRUCTURE:**

**This course is being offered simultaneously as both an on-campus lecture-based course and as an online course. Both courses will have access to the same materials, recordings, exercises, and lectures. Students are asked not to switch sections after the semester has started so that each section may function as a cohesive unit.**

INSTRUCTOR: John J. Barcal, J.D., (CPA Certificate from Illinois)  
California State Bar  
-Certified Specialist – Taxation;  
-Certified Specialist – Estate Planning, Probate and Trust  
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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**

### IMPORTANT DATES

8 Jan	First day of Classes
15 Jan	USC Holiday—Martin Luther King’s Birthday
26 Jan	Last Day to Drop without “W” Day
19 Feb	USC Holiday—President’s Day
11-18 Mar	Spring Recess
6 Apr	DROP DAY—Last day to drop a class with mark of “W”
7 May	Final Exam

### 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:

Briefing of Cases; Assigned problems; MarshallTALK/Class Performance	10%
Matching Quizzes	25%
Midterm	25%
Final	40%
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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/On Campus Class 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/On Campus Class 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.

## ONLINE LEARNING:

This course is divided into **fifteen** modules, and each module is intended to cover one week. Students are also encouraged to participate in the Orientation Week in order to learn how to use the online tools available to them before the official start of class in Module 1. In addition, Module activities may include reading assignments, weekly lessons, interactive exercises, homework assignments, Blackboard discussion forums and MarshallTALK live video discussion forums/On Campus Class.

### Blackboard (Bb)

Blackboard is the primary learning management system currently used at USC and may be accessed at <https://blackboard.usc.edu>. From the Bb Course Home Page, students can access

their course syllabus, identify readings, participate in discussion forums, submit assignments, and review matching quiz scores at any time (asynchronously). They can also access links to the other platforms used in this course. General questions regarding course material, content, or procedures may be posted in the Blackboard discussion board or addressed during MarshallTALK/On Campus Class so that faculty responses may benefit all class members.

### Virtual Classroom

The Virtual Classroom enables students to asynchronously view faculty lessons and other integrated course content. Students also use the Virtual Classroom to engage in self-assessment activities designed to help them understand and apply key course concepts. The Virtual Classroom is organized into weekly modules that correspond to the course syllabus and are designed to be taken in the order they appear. The interactive exercises within this Virtual Classroom are not graded but contain information that would otherwise be delivered in traditional class lectures and that may be included in the midterm and final exams. **A link to this platform will be found in Bb.**

### MarshallTALK – ONLINE STUDENTS ONLY

**Online Students and faculty will meet online on a regular basis at a pre-determined date and time (synchronously) in MarshallTALK, a live video discussion forum. MarshallTALK allows students to discuss course content and to ask questions in real time and may also be used as a forum for individual or group presentations. A link to MarshallTALK will be found in Bb.**

### Classroom Lecture – ON CAMPUS STUDENTS ONLY

**On Campus Students and faculty will meet on campus on a regular basis at a pre-determined date. The On Campus Lecture allows students to discuss course content and to ask questions in real time and may also be used as a forum for individual or group presentations.**

## SYSTEM REQUIREMENTS

1. Browser Requirements:
  - a. Internet Explorer 9.x and above on PCs
  - b. FireFox 3.6 and above on PCs
  - c. Safari 3.6 and higher on Mac (only)
  - d. Firefox 3.x and higher on Mac
  - e. Google Chrome
2. Computer with camera, speakers, and microphone
  - a. Recommended microphone/headset: [http://www.amazon.com/Logitech-ClearChat-Comfort-Headset-Black/dp/B000UXZQ42/ref=pd\\_sim\\_e\\_2](http://www.amazon.com/Logitech-ClearChat-Comfort-Headset-Black/dp/B000UXZQ42/ref=pd_sim_e_2)
  - b. Recommended webcam: <http://www.logitech.com/en-us/product/hd-webcam-c525?crd=34>
3. High Speed Internet Connection (Wired is best but wireless might work) (Wireless or Cabled)

## TECHNICAL SUPPORT

- USC Information Technology Services (for Blackboard support):  
Call (213) 740-5555 or email [consult@usc.edu](mailto:consult@usc.edu)  
For more information, visit their website at: <http://www.usc.edu/its/>
- USC Marshall (for Virtual Classroom support):  
Call (213) 740-3000 Monday through Friday, 7:00am to 6:00pm PST  
Or visit their website at: <http://msbhelp.usc.edu>

## 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 Part B, Section 11, “Behavior Violating University Standards” <https://policy.usc.edu/scampus-part-b/>. 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

*Student Counseling Services (SCS) - (213) 740-7711 – 24/7 on call*

Free and confidential mental health treatment for students, including short-term psychotherapy, group counseling, stress fitness workshops, and crisis intervention.

