

**Course Syllabus**  
**AIM 6354-OG1 Partnership Tax**  
School of Management  
The University of Texas at Dallas

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## Course Information

### Course

Course Number/Section	AIM 6354-OG1
Course Title	Partnership Tax
Term and Dates	Spring 2007

### Professor Contact Information

Professor	Ronald J. Blair, CPA, MBA
Office Phone	972-883-4430
Email Address	rblair@utdallas.edu
Office Location	SM 4.224
Online Office Hours	M-F 9:00 – 4:00
TA Contact Information	972-883-6498

### Course Pre-requisites, Co-requisites, and/or Other Restrictions

AIM 3351 or AIM 6351 Individual Tax

### Course Description / Student Learning Objectives/Outcomes

The course will include an analysis of the IRC, Treasury Regulations, and other authorities relating to the fundamentals of taxation of partnerships. Its purpose is to give the student knowledge of the tax implications of this organizational form of business operation - the effect, the advantages and disadvantages, and the pitfalls, as well as the responsibilities that go with it. It will also give the student an introduction to the partnership return and its purpose.

Students should read the assigned chapters, IRC sections, Regs, and prepare the weekly assigned problems. Students are **strongly urged** to work the problems as assigned **before** solutions are accessed. This will enable you more quickly grasp the concepts involved as you compare your solutions to the posted solution, and will prepare you for the test problems as they will be very similar in content.

**Students are encouraged to obtain a copy or print each IRC section in Subchapter K for reference throughout the semester.**

## Required Textbooks and Materials

Lind, Schwarz, Lathrope, and Rosenberg, *Fundamentals of Partnership Taxation*, Seventh Edition, Foundation Press, 2005 (ISBN 1-58778-832-2)

Discussion slides are based generally on the text. Other references include: McKee, Nelson & Whitmire, *Federal Taxation of Partnerships and Partners*, Third Edition, Warren, Gorham & Lamont

In the frequent quotation of statute in the classnotes (slides), emphases of certain words and phrases are added by the lecturer.

Textbooks and some other bookstore materials can be ordered online through [MBS Direct Virtual Bookstore](#) or [Off-Campus Books](#) online ordering site. They are also available in stock at the [UTD Bookstore](#) and Off-Campus Books.

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## Technical Requirements

In addition to a confident level of computer and Internet literacy, certain minimum technical requirement must be met to enable a successful learning experience. Please review the important [technical requirements and the web browser configuration information](#).

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## Course Access and Navigation

This course was developed using a web course tool called WebCT. It is to be delivered entirely online. Students will use their UTD NetID account to login to the course at: <http://webct.utdallas.edu>. Please see the [course access and navigation information](#).

To get started with a WebCT course, please see the [Getting Started: Student WebCT Orientation](#).

If you have any problems with your UTD account or with the UTD WebCT server, you may send an email to: [assist@utdallas.edu](mailto:assist@utdallas.edu) or call the UTD Computer Helpdesk at: **972-883-2911**. If you encounter any technical difficulties within the course site, please send an email to [gmbasupport@utdallas.edu](mailto:gmbasupport@utdallas.edu).

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## Communications

This WebCT course has built-in communication tools which will be used for interaction and communication. Some external communication tools such as regular email and a web conferencing tool may also be used during the semester. Please see more details about [communication tool information](#).

**Email:** Use the Email tool to communicate with the instructor or TA. This is a closed system and only the person to whom the message is address is allowed access. Students may address messages to the instructor or TA privately. Or messages may be addressed to include all other students, such as to raise a question that might be of interest to everyone; responses will be made accordingly.

**Discussion:** The Discussion feature can be used to post messages to other members of the class. This is an open system and all class members can access postings on it. The instructor and TAs do not normally respond to this feature. Personal messages should be sent by email and not posted on the discussion board.

The instructor will post announcements and discussion materials using the Announcements and Discussions tools; instructor will generally not respond to discussion items posted by students on this tool. Students may send personal concerns or questions to the instructor using the course Email tool. The instructor will reply to student emails within 3 working days under normal circumstances.

