

1957

## Tax Administration and Procedure: Final Examination (January 31, 1957)

William & Mary Law School

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Tax Administration and Procedure

Final Examination - January 31, 1957

1. Whom does a taxpayer (or his representative) with principal office in Williamsburg contact on Federal tax matters under the following circumstances:
  - (a) Needs tax blanks and documentary stamps
  - (b) Needs some further information as to how to report sick pay on his employee's Form W-2
  - (c) Wants an extension of time for filing a Form 1040
  - (d) Wants to know the tax effect of a reorganization plan undertaken by the taxpayer corporation
  - (e) Needs to obtain an exempt ruling for a charitable organization
  - (f) Disagrees with or can't understand a tax bill demanding payment
  - (g) Wants to file a refund claim
  - (h) Believes that the interest element in a refund is in error
  - (i) Thinks he should be excused from the penalty for late filing of Form 1040 for reasonable cause
  - (j) Financially unable to pay his tax
  - (k) Desires to take issue with a revenue agent as to conclusions indicated in his report of examination
  - (l) Wants to file an amended return
2. In the preparation of a return for a client you run into a "receipt" item about which you have honest doubt as to its includability in income. What advice would you give him and why?
3. What is meant by, and what is the significance of the word "assessment"?
4. Summarize by steps all courses of action open to a taxpayer who disagrees with a revenue agent's findings in which he proposes to assess:
  - (a) Additional income taxes
  - (b) Additional manufacturers' excise taxes(Don't overlook jurisdictional choices in Questions 4 and 5)
5. Summarize by steps all courses of action open to a taxpayer who has discovered that he has over-paid his taxes.
6. Indicate return filing and tax payment dates (where applicable) for the following returns: 1040A; 1040; 1040ES; 1041; 1065; 1120; 1120ES; 941; and, 720.
7. What are the general limitation periods for:
  - (a) Making additional assessments
  - (b) Collection of the tax
  - (c) Refunds and credits
  - (d) Obtaining delinquent returns
  - (e) Criminal prosecution in case of fraudulent returns
8. Subtitle F provides a pattern for the "administration and enforcement" of Title 26 by the Secretary or his delegate. Sketch this pattern.

2400  
157/105  
875  
155 = 15