

SOLUTIONS MANUAL

Discussion Questions

1. [LO 1] Based on the definition of gross income in §61 and related regulations, **what is the general presumption regarding the taxability of income realized?**

§61(a) defines gross income as all income from whatever source derived.

Reg. §1.61-(a) provides further insight into the definition of gross income as follows: **Gross income means all income from whatever source derived, unless excluded by law.**

Gross income includes income realized in any form, whether in money, property, or services. Thus, the general presumption regarding any income realized is that it is taxable, unless otherwise excluded by law.

2. [LO 1] Based on the definition of gross income in §61, related regulations, and judicial rulings, **what are the three criteria for recognizing taxable income?**

Based on §61(a), Reg. §1.61-(a), and various judicial rulings, taxpayers recognize gross income when:

- *(1) they receive an economic benefit,*
- *(2) they realize the income, and*
- *(3) no tax provision allows them to exclude or defer the income from gross income for that year.*

3. [LO 1] Describe the **concept of realization for tax purposes.**

*As indicated in Reg. §1.61-(a), the tax definition of income adopts the realization principle. Under this principle, **income is realized when:** (1) a taxpayer engages in a transaction with another party; and (2) the transaction results in a measurable change in property rights.*

In other words, assets or services are exchanged for cash, claims to cash, or other assets with determinable value. The concept of realization for tax purposes closely parallels the concept of realization for financial accounting purposes.

Requiring a transaction to trigger realization reduces the uncertainty associated with determining the amount of income because a change in rights can typically be traced to a specific moment in time and is generally accompanied by legal documentation.

4. [LO 1] **Compare and contrast realization of income with recognition of income.**

Gross Income Exclusion Solution Manual

William Burtis Castenholz



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Solutions Manual to Accompany Intermediate Accounting: Chapters 13-22 J. David Spiceland, 2004 **Problems and Solutions in Income Tax (including Short Questions) Assessment Year 2020-21** Dr. H. C. Mehrotra, Dr. S. P. Goyal, 2020-07-01 The salient features of the present edition are All the Problems and Solutions have been thoroughly revised in the light of up to date amendments in Income tax Law and Rules for Assessment Year 2020 21 Almost all numerical questions given at the end of the chapters of the authors other publications on Income tax viz Income tax Law and Accounts Aaykar Vidhan evam Lekhe Law and Practice of Income tax have been solved in this book and the number printed within brackets at the end of the questions in other publications is the problem number of this book The selection and sequence of the questions are well planned and systematic so as to cover all ticklish points within a reasonable number of questions Wherever needed detailed explanatory notes have been given at the end of solutions Candidates preparing for C A Company Secretaries Cost and Works Accountants and Income tax Departmental Examinations will particularly find the book very useful It will also be useful for candidates preparing for B Com and M Com Examinations of various Indian Universities

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presumpting taxation schemes D Widening and Deepening of Tax Base and Anti Avoidance TDS and Taxability on Net
Winnings from Online Games Increasing rate of TCS of certain remittances Limiting the roll over benefit claimed under
section 54 and section 54F Preventing permanent deferral of taxes through undervaluation of inventory Rationalisation of
exempt income under life insurance policies Alignment of provisions of section 45 5A with the TDS provisions of section 194
IC Prevention of double deduction claimed on interest on borrowed capital for acquiring renewing or reconstructing a
property Defining the cost of acquisition in case of certain assets for computing capital gains E Improving Compliance and
Tax Administration Introduction of the authority of Joint Commissioner Appeals Rationalisation of Appeals to the Appellate
Tribunal Assistance to authorised officer during search and seizure Rationalisation of the provisions of the Prohibition of
Benami Property Transaction Act 1988 the PBPT Act Alignment of timeline provisions under section 153 of the Act Provisions
relating to re assessment proceedings F Rationalisation Facilitating TDS credit for income already disclosed in the return of
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