USF School of Law
Fall 2019 – First Assignment

Course:
Corporate Taxation

Professor:
Joshua Rosenberg

Course Materials:
Schwarz, Lathrope / FUNDAMENTALS OF CORPORATE TAXATION, CASES AND MATERIALS / Foundation, 2016, 9th ed

First Assignment:
Introduction
   Reading: Skim 3-14; Read “The Common Law of Corporate Taxation,” 14 (bottom)-18 (top); Skim 18-24 (first two full paragraphs only), 32-38 (first full paragraph).

Unit 1: Formation
   A. The Shareholders
      Reading: 55-57 (through last full paragraph)
      Problems: p. 59 PROBLEM (a)
      Tape 1 Introduction to 351
      https://media.usfca.edu/Watch/Kd42NmCj
      Tape 2 Shareholders’ basis and holding period
      https://media.usfca.edu/Watch/n8C7MxNp
      Tape 3 problem p. 60 for shareholders
      https://media.usfca.edu/Watch/Ro3g6CXk
   A. The Corporation
      Reading: 57 (bottom)-59
      Problems: p. 59 PROBLEM (b)-(d)
      Tape 4 Gain Recognized and basis for corporation
      https://media.usfca.edu/Watch/Hj83Don5
      Tape 5 Other tax attributes of contributed property—Holding period, recapture and depreciation
      https://media.usfca.edu/Watch/Br79XcTs
   B. Requirements for 351
      (1) Control
         Reading: 60-66
         Problem: p. 66 PROBLEM (a), (b), (d)
         Tape 6 Requirements for 351
         https://media.usfca.edu/Watch/Bi5e3E4R