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SKU: 9780808054078-TEST-BANK

Chapter 2
Tax Research, Practice, and Procedure

TRUE-FALSE QUESTIONS—CHAPTER 2

1. Committee reports of the House Ways and Means Committee, the Senate Finance Committee, and the conference committees are published by the Government Printing Office and are also reprinted in the Internal Revenue Bulletin and Cumulative Bulletin.

2. Title 26 of the United States Code contains the statutes that authorize the Treasury Department, specifically, the Internal Revenue Service, to collect taxes for the federal government.

3. Section numbers run consecutively through the entire Code, but with occasional breaks in their sequence.

4. All Revenue Rulings are published in the Internal Revenue Bulletin.

5. If the IRS revokes or modifies a published ruling, open tax years can be retroactively affected for all taxpayers.

6. Since regulations, revenue rulings, and acquiesced Tax Court decisions all lack judicial authority, an IRS agent would more easily be persuaded by reference to District Court and Circuit Court decisions.

7. Information Releases (IRs) usually are not published in the Internal Revenue Bulletin, but are distributed via a practitioners' mailing list.

8. Private letter rulings by the Internal Revenue Service are only made available by an official court order.

9. A thorough legislative history and background of a Section of the Internal Revenue Code is generally found in the Wolters Kluwer and Thomson Reuters tax services.

10. The Internal Revenue Code of 1986 is arranged as follows: Chapter, Subtitle, Subchapter, Part, Section, Subpart, Subsection.

11. The IRS must follow the precedents set by decisions of the U.S. Court of Federal Claims.

12. In a Court of Appeals dispute between the 5th and 8th Circuits, the U.S. Tax Court operating within the 5th Circuit will usually refer the case to the U.S. Supreme Court.

13. Current tax law dates back only to post-1986 Internal Revenue Code developments.

14. The Citator Service outlines the history of a court case, from inception, through appeals and tells which later cases or rulings have cited it.

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15. The Wolters Kluwer "Citator," outlines current amendments to the Code.

16. The Mertens tax service is a tax service that is sometimes cited by the courts.

17. "Closed Fact" tax research relates to the various procedures involved in "before-the-facts planning" situations.

18. Tax Court decisions that involve issues not previously decided by the Court are released as Memorandum decisions.

19. The IRS might issue an Acquiescence or a Nonacquiescence to a Regular Tax Court decision, but not to a Memorandum decision.

20. Tax "evasion" and "avoidance" are almost identical concepts, both relating to the willful failure to comply with tax laws.

21. A practitioner who is an income tax return preparer and who files a power of attorney with the Internal Revenue Service may receive and endorse a taxpayer's refund check.

22. A corporation may be represented by one of its bona fide officers before the Internal Revenue Service.

23. An individual who is a regular full-time employee of a partnership may represent the partnership before the Internal Revenue Service.

24. An accountant discovers an error on a client's returns. The accountant must advise the client and the Internal Revenue Service of the error.

25. A claim for refund (Form 1040X, Amended U.S. Individual Income Tax Return) must be filed within three years from the date the return was due or filed, or within two years from the date the tax was paid, whichever is later.

26. A notice of deficiency received by a taxpayer from the Internal Revenue Service means that a proposed tax liability has been automatically assessed and the taxpayer can no longer take his or her case to the Tax Court.

27. Determination letters regarding the written qualifications of an individually designed retirement plan are issued by the Internal Revenue Service's National Office in Washington.

28. The taxpayer or the Government may appeal decisions of a District Court to the Court of Appeals.

29. Decisions of the Court of Federal Claims are appealed to the U.S. Supreme Court.

30. The U.S. Tax Court is an independent judicial body that has no connection with the Internal Revenue Service.

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31. An unenrolled individual may represent his or her regular full-time employer before the Internal Revenue Service.

32. An examination of Farley Field's 2020 income tax return resulted in an unagreed deficiency of $20,000, and he has requested that his case be heard by the Tax Court under the Small Tax Case procedures. If his case is handled using these procedures, he cannot appeal the decision.

33. The Tax Court hears cases only if the tax has been assessed or paid.

34. Doris Duncan received a statutory notice of deficiency at her residence in Ohio. If she wishes to appeal the deficiency to the Tax Court, she may file a petition at any time within 120 days of the issuance of the notice.

35. The U.S. Supreme Court is not obligated to hear all tax cases that are appealed to it.

36. The Commissioner of Internal Revenue may appeal an adverse decision of the Tax Court.

37. The Tax Court is less likely to be lenient in its enforcement of the rules of evidence than the District Court or the Court of Federal Claims.

38. A jury trial is allowed in the Tax Court.

39. Payment of tax is not necessary to litigate in the District Court.

40. Taxpayers may request a determination letter from the National Office of the IRS.

41. Arnold Ames, a partner in an accounting firm, discovers that one of his clients omitted a substantial amount of gross income. Arnold should immediately notify his partners and the IRS.

42. A claim for refund must be filed within three years from the date the return was filed or within three years from the date the tax was paid, whichever date is later.

43. If the taxpayer disagrees with an examiner's findings, the taxpayer must first make an appeal to the IRS before going to the courts.

44. Barry Broom's tax return was examined by a tax auditor who determined additional tax due of $2,400. Barry does not agree with the proposed change and requests a conference with the Appeals Office. Barry is required to submit a written protest with his request to the Appeals Office.

45. Secondary sources of authority such as tax services, citators, and legal periodicals are references that explain and comment on primary sources of authority.

46. Regulations often define terms, clarify language used in the Code, and explain how the President believes the tax laws should be interpreted.

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47. The American Institute of Certified Public Accountants (AICPA) has adopted Statements on Standards for Tax Service that are enforceable against all tax practitioners.

