
TABLE OF CONTENTS

Chapter 1: What Is a Partnership?	1
¶101 Introduction	1
¶102 Classification of Partnerships	3
¶103 Advantages and Disadvantages of Operating as a Partnership	5
¶104 Tax Issues Involving Classification of LLCs as Partnerships	7
¶105 IRS Reclassification	12
¶106 Distinguishing Partnerships from Other Relationships	13
¶107 S Corporation Comparison	18
Chapter 1: Test Your Knowledge	21
Chapter 1: Solutions and Suggested Responses	23
Chapter 2: Partnership Formation and Computation of Partner Basis	25
¶201 Introduction	25
¶202 General Rule: Contribution of Property Is Treated as a Tax-Free Exchange of Property for a Partnership Interest	25
¶203 Depreciation Methods	29
¶204 Effect of Partnership Operations on Basis	30
¶205 Contributions of Encumbered Property	33
¶206 Partnership Capital Accounts	39
¶207 Contributions Requiring Special Consideration	42
¶208 S Corporation Comparison	47
Chapter 2: Test Your Knowledge	51
Chapter 2: Solutions and Suggested Responses	53
Chapter 3: Receipt of a Partnership Interest for Services	55
¶301 Introduction	55
¶302 Capital Interest Received	56
¶303 Profit Interest Received	60
¶304 Proposed Regulations	62
¶305 S Corporation Comparison	67
Chapter 3: Test Your Knowledge	69
Chapter 3: Solutions and Suggested Responses	71
Chapter 4: Calculation of Partnership Income	73
¶401 Introduction	73
¶402 Both Entity and Aggregate Rules Apply	75
¶403 Calculation of the Amount of the Partnership's Taxable Income	79
¶404 Payments to a Partner	81
¶405 Taxable Year	101
¶406 Accounting Method	112
¶407 Organization and Syndication Expenses—Code Sec. 709	113
¶408 Investigation, Acquisition, and Start-Up Expenses—Code Secs. 195 and 263	117
¶409 S Corporation Comparison	122

Chapter 4: Test Your Knowledge	125
Chapter 4: Solutions and Suggested Responses	129
Chapter 5: Character and Presentation of Partnership Income	133
¶501 Introduction	133
¶502 Presentation of a Partnership's Taxable Income	134
¶503 Separately Stated Items	135
¶504 Schedules M-1, M-2, and M-3	171
¶505 Partnership Audit Determinations	173
Chapter 5: Test Your Knowledge	175
Chapter 5: Solutions and Suggested Responses	177
Case Table	179
Glossary	183
Index	185
Final Exam Copy	187