<https://engemannshc.usc.edu/counseling/>

*National Suicide Prevention Lifeline - 1-800-273-8255*

Provides free and confidential emotional support to people in suicidal crisis or emotional distress 24 hours a day, 7 days a week. <http://www.suicidepreventionlifeline.org>

*Relationship & Sexual Violence Prevention Services (RSVP) - (213) 740-4900 - 24/7 on call*

Free and confidential therapy services, workshops, and training for situations related to gender-based harm. <https://engemannshc.usc.edu/rsvp/>

*Sexual Assault Resource Center*

For more information about how to get help or help a survivor, rights, reporting options, and additional resources, visit the website: <http://sarc.usc.edu/>

*Office of Equity and Diversity (OED)/Title IX compliance – (213) 740-5086*

Works with faculty, staff, visitors, applicants, and students around issues of protected class.

<https://equity.usc.edu/>

*Bias Assessment Response and Support*

Incidents of bias, hate crimes and microaggressions need to be reported allowing for appropriate investigation and response. <https://studentaffairs.usc.edu/bias-assessment-response-support/>

*Student Support & Advocacy – (213) 821-4710*

Assists students and families in resolving complex issues adversely affecting their success as a student EX: personal, financial, and academic. <https://studentaffairs.usc.edu/ssa/>

*Diversity at USC – <https://diversity.usc.edu/>*

Tabs for Events, Programs and Training, Task Force (including representatives for each school), Chronology, Participate, Resources for Students

Emergency Preparedness/Course Continuity

In case of a declared emergency if travel to campus is not feasible, the *USC Emergency Information* web site (<http://emergency.usc.edu/>) will provide safety and other information, including electronic means by which instructors will conduct class using a combination of USC's Blackboard learning management system ([blackboard.usc.edu](http://blackboard.usc.edu)), teleconferencing, and other technologies.

STUDENTS WITH DISABILITIES:

USC is committed to making reasonable accommodations to assist individuals with disabilities in reaching their academic potential. If you have a disability which may impact your performance, attendance, or grades in this course and require accommodations, you must first register with the Office of Disability Services and Programs ([www.usc.edu/disability](http://www.usc.edu/disability)). DSP provides certification for students with disabilities and helps arrange the relevant accommodations. 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 accommodations can be obtained from DSP. Please be sure the letter is delivered to me (or to your TA) as early in the semester as possible. DSP is located in GFS (Grace Ford Salvatori Hall) 120 and is open 8:30 a.m.–5:00 p.m., Monday through Friday. The phone number for DSP is (213) 740-0776. Email: [ability@usc.edu](mailto:ability@usc.edu).

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.

*Each study group will be given an account (a Go To Meeting or similar type account) for group meetings. 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 the MarshallTALK or the on campus course sessions but prior to the start of the MarshallTALK or the on campus course sessions. For example, Matching Quiz #1 may be taken from 1 a.m. to 5 p.m. PST on Monday, 1/29/18 which is before the MarshallTALK or the On Campus Class sessions. **Please make sure to start early to allow enough time to take each quiz – the session closes at 5:00 p.m. PST whether you have finished or not.**



**MARSHALLTALK/ON CAMPUS CLASS DATES:**

MarshallTALK dates are on **MONDAYS** from 5:30pm to 7:00pm PST  
On Campus Class dates are on **MONDAYS** from 7:30 pm to 9:00 pm PST

Module 1	1/8/18	
Martin Luther King Day	1/15/18	<b>Martin Luther King Day NO MarshallTALK/Class</b>
Module 2	1/22/18	
Module 3	1/29/18	Reminder: Take Matching Quiz #1 before MarshallTALK/Class
Module 4	2/5/18	
Module 5	2/5/18	
Module 6	2/12/18	Reminder: Take Matching Quiz #2 before MarshallTALK/Class
President's Day	2/19/18	<b>President's Day NO MarshallTALK/Class</b>
Module 7	2/26/18	
Module 9	3/5/18	
Spring Break	3/12/18	<b>Spring Break 3/12-16/2018 NO MarshallTALK/Class</b>
Module 8	3/19/18	<b>MIDTERM NO MarshallTALK/Class</b>
Module 10	3/26/18	
Module 11	4/2/18	Reminder: Take Matching Quiz #3 before MarshallTALK/Class
Module 12	4/9/18	
Module 13	4/16/18	Reminder: Take Matching Quiz #4 before MarshallTALK/Class
Module 14	4/23/18	
Module 15	5/7/18	<b>FINAL NO MarshallTALK/Class</b>