48. The Internal Revenue Code of 1939 replaced the piecemeal annual revenue acts.

49. Revenue legislation begins in the Senate.

50. The internal revenue laws were revised by the Tax Reform Act of 1986 and renamed the Internal Revenue Code of 1986.

51. Upon examination of a tax return, the IRS has the authority to impose additional taxes and penalties.

52. Decisions of the U.S. Courts of Appeals and some decisions of other federal courts may be reviewed by the United States Supreme Court. The Supreme Court is obligated to hear all federal tax cases that it has been requested to review.

53. Regulations may be legislative, interpretative, and procedural, and are afforded different weight by the courts.

54. Revenue rulings are issued on the basis of Code sections and may be subsequently changed (modified) or revoked to reflect subsequent law or regulation changes and court decisions.

55. The purpose of revenue rulings is to promote uniform application of the tax law to an entire set of facts. Therefore, IRS employees must follow the rulings, while taxpayers may appeal adverse return examination decisions based on these rulings.

56. The U.S. Tax Court is a court of national jurisdiction.

57. Both the taxpayer and the government may appeal decisions of the U.S. Tax Court or U.S. District Court to the U.S. Court of Appeals.

58. Practice before the IRS is available only for "enrolled agents."

59. The Tax Code provides criminal penalties for tax professionals that include prison time.

60. The Internal Revenue Code and IRS revenue rulings are types of primary sources of tax authority.

61. Research products prepared by publishing companies can be relied on as primary tax authorities.

62. A return preparer who fails to sign a tax return is subject to civil penalties as contained in the Internal Revenue Code.

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63. When an individual taxpayer wishes to file a claim for refund of federal income tax, he or she should file an appeal with the appropriate IRS Appeals Office.

64. In order for a case to be handled in the U.S. Tax Court under the "small tax case procedures," the amount involved must be $25,000 or less for any one tax year.

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MULTIPLE CHOICE QUESTIONS—CHAPTER 2

65. Which of the following arrangements of an Internal Revenue Code citation is customary?

    a. Section 21(A) II(1)(a)iii

    b. Section 81(A)(iv), 2(b)c

    c. Section 243(a)(3)(C)(ii)

    d. Section 482(B)(4)(d)-i

    e. Section 501(IV)(a)5(B)(iii)

66. Determine the correct explanation for the following Wolters Kluwer citation—72-1 USTC P9725 (CA-2 1972).

    a. CCH, U.S. Tax Court, ¶9725, 2nd District of California, 1972, page 1.

    b. CCH, *U.S. Tax Cases*, U.S. Court of Appeals, Second Circuit, 1972, Vol. 1, ¶9725.

    c. CCH, *U.S. Tax Cases*, 2nd Circuit of California, 1972, Vol. 1, ¶9725.

    d. CCH, *U.S. Tax Court*, U.S. Second Court of Appeals, 1972, California, Vol. 2, ¶9725.

67. Determine the correct Wolters Kluwer citation for the following—U.S. District Court of Florida, 1969, Volume 2, ¶9354, CCH *U.S. Tax Cases*.

    a. USTC 69-2, U.S. Dist. Fla., P9354

    b. 69-2 USTC ¶9354 (DC Fla., 1969)

    c. 69-2 USTC, Fla., ¶9354

    d. USDC-FLA (1969), USTC 69-2, ¶9354, CCH

68. The major portion of the Wolters Kluwer *Standard Federal Tax Reports*, in Volumes 1 through 18, consists of the various "Compilations." The purpose of the compilations is:

    a. To offer tax planning ideas related to each income tax topic, and to direct the user to appropriate research articles in selected periodicals.

    b. To provide the reader with in-depth discussions of general concepts of law without reflecting details of the various Code sections or regulations.

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c. To outline related current developments, cross-referenced to each Code section, and to provide in-depth coverage of the legislative history of each Code section.

d. To reflect the text of each Code section, followed by Regulations, Committee Reports, Explanations, and editorial opinion.

69. Which of the following statements is true?

a. Technical Information Releases and Announcements are published in the *Internal Revenue Bulletin*, and were always included in the *Cumulative Bulletin*.

b. The IRS issues "Determination Letters" and publishes summaries of these letters in the *Internal Revenue Bulletin*; they are rarely reprinted in the *Cumulative Bulletin*.

c. The editorial opinion included in the leading looseleaf tax services is an excellent substitute for authoritative sources of law since it is more direct and easier to understand.

d. LEXIS/NEXIS is one of the leading computerized legal data bank services which affords the researcher-user access to the full texts of primary source materials.

70. The authority of the U.S. government to raise revenue through a federal income tax is derived from:

a. The Internal Revenue Service

b. *Eisner v. Macomber* (a Supreme Court case)

c. The 16th Amendment to the Constitution

d. The House Ways and Means Committee

71. Which of the following statements regarding Revenue Rulings is correct?

a. Revenue Rulings present judicial interpretations of tax law.

b. Revenue Rulings present administrative interpretations of tax law.

c. Revenue Rulings have the same authoritative weight as Treasury Regulations.

d. The legal citation for a Revenue Ruling refers to the associated Internal Revenue Code section.

72. Which of the following statements regarding Treasury Regulations is false?

a. In dealing with the IRS, Treasury Regulations have the authority of law.

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b. Courts are bound to follow Treasury Regulations when they are in conflict with the law.

c. The legal citation for a Treasury Regulation refers to the associated Internal Revenue Code section.

d. Regulations are published in the *Federal Register*.

