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income tax. The course will focus on the statutory framework of U.S. tax laws, certain principal and illustrative judicial authorities, and selected Treasury Department regulations and rulings. The course will include frequent discussion of federal tax policy, current tax

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issues and controversies, and the history and politics of the U.S. income tax.

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module, you will be
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different kinds of taxes faced by US taxpayers and the US federal income tax structure. The origin of tax law and its constitutionality is discussed along with a brief history of the different changes in rates that have occurred since the 16th Amendment was passed.

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Early Periods First
federal income tax
levied in 1861 to

fund Civil war. It was
repealed after the
war. Federal income

tax reinstated in
1894, but challenged
in court. In 1895,

Supreme Court ruled
income tax

unconstitutional! 3

Constitution amended

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in 1913; 16th amendment gives Congress right to tax income.

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1 Unit 01.

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doing business as
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partnership under
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Sub-chapter K of the
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Code. It will discuss
the issues pertaining
to the entity itself not
being subject to an
income tax and the
pass through those of
tax characteristics to

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Disadvantages A

major disadvantage to
the individual is the
loss of business and
investment losses

available to offset the

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individual's other sources of income. Incorporation can result in a net tax cost on business income if corporate tax rates are greater than 13% (as in this case). Incorporation results in a prepayment of taxes on income for ...

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economic),
procedural rules and
their application, and
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A major distinguishing feature of this special tax

regime concerns the

source of income: a nonresident alien

(with certain

narrowly defined

exceptions) is subject

to federal income tax

only on income which

is derived from

sources within the

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United States and/or
income that is
effectively connected
with a U.S. trade or
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