

**Income Tax of Trusts & Estates LLM
Spring 2025
Calfee**

**Income Taxation of Trusts & Estates
LAW 7625 & 7931
3 Credit Hours
Spring 2025**

**Professor: Dennis Calfee
Class Time: Monday & Thursday 10:25 a.m. to 11:50 a.m.
Classroom: Holland 359**

**Office Hours: Thursday 2-4 PM In Person Room 315 Holland Hall
Zoom: Meeting ID 3522730911
Passcode 2730911**

Contact Information:

**Office: 315 Holland Hall
Phone: 352-273-0911
Email: calfee@law.ufl.edu**

Required Textbooks/Course materials:

Course materials for the first day will be emailed to individuals enrolled in the course. Thereafter course material will be provided by the Professor.

Federal Internal Revenue Code Section & Regulations covering Sub Chapter J including related income tax provisions. A paper copy of the code and regulations is required.

Course Objective:

To learn the federal income taxation of estates and trusts.

Learning Outcomes:

Upon completion of the course, students should have developed an understanding of Sub-chapter J of the Internal Revenue Code, the federal income tax provisions dealing with decedent's estates, trusts and beneficiaries, sufficient to enable them to practice in this area of taxation and pursue advanced courses which rely upon and understanding of these provisions of the code. After this course, a student should be able to administer a trust or estate and better understand provisions in wills and trusts.

Topical Outline of Subjects to be Covered (Tentative):

Uniform Principal and Income Act
Simple Trusts
What is a "Simple" Trust?
The Simple Trust Fact Pattern
Complex Trusts
Single Beneficiary Questions
Multiple Beneficiaries in General
The Annuity Provisions
The Separate Share Rules
Charitable Deduction
Specific Gifts, Bequests, Devises and Inheritance
Distributions in Kind
Distributions and Transfers of Property in Kind
Section 663 and Kenan Considerations
Estate and Trust Termination
Income and Deductions in Respect of a Decedent
Grantor Trust Rules
 Grantor's Benefit
 Indirect Grantor Benefit
 Third Party's Benefit

Grading Policy:

One three (3) hour examination.
Students will be evaluated based on the final examination. The law school policy on exam delays and accommodations can be found [here](#).

Workload/Class Preparation:

ABA Standard 310 requires that students devote 120 minutes to out-of-class preparation for every “classroom hour” of in-class instruction. (Course) has 3 “classroom hours” of in-class instruction each week, requiring at least 6 hours of preparation outside of class. Accordingly, you will have about 60 pages of reading each week. Because the course includes statutory and regulatory excerpts that require careful reading, as well as discussion problems that require thoughtful advance written preparation, you should spend at least one hour on every 10-15 pages of reading.

Class Attendance Policy:

Regular class attendance (whether online or in person), participation and preparation are required. Students should notify the professor by email of the reason for any class absence. Online students are required to be on camera. Failure to regularly attend class may result in being dropped from the course or precluded from taking the final examination.

Class Recording Policy:

Students are allowed to record video or audio of class lectures. However, the purposes for which these recordings may be used are strictly controlled. The only allowable purposes are (1) for personal educational use, (2) in connection with a complaint to the university, or (3) as evidence in, or in preparation for, a criminal or civil proceeding. All other purposes are prohibited. Specifically, students may not publish recorded lectures without the written consent of the instructor. A “class lecture” is an educational presentation intended to inform or teach enrolled students about a particular subject, including any instructor-led discussions that form part of the presentation, and delivered by any instructor hired or appointed by the University, or by a guest instructor, as part of a University of Florida course. A class lecture does not include lab sessions, student presentations, clinical presentations such as patient history, academic exercises involving solely student participation, assessments (quizzes, tests, exams), field trips, private conversations between students in the class or between a student and the faculty or guest lecturer during a class session. Publication without permission of the instructor is prohibited. To “publish” means to share, transmit, circulate, distribute, or provide access to a recording, regardless of format or medium, to another person (or persons), including but not limited to another student within the same class section. Additionally, a recording, or transcript of a recording, is considered published if it is posted on or uploaded to, in whole or in part, any media platform, including but not limited to social media, book, magazine, newspaper, leaflet, or third-party note/tutoring services. A student who publishes a recording without written consent may be subject to a civil cause of action instituted by a person injured by the publication and/or discipline under UF Regulation 4.040 Student Honor and Student Conduct Code.

Observance of Religious Holidays:

UF Law respects students’ [observance of religious holidays](#).

- Students, upon prior notification to their instructors, shall be excused from class or other scheduled academic activity to observe a religious holy day of their faith.
- Students shall be permitted a reasonable amount of time to make up the material or activities covered in their absence.

- Students shall not be penalized due to absence from class or other scheduled academic activity because of religious observances.

Accommodations for students with disabilities:

Students with disabilities requesting accommodations should first register with the Disability Resource Center (352-392-8565, <https://disability.ufl.edu/>) by providing appropriate documentation. Once registered, students will receive an accommodation letter which must be presented to the instructor when requesting accommodations. Students with disabilities should follow this procedure as early as possible in the semester.

University Policy on Academic Misconduct:

Academic honesty and integrity are fundamental values of the University community. Students should be sure that they understand the UF Student Honor Code at <https://sccr.dso.ufl.edu/policies/student-honor-code-student-conduct-code/>.

Netiquette: Communication Courtesy:

All members of the class are expected to follow rules of common courtesy in all email messages, threaded discussions and chats. https://www.cise.ufl.edu/wp-content/uploads/2019/08/CISE_Netiquette_Guide.pdf

Online Course Evaluation Process:

Students are expected to provide professional and respectful feedback on the quality of instruction in this course by completing course evaluations online via Gator Evals. Click [here](#) for guidance on how to give feedback in a professional and respectful manner. Students will be notified when the evaluation period opens and can complete evaluations through the email they receive from Gator Evals, in their Canvas course menu under GatorEvals, or via <https://ufl.bluera.com/ufl/>. Summaries of course evaluation results are available to students [here](#).

Disclaimer:

This syllabus represents my current plans and objectives. As we go through the semester, those plans may need to change to enhance the class learning opportunity. Such changes, communicated clearly, are not unusual and should be expected.