73. Which of the following sources of tax law are cross-referenced to related Internal Revenue Code sections through the use of a similar numbering system?

a. Revenue Rulings

b. Tax Court cases

c. Treasury Regulations

d. Determination Letters

74. Upon completion of an audit, which procedural form does the IRS agent give to the taxpayer?

a. Form 870, Waiver of Restrictions

b. 30-day letter

c. 90-day letter

d. Revenue Agent's Report

75. When dealing with the Tax Court, which of the following pronouncements has the highest authority?

a. Revenue Procedures

b. Treasury Regulations

c. Revenue Rulings

d. Technical Information Releases

76. Which of the following are not published either by the government or by any of the private publishing services?

a. Private Letter Rulings

b. Tax Court Memorandum Decisions

c. Revenue Procedures

d. Determination Letters

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77. Which level of the IRS handles the majority of tax audits?

    a. The National Office

    b. The Chief Counsel

    c. The Regional Service Centers

    d. The District Offices

78. Which of the following options is not available to a taxpayer after receipt of a 30-day letter from the IRS?

    a. Sign the Form 879 and await assessment of the deficiency.

    b. File a protest and obtain a conference at the Appellate Division of the IRS.

    c. Either request or await a 90-day letter.

    d. Request a rehearing by a new IRS agent.

79. Which of the following types of tax matters are typically handled by a Correspondence Examination?

    a. Audits involving complex corporate reorganizations

    b. Simple matters that can usually be resolved by mail

    c. Tax shelter examinations

    d. TCMP audits

80. The term "Practice before the IRS" refers to:

    a. Tax planning for nonprofit organizations

    b. Macro-economic tax projections

    c. Representing a client before the IRS

    d. Tax planning for timber and forest investments

81. The term "tax doctrine" refers to a:

    a. Legal concept that is found in Treasury Regulations

    b. Statutory provision of the tax law

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c. Judicial interpretation with strong precedential value

d. Tax treaty with a foreign country

82. Which of the following is published in the Internal Revenue Bulletin or the Cumulative Bulletin?

a. Treasury Regulations

b. Revenue Rulings

c. Internal Revenue Code amendments

d. Tax Court cases

83. The "Compilations" which comprise the major portion of Volumes 1 through 18 of the Wolters Kluwer Standard Federal Tax Reporter:

a. Are not arranged in Code section order

b. Do not include related Treasury Regulations

c. Do not contain any Wolters Kluwer editorial opinion

d. Do not contain the full text of Revenue Rulings

84. Which of the following is not true regarding the Wolters Kluwer Citator:

a. Includes Tax Court cases

b. Includes Private Letter Rulings

c. Contains cross-references to the Compilation volumes

d. Outlines the history of most Revenue Rulings

e. All of these are true

85. Which of the following is not permitted to "practice before the IRS"?

a. Attorney

b. CPA

c. Bookkeeping service

d. Enrolled agent

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86. Which of the following is not a "mathematical error" as defined in Code Section 6213?

    a. An error in addition, subtraction, multiplication, or division shown on any return

    b. An incorrect use of any IRS table if such incorrect use is apparent from other information on the return

    c. An omission of income which should be included on the return

    d. Inconsistent entries on the return

87. Jury trial is available in the:

    a. Tax Court

    b. "Small Tax Cases" procedures of the Tax Court

    c. Court of Federal Claims

    d. District Court

88. Which of the following litigation is not under the Tax Court's jurisdiction?

    a. Income tax

    b. Estate tax

    c. Excess profits tax

    d. Employment tax

89. If the fraud penalty is assessed, which one of the following may be assessed with respect to the same underpayment?

    a. Negligence penalty

    b. Failure to file penalty

    c. Failure to pay penalty

    d. Underpayments of estimated tax penalty

90. If any part of any understatement of liability as to a return or claim for refund is due to a willful attempt to understate the liability, the preparer could be subject to a "per return" penalty of:

    a. $250

    b. $1,000

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c. $5,000

d. $10,000

91. Any preparer who endorses or otherwise negotiates a refund check issued to a taxpayer for a return or claim for refund prepared by the preparer is subject, with respect to each such check, to a penalty of:

a. $25

b. $50

c. $100

d. $500 (as adjusted for inflation)

92. Interest is paid by the IRS on overpayment of tax if any overpayment of tax is not refunded within which of the following number of days after the due date of the return (or filing date, if later):

a. 10 days

b. 30 days

c. 45 days

d. 60 days

93. What is the applicable length of time for the statute of limitations on assessment of taxes if the taxpayer willfully evades taxes?

a. No limitation

b. 18 months

c. 3 years

d. 6 years

94. Which of the following helps solve taxpayer problems of dealing with the IRS?

a. Chief Financial Officer

b. Chief Compliance Officer

c. Chief Information Officer

d. National Taxpayer Advocate

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95. If a taxpayer under review disagrees with the revenue agent, he or she may:

    a. Request a conference in the IRS Appeals Office.

    b. File a petition in the Tax Court within the 90-day period after receiving the statutory notice of deficiency.

    c. Wait for the 90-day period to expire, pay the assessment, and start a refund suit in the District Court or the Claims Court.

    d. All of these.

96. Which of the following may not occur during the Appeals conference?

    a. The taxpayer may represent himself or herself.

    b. The Appeals Officer may request that the taxpayer submit additional information which could involve additional conferences.

    c. New issues may be raised by the Appeals Officer regardless of the reasons for raising them.

    d. The Appeals Office may resolve controversies between the taxpayer and the IRS by considering the "hazards of litigation."

97. All of the following statements relating to Form 870-AD are true, except:

    a. By signing Form 870-AD, the taxpayer waives restrictions on the assessment and collection of any deficiency.

    b. Form 870-AD stops the running of interest when filed.

    c. Form 870-AD is merely the taxpayer's offer to waive restrictions and interest will run until 30 days after the IRS has accepted the offer.

    d. The taxpayer is not required to sign Form 870-AD if the taxpayer does not agree with the decision at the Appeals level.

98. All of the following statements regarding determination letters are true, except:

    a. A determination letter is generally issued in the same circumstances as a private ruling.

    b. Determination letters are issued by the National Office of the IRS.