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## Student Assessments

### Grading Information

#### Weights

Two tests – 20 points each	40	40%
Final exam	25	25%
Partnership return	25	25%
Periodic quizzes	10	10%
Total		100%

#### Grading criteria

Scaled Score	Letter Equivalent
90-100	A
80-89	B
70-79	C
Less than 70	F

#### Grading Policy

##### Exams

Two tests and a final are open book, consisting generally of problems, rules, and concepts similar to the text problems assigned, but answered in a multiple choice format.

Translation of the total point score into a letter grade will be based on the instructor's judgment. The letter grade will reflect each student's performance relative to the course and standards expected of graduate students at the University of Texas at Dallas.

## Proctored Final Examination Information

This course requires a proctored final examination. An on-campus class exam session under the supervision of the instructor is scheduled on April 24 in which you may participate. Room information will be announced later on the course discussion board. In the alternative, you may take your exam under the supervision of a proctor in an on-campus classroom (**SM 2.106**) on **Friday, April 20<sup>th</sup>, 2007 from 9:00am-5:00pm**. IDs will be required to enter exam classroom. All exams must be completed by **5pm**.

Students who are not able to attend this exam session with the instructor can arrange an individual proctored exam with a testing service of their choice at a date within this required exam time window: April 20 – 25. For local students, testing services are available at the UTD Learning Resources Center. Students who find UTD geographically inconvenient may use a pre-approved testing service at a convenient location. All individually arranged proctored exams must be completed within the stated exam time window. Students using either must inform the instructor, as well as the Global MBA Online office ([gmbasupport@utdallas.edu](mailto:gmbasupport@utdallas.edu)). Please go to the [Proctored Exam Information](#) page to download the Proctored Exam Form and find all the detailed information and procedures on arranging a proctored exam. All completed exams must be received by April 25 to allow timely grade reporting to UTD Registrar.

The GMBA Office requests all students who need to use testing services strictly follow the proctored exam scheduling deadlines. If any student fails to submit the exam form on time, the student will be required to come to campus and attend the scheduled class exam session (or seek instructor's approval for any special arrangements).

### Accessing Grades

Students can check their grades by clicking "My Grades" under Course Tools after the grade for each assessment task is released.

## Course Policies

### *Make-up exams*

None

### *Extra Credit*

None

### *Late Work*

None

### *Special Assignments*

None

## Assignments

Partnership return – see Academic Calendar

## Online Tests/Quizzes

You can access quizzes/exams by clicking the Assessments link on the course menu or see the quiz/exam icon on the designated page. Each quiz is timed and can be accessed only one time within the scheduled time window. Please read the on-screen instructions carefully before you click "Begin Assessment". After each quiz is graded and released, you may go back to the Assessments page and click "View All Submissions" to review your exam results.

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## Academic Calendar

Wk	Date	Topic	IRC §§	Regs §§
1	J 9	<b>Partnership Tax in Brief</b> Chapter 1 Overview of Taxation of Partnerships and Partners Problems: pp. 15, 16	§§701, 7701	
2	J16	<b>Assembling a Partnership</b> Chapter 2 Formation of a Partnership Problems: pp. 36, 43, 46, 50 and 51, 59, 73, 74 and 75	§§721 - 723, 704, 724	
3	J23	<b>Rules of Partnership Operations - In General</b> Chapter 3 Operations of a Partnership - General Rules Problems: pp. 97, 100, 104, p. 107 #1 and p. 114 #1	§§701-703, 704(d), 705-706	§§1.701-1, 1.702-1(b), 1.703-1(a), 1.704-1(d)
4	J30	<b>Partnership Operations - Allocations</b> Chapter 4, A Introduction B Special Allocations Under §704(b)  §704(b)  <b>Test 1</b> Chapters 1 - 3		

