Assigned Code Sections include the Regulations issued (or proposed) thereunder; and it is important that changes to the Code made by the American Jobs Creation Act of 2004 be taken into account.

Class 1 (January 11)
Procedure – exams, papers, conduct of classes, etc.
Introduction
Objectives
Substantive knowledge
Policy issues
How Conduits Work
Historical review
Unincorporated business arrangements
Classification of unincorporated business arrangements
Old regulations
Check-the-box regulations
Publicly-traded partnerships
Limitations on the check-the-box regulations

Materials
IRC Section 7704 (publicly-traded partnerships)\(^1\)
Internal Revenue Service Form 8832
Notice 95-14
T.D. 8697, 1997-1 C.B. 215 (preamble to the adoption of the current regulations)
The prior regulations, which may be found, e.g., at T.D. 6503, 1960-2 C.B. 409.
Morrissey v. Commissioner, 296 U.S. 344 (1935)

Additional Materials
Lyons, Comments on the New Regulations on Associations, 16 Tax Law Rev. 441 (1961)
Bittker, Professional Service Organizations: A Critique of the Literature, 23 Tax Law Rev. 429 (1968)