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c. Most determination letters are issued in matters involving pension plans and exempt organizations.

d. A determination letter is issued in response to a written inquiry of the taxpayer which applies the principles and precedents announced by the National Office to a specific set of facts.

99. There is no limitation on the period for assessment:

a. If the taxpayer omits from gross income an amount which is in excess of 25 percent of the amount of gross income stated on the return.

b. In the case of a deficiency attributable to the application of a carryback (capital loss, net operating loss, or investment credit carryback).

c. If the taxpayer files a false return.

d. If a personal holding company fails to file with its return a schedule regarding its status as a personal holding company.

e. In all of these cases.

100. Leo Lambert, a calendar-year taxpayer, filed his 2019 individual income tax return on March 15, 2020, and attached a check for the balance of tax due as shown on the return. On June 15, 2020, Leo discovered that he had failed to include, in his itemized deductions, $1,000 interest on his home mortgage. In order for Leo to recover the tax that he would have saved by utilizing the $1,000 deduction, he must file an amended return no later than:

a. December 31, 2022

b. March 15, 2023

c. April 15, 2023

d. June 15, 2023

101. In response to a preliminary (30-day) letter, a written protest discussing the facts and legal arguments must accompany a written request for an Appeals Conference in which of the following cases?

a. A proposed $2,000 tax increase

b. The tax return examination was made in an IRS office by a tax auditor

c. The tax return examination was made by correspondence

d. A proposed disallowance of a $3,000 refund claim

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102. Barbara Bigsby filed her 2018 Form 1040 on April 15, 2019 but did not pay her tax liability of $3,000. On June 15, 2020, she paid the tax in full. In 2021, Barbara discovered additional deductions for 2018 that will result in a refund of $1,000. To receive her refund, Barbara must file an amended income tax return by:

    a. April 15, 2023

    b. June 15, 2023

    c. April 15, 2022

    d. June 15, 2022

103. Brian Bogart wishes to appeal the findings of the United States Court of Federal Claims concerning his tax liability. Brian must appeal to:

    a. United States Court of Appeals for Brian's circuit

    b. United States Board of Tax Appeals

    c. United States District Court

    d. United States Court of Appeals for the Federal Circuit

104. The maximum amount of a deficiency that may be heard under the "Small Tax Cases" procedures of the U.S. Tax Court is:

    a. $5,000

    b. $10,000

    c. $20,000

    d. $25,000

    e. $50,000

105. What are the two Congressional Committees that have primary responsibility for the drafting of tax bills?

    a. Senate Ways and Means and the House Finance Committees.

    b. House Ways and Means and the Senate Finance Committees.

    c. House Tax and the Senate Tax Committees.

    d. House Revenue and the Senate Revenue Committees.

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106. Which of the following is an example of a primary source of law?

a. Citators.

b. Periodicals.

c. Commercial tax services.

d. None of these.

107. Which of the following is most likely to help explain the intent of Congress when it enacts tax legislation?

a. Committee Reports.

b. Internal Revenue Code.

c. Income Tax Regulations.

d. IRS Letter Rulings.

108. In addition to regulations, the IRS issues which one of the following that interpret and apply the tax laws to a specific set of facts?

a. Case law annotations.

b. Rulings and pronouncements.

c. Executive summaries and outlines.

d. Public Laws.

109. Which of the following statements is not true with respect to IRS/taxpayer litigation?

a. If the IRS "acquiesces" it accepts the court's conclusion and follows it in disputes involving other taxpayers with similar situations.

b. If the IRS issues a "nonacquiescence," it accepts the court's conclusion but does not intend to follow the decision in disputes involving other taxpayers with similar situations.

c. After the IRS issues an acquiescence or nonacquiescence to a decision issued by the Tax Court, the case citation is followed by an (Acq.) or (Nonacq.).

d. If the IRS issues a "nonacquiescence" it does not accept the court's reasoning and does not intend to follow the decision in disputes involving other taxpayers with similar situations.

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110. Which of the following statements is not true with respect to tax litigation?

a. Of the three types of opinions issued by the Tax Court, a memorandum opinion (in theory not always in practice) applies well established principles of law to facts found by the court.

b. If a taxpayer elects the Tax Court's "small tax procedures" (available for disputes involving $50,000 or less), a summary opinion, which is not open to appeal is issued by the Tax Court.

c. District courts hear only disputes involving federal tax law.

d. Decisions by a U.S. district court may be appealed to the Court of Appeals having jurisdiction over the district court.

111. Which of the following is not true with respect to citators?

a. Published only by the IRS.

b. Help establish that case law or rulings referenced are valid and authoritative.

c. Helps determine whether a case or ruling has been modified or supplemented.

d. Helps determine whether other subsequent cases and ruling have mentioned the case in question.

112. Which one of the following could be found in the citation for a decision by a U.S. Court of Appeals?

a. F.3d.

b. Fed. Cl.

c. F.Supp 2d.

d. Dec.

113. Regulations can be in the form of:

a. temporary, proposed, or final Regulations.

b. court decisions.

c. public laws.

d. (a) or (b).

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114. The Tax Court may issue an opinion as a "Regular," as opposed to a "Memorandum" opinion, if

    a. The amount at issue exceeds $25,000 (for individuals, trusts and estates) or $100,000 (for all other taxpayers).

    b. The issue involves the Constitutional validity of any federal revenue-raising provision.

    c. The Tax Court considers the case to be expressive of a new point not previously covered by one of its published decisions.

    d. Both the taxpayer and the IRS petition for publication of the opinion as a "Regular" decision.

115. All of the following statements relating to Treasury regulations are true except:

    a. temporary regulations are issued to provide guidance for the public and IRS employees until final regulations are issued.

    b. the rules contained in temporary regulations can never be used as authority by taxpayers but, instead, are meant to aid in taxpayer compliance with IRS rules and regulations.

    c. final regulations supersede temporary regulations.

    d. proposed regulations are issued to solicit public written comments.

