

USC Leventhal

School of Accounting

ACCT 560T – Tax Theory and Ethics Fall 2023 (Aug 21-Dec 13, 2023)/ Section 14268R/ Session 378

ONLINE with required Zoom sessions Tuesday 5:30 – 7:00 p.m. Pacific Time

INSTRUCTOR: John J. Barcal, J.D., (CPA Certificate from Illinois)
California State Bar
-Certified Specialist – Taxation;
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Office Hours: By appointment or as posted on Blackboard

****Use this email when communicating with the professor and include 560T online in the subject line.**

COURSE DESCRIPTION

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 OBJECTIVES

Upon successful completion 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

REQUIRED MATERIALS

Fundamentals of Federal Income Taxation, 20th edition*
Lind, Lathrope, and Field
Foundation Press (2022) **Prior editions are not acceptable**

COURSE FORMAT

This course is taught in a flipped format. All course materials can be found in Blackboard (<https://blackboard.usc.edu>). This course is divided into modules, and each module is intended to cover one class session. Module activities may include reading assignments, weekly lessons, interactive exercises, homework assignments, Blackboard discussion forums, class sessions, and quizzes or exams. **It is expected that students will have completed all required activities and assignments *before* attending their class session each week.**

Students should ensure that they can access all of the online tools via Blackboard prior to the start of classes.

Zoom is the platform used for all online sessions and online office hours. A link and instructions to join the Zoom sessions will be posted in the Blackboard Course Pages. For more information about Zoom, go to: [Zoom Support Tutorials](#)

TECHNOLOGY REQUIREMENTS

Online lectures through Zoom will be provided in Blackboard. Therefore, you must have access to the Internet to view/hear lectures. No special software is required.

The lecture presentations, links to articles, assignments, quizzes, and rubrics are located on Blackboard. To participate in learning activities and complete assignments, you will need:

- Access to a working computer that has a current operating system with updates installed, plus speakers or headphones to hear lecture presentations;
- Reliable Internet access and a USC email account;
- A current Internet browser that is compatible with Blackboard (Google Chrome is the recommended browser for Blackboard);
- A working video camera with microphone for use on Zoom;
- Microsoft Word as your word processing program; and
- Reliable data storage for your work, such as a USB drive or Office365 OneDrive cloud storage.

If your computer does not have Microsoft Word, Office 365 package is available to you free of charge and allows you to install Word, Excel, PowerPoint, Outlook, OneNote, Publisher, and Access on up to 5 PCs or Macs and Office apps on other mobile devices including tablets. Office 365 also includes unlimited cloud storage on OneDrive. To download Office 365 log into your student (University) email through a web browser, choose Settings (top right corner), and select software. If you have further questions or need help with the software, please contact the USC ITS service portal.

GRADING

Briefing of Cases; Weekly Checklists; MarshallTALK Performance	100 points
Matching Quizzes	200 points
Midterm	300 points
Final	400 points

Total	1000 points

GRADING AND CLASSROOM POLICIES

1. MARSHALL TALK - 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.

NOTE: In order to earn full participation points, students must actively participate in all MarshallTALK sessions via computer or laptop, with a webcam and headset/speakers. You are expected to be in a location with a reliable internet connection and without distractions. You need to be able to fully engage in the MarshallTALK at all times. Students are expected to be visually present and to ask thought-provoking questions, offer relevant comments, and answer questions from faculty in a clear and concise manner.

There are specific expectations of an online student. When attending MarshallTALK sessions, present and act appropriate as if you were in a physical classroom. Examples of inappropriate actions include, but are not limited to:

- Inappropriate dress, such as revealing clothing, costumes, pajamas, bathrobes or swim attire
- Engaging in a simultaneous activity (e.g., using a telephone, reading a book, knitting)
- Interacting with persons who are not part of the class
- Leaving frequently or not being on camera for extended periods of time
- Having other persons or pets in view of the camera
- Actively engaging in child care
- Behaving in an overtly inattentive manner (looking distracted, not participating)
- Attending class in a non-quiet area where activities of other people or pets are potential distractions
- Engaging in inappropriate tone and language with instructors or classmates during discussions, postings, instant messaging or email

Please contact your professor ahead of time if you have any questions.

