

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.**

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Minjie Lin



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