# SYLLABUS: FUNDAMENTALS OF FEDERAL INCOME TAX I

**UNIVERSITY OF BALTIMORE SCHOOL OF LAW**
**FALL 2020**

**Course**: Fundamentals of Federal Income Tax I
Number: LAWT 953 – L.L.M./TAXA 651 – M.S./LAW 953 – J.D.
Section: 491 L.L.M./185 M.S./512 J.D.

**Instructor**: Michael Baillif
mbaillif@ubalt.edu
michael.baillif@gmail.com (required as CC)
Office hours: Tuesdays 7:15PM – 8:15PM or by appointment. Contact via phone or preferred email.

**Days/Time:** Tuesday at 6:15PM – 7:15PM

**Modality:** This class will meet online-only. In terms of live interaction, we will all log on together to Zoom on Tuesdays from 6:15PM to 7:05PM. We then will go through the problems together and those problems will provide an opportunity for class discussion and also give me the chance to illustrate what I believe to be the most essential aspects of the week's material. Before attending class at 6:15 on Tuesdays, students should have viewed the recorded lecture posted on Panopto and completed and turned in the problem set, which will have been posted on TWEN along with a link to the pre-recorded lecture. Both the lecture and the questions will always be posted by Thursday night the week prior to our Tuesday class. The problems should be emailed to me at mbaillif@ubalt.edu with a copy to michael.baillif@gmail.com and posted on TWEN.

**Course Description**:

Basic concepts in federal income taxation, including gross income, exclusions, adjusted gross income, deductions, exemptions, credits, assignment of income, identification of the taxpayer, tax rates, depreciation, and the alternative minimum tax.

**Course Materials:**

Required: Freeland, Lathrope, Lind & Stephens, Fundamentals of Federal Income Taxation Foundation Press, 19th ed., 2018), 978-1-64020-852-0

Optional: **Note change in text edition**- Lathrope, Daniel J., Selected Federal Taxation Statutes and Regulations (2021 Edition), 9781647081904

**Student Learning Outcomes:**

After completion of this course, students will be able to identify events triggering gross income, analyze circumstances in which deduction treatment is appropriate or not, and apply other Internal Revenue Code sections impacting the final determination of tax liability.

**Grades:**

Final exam: 80%
Class participation: 20%, as measured by timely, thoughtful answers to the problem sets and participation in class discussion. The problem sets will be graded on a pass/fail basis.

**Course Expectations:**
American Bar Association Standards for Law Schools establish guidelines for the amount of work students should expect to complete for each credit earned. Students should expect approximately one hour of classroom instruction and two hours of out-of-class work per week for each credit earned in a class, or an equivalent amount of work for other academic activities, such as simulations, externships, clinical supervision, co-curricular activities, and other academic work leading to the award of credit hours.

**Attendance**:
Unless an exception is granted, class attendance is a primary obligation of each student whose right to continued enrollment in the course and to take the examination is conditioned upon a record of attendance satisfactory to the professor. A student who exceeds the maximum allowed absences (generally 20% of class sessions) as illustrated below may be compelled to withdraw from the course, or may be barred from sitting for the final exam. Students who are forced to withdraw for exceeding the allowed absences may receive a grade of FA (failure due to excessive absence). This policy is consistent with American Bar Association Standards for Law Schools.

| Regular Semester Hours | | |
|---|---|---|
| Credit Hours | Meetings Per Week | |
| | 1 | 2 |
| 2 | 2 absences | 5 absences |
| 3 | 2 absences | 5 absences |
| 4 | -- | 5 absences |

Attendance will be determined by whether or not you turn in the class problem set for a given week.

**Course Web Site:**
This course has a TWEN page that links to this syllabus, announcements, the class assignments, and other class materials. You are responsible for self-enrolling in the TWEN page and for checking it regularly for course information.

**Zoom and Panopto:**

We will all log on together to Zoom on Tuesdays from 6:15PM to 7:05PM. We then will go through the problems together and those problems will provide an opportunity for class discussion and also give me the chance to illustrate what I believe to be the most essential aspects of the week's material. Before attending class at 6:15 on Tuesdays, students should have viewed the recorded lecture posted on Panopto and completed and turned in the problem set, which will have been posted on TWEN along with a link to the pre-recorded lecture. Both the lecture and the questions

will always be posted by Thursday night the week prior to our Tuesday class. The problems should be emailed to me at michael.baillif@gmail.com and posted on TWEN.