116. Which of the following is a primary source of tax authority:

    a. revenue ruling

    b. Tax Court case.

    c. temporary regulation.

    d. all of these.

117. John Jones filed his 2019 individual income tax return on March 30, 2020, and attached a check for the tax due as shown on the return. On January 15, 2021, John discovered that he understated his itemized deductions on his 2019 tax return. What is the last day on which he can file a claim for refund? (Assume that none of the dates below fall on a weekend or holiday.)

    a. March 30, 2022

    b. April 15, 2022

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c. March 30, 2023

d. April 15, 2023

118. Paul Parrot, who lives in Paris, Texas, receives a letter from the IRS stating that the result of a recent examination is a tax deficiency of $15,000. The examination was handled by a revenue agent at Paul's art studio, his only place of business. The letter also states that Paul has a right to file an appeal if he does not agree with the proposal. Generally, how many days does Paul have to file an appeal?

a. 15

b. 30

c. 60

d. 90

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SUPPLEMENTARY PROBLEMS—CHAPTER 2

119. Compare and contrast the following tax related terms: "statutory" tax provision v. tax "doctrine."

120. List and discuss the various "primary" or "authoritative" sources of tax reference materials.

121. In which government publications are proposed, temporary, and final Treasury Regulations reproduced?

122. Assume that the citation for a given Revenue Ruling is as follows: Rev. Rul. 82-45, 1982-1 CB 234. Explain what the various abbreviations and numbers mean.

123. Why is Mertens Law of Federal Taxation frequently quoted in judicial decisions?

124. What role does the Internal Revenue Service play in interpreting the tax law?

125. Are the various Statements on Responsibilities in Tax Practice advisory?

126. Judy Jensen files her return two months after the due date and pays the remaining $20,000 of tax owed by her. What are her delinquency penalties?

127. Due to negligence, Roy Rugby underpaid his taxes by $50,000. What is his total negligence penalty?

128. Stanley Strummer had the following items on his timely filed 2020 income tax return:

Gross receipts	$1,000,000
Cost of goods sold	($750,000)
Capital gain	$50,000
Capital loss	($75,000)

Stanley inadvertently omitted some income on his 2020 return. What is the statute of limitations if he omitted $300,000 income on the return? What if he omitted $250,000 income?

129. Nancy Norris gives a painting to a church and takes a charitable contribution in the amount of $150,000. If the actual value was only $50,000 and if the tax underpayment is $40,000, how much valuation overstatement penalty should she pay?

130. Answer the following questions concerning the statute of limitations for assessment of tax liability:

(a.) What is the general rule for the statute of limitations on assessment of tax liability?

(b.) What are the exceptions to the general rule?

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131. What are the accuracy-related penalties?

132. What factors should a taxpayer consider in deciding whether to litigate a case and where to litigate?

133. What are some reasonable causes for failure to file a tax return and/or to pay one's tax liability?

134. The Federal Tax Archives Library of Wolters Kluwer ACCESS contains information on tax laws from prior tax years. Describe why this information may be useful to a tax return preparer.

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ANSWERS TO TRUE-FALSE QUESTIONS—CHAPTER 2

1. True.

2. True. See especially Sections 1 and 11, both entitled "Tax Imposed," also Section 6301—Collection Authority; Section 7805—Rules and Regulations.

3. True. Occasionally, because the section numbers do run consecutively, a lettered section number, for example 44A, 50A, 50B, may have to be interspersed among existing sections.

4. True. However, sometimes delays will occur and a ruling with a later number may be published before one with an earlier number.

5. True. The IRS does have the power to retroactively revoke rulings for open years (see Code Sec. 7805(b)). Letter rulings, which directly affect only the taxpayers who requested them, are rarely revoked retroactively.

6. False. An agent must follow all IRS pronouncements, whereas the IRS (through its agents) will often dispute, or interpret in its own way, decisions of the courts.

7. False. IRs are sent to media, including tax publications. Frequently, the substance of an IR may find its way into an IRB.

8. False. Under the Freedom of Information Act and under the Tax Reform Act of 1976, the IRS is required to make public all private rulings and other written determinations issued to taxpayers concerning the tax treatment of specific transactions. However, names, addresses of taxpayers, etc. will be deleted.

9. False. Occasionally these services will carry an excerpt of legislative history. Legislative history may be found in reports of the Ways and Means Committee, the Senate Finance Committee or the Joint Conference Committee, all of which may be found in the Cumulative Bulletins. Discussions on the floor of Congress are reported in the *Federal Register*. Wolters Kluwer and Thomson Reuters will frequently publish special booklets with legislative reports. Extracts of reports for pre-1954 Codes may be found in *Seidman's Legislative History*.

10. False. The correct arrangement is: Subtitle, Chapter, Subchapter, Part, Subpart, Section, Subsection.

11. False.

12. False. The Tax Court operating within the 5th Circuit will usually follow the precedent of the 5th Circuit Court of Appeals.

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13. False. The current law of federal taxation is found in the 1986 Code, as amended by post-1986 tax acts. The Code was first enacted in 1939 and a revised Code was enacted in 1954. The 1986 Code incorporates the parts of the 1954 Code that continued to be applicable.

14. True. A citator does not look at any events preceding a case.

15. False. The "Citator" indicates which later cases or rulings have cited the relevant case.

16. True.

17. False. Closed fact research relates to "after-the-facts compliance" or ex post facto research.

18. False. Issues not previously decided by the Court are issued as Regular Tax Court decisions, whereas decisions that rest on federal determinations or on previously decided legal issues are known as Memorandum decisions.

19. False. The IRS might issue an Acquiescence or a Nonacquiescence to either type of decision.

20. False. Tax evasion relates to sham transactions, schemes, or willful failure to comply with tax laws. In contrast, "tax avoidance" relates to the legal tax planning ideas that may be employed to minimize taxes.

