

FORDHAM UNIVERSITY SCHOOL OF LAW

In-Person Exams

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| Course: Partnership Taxation, Fall 2023 | Exam Date and Time: December 7, 2023; 9:30AM; Room 4-09 |
| Professor(s): Professor Colon | Exam Type: OPEN BOOK |
| Exam Length: 3 hours | EXAM4 SOFTWARE MODE: OPEN LAPTOP |

EXAM INSTRUCTIONS

- Be sure to include your Exam ID Number (begins with the letter “E”) on **ALL** of your exam materials. **DO NOT** write your name, Fordham ID Number, or any personally identifiable information on any materials.
- **Materials Allowed:** You can use any materials except a live, personal consultant. I recommend: (1) IRC/Regs; (2) your Class Notes and Slides; (3) Logic; and (4) a calculator. You may not use or access any LLM, including, but not limited, to ChatGPT, Copilot, etc.
- You may **not** consult with any other person or unauthorized materials while working on the exam and may not disclose the examination questions to any other individual until the exam period has concluded.
- **NO OTHER** electronic devices (iPads, electronic dictionaries, smartwatch/smart glasses, or tablets) are permitted during the exam.
- The exam answers must be typed. The suggested time is indicated in brackets at the beginning of each question. There are **[18]** questions.
- For the T/F Qs, answer T or F or Y or N and give a very brief—1 or 2 sentences—explanation. For any MC Qs, please type the correct answer and give a very brief explanation. A Code/Reg/Case/Rev. Rul. citation may be entirely sufficient.
- **ALL MATERIALS MUST BE TURNED IN TO PROCTORS AT THE END OF THE EXAM** (exam questions, scrap paper, Pink Exam4 Submission Form and bluebooks if handwriting, etc.).
- Don’t waste time paraphrasing the Code/Regs; an accurate citation is sufficient. Common abbreviations, e.g., P, PSH, CA, FMV, AB, OB, LOL, OMG, AR, Reg, and Sec, are fine.
- Apply the Code/Regs in effect today, and if relevant, any proposed regulations we discussed in class. All taxpayers are U.S. persons, cash method, and calendar year taxpayers.
- You are not responsible for: 199A, 751(b), the after-tax test for substantiality, 736, or 1061.
- The exam has **[7]** pages, including the instruction page. Make sure you have them all.
- **Academic Responsibility Reminder:** By submitting this exam, I certify that I have not consulted, collaborated, or shared with any person, nor have I used materials not allowed during this exam. You are reminded that you are bound to the rules put forth by the **Code of Academic Responsibility**. Any person found violating the code will be sanctioned for compromising the trust and honor of the academic community. Violations will be thoroughly investigated by the Office of Student Affairs.

EXAM COMPONENTS: 100% shortish answers**GOOD LUCK!**