As per University of Baltimore:

> Faculty are required to record Zoom classes for the purposes of accommodating a disability, for students who cannot attend or so students who wish to review may have access to the full class content. All recordings are for the sole use of the class and may not be reproduced by students for any other purpose. Faculty cannot reproduce students' voices or images from the class for any other purpose without additional student consent. All such recordings are protected by a UB login process based on where they are posted. Students may mute their microphone or turn off their camera if they do not consent to be recorded, but this may mean they need to find additional ways to participate in the class discussion. In addition, students who turn off their camera and do not remain present for the class session may be subject to the Honor Code for misrepresenting attendance.

**Class Cancellation:**
If the instructor must cancel a class, notices will be sent to students via email.

**Academic Integrity:**
Students are obligated to refrain from acts that they know or, under the circumstances, have reason to know will impair the academic integrity of the University and/or the School of Law. Violations of academic integrity include, but are not limited to: cheating; plagiarism; misuse of library materials; use of another's book or study materials without consent; unapproved multiple submissions; material misrepresentation of one's academic history or standing; misrepresentation of any academic matter; intentionally giving another student false or inaccurate information about class requirements; inappropriate discussion of exams; and misrepresenting or falsifying class attendance reports. The School of Law Honor Code and information about the process is available at https://law.ubalt.edu/academics/policiesandprocedures/honor_code/index.cfm.

**Course Evaluations**
It is a requirement of this course that students complete a course evaluation. The evaluation will be available later in the semester and is entirely anonymous. Faculty members will not have access to the feedback provided on course evaluations until after all grades are submitted.

**Title IX Sexual Misconduct and Nondiscrimination Policy:**
The University of Baltimore's Sexual Misconduct and Nondiscrimination policy is compliant with Federal laws prohibiting discrimination. Title IX requires that faculty, student employees and staff members report to the university any known, learned or rumored incidents of sex discrimination, including sexual harassment, sexual misconduct, stalking on the basis of sex, dating/intimate partner violence or sexual exploitation and/or related experiences or incidents. Policies and procedures related to Title IX and UB's nondiscrimination policies can be found at: http://www.ubalt.edu/titleix.

**Disability Policy:**
If you are a student with a documented disability who requires an accommodation for academic programs, exams, or access to the University's facilities, please contact Keri Hickey, Director of Student Support in the Office of Academic Affairs, at khickey@ubalt.edu.

## Student Success Resources Syllabus Addendum

**ASSIGNMENTS**

Class 1
DATE: August 25
TOPIC: Syllabus and basics of tax policy
READING: Chapter 16A

Class 2
DATE: September 1
TOPIC: Gross income
READING: Chapter 2, Chapter 3 (skim Hoey case)

Class 3
DATE: September 8
TOPIC: Employee benefits, other exclusions from gross income, and awards
READING: Chapter 4, Chapter 11, Chapter 5

Class 4
DATE: September 15
TOPIC: Gain from dealings in property
READING: Chapter 6 through 6B3

Class 5
DATE: September 22
TOPIC: Gain from dealings in property; capital gains
READING: Chapter 6B4, 6C, Chapter 21A

Class 6
DATE: September 29
TOPIC: Life insurance and annuities; discharge of indebtedness
READING: Chapter 7, Chapter 8

Class 7
DATE: October 6
TOPIC: Damages; Separation and Divorce
READING: Chapter 9, Chapter 10

Class 8
DATE: October 13
TOPIC: Assignment of income
READING: Chapter 12

Class 9
DATE: October 20
TOPIC: Business deductions

READING: Chapter 14 (skip 14D1)

Class 10
DATE: October 27
TOPIC: Deductions for profit-making, non-business activities
READING: Chapter 15

Class 11
DATE: November 3
TOPIC: Deductions not limited to business or profit-seeking activities; deduction, s affected by characterization principles
READING: Chapter 16B, Chapter 16C, Chapter 23B, Chapter 23C1 (Skip 21C2)

Class 12
DATE: November 10
TOPIC: Restrictions on deductions
READING: Chapter 17A-C

Class 13
DATE: November 17
TOPIC: Restrictions on deductions, cont'd
READING: Chapter 17D, Chapter 17H, Chapter 18A-D

Class 14
Date: November 24
TOPIC: Class summary and review
READING: N/a

Study period: December 5-7
Exam period: December 8-16