Income Taxation I
Prof. Jack Bogdanski
Fall 2026
Syllabus

Your Mission

For each topic listed herein, you are responsible for the assigned casebook reading and any and all Internal Revenue Code and Treasury regulation sections discussed in the casebook and/or mentioned in class. If you feel you need an exhaustive list of these Code and regulation sections, it might be a useful exercise for you to make one for yourself as we go along.

With each assignment, don't forget to check the supplement to the casebook! Many changes were made to the Code in July 2025, too late for the casebook. The casebook supplement pages are shown here preceded by the letter "S."

The Chirelstein handbook has been an invaluable aid to generations of students, and so I highly recommend (but am not requiring) that with each casebook reading, you read the corresponding pages in the Chirelstein work as well. They are all listed here.

At the end of class each Wednesday evening, I'll announce how far you should read ahead for the following week. This will depend on how much time it takes to cover the material.

This is a 4-unit course. The official expectation is that you will spend eight hours a week, outside of class time, studying for this course. That works out to a full day every week for 13 weeks! Please be responsible and stay caught up. Although the volume of material assigned is by no means light, it shouldn't be too threatening if you're spending sufficient time reading, thinking, and talking about the subject. Above all, don't get discouraged if things seem confusing; with time and effort, most (if not all) of it will make sense in the end.

1. Introduction

Casebook pages	*Chirelstein pages*
1–47; S2, S4–6 (middle), S26–27	vii–viii; 1–7 (stopping before last partial paragraph)

PART I. GROSS INCOME

2. Gross income: Does source matter?

Casebook pages	*Chirelstein pages*
71–79 (middle)	11–14, 113–115 (Question 2)

3. Gifts and bequests

Casebook pages	*Chirelstein pages*
82–94, 203–204 (note 2); S4, S6 (bottom)–S7 (top)	78 (middle)–83 (top)

4. Damages

Casebook pages	*Casebook problems*	*Chirelstein pages*
95–106 (top)	2.1 to 2.4, pp. 105–106	47 (middle)–52 (top)

5. Noncash benefits

Casebook pages	*Casebook problems*	*Chirelstein pages*
113–128 (middle), 221–230; S7	2.5 to 2.8, pp. 125, 128	15–26 (middle), 30 (bottom)–33 (middle), 476 (middle)–480 (top)

6. Some statutory exclusions

Casebook pages	*Casebook problems*	*Chirelstein pages*
130 (middle)–145, 208–220; S7	2.10 to 2.14, pp. 144–145; 2.15 to 2.28, pp. 208–211	26 (middle)–30, 245 (middle)–248, 324 (bottom)–327 (bottom), 332 (subsection (c))

7. Annual accounting problems

Casebook pages	*Chirelstein pages*
145 (bottom)–149 (middle), 181–189, 79 (middle)–81	311–324

8. Debt

Casebook pages	*Chirelstein pages*
149 (middle)–164 (top)	52–67 (top)

9. *Tufts* (and *Crane*)

Casebook pages	*Chirelstein pages*
164–181 (top)	357–367 (middle), 374–388 (middle)

10. *Eisner v. Macomber*

Casebook pages	*Chirelstein pages*
128 (middle)–130 (middle), 251–263 (top); S8 (top)	33 (middle)–36, 83–96 (middle)

11. Realization

Casebook pages	*Casebook problems*	*Chirelstein pages*
263–277	3.1 to 3.3, pp. 276	105 (middle)–107, 388 (middle)–391 (middle)

12. Nonrecognition

Casebook pages	*Casebook problems*	*Chirelstein pages*
277 (bottom)–292 (bottom), 315 (bottom)–318 (top)	3.4 to 3.8, pp. 285–287	398 (middle)–410

13. Installment sales and annuities

Casebook pages	*Casebook problems*	*Chirelstein pages*
292 (bottom)–299 (top), 339–347	3.10, p. 295; 3.11–3.12, pp. 298–299; 3.25, p. 342; 3.26–3.27, p.343	391 (middle)–398 (top), 38 (middle)–42 (section 2.02)

14. Basis and gifts

Casebook pages	*Casebook problems*	*Chirelstein pages*
299–303 (bottom); S8 (bottom)	3.13 to 3.19, pp. 301–303	67–73 (middle)

15. Basis allocation

Casebook pages	*Chirelstein pages*
303 (bottom)–308	37–38 (middle)

PART II. DEDUCTIONS

16. Charitable contributions

Casebook pages	*Casebook problems*	*Chirelstein pages*
375–393 (middle), 470–485; S9–S10 (middle)	4.1 to 4.4, pp. 392–393	238–240, 123–124 (middle), 212 (bottom)–216 (middle), 225–228

17. Interest expense

Casebook pages	*Casebook problems*	*Chirelstein pages*
393–403 (middle), 409 (bottom)–410 (top); S10 (middle)–S11 (middle)	4.5 and 4.6, pp. 396−397	174–178, 229–235 (middle)

18. State and local taxes

Casebook pages	*Chirelstein pages*
410 (middle)–418 (middle); S11 (middle)	218 (bottom)–220 (top)

19. Casualty losses and medical expenses

Casebook pages	*Chirelstein pages*
421 (middle)–448 (bottom); S11 (bottom)–S12 (middle)	220–225 (top)