2. BRIEFING CASES - Students must brief each case listed in the syllabus on their own and be prepared to show their work in MarshallTALK every week. **Students must brief cases in their textbook.**
3. STUDY GROUPS - 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. Each study group will decide how to communicate with each other for group meetings.
4. WEEKLY CHECKLISTS - Each student must complete and submit a Weekly Checklist sheet. The checklist will be found in Blackboard under the Assignment tab - Weekly Checklist and submitted under the Assignment Tab for the specified Module. There will be separate points assigned ; and it will be taken into account as part of your class performance.
5. MATCHING QUIZZES - Matching quizzes are to be taken on the same date as the MarshallTALK sessions but prior to the start of the MarshallTALK sessions. For example, Matching Quiz #1 may be taken from 1 a.m. to 5 p.m. PT on Monday, 9/12/22 which is before the MarshallTALK sessions from 5:30-7:00 p.m.. **Please make sure to start early to allow enough time to take each quiz – the session closes at 5:00 p.m. PT whether you have finished or not.**

6. 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.
7. **USE OF AI:** Since creating, analytical, and critical thinking skills are part of the learning outcomes of this course, all assignments should be prepared by the student working individually or in groups. Students may not have another person or entity complete any substantive portion of the assignment. Developing strong competencies in these areas will prepare you for a competitive workplace. Therefore, using AI-generated tools is prohibited in this course, will be identified as plagiarism, and will be reported to the Office of Academic Integrity.
 - a. Collaboration. In this class, you are expected to submit work that demonstrates your individual mastery of the course concepts.
 - b. Group work. Unless specifically designated as a 'group project,' all assignments are expected to be completed individually.

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.

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. In addition, students may not distribute or use notes or recordings based on University classes or lectures without the express permission of the instructor for purposes other than personal or class-related group study by students registered for the class. This restriction on unauthorized use applies to all information that is distributed or displayed for use in relationship to the class. *Exceptions are made for students who have made prior arrangements with me.*

IMPORTANT DATES

Monday, August 21	First day of Classes
Monday, September 4	Labor Day Holiday
Friday, September 8	Last Day to Add or Drop w/out a "W" and receive a refund
Friday, October 6	Last day to withdraw without a "W" on transcript or change pass/no pass to letter grade:
Thursday-Friday October 12-13	Fall Recess
Friday, November 10	Last Day to Drop with a "W" Veterans Day
Wednesday – Sunday November 22-26	Thanksgiving Holiday
Wednesday-Wednesday, Dec 6-13	Final Exams for Regular (001) and 442 sessions
Thursday - Sunday, December 14- January 7	Winter Recess

LEVENTHAL AND MARSHALL GRADING STANDARDS

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 3.4 to 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) from all your courses 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.

LEVENTHAL PROGRAM LEARNING OUTCOMES

The following are the five Student Learning Outcomes developed for the Master of Business Taxation 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*

Student will apply critical thinking and problem-solving skills related to taxation of individuals, flow-through entities, and corporations. In addition, students will recognize potential opportunities for tax savings and tax planning.

2. *Professional Development Requirement*

Student will convert complex and technical tax terminology into language that translates to non-technical audiences. This outcome allows students to demonstrate strong interpersonal communication skills that build relationships with clients over time, and be able to prepare work products with careful attention to word choice, tone, and accuracy.

3. *Applied Data Analysis*

Students will be able to analyze business and tax objectives, issues, and problems, and identify the data necessary for solutions. They will integrate data tools and languages and communicate answers in pragmatic and understandable terms.

4. *Research/Life-Long Learning Requirement*

Students will use computer-based and paper-based systems to thoroughly research and analyze tax codes, tax law, rulings and interpretations, providing for adaptability as the tax law changes over time.

5. *Ethical Principles and Professional Standards Requirement*

Students will demonstrate understanding of and apply consistently the ethical principles and professional standards related to the profession, including the standards in taking a tax position. Students will also show the ability to express and follow rules of independence exhibiting the highest sense of professional ethics.

6. *Globalization Requirement*

Students will be able to explain key differences in taxing policies related to expatriates and the countries they live and work in – allowing them to reflect on cultural and ethnic differences in approaches to business and taxation policies.

OPEN EXPRESSION AND RESPECT FOR ALL

An important goal of the educational experience at USC Marshall is to be exposed to and discuss diverse, thought-provoking, and sometimes controversial ideas that challenge one's beliefs. In this course we will support the values articulated in the USC Marshall "[Open Expression Statement](#)."