<b>"Orientation" Week</b>	<b>Introduction to Online Coursework</b>
<b>Learning Outcomes</b>	<ul style="list-style-type: none"> <li>• Access Blackboard (Bb) Course Materials</li> <li>• Navigate the Virtual Classroom</li> <li>• Introduce yourself using Bb Discussion Forum</li> </ul>
<b>Readings</b>	<b>Course Syllabus</b> (found in Bb)
<b>Activities</b>	<p><b>(1) Blackboard Discussion Forum FOR ONLINE AND ON CAMPUS STUDENTS</b></p> <p>Post your bio or introduction in the Blackboard Discussion Board. In approximately 100 words, describe:</p> <ul style="list-style-type: none"> <li>• who you are</li> <li>• what you do for a living</li> <li>• where you are located</li> <li>• what tax experience you have</li> <li>• what you hope to get out of this course</li> </ul> <p><b>Read your peers' bios before signing up for your Study Groups (in Blackboard).</b></p> <p>(2) In addition, attached to the Syllabus (last page) is a <b>Student Information Sheet</b> that the Professor would like you to fill out, scan, and submit to the Professor through Blackboard as an Assignment prior to the 1<sup>st</sup> week of class.</p> <p>(3) Sign up for study groups</p>
<b>Assessments</b>	<b>None</b>

<b>Module 1: 1/8/18</b>	<b>Orientation, Gross Income, Federal Tax Procedure, Professional Responsibility Issues and Tax Policy Considerations</b>
<b>Learning Outcomes</b>	<ul style="list-style-type: none"> <li>• Compare administrative and judicial procedures for federal tax matters</li> <li>• Brief cases</li> <li>• Analyze the nature of gross income</li> <li>• Interpret and apply income tax laws to fact patterns</li> <li>• Assess ethical principles and professional standards in analyzing tax matters and advising clients</li> <li>• Recall case names and key points</li> </ul>
<b>Readings</b>	<b>Ch. 1                      Ch. 29</b> <b>Ch. 2                      Ch. 30</b> <b>Ch. 28</b>
<b>Activities</b>	<b>Virtual Classroom Lesson 1</b> Review Content and Self-Assessment Exercises via Website link in Bb. Cases: <ul style="list-style-type: none"> <li>• Cesarini</li> <li>• Old Colony Trust</li> <li>• Glenshaw Glass</li> <li>• Charley</li> <li>• Independent Life Insurance Co.</li> <li>• RR 79-24</li> <li>• Dean</li> </ul> <p><b>Blackboard Discussion Forum – Due by Sunday, 1/7/18 no later than 11:59 pm PST</b>  <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><b>MarshallTALK session</b> will take place on <b>Monday, January 8<sup>th</sup></b> from 5:30pm to 7:00pm PST  <b>On Campus Class session</b> will take place on <b>Monday, January 8<sup>th</sup></b> from 7:30pm to 9:00pm PST</p>
<b>Assessments</b>	<b>Briefs of Cases</b> Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK/On Campus Class to demonstrate the briefing was done. Remember to “meet” with your study group to ask questions regarding the cases prior to class. <b>Homework Problems (not to be handed in or graded but may be discussed in MarshallTALK/On Campus Class):</b> p. 62 ##1,2, 5 p. 66 ##1,2

**REMINDER: NO CLASS/MARSHALLTALK on 1/15/18 - Martin Luther King Day**

<b>Module 2: MarshallTALK 1/22/18</b>	<b>Exclusion of Gifts &amp; Inheritances, Employee Benefits and Awards</b>
<b>Learning Outcomes</b>	<ul style="list-style-type: none"> <li>• Brief cases</li> <li>• Analyze gross income inclusion and exclusion rules relating to: gifts, employee benefits, inheritances, awards</li> <li>• Interpret and apply income tax laws to fact patterns</li> <li>• Recall case names and key points</li> </ul>
<b>Readings</b>	<b>Ch. 3 Ch. 4 Ch. 5</b>
<b>Activities</b>	<p><b>Virtual Classroom Lesson 2</b> Review Content and Self-Assessment Exercises via Website link in Bb. Cases:</p> <ul style="list-style-type: none"> <li>• Duberstein</li> <li>• Stanton</li> <li>• Lyeth v. Hoey</li> <li>• Wolder</li> <li>• Hatt</li> <li>• McDonell</li> <li>• Mayo Foundation</li> </ul> <p><b>Blackboard Discussion Forum – Due by Sunday, 1/21/18 no later than 11:59 pm PST</b> <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><b>MarshallTALK session</b> will take place on <b>Monday, January 22nd</b> from 5:30pm to 7:00pm PST <b>On Campus Class session</b> will take place on <b>Monday, January 22nd</b> from 7:30pm to 9:00pm PST</p>
<b>Assessments</b>	<p><b>Briefs of Cases</b> Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK/On Campus Class to demonstrate the briefing was done. Remember to “meet” with your study group to ask questions regarding the cases prior to class.</p> <p><b>Homework Problems (not to be handed in or graded but may be discussed in MarshallTALK/On Campus Class):</b> p. 89 #1 p. 106 ##2,3,4 p. 117 ##1,2 <b>REMINDER:</b> Matching Quiz #1 (Chap 2 to 5) next week.</p>

