

FEDERAL INCOME TAX

GROSS INCOME

DEFINITION

- Income = market value of rights received in consumption + change in value of share of property rights between start and end of specific period (step-toward)
- See law states that gross income = Code s. 62-deductions = adjusted gross income - personal exemptions and standard (or itemized) deductions = taxable income x tax rate = gross tax liability - credits = net tax liability
- Gross income requires receipt of economic benefit
- Includes largely gained money or property and payment for damages
- Excludes borrowing money or property and recedes on purchase price

CONSIDERATION FOR SERVICES

- Amounts paid in cash, fees, commissions, wages fringe benefits, property value, and other economic benefits received for services that have been or will be performed (Code s. 612)
- Payments in kind are non-cash payments (Reg. ss. 1.661-1, 62)
- Gainless purchase = value of property - price paid
- Economic benefit without receipt of cash or property, less paid interest (Code s. 7872)

EXCLUDED FRINGE BENEFITS

- Services provided to employees at no extra cost, available for sale to customers
- Employee discounts on qualified property or services
- Fringe benefits based on working conditions
- De minimis benefits (i.e., too small to be accountable)
- Qualified transportation and parking benefits
- Qualified moving expense reimbursements
- On premises athletic facilities (Code s. 112)

SALES FROM PROPERTY BUSINESS

- Determined by amount realized from disposition of property and adjusted basis of property (Code s. 1001)
- Property gain is excess of amount realized over adjusted basis of property
- Amount realized is consideration received for property, includes sale of any money plus fair market value of any property received in transaction
- Reduced by commissions and other expenses connected with disposition of property
- Full amount of realized gain or loss must be recognized unless excluded by provision
- Basis of property item is amount invested (tax-related) in property
- Cost basis includes cash paid, deferred payments, exchanges, and tax cost (Code s. 1012)
- Basis of property acquired from decedent is fair market value at time of decedent's death
- Gift has no effect on gross income or realized gain; various exceptions
- Adjustments to basis occur through increase in amount of capital gains tax paid and decrease in amount of deductions which (Code s. 1016)
- Like transactions require apportionment of basis between component parts of property
- Modified basis rule requires basis to remain equal (with adjustments) when passing through other hands

INCLUDED BY STATUTE

- Prizes and awards (Code s. 740); excludes qualified scholarships, certain awards given in recognition of religious, civil, artistic, scientific, literary, educational or other charitable achievement which are transferred to a charity or governmental unit, and employee achievement awards within limits (Code s. 112)
- Alimony and separate maintenance payments (Code ss. 71, 215)
- Reimbursed moving expenses not expressly excluded from gross income (Code s. 62)
- Appreciated property transferred to a political organization (Code s. 560)
- Unemployment compensation (Code s. 602)
- Part of social security benefits, where modified adjusted gross income = one-half of benefits, exceeds taxpayer's base amount (Code s. 86)
- Annuities received under annuity, endowment or life insurance contract (Code s. 72)
- Amounts received for minor's services (Code s. 73)



EXCLUDED BY COURT

- Death benefits: Includes life insurance proceeds paid upon death and portion of amounts paid by employer to decedent's estate (Code s. 101)
- Amounts received as gifts or by bequest, devise or inheritance (Code s. 102); includes income earned from gift or inheritance and employer's gifts
- Interest earned on state and local bonds (Code s. 103); excludes unqualified private activity bonds, arbitrage bonds, and unregistered bonds
- Compensation and damages received for personal injuries or sickness (Code s. 104); includes payments of, and recovery under, employer-provided plans
- Compensation received by U.S. armed forces while involved in combat (Code s. 112)
- Income from discharge of indebtedness (Code s. 611); excludes insolvency (Code s. 114)
- Qualified scholarships for a degree at an educational institution, qualified tuition reduction, limited amounts received from educational assistance programs, and income from U.S. savings bonds
- Value of meals and lodging (provided) to employee for employer's convenience on the premises (Code s. 119)
- Value of improvements to a property left by lessee
- Amounts received under insurance contracts for some living expenses when primary residence is rendered unusable by casualty (Code s. 127)
- Certain foster care payments (Code s. 130)



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Curtis Hillyer



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