5	F 6	<p><b>Allocations</b> (cont'd) Chapter 4, B (cont'd) Problems: p. 154 ##1 and 2; p. 165</p> <p>C Allocations with Respect to Contributed Property §704(a) and (c) §§1.701-3(a), Problems: p. 188 ##1 and 2 1.704-1(b)(1) and (2)</p> <p>D Allocation of Partnership Liabilities §§704(c)(1)(A), §§1.752-1, 1.752-2(a) - (c) 752(a) and (c) Problems: p. 207 #1</p>
6	F13	<p><b>Allocations</b> (cont'd) Chapter 4, E Allocations Where Partners Interests Vary During the Year §703 (c)(2)(B) and (d) §1.706-1(c)(4) Problem: p. 213 #2</p> <p>F The Family Partnership Rules §704(e) §704-1(e)(1) and (3)(i)(b) Problems: p. 218 and 219</p>
7	F20	<p><b>The Anti-Abuse Regs. - §1.701-2</b> Chapter 10 §§1.701-2(a) - (c), The Partnership Anti-Abuse Regs 1.702-2(e), (h) and (l) Problem: p. 400</p> <p><b>Partner / Partnership Transactions</b> Chapter 5 §§707(a)(1) and (c), §§1.707-1(a) and (c), 267(a)(1) - (d), 453(g) 1.707-3(a) - (d) Transactions Between Partners and Partnerships Problems: pp. 227 and 228; p. 233 #1; p.241 ##1 and 2; p. 247 ##1 and 2</p>
8	F27	<p><b>Partnership Return</b> Form 1065 Form 1065 Form 1065 Software Assign partnership practice return - <b>due March 20</b> <b>Form 1065 Partnership Return Project - due April 3</b></p> <p><b>Test II</b> Chapters 4, 5 and 10</p>
9	M 6	<b>Spring Break</b>

10	M13	<p><b>Partnership Interest Dispositions</b>  Chapter 6 §§705(a), 706(c), 741, 742, 743, 751(a) - (f), 752(a), 754, 755</p> <p>§§1.7061(c)(1) - (5), 1.743-1(a) - (e), 1.751-1(a) and (c), 1.754-1, 1.755-1(a)</p> <p>Sales and Exchanges of Partnership Interests  Problems: p. 265 #1, p. 267, p. 272, and p. 281 #1</p>
11	M20	<p><b>Distributions - Operating</b>  Chapter 7 §§731, 732(a) - (d), 733, (Except E) 735, 751(a) - (d), §1245</p> <p>§§1.731-1(a)(1) and (3), 1.732-1(a) - (d), 1.733-1, 1.735-1, 1.735-1, 1.1245-4(f)(2)-(3)</p> <p>Operating Distributions  Problems: p. 294 ##1 and 2; p.297 #1, p. 303, and p. 308  Discuss partnership practice return</p>
12	M27	<p><b>Liquidations / Terminations</b>  Chapter 8 §§708(b)(1), 731, 732, 735, 751</p> <p>§§1.731-1(a)(2), 1.731-2(b), 1.731-1(b)(4)</p> <p>Liquidating Distributions and Terminations  Problems: p. 326, p. 339 #1, p. 348, p 354, p. 360, p. 378 #1</p>
13	A 3	<p><b>Death of a Partner</b>  Chapter 9 §§694, 706(c), 708(b), 753, 1014(a) and (c), §2033</p> <p>§§1.742-1, 1.753-1(a)</p> <p>Consequences of Partner's Death  Problems: p. 393, p. 394 #2</p> <p><b>S Corporations</b>  Chapter 11 §§311(b), 1361, 1362, 1363, 1366(a) - (e), 1367, 1368, 1371, 1372, 1374, 1375, and 1378</p> <p>S Corporations and Their Shareholders  Problems: pp. 412, 417, p. 431 #1, p. 435 #1 and 441 #1</p> <p><b>Partnership return project due</b></p>
14	A10	<p><b>S Corporations</b> (cont'd)  Chapter 11 (cont'd)</p>

15	A17	<b>S Corporations</b> (cont'd) Chapter 11 (cont'd) <b>Form 1065</b> Review of Form 1065 Partnership Return Project
16	A24	<b>Final Exam</b> <span style="float: right;"><b>Emphasis on Chs. 6 - 9 and 11</b></span>

## Scholastic Honesty

The University has policies and discipline procedures regarding scholastic dishonesty. Detailed information is available on the [Scholastic Dishonesty](#) web page. All students are expected to maintain a high level of responsibility with respect to academic honesty. Students who violate University rules on scholastic dishonesty are subject to disciplinary penalties, including the possibility of failure in the course and/or dismissal from the University. Since such dishonesty harms the individual, all students and the integrity of the University, policies on scholastic dishonesty will be strictly enforced

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## Course Evaluation

As required by UTD academic regulations, every student must complete an evaluation for each enrolled course at the end of the semester. An online instructional assessment form will be made available for your confidential use. Please look for the course evaluation link on the course Homepage towards the end of the course.

