- CHAPTER I s
 - Horizontal Equity treating taxpayers equally
- II. CHAPTER II INCOME
 - A. DEFINITIONS: ECONOMIC INCOME VS. TAX LAW INCOME.
 - i. ECONOMIC INCOME:
 - 1. The Haig-Simmons Definition "Spending Plus Savings"
 - a. Personal Income may be defined as the algebraic sum of:
 - The market value of rights exercised in consumption,

AND (Spending or Consumption - Includes giving money away)

- The change in the value of the store of property rights between the beginning and end of the period in question (Savings or "Accumulation" - includes investment)
- b. Can have NEGATIVE income
- Difference btw HS definition of income and tax income is realization
- ii. TAX LAW INCOME:
 - IRC §61 "Gross income means all income from whatever source derived, including, but not limited to," [see list]
 - 2. IRC §102:
 - a. (a) "Gross income does not include the value of property acquired by gift, bequest, devise, or inheritance"
 - b. (b) Gross income includes:
 - Income from any property referred to in subsection (a); and
 - Income from gifts, bequest, devise, or inheritance is of income from property
 - 3. IRC §1001 DETERMINATION OF AMOUNT OF AND RECOGNITION OF GAIN OR LOSS
 - a. (a) Computation of Gain or Loss Excess of adjusted basis from IRC §1012
 - b. (b) AMOUNT REALIZED the amount realized from the sale or other disposition of property shall be the sum of any money received plus the fair market value of the property (other than money) received; In determining amount realized:
 - Does not take into account any amount received as reimbursement for real property taxes which are treated under §164(d) as imposed on purchaser; and
 - Does take into account real property taxes which are treated under §164(d) as imposed on taxpayer if such taxes are to be paid by the purchaser
 - c. (d) INSTALLMENT SALES Nothing in this section prevents (in the case of property sold under contract providing for payment in installments) the taxation of that portion of any installment

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Patrick R. Delaney, O. Ray Whittington

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