

Partnership Taxation  
Tax 6205  
Spring 2018

Instructor: Michael Mayberry  
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Location: Gerson 126  
Dates: Module III is January 8 – February 23  
Times: Tuesday and Thursday  
Section 2D64: Periods 3-4: 9:35 – 11:30  
Final Exam: Tuesday, February 27, assigned section time  
Office hours: 11:35 – 12:35pm Tuesday

Required Texts: The Logic of Subchapter K: A Conceptual Guide to the Taxation of Partnerships. Authors: Cunningham and Cunningham. West Press. Fourth Edition. ISBN: 978-0-314-19985-0. Also, the accompanying problem text with ISBN: 978-0-314-19894-5

It is important to note that I will be supplementing topics covered by this textbook. It is **important** to pay attention in class.

Course Descriptions: This course examines the taxation of the formation, operations, and liquidations of partnerships.

Expectations before Class: I expect students to have read the assigned reading in the textbook. You should familiarize yourself with all concepts and have at least attempted each of the suggested problems. **This is a very fast-paced class and failure to plan ahead will cause your performance to suffer.**

Strategy for success: As a module, graduate level class, this class has a notable pace. We will not have time to cover material more than once. Therefore, it is critical that you read materials beforehand and attempt problems beforehand. I will go over material and problems in class. Identify the problems or concerns you have on the material before class so that you can ask me during class.

Grades: There are three components to your grade.

- 1) 45% Midterm
- 2) 45% Final
- 3) 10% Participation

Exams: This course has a mid-term exams and a final exam. The final will be comprehensive. You will be tested on both comprehension and analysis of the material covered in class. **However, if a concept is not covered in class, it will not appear on any of the exams.**

The exams are closed-book and will primarily, but not exclusively, consist of multiple-choice problems.

You may bring a non-programmable calculator to the exam. Examples of calculators which are **NOT** allowed would be graphing calculators or cell phones.

Please see me if you must make-up an exam for a university excused absence or extenuating circumstances. If you fail to take the exam on the assigned day and do not have a valid excuse, there will be no makeup exam and you will be given a zero (0) on the exam. Employment interviews, employer events, weddings, vacations, etc. are **NOT** excused absences.

A note indicating that you were seen at the health center the day of the exam is not sufficient documentation of a medically excused absence from an exam. The note must say that you were medically unable to take the exam

Exam Grading Appeals: I will make every effort to ensure that grading is as objective and fair as possible. If you believe that there is an error in the grading, please submit, in writing, an appeal within one week of your exam being returned. However, please be advised that if you submit such an appeal, I will regrade the entire exam to ensure that all parts are properly graded. As such, your grade on the exam could increase *or decrease* based on the secondary grading.

Class Participation: My aim is to facilitate a learning environment that stimulates discussions about current tax law and planning. Although it is my responsibility to teach, it is everyone's responsibility to facilitate learning. Class will be more enjoyable if we have an active discussion in which everyone can participate in an informal way, so please do not hesitate to ask any relevant question.

To motivate discussion and preparation, a portion of your grade is based upon class participation and professionalism. Your total class participation score is based, in equal parts, on class attendance and participation in class. Showing up to class is important, but speaking and asking relevant questions is equally important. I also reserve the right to deduct points (i.e. grant negative points) for students that behave in a grossly unprofessional manner.

Academic Integrity: Upon accepting admission to the Fisher School of Accounting, a student immediately assumes a commitment to uphold the Fisher School of Accounting Honor Statement, to accept responsibility for learning and to follow the philosophy and rules of the Honor Statement. Ignorance of the rules does not exclude any member of the Fisher School community from the requirements or the processes of the Honor Statements. For additional information please visit: [http://warrington.ufl.edu/accounting/docs/fsoa\\_honor.pdf](http://warrington.ufl.edu/accounting/docs/fsoa_honor.pdf)

I have a high view of an individual's honor. As a future accountant, you will be required to behave honorably when interacting with regulatory agencies such as the Internal Revenue Service or the Securities and Exchange Commission. Dishonorable behavior undermines society's view of the entire profession's integrity and harms each and every one of us as well as the common trust necessary for a functioning capitalist system. Therefore, I consider it my duty to penalize dishonorable behavior to the maximum extent. Dishonorable behavior will result in a failing grade for the entire class (not just the single assignment).