<b>Module 3: MarshallTALK 1/29/18</b>	<b>Gain from Dealings in Property, Life Insurance Proceeds &amp; Annuities, Discharge of Indebtedness and Damages &amp; Related Receipts, Separation and Divorce</b>
<b>Learning Outcomes</b>	<ul style="list-style-type: none"> <li>• Brief cases</li> <li>• Analyze factors in the determination of gain</li> <li>• Analyze determination of basis</li> <li>• Analyze gross income inclusion and exclusion rules relating to: life insurance, annuities, discharge of indebtedness, damages, marital separation and divorce</li> <li>• Interpret and apply income tax laws to fact patterns</li> <li>• Recall case names and key points</li> </ul>
<b>Readings</b>	<b>Ch. 6</b> <b>Ch. 7</b> <b>Ch. 8</b> <b>Ch. 9</b> <b>Skim Ch. 10</b>
<b>Activities</b>	<b>Virtual Classroom Lesson 3</b> Review Content and Self-Assessment Exercises via Website link in Bb. Cases: <ul style="list-style-type: none"> <li>• Philadelphia Park Amusement</li> <li>• Taft v. Bowers</li> <li>• Farid-Es-Sultaneh</li> <li>• International Freighting Corp.</li> <li>• Crane</li> <li>• Tufts</li> <li>• Diedrich</li> <li>• Kirby Lumber</li> <li>• Zarin</li> <li>• RR 2008-34</li> <li>• Raytheon</li> <li>• RR 79-313</li> <li>• Young</li> <li>• Davis</li> </ul> <p><b>Blackboard Discussion Forum – Due by Sunday, 1/28/18 no later than 11:59 pm PST</b></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><b>MarshallTALK session</b> will take place on <b>Monday, January 29<sup>th</sup></b> from 5:30pm to 7:00pm PST</p> <p><b>On Campus Class session</b> will take place on <b>Monday, January 29<sup>th</sup></b> from 7:30pm to 9:00pm PST</p>

<b>Module 3 Assessments</b>	<b>Briefs of Cases</b> Brief all cases in your textbook and be prepared to <b>SHOW YOUR TEXTBOOK</b> in MarshallTALK/On Campus Class to demonstrate the briefing was done. Remember to “meet” with your study group to ask questions regarding the cases prior to class.  <b>Homework Problems (not to be handed in or graded but may be discussed in MarshallTALK/On Campus Class):</b> 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 <b>Matching Quiz #1 – (Chap. 2 to 5) TAKE BEFORE MARSHALLTALK/On Campus Class</b>
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<b>Module 4: MarshallTALK 2/5/18</b>	<b>Exclusions from Gross Income and Assignment of Income</b>  <b>***ALSO PREPARE MODULE 5***</b>
<b>Learning Outcomes</b>	<ul style="list-style-type: none"> <li>• Analyze gross income inclusion and exclusion rules relating to: residences</li> <li>• Identify who is the proper taxpayer to report a particular income or deduction item – assignment of income</li> <li>• Interpret and apply income tax laws to fact patterns</li> <li>• Recall case names and key points</li> </ul>
<b>Readings</b>	<b>Ch. 11 (IRC 121 only)</b> <b>Ch. 12</b>
<b>Activities</b>	<b>Virtual Classroom Lesson 4</b> Review Content and Self-Assessment Exercises via Website link in Bb. Cases: <ul style="list-style-type: none"> <li>• Lucas v. Earl</li> <li>• Giannini</li> <li>• RR 66-167</li> <li>• RR 74-581</li> <li>• Horst</li> <li>• Blair</li> <li>• Stranahan</li> <li>• Susie Salvatore</li> <li>• RR 69-102</li> </ul> <b>Blackboard Discussion Forum – Due by Sunday, 2/4/18 no later than 11:59 pm PST</b> <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>  <b>MarshallTALK session</b> will take place on <b>Monday, February 5<sup>th</sup></b> from 5:30pm to 7:00pm PST <b>On Campus Class session</b> will take place on <b>Monday, February 5<sup>th</sup></b> from 7:30pm to 9:00pm PST
<b>Assessments</b>	<b>Briefs of Cases</b> Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK/On Campus Class to demonstrate the briefing was done. Remember to “meet” with your study group to ask questions regarding the cases prior to class.  <b>Homework Problems (not to be handed in or graded but may be discussed in MarshallTALK/On Campus Class):</b>