USC STATEMENT ON ACADEMIC CONDUCT AND SUPPORT SYSTEMS

Academic Conduct:

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" policy.usc.edu/scampus-part-b. Other forms of academic dishonesty are equally unacceptable. See additional information in SCampus and university policies on [Research and Scholarship Misconduct](#).

Students and Disability Accommodations:

USC welcomes students with disabilities into all of the University's educational programs. The Office of Student Accessibility Services (OSAS) is responsible for the determination of appropriate accommodations for students who encounter disability-related barriers. Once a student has completed the OSAS process (registration, initial appointment, and submitted documentation) and accommodations are determined to be reasonable and appropriate, a Letter of Accommodation (LOA) will be available to generate for each course. The LOA must be given to each course instructor by the student and followed up with a discussion. This should be done as early in the semester as possible as accommodations are not retroactive. More information can be found at osas.usc.edu. You may contact OSAS at (213) 740-0776 or via email at osasfrontdesk@usc.edu.

Support Systems:

Counseling and Mental Health - (213) 740-9355 – 24/7 on call
studenthealth.usc.edu/counseling

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

988 Suicide and Crisis Lifeline - 988 for both calls and text messages – 24/7 on call

The 988 Suicide and Crisis Lifeline (formerly known as the National Suicide Prevention Lifeline) provides free and confidential emotional support to people in suicidal crisis or emotional distress 24 hours a day, 7 days a week, across the United States. The Lifeline is comprised of a national network of over 200 local crisis centers, combining custom local care and resources with national standards and best practices. The new, shorter phone number makes it easier for people to remember and access mental health crisis services (though the previous 1 (800) 273-8255 number will continue to function indefinitely) and represents a continued commitment to those in crisis.

<https://988lifeline.org>

Relationship and Sexual Violence Prevention Services (RSVP) - (213) 740-9355(WELL), press "0" after hours – 24/7 on call
studenthealth.usc.edu/sexual-assault

Free and confidential therapy services, workshops, and training for situations related to gender-based harm.

Office for Equity, Equal Opportunity, and Title IX (EEO-TIX) - (213) 740-5086
eeotix.usc.edu

Information about how to get help or help someone affected by harassment or discrimination, rights of protected classes, reporting options, and additional resources for students, faculty, staff, visitors, and applicants.

Reporting Incidents of Bias or Harassment - (213) 740-5086 or (213) 821-8298

usc-advocate.symplcity.com/care_report

Avenue to report incidents of bias, hate crimes, and microaggressions to the Office for Equity, Equal Opportunity, and Title for appropriate investigation, supportive measures, and response.

The Office of Student Accessibility Services (OSAS) - (213) 740-0776

osas.usc.edu

OSAS ensures equal access for students with disabilities through providing academic accommodations and auxiliary aids in accordance with federal laws and university policy.

USC Campus Support and Intervention - (213) 821-4710

campussupport.usc.edu

Assists students and families in resolving complex personal, financial, and academic issues adversely affecting their success as a student.

Diversity, Equity and Inclusion - (213) 740-2101

diversity.usc.edu

Information on events, programs and training, the Provost's Diversity and Inclusion Council, Diversity Liaisons for each academic school, chronology, participation, and various resources for students.

USC Emergency - UPC: (213) 740-4321, HSC: (323) 442-1000 – 24/7 on call

dps.usc.edu, emergency.usc.edu

Emergency assistance and avenue to report a crime. Latest updates regarding safety, including ways in which instruction will be continued if an officially declared emergency makes travel to campus infeasible.

USC Department of Public Safety - UPC: (213) 740-6000, HSC: (323) 442-120 – 24/7 on call

dps.usc.edu

Non-emergency assistance or information.

Office of the Ombuds - (213) 821-9556 (UPC) / (323-442-0382 (HSC)

ombuds.usc.edu

A safe and confidential place to share your USC-related issues with a University Ombuds who will work with you to explore options or paths to manage your concern.

Occupational Therapy Faculty Practice - (323) 442-3340 or otfp@med.usc.edu

chan.usc.edu/otfp

Confidential Lifestyle Redesign services for USC students to support health promoting habits and routines that enhance quality of life and academic performance.