## Syllabus Addendum

**Course Grade:** Final grades will be based on obtaining the following percentage of total course points: 96-100% = A; 90-95% = A-; 88-89% = B+; 85-87% = B; 80-84% = B-; 78-79% = C+; 75-77% = C; 70-74% = C-; 68-69% = D+; 65-67% = D; 60-64% = D-; 0-59% = E. Required percentages may be reduced based on a course curve.

**Grade Values:** The grade-point value per credit hour associated with each letter grade is assigned by the Office of the University Registrar: A = 4.0, A- = 3.67, B+ = 3.33, B = 3.0, B- = 2.67, C+ = 2.33, C = 2.0, C- = 1.67, D+ = 1.33, D = 1.0, D- = .67, E = 0.0. For more information visit: <https://catalog.ufl.edu/ugrad/current/regulations/info/grades.aspx>

**Make-Ups:** A make-up exam will be given when the student has a valid verifiable reason for not taking the exam during the scheduled time. Barring a documented emergency, the request must be made a minimum of ten days prior to the scheduled exam. Exceptions are made if the policy conflicts with UF attendance requirements. More detail on acceptable reasons for absence and UF policies on attendance are found at:

<https://catalog.ufl.edu/ugrad/current/regulations/info/attendance.aspx>

**Attendance:** Although attendance may not be taken at every class, students are expected to attend and participate in every class. Students should prepare for all classes even if they miss and are responsible for material covered in their absence. Students may not attend a class unless they are officially registered for the course. The Fisher School of Accounting does not approve requests to audit its courses. Students who do not attend at least one of the first two class meetings of a course or laboratory in which they are registered, and who have not contacted the School to indicate their intent, may be dropped from the course. The instructor adheres to all UF attendance policies.

**Honesty:** Academic dishonesty will not be tolerated. Students are required to know and comply with the university's policy on academic honesty. This policy is detailed in the Undergraduate Catalog and by reference is included in this course syllabus. For more information visit:

<https://sccr.dso.ufl.edu/process/honor-code/>

**Civility:** This course will be conducted in a courteous and professional manner. Inappropriate classroom behavior of any form will not be tolerated. At the instructor's discretion, students acting in an uncivil manner will receive a grade reduction commensurate with the infraction. Students can be withdrawn from the course for excessive unacceptable behavior.

**Disabilities:** Students requesting classroom accommodations must first register with the Dean of Students Office. Support services for students with disabilities are coordinated by the [Disability Resource Center](#) in the [Dean of Students Office](#). All support services provided for University of Florida students are individualized to meet the needs of students with disabilities. To obtain individual support services, each student must meet with one of the support coordinators in the Disability Resources Program and collaboratively develop appropriate support strategies. Appropriate documentation regarding the student's disability is necessary to obtain any reasonable accommodation or support service. The Dean of Students Office will provide documentation to the student who must then provide this documentation to the instructor a minimum of ten days prior to the requested accommodation.

**Evaluation:** Students are expected to provide feedback on the quality of instruction in this course based on 10 criteria. These evaluations are conducted online at <https://evaluations.ufl.edu>. Evaluations are typically open during the last two or three weeks of the semester, but students will be given specific times when they are open. Summary results of these assessments are available to students at <https://evaluations.ufl.edu/results/>

**U Matter, We Care:** Your well-being is important to the University of Florida. The U Matter, We Care initiative is committed to creating a culture of care on our campus by encouraging members of our community to look out for

one another and to reach out for help if a member of our community is in need. If you or a friend is in distress, please contact [umatter@ufl.edu](mailto:umatter@ufl.edu) so that the U Matter, We Care Team can reach out to the student in distress. A nighttime and weekend crisis counselor is available by phone at 352-392-1575. The U Matter, We Care Team can help connect students to the many other helping resources available including, but not limited to, Victim Advocates, Housing staff, and the Counseling and Wellness Center. Please remember that asking for help is a sign of strength. In case of emergency, call 9-1-1.

**Course Schedule**  
*(Note: Subject to change)*

Lecture	T or R?	Date	Chapters
1	T	9-Jan	1-2
2	R	11-Jan	2-4
3	T	16-Jan	3 (also pages 132-133)
4	R	18-Jan	5
5	T	23-Jan	6,8
6	R	25-Jan	7
7	T	30-Jan	EXAM
8	R	1-Feb	10
9	T	6-Feb	10
10	R	8-Feb	11
11	T	13-Feb	11
	R	15-Feb	JATA no class
12	T	20-Feb	12
13	R	22-Feb	15