	p. 229 #1; p. 274 #1; p. 294 #1,2,3
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	<b>REMINDER:</b> Matching Quiz #2 (Chap 2 to 12) next class on 2/12/18.
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<b>Module 5: MarshallTALK 2/5/18</b>	<b>Income Producing Entities</b>
<b>Learning Outcomes</b>	<ul style="list-style-type: none"> <li>• Brief cases</li> <li>• Compare how different types of income producing entities are taxed: trusts and estates, partnerships, corporations</li> <li>• Interpret and apply income tax laws to fact patterns</li> <li>• Recall case names and key points</li> </ul>
<b>Readings</b>	<b>Ch. 13</b>
<b>Activities</b>	<p><b>Virtual Classroom Lesson 5</b> Review Content and Self-Assessment Exercises via Website link in Bb. Cases:</p> <ul style="list-style-type: none"> <li>• Corliss v. Bowers</li> <li>• Morrill</li> <li>• Clifford</li> <li>• Culbertson</li> <li>• Overton</li> <li>• Johnson</li> <li>• Borge</li> </ul> <p><b>Blackboard Discussion Forum – Due by Sunday, 2/4/18 no later than 11:59 pm PST</b> <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><b>MarshallTALK session</b> will take place on <b>Monday, February 5<sup>th</sup></b> from 5:30pm to 7:00pm PST <b>On Campus Class session</b> will take place on <b>Monday, February 5<sup>th</sup></b> from 7:30pm to 9:00pm PST</p>
<b>Assessments</b>	<p><b>Briefs of Cases</b> Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK/On Campus Class to demonstrate the briefing was done. Remember to “meet” with your study group to ask questions regarding the cases prior to class.</p> <p><b>Homework Problems (not to be handed in or graded but may be discussed in MarshallTALK/On Campus Class):</b> p. 312 ##1,2; p. 320 ##1,2 <b>REMINDER:</b> Matching Quiz #2 (Chap 2 to 12) next class on 2/12/18.</p>

**REMINDER: NO CLASS/MARSHALLTALK on 2/19/18 – President’s Day**

<b>Module 6: MarshallTALK 2/12/18</b>	<b>Business Deductions</b>
<b>Learning Outcomes</b>	<ul style="list-style-type: none"> <li>• Brief cases</li> <li>• Analyze business deductions allowed in the computation of taxable income – IRC 162</li> <li>• Interpret and apply income tax laws to fact patterns</li> <li>• Recall case names and key points</li> </ul>
<b>Readings</b>	<b>Ch. 14</b>
<b>Activities</b>	<p><b>Virtual Classroom Lesson 6</b> Review Content and Self-Assessment Exercises via Website link in Bb. Cases:</p> <ul style="list-style-type: none"> <li>• Welch</li> <li>• Midland Empire</li> <li>• INDOPCO</li> <li>• Norwest corp.</li> <li>• Morton Frank</li> <li>• Harold's Club</li> <li>• Exacto Spring Corp.</li> <li>• Rosenspan</li> <li>• Andrews</li> <li>• RR 99-7</li> <li>• Starr's Estate</li> <li>• Hill</li> <li>• Coughlin</li> <li>• Sharp</li> <li>• Simon</li> </ul> <p><b>Blackboard Discussion Forum – Due by Sunday, 2/11/18 no later than 11:59 pm PST</b> <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><b>MarshallTALK session</b> will take place on <b>Monday, February 12<sup>th</sup></b> from 5:30pm to 7:00pm PST <b>On Campus Class session</b> will take place on <b>Monday, February 12<sup>th</sup></b> from 7:30pm to 9:00pm PST</p>

<p><b>Assessments</b></p>	<p><b>Briefs of Cases</b>  Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK/On Campus Class to demonstrate the briefing was done.  Remember to “meet” with your study group to ask questions regarding the cases prior to class.</p> <p><b>Homework Problems (not to be handed in or graded but may be discussed in MarshallTALK/On Campus Class):</b>  p. 383 #1; p. 403 #5; p. 416 #1;  p. 424 ##1,2,3; p. 490 ##1,3; p. 501 ##1,2</p> <p><b>Matching Quiz #2 – (Chap. 2 to 12) TAKE BEFORE MARSHALLTALK/On Campus Class</b></p>
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**REMINDER: NO CLASS/MARSHALLTALK on 2/19/18 – President’s Day**

