TAXATION OF PARTNERSHIPS
Georgetown University Law Center
Spring 2016

Class 1
January 19, 2014

Course Overview

Definition of a Partnership

Code §§ 761(a) - (c).

Reg. §§ 1.761-1(a) - (c); 301.7701-1(a); 301.7701-2(a), (c)(1)-(2)(i); 301.7701-3(a)-(b)(2).


Class 2
January 26, 2016

Basics of Partnership Formation

Code §§ 721(a) – (b); 722; 723; 724.

Reg. §§ 1.721-1(a)-(b); 1.722-1; 1.723-1.


Cunningham: Chapter 2.

Basic Partnership Operations
Code §§ 701; 702; 703; 706(a); 705; 752(a-b).

Cunningham: Chapter 3.


Rev. Rul. 68-79.

**Class 3**  
**February 2, 2016**

**Partnership Allocations**

Code § 704.

Reg. §§ 1.704-1(a), (b)(1)(i); 1.704-1(b)(2)(i), (b)(2)(ii)(a), (b)(2)(iv)(a)-(b); 1.704-1(b)(5)(Example 4).

Cunningham: Chapter 4-5 (through Example 4).

**Class 4**  
**February 9, 2016**

**Partnership Allocations (continued)**

Reg. §§ 1.704-1(b)(2)(iii) (except last paragraph), (b)(3)(i)-(ii).

Cunningham: Chapter 5 (Start after Example 4, continue through Example 6).

**Partnership Allocations, Nonrecourse Deductions**

Treas. Reg. §§ 1.704-2(b), (c), (d)(1), (e), (f)(1), (f)(6), (g)(1), (g)(2) (i)(1).

Cunningham: Chapter 6.


**No Class Scheduled--February 16, 2014**
Class 5
February 23, 2016

Contributions of Property: Section 704(c) Allocations

Code § 704(c)(1)(A), (C).

Reg. §§ 1.704-1(b)(4)(i); 1.704-3(a)(1)-(3)(ii), (7), (10), (b)(1)-(2), (c)(1)-(4)(Example1), d)(1)-(7)(Example 1).

Cunningham: Chapter 7

Class 6
March 1, 2016

Partnership Liabilities

Code § 752

Reg. §§ 1.752-1; 1.752-2(a)-(c)(1), (f)(Examples 1-3), (j), (k)(1); 1.752-3(a), (c)(Examples 1-2).

Cunningham: Chapter 8.

No Class Scheduled: March 8, 2016

Class 7
March 15

Review Class
No reading assignment

Class 8
March 22, 2016

Purchase and Sale of Partnership Interest

Code §§ 741, 742, 743, 751(a), (c) and (d), 754, 755, 708(b)(1)(B).
Reg. §§ 1.741-1(a)-(b); 1.743-1(a)-(f), (j)(1), 1.751-1(a); 1.755-1(a)-(b)(1)-(2); 1.704-1(b)(2)(iv)(l), 1.708-1(a) and (b).

Cunningham: Chapter 10 (Skim Allocation of Income in Year of Change)

Class 9
March 29, 2016

Distributions

Code §§ 731(a)-(c)(2); 732(a)-(d); 733; 734(a); 751(b).

Reg. §§ 1.731-1; 1.731-2(a); 1.732-1(a)-(c); 1.734-1; 1.755-1(c)(1)(i).

Cunningham: Chapter 11, Chapter 12 (through Example 1)

Class 10
April 5, 2016

Transactions Between a Partnership and Its Partners

Code §§ 707(a); 707(c); 706(a); 721; 83(a) and (h)

Reg. §§ 1.707-1(a), (c), including Examples 1 through 4.

Cunningham: Chapter 9

Disguised Sales

Code §§ 707(a), (b); 704(c)(1)(B); 737.

Reg. §§ 1.707-3(a)-(c)(Examples 1 and 3), 1.707-4(a)1-4 (Example 1), (b)(1); 1.707-5(a)(1)-(3), (6), (7), (f)(Example 1).

Cunningham: Chapter 15

Class 11
April 12, 2016

Disguised Sales (continued)

Recognition of Contributed Gain and Loss
Class 12  
April 19, 2016

Partnership Reorganizations.

Reg. §§ 1.708-1(a)-(c).


McCauslen v. Commissioner, 45 TC 588 (1966)

Review Session  
April 26, 2016

No reading assignment