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## University Policies

### Student Conduct & Discipline

The University of Texas System and The University of Texas at Dallas have rules and regulations for the orderly and efficient conduct of their business. It is the responsibility of each student and each student organization to be knowledgeable about the rules and regulations which govern student conduct and activities. General information on student conduct and discipline is contained in the UTD publication, *A to Z Guide*, which is provided to all registered students each academic year.

The University of Texas at Dallas administers student discipline within the procedures of recognized and established due process. Procedures are defined and described in the *Rules and Regulations, Board of Regents, The University of Texas System, Part 1, Chapter VI, Section 3*, and in Title V, Rules on Student Services and Activities of the university's *Handbook of Operating Procedures*. Copies of these rules and regulations are available to students in the Office of the Dean of Students, where staff members are available to assist students in interpreting the rules and regulations (SU 1.602, 972/883-6391).



A student at the university neither loses the rights nor escapes the responsibilities of citizenship. He or she is expected to obey federal, state, and local laws as well as the Regents' Rules, university regulations, and administrative rules. Students are subject to discipline for violating the standards of conduct whether such conduct takes place on or off campus, or whether civil or criminal penalties are also imposed for such conduct.

### **Academic Integrity**

The faculty expects from its students a high level of responsibility and academic honesty. Because the value of an academic degree depends upon the absolute integrity of the work done by the student for that degree, it is imperative that a student demonstrate a high standard of individual honor in his or her scholastic work.

Scholastic dishonesty includes, but is not limited to, statements, acts or omissions related to applications for enrollment or the award of a degree, and/or the submission as one's own work or material that is not one's own. As a general rule, scholastic dishonesty involves one of the following acts: cheating, plagiarism, collusion and/or falsifying academic records. Students suspected of academic dishonesty are subject to disciplinary proceedings.

Plagiarism, especially from the web, from portions of papers for other classes, and from any other source is unacceptable and will be dealt with under the university's policy on plagiarism (see general catalog for details). This course will use the resources of turnitin.com, which searches the web for possible plagiarism and is over 90% effective.

### **Email Use**

The University of Texas at Dallas recognizes the value and efficiency of communication between faculty/staff and students through electronic mail. At the same time, email raises some issues concerning security and the identity of each individual in an email exchange. The university encourages all official student email correspondence be sent only to a student's U.T. Dallas email address and that faculty and staff consider email from students official only if it originates from a UTD student account. This allows the university to maintain a high degree of confidence in the identity of all individual corresponding and the security of the transmitted information. UTD furnishes each student with a free email account that is to be used in all communication with university personnel. The Department of Information Resources at U.T. Dallas provides a method for students to have their U.T. Dallas mail forwarded to other accounts.

### **Withdrawal from Class**

The administration of this institution has set deadlines for withdrawal of any college-level courses. These dates and times are published in that semester's course catalog. Administration procedures must be followed. It is the student's responsibility to handle withdrawal requirements from any class. In other words, I cannot drop or withdraw any student. You must do the proper paperwork to ensure that you will not receive a final grade of "F" in a course if you choose not to attend the class once you are enrolled.

## **Student Grievance Procedures**

Procedures for student grievances are found in Title V, Rules on Student Services and Activities, of the university's *Handbook of Operating Procedures*.