<b>Module 7: MarshallTALK 2/26/18</b>	<b>Business Deductions (cont'd), and Deductions for Profit-Making, Nonbusiness Activities</b>
<b>Learning Outcomes</b>	<ul style="list-style-type: none"> <li>• Brief cases</li> <li>• Analyze business deductions allowed in the computation of taxable income – IRC 162</li> <li>• Analyze deductions from profit making non business activities allowed in the computation of taxable income – IRC 212</li> <li>• Interpret and apply income tax laws to fact patterns</li> <li>• Recall case names and key points</li> </ul>
<b>Readings</b>	<b>Ch. 14 (continued) Ch. 15</b>
<b>Activities</b>	<p><b>Virtual Classroom Lesson 7</b> Review Content and Self-Assessment Exercises via Website link in Bb. Cases:</p> <ul style="list-style-type: none"> <li>• Higgins</li> <li>• Bowers v. Lumpkin</li> <li>• Surasky</li> <li>• Meyer J. Fleischman</li> <li>• William C. Horrmann</li> <li>• Lowry</li> </ul> <p><b>Blackboard Discussion Forum – Due by Sunday, 2/25/18 no later than 11:59 pm PST</b> <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><b>MarshallTALK session</b> will take place on <b>Monday, February 26<sup>th</sup></b> from 5:30pm to 7:00pm PST <b>On Campus Class session</b> will take place on <b>Monday, February 26<sup>th</sup></b> from 7:30pm to 9:00pm PST</p>
<b>Assessments</b>	<p><b>Briefs of Cases</b> Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK/On Campus Class to demonstrate the briefing was done. Remember to “meet” with your study group to ask questions regarding the cases prior to class.</p>

<b>Module 9: MarshallTALK 3/5/18</b>	<b>Deductions Not Limited to Business or Profit-Seeking Activities, Restrictions on Deductions and Deductions for Individuals Only</b>
<b>Learning Outcomes</b>	<ul style="list-style-type: none"> <li>• Brief cases</li> <li>• Explore tax avoidance limitation</li> <li>• Compare deductions for individuals</li> <li>• Interpret and apply income tax laws to fact patterns</li> </ul>
<b>Readings</b>	<b>Ch. 16, Ch. 17 Ch. 18 (read Cases &amp; Rev Rulings only)</b>
<b>Activities</b>	<p><b>Virtual Classroom Lesson 9</b> Review Content and Self-Assessment Exercises via Website link in Bb. Cases:</p> <ul style="list-style-type: none"> <li>• RR 69-188</li> <li>• J. Simpson Dean</li> <li>• RR 2010-25</li> <li>• Sophy</li> <li>• Cramer</li> <li>• Engdahl</li> <li>• Tellier</li> <li>• Raymon Gerard</li> <li>• RR 2002-18</li> <li>• Montgomery</li> <li>• Banks</li> </ul> <p><b>Blackboard Discussion Forum – Due by Sunday, 3/4/18 no later than 11:59 pm PST</b> <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><b>MarshallTALK session</b> will take place on <b>Monday, March 5<sup>th</sup></b> from 5:30pm to 7:00pm PST <b>On Campus Class session</b> will take place on <b>Monday, March 5<sup>th</sup></b> from 7:30pm to 9:00pm PST</p>
<b>Assessments</b>	<p><b>Briefs of Cases</b> Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK/On Campus Class to demonstrate the briefing was done. Remember to “meet” with your study group to ask questions regarding the cases prior to class.</p> <p><b>Homework Problems (not to be handed in or graded but may be</b></p>

	<p><b>discussed in MarshallTALK/On Campus Class):</b> p. 545 ##1-4; p. 575 ##1,2,3,4</p> <p><b>Reminder: MIDTERM and matching next class 3/19/18 (Chap. 2-14)</b></p>
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**REMINDER: NO CLASS/MARSHALLTALK on 3/12/18 – Spring Break 3/12-16/2018**

<b>Module 8: MarshallTALK 3/19/18</b>	<b>MIDTERM</b>
<b>Learning Outcomes</b>	
<b>Readings</b>	<b>Review Ch. 2 – 14</b>
<b>Activities</b>	<b>NO MarshallTALK will take place on Monday, March 19th</b>
<b>Assessments</b>	<b>Mid-Term Exam (Chap. 2 to 14)– 3/19/18</b> <ul style="list-style-type: none"> <li>• Matching (Chap. 2-14) and</li> <li>• Essay Questions (Chap. 2 to 14)</li> </ul> <b>DETAILS TO BE PROVIDED AT A LATER TIME</b>

