TEXT: Latest revision of the 1986 Internal Revenue Code (IRC) and Regulations.

REFERENCES: Tax Research and tax planning. Selected areas of tax law will be covered including income, deductions and administrative procedures. An opportunity will be provided to learn computerized tax preparation. Professional ethics as applied to tax practice will be included as a component of the material covered.

METHODOLOGY: Discussion and lecture emphasizing WHY and HOW, not WHAT.

COURSE WORK AND GRADE:

1. Assigned cases will be handed in on date specified. Grade will be assigned based on research and writing (grammar, organization, etc.) -- 25%
2. Class discussion and attendance -- 5%
3. Briefs as assigned -- 5%
4. Two exams -- 60%
5. Legislative History -- 5%

FORMAT FOR WRITE-UP OF HYPOS AND CASES

Case: Name, topic, student information.

Facts: Briefly condense facts.

Issues: What specific tax issues are involved (may be in addition to question asked in case). What does this case point out? Do tax planning possibilities exist? Why is case included?

Law: Cite all IRC secs. and regs. that are pertinent, as well as such authorities as court cases, rev. rul., rev. proc., and any other sources.
Conclusions: A brief summary of relevant points and concise answer, that is, who wins or loses and an application of the law to stated issues. Also include any suggestions for tax planning.

Research Methodology: How you got the answer. This should go on the outside of the case with your name and topic.

LEGISLATIVE HISTORY

Prepare a brief paper tracing the history of a tax statute through Congress (that is, the origin of the bill, committee reports, hearings, movement through Congress to signature by President); then indicate how it has been implemented by administration and judicial action. If much adjudication has occurred, paraphrase and summarize. This assignment is intended to emphasize the importance of the role legislative history has on tax research. Code sections to be researched will be assigned individually.

Good sources of material include: Seidman; Legislative History; USC Annotated; BNA Portfolios; Internal Revenue Code (yr); Text and Legislative History.