21. False. Endorsing a taxpayer's refund check is not allowed and there is a preparer penalty for doing so.

22. True.

23. True.

24. False. The accountant should advise the client but not the Internal Revenue Service.

25. True.

26. False. The taxpayer can still go to the Tax Court.

27. False. Determination letters are issued by the District Director.

28. True.

29. False. Decisions of the Court of Federal Claims are first appealed to the U.S. Court of Appeals for the Federal Circuit and then may be appealed to the U.S. Supreme Court.

30. True.

31. True.

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32. True.

33. False. A taxpayer does not have to pay the tax before petitioning the Tax Court.

34. False. Doris Duncan may file a petition at any time within 90 days of the issuance of the statutory notice of deficiency.

35. True.

36. True.

37. False. The Tax Court is more likely to be lenient in its enforcement of the rules of evidence.

38. False. A jury is not allowed in the Tax Court, only in the District Court, and then only on facts.

39. False. Payment of tax is necessary to litigate in the District Court or the Court of Federal Claims, but not in the Tax Court.

40. False. Taxpayers may request a determination letter from the District Director.

41. False. It is not the responsibility of an accountant to notify the IRS (see AICPA Statement No. 6).

42. False. The claim for refund must be filed within three years from the date the return was filed or within two years from the date the tax was paid, whichever is later.

43. False. See flowchart in Exhibit 8 in the textbook. Taxpayer may go to Tax Court.

44. False. The dollar amount is less than $2,500, so Barry is not required to submit a written protest with his request to the Appeals Office.

45. True. Secondary sources such as tax services, citators, and legal periodicals explain and comment on primary sources of authority.

46. False. Regulations are the Secretary of the Treasury's interpretations of the provisions in the Code, not the President's interpretations.

47. False. AICPA Statements on Standards for Tax Service are enforceable only against AICPA members.

48. True. The Internal Revenue Code of 1939 was the first codification of the previous annual revenue acts.

49. False. Revenue legislation begins in the House of Representatives, more specifically the House Ways and Means Committee.

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50. True. The internal revenue laws as revised by the Tax Reform Act of 1986 resulted in the naming of the Code as the Internal Revenue Code of 1986.

51. True.

52. False. The Supreme Court is not obligated to hear all federal tax cases that it has been requested to review. The Court frequently denies certiorari.

53. True. These are three types of regulations that have different weight.

54. True.

55. True. IRS employees follow the rulings, but taxpayers may appeal adverse return examination decisions based on these rulings.

56. True.

57. True.

58. False. Practice before the IRS is available for CPAs and attorneys also, as well as a few other groups.

59. True.

60. True. The Code and revenue rulings are primary sources of authority.

61. False. Research products of publishing companies are secondary sources of authority, not primary sources of authority.

62. True.

63. False. Taxpayers cannot go directly to the IRS Appeals Office.

64. False. The amount involved must be $50,000 or less.

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ANSWERS TO MULTIPLE CHOICE QUESTIONS—CHAPTER 2

65. c. This is the customary format, which does not correspond with traditional outline format described in various style manuals.

66. b. However, an acceptable variation could allow for the omission of 1972.

67. b. The court and date are sometimes omitted.

68. d. Additionally, the Compilations reflect the pertinent court cases, Revenue Rulings, and Revenue Procedures as annotations to the Code Sections and Regulations.

69. d. LEXIS/NEXIS accesses the full texts of primary source materials.

70. c. The 16th Amendment to the Constitution.

71. b. Revenue Rulings present administrative interpretations of tax law.

72. b. Courts are not bound to follow Treasury Regulations when they are in conflict with the law.

73. c. Treasury Regulations are cross-referenced to related Code sections. For example, a Treasury Regulation in support of Code Section 453 would be cited as Reg. Sec. 1.453. In contrast, the other sources of tax law have their own unique numbering system.

74. d. The IRS Form—Revenue Agent's Report is typically referred to as the "RAR."

75. b. The Treasury Department is authorized by the Internal Revenue Code to publish interpretations of the law. In contrast, the other pronouncements listed in this question are issued by the Internal Revenue Service. The IRS derives its authority from the Treasury Department. Thus, IRS pronouncements do not have the same legal authority as Treasury Regulations.

76. d. Determination Letters are issued by the Regional Offices of the IRS and are not published.

77. d. The District Offices are regarded as the IRS field offices and handle all office and field audits, other than correspondence audits.

78. d. It is impossible to start the audit procedure over once the 30-day letter has been issued.

79. b. Correspondence audits are conducted by mail and typically involve matching of various types of information returns with selected tax returns, looking for discrepancies in reported amounts.

80. c. The tax practitioner is often called upon to represent a client before the Audit and Appellate divisions of the IRS.

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81. c. "Tax Doctrine" refers to a judicial interpretation with strong precedential value. For example, the Doctrine of Constructive Receipt is not a statutory provision of tax law, but judicial support gives strength to this concept.

82. b. Revenue Rulings are published in the Internal Revenue Bulletin or the Cumulative Bulletin. In addition, it also includes Revenue Procedures.

83. d. Following each section of the Compilations (Vols. 1 through 18) are digests of associated judicial decisions and Revenue Rulings. Current Revenue Rulings are reproduced in full text in Vol. 19 of the Wolters Kluwer Tax Service.

84. e. The Wolters Kluwer Citator includes all BTA and Tax Court cases, as well as all tax related cases in the District Courts, Court of Federal Claims, Courts of Appeals and the U.S. Supreme Court. The Finding Lists section of the Wolters Kluwer Citator includes Private Letter Rulings reported by Wolters Kluwer in full text and outlines the history of most Revenue Rulings. The citator contains cross references to the compilation volumes.

85. c. Attorneys, CPAs, and enrolled agents specifically are permitted to represent clients or "practice before the IRS."

