

TAX EXEMPT ORGANIZATIONS

Professor Hoyt
Fall Semester, 2009
Wednesday, 8:15 A.M. to 9:50 A.M.

TEXTS

1. Hill and Mancino, *Tax Exempt Organizations*
2. Internal Revenue Code & Regs- will be distributed in class
3. Cases & rulings at Prof Hoyt's UMKC web page; download

<u>WEEK</u>	<u>SUBJECT</u>	<u>ASSIGNMENT</u>
8/26	<u>Intro to Tax Exempt Orgs</u> History; Policy Survey of Exempt Orgs	C: 501(a)-(c); 501(i); 527; 528 Reg: 1.501(c)-(4) through 1.501(c)-(7) H: 1-2 to 5; 13-2 to 8; 14-3 to 18; 15-9 to 13; 16-2 to 10 and 16-19>22 Cas: <u>National Muffler; Spanish-Am Assn</u> RR: 83-164
9/02	<u>State Law Issues</u> Mo Stat:	H: 2-17 to 21; 10-29 to 33 355.025-26, 36, 76, 96->236, 316->501 Cas: RS Mo 537.117; PLR 200134025 Pr: State law 1->5
9/09	<u>Intro to Charit Orgs</u> Organized/Operated Test Politics / Lobbying	C: 501(c)(3)+(4) Reg: 1.501(c)(3)-1; 1.501(c)(4)-1 H: 2-2 to 2-17; skim 7-2 to 7-13 C: 501(h); 504; 4911; 4912; 4955; 527 H: 6-3&4; 6-13->25; 5-3->25; 13-1->11; 18-49->55
9/16	<u>Charitable Purposes</u> Case Studies: The Arts Merchandising Cost Sharing Education Scholarships	H: 3-4 to 12; 3-19 to 36; 3-48 to 56 RR: 64-175; Cas: <u>Plumstead</u> ; RR: 73-127, 73-128, 71-581 C: 501(e) & (f); RR: 71-529 Cas: <u>IRS' Response to "Big Mama Rag"</u> Cas: Rev. Proc. 76-47
9/23	<u>Private Inurement /</u> <u>Private Benefit /</u> Excess Benefit Hospitals	C: 4958 H: 4-3 to 11; 4-21 to 56; 4-63&64 Cas: <u>Westward Ho; Colorado Chiro</u> RR: 69-545, 83-157 Otr: skim "conflict policy"; "presumption"
9/30	<u>Organization</u> Application for Tax Exemption; Annual IRS Returns; Processing Contributions	C: 508; 170(f)(8); skim reg 1.170A-13 H: 32-2 to 15; 33-3 to 6; 33-29 to 32 review again 2-2 to 17 Otr: "Subway Map" skim IRS Forms 1023; 990; 8283 & 8282

<u>WEEK</u>	<u>SUBJECT</u>	<u>ASSIGNMENT</u>
10/07	<u>Public Charity versus Private Foundation</u> Types of Public Charities Public Support Test	C: 509(a); 170(b)(1)(A) H: 8-4 to 7; 8-13 to 60; skim 61 to 75 Cas: Public support test computations Form: Form 8724
10/14	<u>Supp Orgs; Intro PFs</u> Disqualified persons <u>Private Foundations</u> Excise Taxes; Terminations	C: 509(a)(3); 4946; skim 4940 Cas: <u>Quarrie</u> H: gen'l: 9-2 to 9-13 Self deal: 10-3 to 15; 10-41 to 53 Min Distr: 11-3 to 7; 19 to 33; 41 to 43; 56 & 57 C: 4940-4947, 4961-4963; 507 Otr: "Subway Map For PFs"
10/21	<u>Choice of Grant-Making</u> <u>Entity PF, Donor Adv Fund</u> or a Supporting Org <u>Special Rules for Non-Charitable Orgs</u> Social clubs; polit; homeowners; tuition	H: 31-1 to 9; 2-7 & 8 Cas: ABA outline "choice of entity" H: clubs: 16-2 to 22; 16-32; skim 24-2 to 19 polit: 18-3 to 12; 18 to 23; 49 homeowners: 19-22 to 24; 27 to 31 C: 501(C)(7), 527, 528 and 529
10/28	<u>Unrelated Business</u> <u>Income Tax</u> Policy, History; Advertising; Partnership & LLC interests; Subch S corp stock	H: CH 21: 2 to 4; 10 to 19 CH 22: 3 to 8; 18 to 44; 76; 84 to 89; 95 to 100 CH 23: 2 to 4; 23 & 24; 33 to 38 CH 25: 2 to 4; 20 to 23 C: 501(b); 511-513; 1361(c)(7); 512(c) & (e) Reg: 1.513-1 RR: 76-94 Otr: Sch. K-1 for 1065 & 1120S Cas: Tax Planning for S Corp
11/04	<u>Debt-Financed UBIT</u>	H: 26-2 to 23; 26-47 C: 514 Cas: <u>Elliot Knitwear Profit Sharing</u> Reg: Skim 1.514(b)-1
11/11	<u>Joint Ventures with For-Profits</u> For-Profit Subsidiaries; Partnerships & LLCs	H: 27-2 to 12; 39 to 42 29-2 to 9; 32 to 40; skim 9 to 32 C: 502; Reg. 1.337-4 and 2 Cas: Rev Rul. 98-15; <u>St. David's Health</u> Rev. Rul. 2004-51
11/18	<u>Terminations</u>	H: 33-3; skim 30-2 to 12 Mo Stat: 355.616 to 721
11/25	THANKSGIVING HOLIDAY	
12/02	<u>Review</u>	

FINAL EXAMINATION: OPEN BOOK; OPEN NOTE. **BRING A #2 LEAD PENCIL!!**
MONDAY - DECEMBER 7, 2009 9:00 am to 11:30 am

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