

Tax Planning
Professor Barondes
Spring 2021
[Version of 1/7/21]

Required Texts and First Week Reading Assignment:

The texts for this class are:

1. **Required:** BRADLEY T. BORDEN, TAXATION AND BUSINESS PLANNING FOR PARTNERSHIPS AND LLCs, 2020–2021 CLIENT FILE (Wolters Kluwer). There have been changes in the problems from the prior edition. So, using another edition won't be practicable.
2. **Intermittently Required:** All enrolled students were enrolled in Partnership Tax in Fall 2020. As announced in that class, we will cover in this class at least one chapter (Chapter 9) in the primary text used in Partnership Tax: CUNNINGHAM & CUNNINGHAM, THE LOGIC OF SUBCHAPTER K (6th ed., 2020); West Academic Publishing. We also may cover Chapter 13 or Chapter 15 or both from that text. Students will need to have access to those chapters of that text that we cover, in one form or another (whether by having retained the text after the Fall 2020 term, or by sharing, etc.).
3. **Recommended:** BANK AND STARK'S SELECTED SECTIONS: CORPORATE AND PARTNERSHIP INCOME TAX CODE AND REGULATIONS, 2020–2021; Foundation Press; ISBN 9781684679751. Students can use an alternative statutory Internal Revenue Code supplement (containing statutes and the regulations)—either a more comprehensive one, an electronic one or one for the prior year (although the latter choice will necessitate a student identifying anything that needs updating).

Instructional Methodology

The class meetings for this class will be held in synchronous Zoom sessions. *The Zoom meeting IDs for the class meetings will be posted in the course Canvas site (available at <https://courses.missouri.edu>, starting at or about one week before the first class).* They will be in the module named: *Administrative—Spring 2021.*

Note that the Zoom meeting IDs will change for the first few class meetings. That is because students will form teams, and a permanent Zoom meeting ID cannot easily be created for class meetings until those teams have been settled.

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 at each synchronous class meeting, including the first one: (i) the Borden text; (ii) if relevant to the class meeting, the relevant pages of the Cunningham & Cunningham text; (iii) a statutory supplement or online or other access to statutes/regs; and (iv) means to do basic calculations and work problems.

Assignments

Readings are from BORDEN, TAXATION AND BUSINESS PLANNING FOR PARTNERSHIPS AND LLCs, 2020–2021 CLIENT FILE or 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. So, in such a case, a student should simply read the greater of the possible alternatives.

Assignment for Class 1:

As noted above, the class will meet synchronously, through Zoom. The meeting ID will be posted in the Canvas website, under the module: Administrative—Spring 2020. The following is the preparation required for the first class meeting:

- *Read CUNNINGHAM & CUNNINGHAM pp. 181–195.1.*
 - Note that the Canvas website, in the module for Chapter 9, includes the text of some proposed regulations discussed in this

assigned reading. Those proposed regulations appear not to be included in the assigned statutory supplement.

- ***Coordinate with your classmates to the extent necessary so that you can in class identify one student with whom you will team/partner for the first two weeks of class.***
 - I will let students switch-up later in the term, and it is possible that, in subsequent weeks, students will be able to work by themselves (not as a team). However, subject to the next paragraph, I will wish for students to team in groups of 2 for at least the first two weeks.
 - There is an odd number of students enrolled in the class. As a result, I will either have to have one group that has three students or have one student who works on his own.
 - I will create a discussion forum on the Canvas website to facilitate student coordination as to this matter.
- ***Think about questions on the material from the class in Partnership Tax that you wish to get additional guidance on.***
 - At some point in time in the first two weeks in class, I will endeavor to answer lingering questions that students have on material covered in Partnership Tax. This class in large measure involves applying those principles to simulated client work (although some additional doctrine is also added in this class). It will assist students in completing the simulated client work if students have squared away their understanding of the material covered in Partnership Tax. So, at some point in time during one or more of the first three class meetings, I will have student teams go about formulating questions that they wish for me to address as to the doctrine covered in Partnership Tax. My current plan is to discuss those matters in the third or fourth class meeting.
 - For that to be productive, a student would need to have thought about the issue before spending time in a break-out session collaborating with another student. Effectively identifying questions may necessitate that a student has access to his notes for Partnership Tax.