86. c. (a.), (b), and (d) are considered "mathematical errors" under Code Sec. 6213, but an omission of income is not.

87. d. A jury trial is available only in the District Court and then only on questions of facts.

88. d. Employment tax litigation is not under the Tax Court's jurisdiction.

89. d. If the fraud penalty is assessed, the penalty for underpayment of estimated tax penalty may be assessed, but not the penalties in (a), (b), or (c).

90. c. The preparer could be subject to a "per return" penalty of the greater of $5,000 or 75% of the fee received if any part of any understatement of liability as to a return or claim for refund is due to a willful attempt to understate the liability.

91. d. A preparer is subject to a penalty of $500 (as adjusted for inflation) if the preparer endorses or otherwise negotiates a refund check issued to a taxpayer for a return or claim for refund prepared by the preparer.

92. c. Interest is paid if any overpayment is not refunded within 45 days after the due date of the return (or filing date, if later).

93. a. There is no limitation on the statute of limitations if the taxpayer willfully evades taxes.

94. d. The National Taxpayer Advocate is in charge of the Problem Resolution Program.

95. d. If a taxpayer under review disagrees with the revenue agent, he or she may do any of the three options listed in (a), (b), or (c).

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96. c. New issues may be raised only if the grounds for such action are "substantial."

97. b. Form 870-AD does not stop the running of interest when filed.

98. b. Determination letters are issued by the District Director.

99. c. There is no limitation on the period for assessment if the taxpayer files a false return.

100. c. The amended return would have to be filed within three years of the due date of the return, or April 15, 2023.

101. d. An office examination and an examination conducted by correspondence are excluded as answers, i.e., they do not require a written protest to obtain appeals office consideration. The situation in which no written protest is required to obtain an appeals conference involves a field examination case in which the amount of the additional tax is $2,500 or less for a taxable period. Since the amount in part (a) is only $2,000, a protest is not required. Therefore, (d) is the correct answer.

102. d. Barbara's claim must be filed within three years from the time the original return was filed or two years from the time the tax was paid, whichever of these two periods has the later expiration. Therefore, the time is June 15, 2022.

103. d. The Court of Federal Claims decision must be appealed to the U.S. Court of Appeals for the Federal Circuit.

104. e. The maximum deficiency that can be handled by the "Small Tax Cases" procedures of the U.S. Tax Court is $50,000.

105. b. The two Congressional Committees that have primary responsibility for the drafting of tax bills are the Senate Finance Committee and the House Ways and Means Committee.

106. d. These are all secondary sources of authority.

107. a. Committee Reports are most likely to help explain the intent of Congress when it enacts tax legislation.

108. b. In addition to regulations, the IRS issues rulings and pronouncements that interpret and apply the tax laws to a specific set of facts.

109. d. If the IRS issues a "nonacquiescence," it does not accept the court's reasonsing and does not intend to follow the decision in disputes involving other taxpayers with similar situations.

110. c. District courts hear many types of federal law cases, not just those involving federal tax law.

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111. a. Some citators are published by commercial publishers, such as Wolters Kluwer, but not by the IRS.

112. a. F.3d indicates a Court of Appeals case. Fed. Cl. indicates a Court of Federal Claims case and F. Supp 2d indicates a District court case.

113. a. Regulations can be in the form of temporary, proposed, or final.

114. c. The Tax Court can choose to issue an opinion as a "Regular" opinion if it considers the case to be important or expressive of a new point not covered in its other published opinions.

115. b. It is false to state that the rules contained in temporary regulations can never be used as authority by taxpayers but are meant to aid in taxpayer compliance with IRS rules and regulations. The rules contained in temporary regulations can be used as authority.

116. d. All of the items listed are primary sources of authority.

117. d. April 15, 2023. The last day for filing for refund is 3 years after the due date of the return.

118. b. The taxpayer has 30 days to file an appeal.

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ANSWERS TO SUPPLEMENTARY PROBLEMS—CHAPTER 2

119. A statutory provision relates to the Internal Revenue Code whereas a tax doctrine is a well recognized principle that has evolved from judicial interpretation of the laws.

120. Statutory: The Code. Administrative: Treasury Regulations and Internal Revenue Service Rulings. Judicial: The various decisions of the trial and appellate courts.

121. The *Federal Register*.

122. The 45th Revenue Ruling of 1982, found on page 234 of the 1st Cumulative Bulletin of 1982.

123. Mertens is frequently quoted because it is a heavily annotated tax service, providing in-depth discussions of general concepts of tax law. However, Mertens is not generally used as a comprehensive, self-contained reference service.

124. The IRS issues Revenue Rulings, Revenue Procedures, and Technical Information Releases as administrative interpretations of the law. Additionally, the IRS issues Private Letter Rulings, Technical Advice Memoranda, and Determination Letters.

125. No. The Statements are enforceable. Tax practitioners should be familiar with the Statements since they indicate the viewpoint of the AICPA and some accounting firms use the Statements as policy in their firms.

126. Judy's total penalties (disregarding interest) are $2,000 consisting of a failure to pay penalty of $200 (.5% × 2 months × $20,000) and a failure to file penalty of $1,800 (5% × 2 months × $20,000) less (.5% × 2 months × $20,000).

127. Roy's penalty is $10,000 (20% × $50,000).

128. 25 percent of gross income of $1,050,000 ($1,000,000 + $50,000) is $262,500. If Stanley omitted $300,000 income which is greater than $262,500, the statute of limitation would be six years. If Stanley omitted $250,000 income which is less than $262,500, the statute of limitation would be three years.

129. The valuation claimed ($150,000) is 300 percent of the correct valuation ($50,000). The penalty is 40 percent of the underpayment of tax. Nancy's underpayment of tax is $40,000, which means the penalty is $16,000.