MARSHALL TALK DATES:

MarshallTALK dates are on **Tuesdays** from 5:30pm to 7:00pm PT

CLASS 1	Module 1	8/22/23	Chaps 1, 2, 28, 29
CLASS 2	Module 2	8/29/23	Chaps 3, 4, 5
CLASS 3	Module 3	9/5/23	Chap 6,7,8,9,10 Reminder: Take Practice Matching Quiz #1 before MarshallTALK (covers Chap 2 to 5)
CLASS 4	Module 4	9/12/23	Chap 11, 12
CLASS 5	Module 5	9/19/23	Chap 13
CLASS 6	Module 6	9/26/23	Chap 14 Reminder: Take Matching Quiz #2 before MarshallTALK (covers Chap 2 to 12)
CLASS 7	Module 7	10/3/23	Chap 15
CLASS 8	Module 9	10/10/23	Chap 16, 17,18
CLASS 9	Module 10	10/17/23	Chap 19
CLASS 10	MIDTERM	10/24/23	MIDTERM NO MarshallTALK (covers Chap 2 to 14)
CLASS 11	Module 11	10/31/23	Chap 20, 21 Reminder: Take Matching Quiz #3 before MarshallTALK (covers Chap 2 to 18)
CLASS 12	Module 12	11/7/23	Chap 22,23
CLASS 13	Module 13	11/14/23	Chap 24, 25 Reminder: Take Matching Quiz #4 before MarshallTALK (covers Chap 2 to 21)
CLASS 14	Module 14	11/21/23	Chap 26
CLASS 15	REVIEW	11/28/23	REVIEW
FINAL	12/12/23	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
Readings	Course Syllabus (found in Bb)
Activities	<p>(1) Blackboard Discussion Forum</p> <p>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).</p> <p>(2) 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> <p>(3) Sign up for study groups</p>
Assessments	None

CLASS 1 Module 1: 8/22/23	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 (skim) Ch. 29 (skim) Ch. 2 Ch. 28 (skim)
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 <p style="background-color: yellow;">Weekly Checklists – Due by Monday, 8/21/23 no later than 11:00 pm PT</p> <p>MarshallTALK session will take place on Tuesday, August 22 from 5:30pm to 7:00pm 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.

CLASS 2 Module 2: MarshallTALK 8/29/23	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 Review p. 84-85 Problem #1
Activities	Virtual Classroom Lesson 2 Review Content and Self-Assessment Exercises via Website link in Bb. Cases: <ul style="list-style-type: none"> • Duberstein • Stanton • Lyeth v. Hoey • Wolder • Hatt • McDonell <p style="background-color: yellow;">Weekly Checklists – Due by Sunday, 8/27/23 no later than 11:00 pm PT</p> <p>MarshallTALK session will take place on Tuesday, August 29 from 5:30pm to 7:00pm 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: Practice Matching Quiz #1 (Chap 2 to 5) 9/5/23

CLASS3 Module 3: MarshallTALK 9/5/23	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. 9 Ch. 7 Skim Ch. 10 Ch. 8
Activities	Virtual Classroom Lesson 3 Review Content and Self-Assessment Exercises via Website link in Bb. Cases: <ul style="list-style-type: none"> • Philadelphia Park Amusement • Taft v. Bowers • Farid-Es-Sultaneh • International Freighting Corp. • IRS Notice 2014-21 • Crane • Tufts • Diedrich • Kirby Lumber • Zarin (in BB content, not in text) • RR 2008-34 • Raytheon • RR 79-313 • Young • Davis <p style="background-color: yellow;">Weekly Checklists – Due by Sunday, 9/3/23 no later than 11:00 pm PT</p> <p>MarshallTALK session will take place on Tuesday, September 5 from 5:30pm to 7:00pm PT</p>
Module 3 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. Practice Matching Quiz #1 – (Chap. 2 to 5) - TAKE BEFORE MARSHALLTALK

CLASS 4 Module 4: MarshallTALK 9/12/23	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	Virtual Classroom Lesson 4 Review Content and Self-Assessment Exercises via Website link in Bb. Cases: <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 style="background-color: yellow;">Weekly Checklists – Due by Sunday, 9/10/23 no later than 11:00 pm PT</p> <p>MarshallTALK session will take place on Tuesday, September 12 from 5:30pm to 7:00pm 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.