20. Limitations on itemized deductions

Casebook pages	*Chirelstein pages*
448 (bottom)–450 (top); S12 (middle)–S13 (top)	235 (bottom)–238 (top)

21. Ordinary and necessary business expenses

Casebook pages	*Chirelstein pages*
509–524 (middle)	162 (middle)–165 (middle)

22. Attorney's fees and litigation costs

Casebook pages	*Chirelstein pages*
HANDOUT	137 (middle)–138 (middle)

23. Public policy limitations and lobbying

Casebook pages	*Chirelstein pages*
524–545 (bottom); S15 (top)	165 (middle)–166

24. Travel and entertainment

Casebook pages	*Chirelstein pages*
545–562 (top)	132 (bottom)–137 (middle), 138 (middle)–146

25. Hobbies, vacation homes, home offices

Casebook pages	*Chirelstein pages*
562–572 (top), 604–608 (top); S15 (middle)	124 (middle)−126 (middle), 146 (bottom)−149 (top)

26. Education expenses, work clothes

Casebook pages	*Chirelstein pages*
572–586	160 (middle)–162 (middle), 130–132

27. Capitalization and depreciation

Casebook pages	*Casebook problems*	*Chirelstein pages*
617–626 (top); S17	6.2 to 6.6, pp. 625–626	149 (middle)−150 (middle), 190–203 (middle)

28. What is depreciable? What must be capitalized?

Casebook pages	*Chirelstein pages*
626–642 (bottom)	154 (bottom)–157 (middle), 207 (middle)–210

29. Repairs, *Welch v. Helvering*, job hunting

Casebook pages	*Casebook problems*	*Chirelstein pages*
642 (bottom)–659	6.10, p. 649; 6.11, p. 659	150 (middle)−154 (middle)

30. "Qualified business income" deduction

Casebook pages	*Chirelstein pages*
587–589; S15 (bottom)–S16	7 (bottom)−9

31. Tax shelters

Casebook pages	*Chirelstein pages*
693–704 (top)	511–522

32. Passive loss rules

Casebook pages	*Casebook problems*	*Chirelstein pages*
704–721 (middle)	8.1 to 8.5, pp. 720–721	367 (bottom)–374 (top)

33. Anti-abuse doctrines

Casebook pages	*Chirelstein pages*
721–726 (middle), 732 (bottom)–738 (middle), 742–746 (top)	179–182 (top)

34. Alternative minimum tax

Casebook pages	*Chirelstein pages*
746–750; S18	248 (bottom)–251

PART III. TAXATION AND THE FAMILY

35. Family

Casebook pages	*Casebook problems*	*Chirelstein pages*
753−763 (top); S19–S23	9.1 to 9.13, pp. S21–23	126 (middle)−130 (top), 238–243

36. Marriage

Casebook pages	*Chirelstein pages*
763–774 (top), 784–792	300–305 (top)

37. Divorce

Casebook pages	*Casebook problems*	*Chirelstein pages*
774–775	9.14 to 9.16, p. 775	102 (middle)−105 (middle), 305–306 (middle)

38. Earned income credit

Casebook pages	*Chirelstein pages*
776 (middle)–779	243 (bottom)–245 (top)

PART IV. ATTRIBUTION (SPLITTING) OF INCOME

39. Attribution of earned income

Casebook pages	*Chirelstein pages*
813−816 (top)	259−266 (top)

40. Attribution of income from property

Casebook pages	*Casebook problems*	*Chirelstein pages*
827 (middle)−837	10.2 to 10.5, p. 831; 10.6, p. 834	73 (middle)–78 (middle), 283–293

PART V. PENSIONS

41. Retirement savings and consumption taxation

Casebook pages	*Chirelstein pages*
839–848	108–112 (top), 327 (bottom)–332 (top), 505–510

PART VI. CAPITAL GAINS AND LOSSES

42. Capital gains – policy and mechanics

Casebook pages	*Casebook problems*	*Chirelstein pages*
849–861 (bottom); S25	12.1 and 12.2, pp. 860−861	417–419 (middle), 425 (middle)–428 (middle)

43. Definition of "capital asset"

Casebook pages	*Casebook problems*	*Chirelstein pages*
861–870 (middle)	12.7, p. 870	428–430 (top)

44. Property used in a trade or business

Casebook pages	*Chirelstein pages*
870–879	466 (bottom)–476 (top), 480–483 (middle), 491–495

Learning Objectives

Students in this course will gain knowledge of substantive law relating to federal income taxation, and develop the ability to apply that law to a variety of fact patterns.

The source materials with which students will obtain substantial familiarity include the U.S. Internal Revenue Code (the "Code"); the Treasury regulations implementing the Code; published rulings and other pronouncements by the Internal Revenue Service; and opinions by various federal courts, including the U.S. Tax Court.

The crucial aspect of substantive law as to which proficiency will be built is the federal income tax. Specifically, students will develop skills in identifying income, deductions, and credits; solving problems of timing; computing gains and losses from property transactions; spotting and resolving issues relating to assignment of income; analyzing capital gain and loss; and tax accounting.

bojack@lclark.edu
503-768-6653