130. (a.) Assessment of any tax must be made within three years after the return was filed or after the due date for filing, whichever is later.

(b.) The exceptions to the general rule are as follows:

(1.) There is no limitation on the period for assessment in the following cases: (1) false return; (2) willful attempt to evade tax; and (3) no return.

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(2.) If the taxpayer omits from gross income an amount that is in excess of 25 percent of the amount of gross income stated on the return, the tax may be assessed at any time within six years after the return is filed or the due date for filing, whichever is later.

(3.) Where both the taxpayer and the IRS agree, the statute of limitations may be extended for a specific period.

(4.) Certain taxpayers may request a prompt assessment. The period of assessment may be shortened to 18 months in the case of a decedent, the estate of a decedent, or a corporation that is dissolved or contemplating dissolution.

(5.) If a personal holding company fails to file with its return a schedule regarding its status as a personal holding company, the tax may be assessed at any time within six years after the return is filed.

(6.) In the case of a deficiency attributable to the application of a carryback (capital loss, net operating loss, or credit), the statute of limitations runs from the year of the loss rather than the carryback year.

Sections 1311 through 1314 contain provisions to mitigate the effect of the statute of limitations where inequitable results might occur.

131. The accuracy-related penalties are as follows:

(1) Negligence

(2) Substantial understatement of income tax

(3) Substantial valuation misstatement

(4) Substantial overstatement of pension liabilities

(5) Substantial estate or gift tax valuation understatement

(6) Understatements resulting from listed and reportable transactions.

132. Factors to consider in deciding whether to litigate a case and where to litigate include:

(1) Jurisdiction

(2) Payment of tax

(3) Jury trial

(4) Rules of evidence

(5) Expertise of judges

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(6) Publicity

(7) Legal precedent

(8) Factual precedent

(9) Statute of limitations

(10) Discovery

133. The following are some reasonable causes for purposes of the delinquency penalties:

(1.) A return mailed in time but returned for insufficient postage.

(2.) A return filed within the legal period but in the wrong district.

(3.) Death or serious illness of the taxpayer or in the immediate family.

(4.) Unavoidable absence of the taxpayer.

(5.) Destruction of the taxpayer's business or business records by fire or other casualty.

(6.) Erroneous information given the taxpayer by an IRS official, or a request for proper blanks or returns not furnished by the IRS in sufficient time to permit the filing of the return by the due date.

(7.) Taxpayer made an effort to obtain assistance or information necessary to complete the return by a personal appearance at an IRS office but was unsuccessful because the taxpayer, through no fault, was unable to see an IRS representative.

(8.) The taxpayer is unable to obtain the records necessary to determine the amount of tax due for reasons beyond the taxpayer's control.

(9.) Taxpayer contacts a competent tax adviser, furnishes the necessary information, and then is incorrectly advised that the filing of a return is not required.

134. Occasionally a tax return preparer may have a client who has failed to file tax returns for numerous years. The Federal Tax Archives Library offers information on tax rates and allowable deductions since the 1978 tax year. The last 1939 and 1954 Internal Revenue Codes and the 1913 Income Tax Law are also included. Also, a tax return preparer may discover that an error was made on a prior year's return. The Federal Tax Archives Library can be useful in preparing an amended tax return.

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DIFFICULTY LEVEL RATINGS—CHAPTER 2

The following table denotes the relative difficulty level of each question. Teachers may wish to organize test questions based on the difficulty level of the particular class.

True-False Question Ratings

1. Easy
2. Easy
3. Easy
4. Easy
5. Moderate
6. Moderate
7. Moderate
8. Moderate
9. Easy
10. Difficult
11. Moderate
12. Moderate
13. Easy
14. Moderate
15. Moderate
16. Moderate
17. Moderate
18. Moderate
19. Moderate
20. Easy
21. Moderate

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22. Moderate
23. Moderate
24. Moderate
25. Moderate
26. Moderate
27. Moderate
28. Moderate
29. Moderate
30. Moderate
31. Moderate
32. Moderate
33. Moderate
34. Moderate
35. Easy
36. Moderate
37. Difficult
38. Easy
39. Easy
40. Moderate
41. Moderate
42. Moderate
43. Moderate
44. Moderate
45. Moderate
46. Moderate

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47. Moderate
48. Moderate
49. Easy
50. Difficult
51. Moderate
52. Moderate
53. Difficult
54. Moderate
55. Moderate
56. Moderate
57. Moderate
58. Easy
59. Easy
60. Difficult
61. Difficult
62. Moderate
63. Moderate
64. Moderate

Multiple Choice Question Ratings

65. Difficult
66. Difficult
67. Difficult
68. Difficult
69. Difficult
70. Difficult

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71. Difficult
72. Difficult
73. Difficult
74. Difficult
75. Moderate
76. Moderate
77. Moderate
78. Difficult
79. Moderate
80. Moderate
81. Difficult
82. Moderate
83. Moderate
84. Difficult
85. Difficult
86. Difficult
87. Moderate
88. Difficult
89. Difficult
90. Difficult
91. Difficult
92. Difficult
93. Difficult
94. Difficult
95. Difficult

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96. Difficult
97. Difficult
98. Difficult
99. Difficult
100. Difficult
101. Difficult
102. Difficult
103. Difficult
104. Moderate
105. Moderate
106. Moderate
107. Moderate
108. Moderate
109. Moderate
110. Difficult
111. Moderate
112. Moderate
113. Moderate
114. Difficult
115. Difficult
116. Moderate
117. Difficult
118. Moderate

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Supplementary Problem Ratings

119. Moderate

120. Moderate

121. Moderate

122. Moderate

123. Moderate

124. Moderate

125. Moderate

126. Moderate

127. Moderate

128. Difficult

129. Difficult

130. Difficult

131. Difficult

132. Difficult

133. Difficult

134. Difficult

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