

**Course Syllabus for
Income Taxation of Trusts & Estates
LAW 6930, Section 23657
Fall Semester 2019**

Professor: Dennis Calfee
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Office Hours: Wednesday 4:00 PM – 5:00 PM

Required and Recommended Textbooks and Other Course Materials:

Course materials for the first day will be available in the Office of Graduate Programs, room 320, on the 3rd floor of Holland Hall. Thereafter, course material will be provided in class by the Professor.

Federal internal Revenue Code Section & Regulations covering Sub-Chapter J including related income tax provisions. A paper copy of the code and regulations is required.

Course Objectives:

To learn Federal income Tax as it relates to Income Taxation of Estates and Trusts.

Learning Outcomes:

Upon completion of the course, students should have an understanding of Sub-chapter J of the Internal Revenue Code, the federal income tax provisions dealing with decedent's estates, trusts and beneficiaries, sufficient to enable them to practice in this area of taxation and pursue advanced courses which rely upon and understanding of these provision of the code. After this course, a student should be able to administer a trust or estate and better understand provisions in wills and trusts.

Topical Outline of Subjects to be Covered (Tentative):

- Uniform Principal and Income
- Act Simple Trusts
 - What is a "Simple" Trust? The Simple Trust Fact Pattern
 - Complex Trusts
 - Single Beneficiary Questions
 - Multiple Beneficiaries In General
 - The Annuity Provisions
 - The Separate Share Rules
- Charitable Deduction
- Specific Gifts, Bequests, Devises and Inheritance
- Distributions in Kind
 - Distributions and Transfers of Property in Kind
 - Section 663 and Kenan Considerations
- Estate and Trust Termination
- Income and Deductions in Respect of a Decedent
- Grantor Trust Rules

Grantor's Benefit Indirect
Grantor Benefit Third
Party's Benefit

Class Attendance Policy:

Regular class attendance and preparation are required. Students should notify the professor by email of the reason for any class absence.

ABA Standard 310/Workload:

It is anticipated that you will spend approximately 2 hours out of class preparing for in class assignments for every 1 hour in class

Evaluation:

The grade will be based on the final exam.

Information of UF Law Grading Policies:

Grade:	Points:
A	4.0 (Excellent)
A-	3.67
B+	3.33
B	3.0 (Good)
B-	2.67
C+	2.0 (Satisfactory)
C-	1.67
D+	1.33
D	1.00 (Poor)
D-	0.67
E	0.00 (Failure)

The law school grading policy is available at:

<http://www.law.ufl.edu/student-affairs/current-students/academic-policies#9>.

Policy Related to make-up exams:

The law school policy on delay in taking exams can be found at:

<http://www.law.ufl.edu/student-affairs/current-students/academic-policies#12>.

Course evaluation:

"Students are expected to provide professional and respectful feedback on the quality of instruction in this course by completing course evaluations online via GatorEvals. Guidance on how to give feedback in a professional and respectful manner is available at <https://gatorevals.aa.ufl.edu/students/>. Students will be notified when the evaluation period opens, and can complete evaluations through the email they receive from GatorEvals, in their Canvas course menu under GatorEvals, or via <https://ufl.bluera.com/ufl/>. Summaries of course evaluation results are available to students at <https://gatorevals.aa.ufl.edu/public-results/>."

Statement related to accommodations for students with disabilities:

Students requesting classroom accommodations 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.

Honor Code:

Students are subject to the UF Student Honor Code, which can be found at <http://www.dso.ufl.edu/students.php>.