In attempting to resolve any student grievance regarding grades, evaluations, or other fulfillments of academic responsibility, it is the obligation of the student first to make a serious effort to resolve the matter with the instructor, supervisor, administrator, or committee with whom the grievance originates (hereafter called "the respondent"). Individual faculty members retain primary responsibility for assigning grades and evaluations. If the matter cannot be resolved at that level, the grievance must be submitted in writing to the respondent with a copy of the respondent's School Dean. If the matter is not resolved by the written response provided by the respondent, the student may submit a written appeal to the School Dean. If the grievance is not resolved by the School Dean's decision, the student may make a written appeal to the Dean of Graduate or Undergraduate Education, and the dean will appoint and convene an Academic Appeals Panel. The decision of the Academic Appeals Panel is final. The results of the academic appeals process will be distributed to all involved parties.

Copies of these rules and regulations are available to students in the Office of the Dean of Students, where staff members are available to assist students in interpreting the rules and regulations.

## **Incomplete Grade Policy**

As per university policy, incomplete grades will be granted only for work unavoidably missed at the semester's end and only if 70% of the course work has been completed. An incomplete grade must be resolved within eight (8) weeks from the first day of the subsequent long semester. If the required work to complete the course and to remove the incomplete grade is not submitted by the specified deadline, the incomplete grade is changed automatically to a grade of **F**.

## **Disability Services**

The goal of Disability Services is to provide students with disabilities educational opportunities equal to those of their non-disabled peers. Disability Services is located in room 1.610 in the Student Union. Office hours are Monday and Thursday, 8:30 a.m. to 6:30 p.m.; Tuesday and Wednesday, 8:30 a.m. to 7:30 p.m.; and Friday, 8:30 a.m. to 5:30 p.m.

The contact information for the Office of Disability Services is:

The University of Texas at Dallas, SU 22

PO Box 830688

Richardson, Texas 75083-0688

(972) 883-2098 (voice or TTY)

Essentially, the law requires that colleges and universities make those reasonable adjustments necessary to eliminate discrimination on the basis of disability. For example, it may be necessary to remove classroom prohibitions against tape recorders or animals (in the case of dog guides) for students who are blind. Occasionally an assignment requirement may be substituted (for example, a research paper versus an oral presentation for a student who is hearing impaired). Classes enrolled students with mobility impairments may have to be rescheduled in accessible facilities. The college or university may need to provide special services such as registration, note-taking, or mobility assistance.

It is the student's responsibility to notify his or her professors of the need for such an accommodation. Disability Services provides students with letters to present to faculty members to verify that the student has a disability and needs accommodations. Individuals requiring special accommodation should contact the professor after class or during office hours.

### **Religious Holy Days**

The University of Texas at Dallas will excuse a student from class or other required activities for the travel to and observance of a religious holy day for a religion whose places of worship are exempt from property tax under Section 11.20, Tax Code, Texas Code Annotated.

The student is encouraged to notify the instructor or activity sponsor as soon as possible regarding the absence, preferably in advance of the assignment. The student, so excused, will be allowed to take the exam or complete the assignment within a reasonable time after the absence: a period equal to the length of the absence, up to a maximum of one week. A student who notifies the instructor and completes any missed exam or assignment may not be penalized for the absence. A student who fails to complete the exam or assignment within the prescribed period may receive a failing grade for that exam or assignment.

If a student or an instructor disagrees about the nature of the absence [i.e., for the purpose of observing a religious holy day] or if there is similar disagreement about whether the student has been given a reasonable time to complete any missed assignments or examinations, either the student or the instructor may request a ruling from the chief executive officer of the institution, or his or her designee. The chief executive officer or designee must take into account the legislative intent of TEC 51.911(b), and the student and instructor will abide by the decision of the chief executive officer or designee.

### **Off-Campus Instruction and Course Activities**

Off-campus, out-of-state, and foreign instruction and activities are subject to state law and University policies and procedures regarding travel and risk-related activities. Information regarding these rules and regulations may be found at the website address given below. Additional information is available from the office of the school dean.  
([http://www.utdallas.edu/BusinessAffairs/Travel\\_Risk\\_Activities.htm](http://www.utdallas.edu/BusinessAffairs/Travel_Risk_Activities.htm))

***These descriptions and timelines are subject to change at the discretion of the Professor.***

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