<b>Module 10: MarshallTALK 3/26/18</b>	<b>Fundamental Timing Principles</b>
<b>Learning Outcomes</b>	<ul style="list-style-type: none"> <li>• Brief cases</li> <li>• Compare deductions relating to home mortgages (interest, points) – IRC 163</li> <li>• Analyze basic timing issues</li> <li>• Interpret and apply income tax laws to fact patterns</li> </ul>
<b>Readings</b>	<b>Ch. 19</b>
<b>Activities</b>	<p><b>Virtual Classroom Lesson 10</b> Review Content and Self-Assessment Exercises via Website link in Bb. Cases:</p> <ul style="list-style-type: none"> <li>• Charles F. Kahler</li> <li>• Williams</li> <li>• Cowden</li> <li>• Hornung</li> <li>• Boylston Market</li> <li>• Cathcart</li> <li>• RR 87-22</li> <li>• RR 54-465</li> <li>• Vander Poel</li> <li>• Spring City Foundry</li> <li>• RR 70-151</li> <li>• North American Oil</li> <li>• New Capital Hotel</li> <li>• Artnell</li> <li>• RR 57-463</li> <li>• Schuessler</li> <li>• RR 2007-3</li> </ul> <p><b>Blackboard Discussion Forum – Due by Sunday, 3/25/18 no later than 11:59 pm PST</b> <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><b>MarshallTALK session</b> will take place on <b>Monday, March 26<sup>th</sup></b> from 5:30pm to 7:00pm PST <b>On Campus Class session</b> will take place on <b>Monday, March 26<sup>th</sup></b> from 7:30pm to 9:00pm PST</p>



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

<b>Module 11: MarshallTALK 4/2/18</b>	<b>Taxable Year and Capital Gains &amp; Losses</b>
<b>Learning Outcomes</b>	<ul style="list-style-type: none"> <li>• Brief cases</li> <li>• Analyze the taxable year, the tax benefit rule and the claim of right doctrine</li> <li>• Analyze characterization of income</li> <li>• Analyze how different types of income are taxed</li> <li>• Distinguish between business, investment and personal activities</li> <li>• Distinguish deductible expenses from non deductible capital expenditures</li> <li>• Interpret and apply income tax laws to fact patterns</li> </ul>
<b>Readings</b>	<b>Ch. 20 (omit p. 724-733)</b> <b>Ch. 21</b>
<b>Activities</b>	<b>Virtual Classroom Lesson 11</b> Review Content and Self-Assessment Exercises via Website link in Bb. Cases: <ul style="list-style-type: none"> <li>• Lewis</li> <li>• Van Cleave</li> <li>• Alice P. Sullivan</li> <li>• Mauldin</li> <li>• Malat v. Riddell</li> <li>• Kenan</li> <li>• Hudson</li> <li>• RR 66-7</li> <li>• RR 66-97</li> <li>• Hort</li> <li>• Metropolitan Bldg.</li> <li>• Watkins</li> <li>• Arrowsmith</li> <li>• Skelly Oil</li> <li>• Wasnok</li> <li>• McGowan</li> </ul> <p><b>Blackboard Discussion Forum – Due by Sunday, 4/1/18 no later than 11:59 pm PST</b>  <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><b>MarshallTALK session</b> will take place on <b>Monday, April 2nd</b> from 5:30pm to 7:00pm PST</p> <p><b>On Campus Class session</b> will take place on <b>Monday, April 2nd</b> from 7:30pm to 9:00pm PST</p>
<p><b>Module 11 Assessments</b></p>	<p><b>Briefs of Cases</b>  Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK/On Campus Class to demonstrate the briefing was done.  Remember to “meet” with your study group to ask questions regarding the cases prior to class.</p> <p><b>Matching Quiz #3 – (Chap. 2 to 18) TAKE BEFORE MARSHALLTALK/On Campus Class</b></p>

<b>Module 12:</b> <b>MarshallTALK</b> <b>4/9/18</b>	<b>Characterization on the Sale of Depreciable Property and Deductions Affected by Characterization Principles</b>
<b>Learning Outcomes</b>	<ul style="list-style-type: none"> <li>• Brief cases</li> <li>• Analyze characterization of income on the sale of depreciable property</li> <li>• Analyze when a bad debt or worthless security is deductible and its characterization</li> <li>• Examine charitable deductions</li> <li>• Examine casualty and theft losses</li> <li>• Interpret and apply income tax laws to fact patterns</li> </ul>
<b>Readings</b>	<b>Ch. 22</b> <b>Ch. 23</b>
<b>Activities</b>	<b>Virtual Classroom Lesson 12</b> Review Content and Self-Assessment Exercises via Website link in Bb. Cases <ul style="list-style-type: none"> <li>• Parker</li> <li>• RR 69-487</li> <li>• Bugbee</li> <li>• Haslam</li> <li>• RR 83-104</li> <li>• RR 67-246</li> <li>• RR 63-232</li> <li>• Pulvers</li> <li>• Mary Frances Allen</li> <li>• Owens</li> </ul> <p style="background-color: yellow;"><b>Blackboard Discussion Forum – Due by Sunday, 4/8/18 no later than 11:59 pm PST</b></p> <p style="background-color: yellow;"><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><b>MarshallTALK session</b> will take place on <b>Monday, April 9<sup>th</sup></b> from 5:30pm to 7:00pm PST  <b>On Campus Class session</b> will take place on <b>Monday, April 9<sup>th</sup></b> from 7:30pm to 9:00pm PST</p>
<b>Assessments</b>	<b>Briefs of Cases</b> Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK/On Campus Class to demonstrate the briefing was done. Remember to “meet” with your study group to ask questions regarding the cases prior to class. <b>REMINDER:</b> Matching Quiz #4 (Chap 2 to 21) next week.