CLASS 5 Module 5: MarshallTALK 9/19/23	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	Virtual Classroom Lesson 5 Review Content and Self-Assessment Exercises via Website link in Bb. Cases: <ul style="list-style-type: none"> • Corliss v. Bowers • Clifford • Culbertson • Overton • Johnson • Borge <p style="background-color: yellow;">Weekly Checklists – Due by Sunday, 9/17/23 no later than 11:00 pm PT</p> <p>MarshallTALK session will take place on Tuesday, September 19 from 5:30pm to 7:00pm 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 #2 (Chap 2 to 12) next class on 9/26/23

CLASS 6 Module 6: MarshallTALK 9/26/23	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	Virtual Classroom Lesson 6 Review Content and Self-Assessment Exercises via Website link in Bb. Cases: <ul style="list-style-type: none"> • Welch • Midland Empire • INDOPCO • Norwest corp. (in BB content, not in text) • Morton Frank • Harold’s Club • Exacto Spring Corp. • Rosenspan • Andrews • RR 99-7 • Starr’s Estate • Hill • Coughlin • Sharp • Simon <p style="background-color: yellow;">Weekly Checklists – Due by Sunday, 9/24/23 no later than 11:00 pm PT</p> <p>MarshallTALK session will take place on Tuesday, September 26 from 5:30pm to 7:00pm 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. Matching Quiz #2 – (Chap. 2 to 12) TAKE BEFORE MARSHALLTALK

CLASS 7 Module 7: MarshallTALK 10/3/23	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. 15
Activities	Virtual Classroom Lesson 7 Review Content and Self-Assessment Exercises via Website link in Bb. Cases: <ul style="list-style-type: none"> • Higgins • Bowers v. Lumpkin • Surasky • Meyer J. Fleischman • William C. Horrmann • Lowry <p style="background-color: yellow;">Weekly Checklists – Due by Sunday, 10/1/23 no later than 11:00 pm PT</p> MarshallTALK session will take place on Tuesday, October 3 from 5:30pm to 7:00pm 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.

CLASS 8 Module 9: MarshallTALK 10/10/23	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	Virtual Classroom Lesson 9 Review Content and Self-Assessment Exercises via Website link in Bb. Cases: <ul style="list-style-type: none"> • RR 69-188 • J. Simpson Dean • CA Helping to Alleviate Medical Problems • Cramer • Engdahl • Tellier • Raymon Gerard • RR 2002-19 • Montgomery (not as a case, just mentioned) <p style="text-align: center;">Weekly Checklists – Due by Sunday, 10/8/23 no later than 11:00 pm PT</p> MarshallTALK session will take place on Tuesday, October 10 from 5:30pm to 7:00pm 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. REMINDER: MIDTERM 10/17/23 (Chap. 2-14)

CLASS 9 Module 10: MarshallTALK 10/17/23	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	Virtual Classroom Lesson 10 Review Content and Self-Assessment Exercises via Website link in Bb. Cases: <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 2003-10 • North American Oil • New Capital Hotel • Artnell (omitted in 20th ed) • RR 57-463 • Schuessler • RR 2007-3 <p style="background-color: yellow;">Weekly Checklists – Due by Sunday, 10/15/23 no later than 11:00 pm PT</p> <p>MarshallTALK session will take place on Tuesday, October 17 from 5:30pm to 7:00pm PT</p>
Module 10 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.

CLASS 9 MIDTERM MarshallTALK 10/24/23	MIDTERM
Learning Outcomes	
Readings	Review Ch. 2 – 14
Activities	NO MarshallTALK will take place on Tuesday, October 24
Assessments	Mid-Term Exam (Chap. 2 to 14)– 10/24/23 <ul style="list-style-type: none"> • Essay Questions (Chap. 2 to 14) DETAILS TO BE PROVIDED AT A LATER TIME

CLASS 11 Module 11: MarshallTALK 10/31/23	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. 660-669) Ch. 21
Activities	Virtual Classroom Lesson 11 Review Content and Self-Assessment Exercises via Website link in Bb. Cases: <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 • RR 2019-11 <p style="background-color: yellow;">Weekly Checklists – Due by Sunday, 10/29/23 no later than 11:00 pm PT</p> <p>MarshallTALK session will take place on Tuesday, October 31 from 5:30pm to 7:00pm PS</p>
Module 11 Assessments	Briefs of Cases 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. Matching Quiz #3 – (Chap. 2 to 18) - TAKE BEFORE MARSHALLTALK

CLASS 12 Module 12: MarshallTALK 11/7/23	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 (not as a case, just mentioned) <p style="background-color: yellow;">Weekly Checklists – Due by Sunday, 11/5/23 no later than 11:00 pm PT</p> <p>MarshallTALK session will take place on Tuesday, November 7 from 5:30pm to 7:00pm 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.

