Required Texts and First Week Reading Assignment:
The texts for this class are:

1. **Required:** Cunningham & Cunningham, The Logic of Subchapter K (6th ed., 2020); West Academic Publishing. Older editions, which do not reference the 2017 tax act, won’t be suitable.

2. **Recommended:** Bank and Stark’s Selected Sections: Corporate and Partnership Income Tax Code and Regulations, 2020–2021; Foundation Press; ISBN ISBN 9781684679751. Students can use an alternative statutory Internal Revenue Code supplement (containing statutes and the regulations)—either a more comprehensive one or one for the prior year. If a student opts to use last year’s version, it will be up to him or her to identify any updates.

   In case a student thinks it relevant, in a prior year, most students opted to purchase the recommended code and regulation supplement. It’s your instructor’s recollection that at least one student who initially attempted to use another one ultimately concluded that it was too cumbersome to use a different version—attempting to find material by section and subsection was too distracting and took the student too much time.

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Materials to Have Available in Synchronous Class Meetings
We will be doing problems at times during the synchronous class meetings. **To participate in these, students will need to have to each synchronous class meeting, including the first one:** (i) the Cunningham & Cunningham text; (ii) a Statutory supplement or online or other access to statutes/regs; and (iii) means to do basic calculations.

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Course Website
A website, created using the Canvas course management system, will be available for this course starting on or about one week before classes begin. To get to the site, navigate: https://courses.missouri.edu | select “Canvas” | enter your pawprint. This may require two-factor authentication. In the past, the two-factor authentication system has not worked for a small number of students. A student who has difficulty with accessing the site should contact the student tech support listed at the bottom of the above-referenced web page.

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Assignments

Readings are from Cunningham & Cunningham, The Logic of Subchapter K (6th ed.), unless otherwise indicated.
A note on page numbers in reading assignments: If a page number is shown with a decimal point, that means to read part of the way down the page—the amount being the indicated fraction after the decimal point. So, “2.3” means two-tenths down page 2. These fractions of a page are not measured.

Occasionally a student will find the specification ambiguous—a natural break may, to the student, appear slightly before that percentage or slightly after. In such a case, it takes much less time for a student simply to read the possibly included material, than it does for a student to email the instructor about precisely where to stop, have the instructor reply, and then have the student attempt to pick-up where he or she left off. Doing something very inefficient is not a suitable use of either student or instructor time, and your instructor is not inclined to entertain using our time inefficiently. So, in such a case, a student should simply read the greater of the possible alternatives.

Assignment for Class 1:

Note this class meets once a week. So, the assignment for the first class contemplates that, as of the end of the synchronous meeting on Tuesday, we will have completed one week of class. For a three-credit class, typical expectations would be 6 hours of work per week. So, the assignments contemplate 4–1/2 hours of work, in addition to the class meeting on Tuesday. The recordings for Week 1 total 46 mins., 35 secs. That leaves over 3 hours for the reading assignment.

It will be possible to do the in-class work without having fully completed the reading, as long as all the recordings have been reviewed. However, I don’t recommend that approach. Rather, I recommend that you start on this assignment relatively early, so that all the reading for the first synchronous meeting are completed before that class meeting, and you don’t have an overload for the following week.

• Scan the syllabus, which is posted on the course website.
  o You are to read it by the end of the first week of classes. However, because this class meets on Tuesdays, and there may not be enough time to read it and do other preparation in advance of the class meeting, its due date is postponed to the end of the week.
• Review the following recordings:
• Under: Module Welcome—Fall 2020!, in the Welcome Splash Page:
  ▪ Recording 01: Welcome Fall 2020

• Under: Module 1, at the link “Week 1”:
  ▪ Recording 02: Overview of Partnership Taxation
  ▪ Recording 03: Choice of Entity
  ▪ Recording 04: Basics of Inside Basis and Outside Basis
  ▪ Recording 05: Basics of Inside Basis and Outside Basis During Operations
  ▪ Recording 06: Additional Details of the Relationship Between Inside Basis and Outside Basis

• Do the reading set forth below from Chapters 1 and 2.
  o Please note that, at the end of the listing of the assignment for Class 1, I have identified code and regulation provisions that your text’s authors have identified as for possible reference in connection with reading Chapters 1 and 2.

  **Reading from the Text**

• Read or skim, as indicated, the parts of Chapter 1 indicated below:
  o Read 1–2.3.
  o Skim 2.3–4.7.
    ▪ All we really need to know at this point is the partnership form of business is the default where two or more persons agree to pursue a business for profit as co-owners.
  o Read 4.7–9.2.
  o Read 15.9–17.10.

• Read or skim, as indicated, the parts of Chapter 2 indicated below:
  o Read 19–23.10.
    ▪ The text identifies special treatment for accounts receivable and inventory items here. It is your instructor’s view that this information is best addressed after we have fully discussed the general contours of capital accounting (which will not occur for a number of weeks). So, your instructor is not going to discuss that level of detail at this time.
  o Read 26.2–30.3.
The text’s authors have identified the following code and regulation provisions as possibly for reference in connection with reading the Chapters 1 and 2:

Chapter 1:
Code: §§ 701, 761(a), 7701(a)(2) & (3). Skim §§ 702, 703(b), 706 (a) and 7704. See also § 1411.
Regulations: §§ 1.761—1(a)—(c), —2(a), §§ 301.7701—1(a), —2(a) & (b), and —3(a) & (b)(1) and —4(a) & (b).

Chapter 2:
Tranche 1: Code §§ 704(c)(1)(A), 721, 722, 723, 724, 1223(1) & (2), 1245(b)(3), 7701(a)(42)—(45); Regs. §§ 1.721—1(a), 1.722—1, 1.723—1, 1223—3(b)(1). Glance at § 704(c)(1)(C).
Tranche 2: Code §§ 704(c)(3), 731(a), (b), (c)(1), 733, 752(a) & (b); Reg. §§ 1.752—1(a)—(f), 1.752—2(a).

Note the references to Tranches 1 and 2 are to groupings that the text’s authors prepared (the reasons for grouping them are too tedious to detail). I am simply reproducing the groupings as previously provided by the authors of the text, because little benefit seems apparent from my attempting to combine the two groups.

Note that the recommended supplement, containing selected code provisions and regulations, is abridged. Using that one has the benefit of mitigating the weight one has to carry to class, and decreasing cost. A disadvantage is it may not include each provision that our text’s authors seek to reference. In such a case, a student wishing to reference the indicated code provision should take the initiative of accessing it in Westlaw or Lexis or some other website or an app with the code and regulations.