Office Hours, Telephone and E-mail

My office is located in Holland Hall 325B. Regular office hours are Monday and Wednesday, 3:00 - 4:00 p.m., or by appointment. If I am in my office and the door is open, you are welcome to drop by. You can also reach me by telephone at 352.273.0924 or by e-mail at burkek@sandiego.edu.

Course Materials

The casebook (required) for this course is Schwartz & Lathrope, Fundamentals of Corporate Taxation (8th ed. 2012). You should also have a current copy of the Internal Revenue Code and Regulations (complete or selected versions). Recommended reading: Burke, Federal Income Taxation of Corporations and Stockholders (7th ed. 2014).

Course Objectives

The primary objective of the course is to introduce students to the basic concepts of federal income taxation of corporations and their shareholders, including organization of corporations; cash and stock dividends; redemptions of stock; partial and complete liquidations; sales of corporate businesses and reorganizations. Taxation of corporations is compared with taxation of partnerships and S corporations. The emphasis is on careful analysis of Code provisions, Treasury Regulations, other administrative materials and important judicial decisions in relation to assigned problems. Prerequisite: Income Taxation (Law 6000)

Class Meetings, Attendance and Reading Assignments

Class will meet on Monday, Tuesday, and Wednesday at 11:00-11:50. Regular and punctual class attendance is required. A student with more than four unexcused class absences may be penalized in the final grade or excluded from the course. Students should be prepared to discuss the assigned readings and problems in class. The reading assignment for the first week of class is Schwartz & Lathrope, pp. 1-34. Additional reading assignments will be posted on the course website (TWEN).

Topical Outline

The topics will be covered in the following order:

I. Overview
II. Formation of a Corporation
III. Nonliquidating Distributions
IV. Redemptions and Partial Liquidations
V. Stock Dividends and Section 306 Stock
VI. Complete Liquidations
VII. Taxable Acquisitions
VIII. Corporate Reorganizations
IX. Economic Substance Doctrine

Evaluation

Students will be evaluated primarily based on the final examination, which will be graded anonymously. Grades will follow the law school grading policy, which is available at http://www.law.ufl.edu/students/policies.shtml#9. In calculating the final grade for the course, the grade awarded on the final examination may be raised by one grade level to reflect active, voluntary participation of consistently high quality in class discussion.

Makeup Exams

The law school policy on delay in taking exams can be found at: http://www.law.ufl.edu/students/policies.shtml#12.

Disability Accommodation

Students requesting classroom accommodation must first register with the Office of Disability Resources. The UF Office of Disability Resources will provide documentation to the student who must then provide this documentation to the Law School Office of Student Affairs when requesting accommodation.