Partnership Taxation
Prof. Chorvat
Spring 2026

All references below to Chapters refer to chapters in **Fundamentals of Partnership Taxation** by Schwarz, Lathrope and Hellwig.

The intended learning outcome for this course is that you will be able to analyze the income tax issues of essentially any situation involving a partnership or an S-corporation. The method of assessment for this course will be a tax-home examination given at the end of the semester. It will almost entirely consist of factual situations for which you will have to discuss the tax consequences. By the end of the course, you will see that any situation can be taken apart piece-by-piece. You will find that a problem that might at first seem quite daunting, will be able to be broken down into parts and dealt with. One might argue that one of the most important learning outcomes of the course are the skills developed in breaking part complex situations. These skills will be helpful in addressing any tax problems, and indeed any complex transaction.

The key to doing well in this class is keeping up with the readings and problems. I would also advise starting to put together an outline as early as reasonably possible. The exam will be a tax-home exam, but it will require a solid knowledge of the subject. If you have a well-organized outline that you understand, you will almost certainly do well on the exam.

You may use AI to help you study and to explore ideas raised in the class. But all written work submitted in this course must be your own and not AI generated. You may not avoid reading for this class by using AI. Reading the material yourself is a requirement for the course.

Each assignment is expected to take approximately one week.

Assignment I.
Reading: Chapter 1
Code Sections: §§ 761(a), 7701(a)(3), 7704
Problems: 1 and 2 (pp. 24-25)

Assignment II.
Readings: Chapter 2
Code Sections: §§ 721, 722,723, 704(c)(1)(A), 704(b), 724, 752 (a)-(c)
Problems: Problem p.38-9, pp.45, p.48, Problem 1 p.53

Assignment III.
Readings: Chapter 3, *Bayse* (on TWEN)
Code Sections: §§ 701, 702(b), 703, 704(d), 706
Problems: Problem p.76 (a),(b),(c), Problem p.80 (a),(b), (c) Problem p.81 (a)-(c), P. 93 Problem 1 (a)-(c)

Assignment IV.
Readings: Chapter 4
Code Sections: § 704(b)
Problems: Problem p.134-35 (a)-(f), p. 147 (a)-(c)

Assignment V.
Readings   Chapter 5
Code Sections: §§ 704(a), (c)(1)(A) & 3, 724
Problems: p. 170-71 Problem 1 (all), Problem 2 (a)-(d), p.180 Problem 1 (a) and (b).

Assignment VI.
Readings   Chapter 6
Code Sections: §§ 751(c), 752 (a)-(c)
Problems: P. 204-05 Problem 1 (all).

Assignment VII.
Readings   Chapter 7
Code Sections: §§ 731, 732(a), (c),(d),(e), 733, 751(b), 754, 755,
Problems: Problem p. 242, Problem 1 pp. 255-256

Assignment VIII.
Readings   Chapter 10
Code Sections: §§ 704(a), (c)(1)(A) & 3, 724, 751(c), 752 (a)-(c)
Problems: P. 331 Problem 1, p. 334-5 Problem 1, p.340-341 Problem, p.359,
                   Problems 1, 2.

Assignment IX.
Readings   Chapter 8
Code Sections: §§ 267(a)(2),(e)(1)& (2) & 707
Problems: P. 266 Problem. P. 281-2 1 & 2

Assignment X.
Readings: Chapter 9
Code Sections: §§ 705(a), 706(c) 741, 742, 743, 751(a)(c),(d)(f), 752(d), 754, 755
Problems: Problem 1 p.299-300, Problem 1 (a)-(i) p. 215-16.

Assignment XI.
Readings: Chapter 11
Code Sections: §§ 705(a), 706(c) 741, 742, 743, 751(a)(c),(d)(f), 752(d), 754, 755
Problems: Problem 1 & 2, p.369-70 Problem 1 p. 385, Problem p. 395-6,

Assignment XII
Readings: Chapter 12
Code Sections: §§ 708, 731, 732(b),(c), (d) & (e), 736, 741, 751, 761(d)
Problems: Problem p.402

Assignment XIII
Readings: Chapter 13
Code Sections: §§ 706(c), 708(b), 742, 753
Problems: Problem 1 p.447

Assignment XIV
Readings: Chapter 15
Code Sections: §§ 1361, 1362, 1363, 1366, 1367, 1368, 1371, 1374, 1375,1378
Problems: Problem (a)-(f), p. 465-66, Problem p.471-2, Problem 1, p.486-7,
Problem 1 p.490.

Assignment XV
Readings: Chapter 15.
Code Sections: Regulation § 1.701-2
Problems: Problem p.454-5