CLASS 13 Module 13: MarshallTALK 11/14/23	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. 857-866) Ch. 25
Activities	Virtual Classroom Lesson 13 Review Content and Self-Assessment Exercises via Website link in Bb. Cases: <ul style="list-style-type: none"> • Burnet v. Logan • Inaja Land Co. • Warren Jones • McWilliams <p style="background-color: yellow;">Weekly Checklists – Due by Sunday, 11/12/23 no later than 11:00 pm PT</p> MarshallTALK session will take place on Tuesday, November 14 from 5:30pm to 7:00pm 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. Matching Quiz #4 –(Chap 2 to 21) - TAKE BEFORE MARSHALLTALK

CLASS 14 Module 14: MarshallTALK 11/21/23	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	Virtual Classroom Lesson 14 Review Content and Self-Assessment Exercises via Website link in Bb. Cases: <ul style="list-style-type: none"> • Bloomington Coca-Cola • Crichton • Leslie Co. • RR 77-297 • Masser (in BB content, not in text) • Clifton • RR 76-319 • RR 67-254 • RR 71-41 <p style="background-color: yellow;">Weekly Checklists – Due by Sunday, 11/19/23 no later than 11:00 pm PT</p> MarshallTALK session will take place on Tuesday, November 21 from 5:30pm to 7:00pm 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. Reminder: REVIEW on 11/28/23 FINAL exam (Chap. 2-30 (omit Chap 27)) on 12/12/23

CLASS 15 REVIEW 11/28/23	REVIEW
Readings	Review Ch. 1 to 30 (omit Ch. 27)
Activities	MarshallTALK will take place on Tuesday, November 28 from 5:30pm to 7:00pm PT
Assessments	Final Exam (Chap. 2 to 30 (omit Chap. 27)) on 12/12/23 <ul style="list-style-type: none"> • Essay Questions (Chap. 2 to 30 (omit Chap. 27))

FINAL 12/12/23	FINAL
Assessments	Final Exam (Chap. 2 to 30 (omit Chap. 27)) <ul style="list-style-type: none"> • Essay Questions (Chap. 2 to 30 (omit Chap. 27)) DETAILS TO BE PROVIDED AT A LATER TIME

SUMMARY OF DELIVERABLES:

Module	Assessment	Due Date	Points
Module 1	Weekly Checklist	8/21/23 11:00 pm PT	3
Module 2	Weekly Checklist	8/27/23 11:00 pm PT	3
Module 3	Weekly Checklist Practice Matching Quiz #1	9/3/23 11:00 pm PT 9/5/23 5:00 pm PT	3 0
Module 4	Weekly Checklist	9/10/23 11:00 pm PT	3
Module 5	Weekly Checklist	9/17/23 11:00 pm PT	3
Module 6	Weekly Checklist Matching Quiz #2	9/24/23 11:00 pm PT 9/26/23 5:00 pm PT	3 35
Module 7	Weekly Checklist	10/1/23 11:00 pm PT	3
Module 9	Weekly Checklist	10/8/23 11:00 pm PT	3
Module 10	Weekly Checklist	10/15/23 11:00 pm PT	3
Midterm (Chapters 2-12)	Midterm	10/24/23 TBD	300
Module 11	Weekly Checklist Matching Quiz #3	10/29/23 11:00 pm PT 10/31/23 5:00 pm PT	3 69
Modules 12	Weekly Checklist	11/5/23 11:00 pm PT	3
Module 13	Weekly Checklist Matching Quiz #4	11/12/23 11:00 pm PT 11/14/23 5:00 pm PT	3 96
Module 14	Weekly Checklist	11/19/23 11:00 pm PT	3
Final Exam	Final Exam	12/12/23	400
Briefing of Cases, MarshallTALK Performance			61
TOTAL			1000

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: _____