<b>Module 13: MarshallTALK 4/16/18</b>	<b>The Interrelationship of Timing &amp; Characterization and Disallowance of Losses</b>
<b>Learning Outcomes</b>	<ul style="list-style-type: none"> <li>• Brief cases</li> <li>• Analyze the interrelationship of timing and characterization issues relating to installment sales transactions under IRC 453</li> <li>• Interpret and apply income tax laws to fact patterns</li> </ul>
<b>Readings</b>	<b>Ch. 24 (omit pp. 921-931) Ch. 25</b>
<b>Activities</b>	<p><b>Virtual Classroom Lesson 13</b> Review Content and Self-Assessment Exercises via Website link in Bb. Cases:</p> <ul style="list-style-type: none"> <li>• Burnet v. Logan</li> <li>• Inaja Land Co.</li> <li>• Warren Jones</li> <li>• McWilliams</li> </ul> <p><b>Blackboard Discussion Forum – Due by Sunday, 4/15/18 no later than 11:59 pm PST</b> <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><b>MarshallTALK session</b> will take place on <b>Monday, April 16<sup>th</sup></b> from 5:30pm to 7:00pm PST <b>On Campus Class session</b> will take place on <b>Monday, April 16<sup>th</sup></b> from 7:30pm to 9:00pm PST</p>
<b>Assessments</b>	<p><b>Briefs of Cases</b> Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK/On Campus Class to demonstrate the briefing was done. Remember to “meet” with your study group to ask questions regarding the cases prior to class.</p> <p><b>Homework Problems (not to be handed in or graded but may be discussed in MarshallTALK/On Campus Class):</b> p. 910 ##1,2,3 <b>Matching Quiz #4 –(Chap 2 to 21) TAKE BEFORE MARSHALLTALK/On Campus Class</b></p>

<b>Module 14: MarshallTALK 4/23/18</b>	<b>Nonrecognition Provisions</b>
<b>Learning Outcomes</b>	<ul style="list-style-type: none"> <li>• Brief cases</li> <li>• Examine disallowance of losses issues</li> <li>• Analyze non recognition provisions</li> <li>• Interpret and apply income tax laws to fact patterns</li> </ul>
<b>Readings</b>	<b>Ch. 26 Omit Ch. 27</b>
<b>Activities</b>	<p><b>Virtual Classroom Lesson 14</b> Review Content and Self-Assessment Exercises via Website link in Bb. Cases:</p> <ul style="list-style-type: none"> <li>• Bloomington Coca-Cola</li> <li>• Crichton</li> <li>• Leslie Co.</li> <li>• RR 77-297</li> <li>• Masser</li> <li>• Clifton</li> <li>• RR 76-319</li> <li>• RR 67-254</li> <li>• RR 71-41</li> </ul> <p><b>Blackboard Discussion Forum – Due by Sunday, 4/22/18 no later than 11:59 pm PST</b> <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><b>MarshallTALK session</b> will take place on <b>Monday, April 23rd</b> from 5:30pm to 7:00pm PST <b>On Campus Class session</b> will take place on <b>Monday, April 23rd</b> from 7:30pm to 9:00pm PST</p>
<b>Assessments</b>	<p><b>Briefs of Cases</b> Brief all cases in your textbook and be prepared to SHOW YOUR TEXTBOOK in MarshallTALK/On Campus Class to demonstrate the briefing was done. Remember to “meet” with your study group to ask questions regarding the cases prior to class.</p> <p><b>Reminder: FINAL exam and matching (Chap. 2-30 (omit Chap 27)) on 5/7/18.</b></p>

<b>Module 15: FINAL 5/7/18</b>	<b>FINAL</b>
<b>Readings</b>	<b>Review Ch. 1 to 30 (omit Ch. 27)</b>
<b>Activities</b>	<b>NO CLASS/MarshallTALK</b> will take place on <b>Monday, May 7<sup>th</sup></b>
<b>Assessments</b>	<b>Final Exam (Chap. 2 to 30 (omit Chap. 27))– 5/7/18</b> <ul style="list-style-type: none"> <li>• Matching (Chap. 2-30 (omit Chap. 27)) and</li> <li>• Essay Questions (Chap. 2 to 30 (omit Chap. 27))</li> </ul> <b>DETAILS TO BE PROVIDED AT A LATER TIME</b>

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: \_\_\_\_\_