

INCOME TAXATION OF TRUSTS & ESTATES
UNIVERSITY OF FLORIDA LEVIN COLLEGE OF LAW
SEMESTER SYLLABUS – LAW 7623

Spring 2026, Tuesday 3:15-5:15

2 Credit Hours

Professor: Teena Manners

Email: Teena@ufl.edu

Office Hours: Tuesday

MEETING TIME: Tuesday 3:15-5:15

LOCATION: 315 Holland Hall

UF Zoom Meeting:

Passcode:

COURSE DESCRIPTION AND OBJECTIVES:

To learn federal income taxation of estates and trusts.

STUDENT LEARNING OUTCOMES:

Upon completion of this course, students will understand Subchapter J of the Internal Revenue Code, including federal income tax provisions for estates, trusts, and beneficiaries. They will be equipped to administer trusts and estates and interpret relevant provisions in wills and trust documents.

REQUIRED MATERIALS:

1. Course Materials to be provided prior to class.
2. Federal Income Tax Code and Regulations covering Subchapter J, including related income tax provisions. A paper copy is strongly recommended.

COURSE EXPECTATIONS AND GRADING EVALUATION:

Regular attendance, participation and preparation for class is required. Grades will be based on the final exam. The law school grading policy can be found [here](#).

The Levin College of Law's mean and mandatory distributions are posted on the College's website and this class adheres to that posted grading policy.

CLASS ATTENDANCE AND MAKEUP POLICY:

Regular attendance, participation and preparation for class is required. Attendance will be taken at each class meeting. Students will notify the professor by email of the reason for any class absence. Online students are required to have cameras on for the duration of class. Failure to regularly attend and participate in class may result in being dropped from the course or precluded from taking the final examination.

Notwithstanding the forgoing, Students will be allowed two unexcused absences during the semester for any reason. Additional absences may be excused at the professor's discretion and will be considered in the case of unplanned and unavoidable conflicts or emergencies. In each case, the student will be responsible for covering the materials missed during class.

The law school's policy on attendance can be found [here](#).

ABA OUT-OF-CLASS HOURS REQUIREMENTS:

ABA Standard 310 requires that students devote 120 minutes to out-of-class preparation for every "classroom hour" of in-class instruction. Each weekly class is approximately 2 hours in length, requiring at least 4 hours of preparation outside of class including reading the assigned materials and completing problems.

UF LEVIN COLLEGE OF LAW STANDARD SYLLABUS POLICIES:

Other information about UF Levin College of Law policies, including compliance with the UF Honor Code, Grading, Accommodations, Class Recordings, and Course Evaluations can be found at this [link](#).

UF ACADEMIC POLICIES AND RESOURCES:

Other information about UF academic policies and resources can be found at [this link](#).

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