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course is intended to  
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understanding of the  
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is a concise primer on  
the Federal Income Tax  
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income exclusions and  
deductions, itemized  
restrictions, exemptions,  
the Pease limitations,  
the new tax on  
investment income,

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income tax.

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a brief history of the  
different changes in  
rates that have occurred  
since the 16th

Amendment was passed.

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History of Taxation

Early Periods First  
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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repealed after the war.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 in

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1913; 16 th amendment  
gives Congress right to  
tax income.  
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Unit 01. Introduction  
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federal tax system as it  
relates to individuals,

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proprietors. Key  
concepts covered  
include gross income  
and items that are  
statutorily included or  
excluded in it, personal  
and business expenses  
that qualify as tax  
deductions, and the  
differing tax treatments  
for employees versus  
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preparation of Form  
1065 for an entity doing  
business as partnership

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the Internal Revenue  
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 ...

AA. Introduction to the  
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Issues of ...

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Canada Disadvantages

A major disadvantage to the individual is the loss of business and

investment losses

available to offset the

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

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this case). Incorporation  
results in a prepayment  
of taxes on income for  
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Taxation

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rules and their  
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planning techniques.  
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202 and junior standing

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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

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on income which is  
derived from sources  
within the United States  
and/or income that is  
effectively connected  
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