

Chapter 1

Business Income, Deductions, and Accounting Methods

SOLUTIONS MANUAL

Discussion Questions

1. [LO 1] What is an "ordinary and necessary" business expenditure?
"Ordinary" and "necessary" imply that an expense must be customary and helpful, respectively. Because these terms are subjective, the tests are ambiguous. However, ordinary is interpreted by the courts as including expenses which may be unusual for a specific taxpayer (but not unusual for that type of business) and necessary is not interpreted as only essential expenses. These limits can be contrasted with the reasonable limit on amounts and the bona fide requirement for profit motivation.
2. [LO 1] Explain how cost of goods is treated when a business sells inventory.
Under the return of capital principle, cost of goods sold represents a reduction in gross income rather than a business expense. For example, if a taxpayer sells inventory for \$100,000 and reports a cost of goods sold of \$40,000, the business's gross income is \$60,000 (\$100,000 - 40,000) not \$100,000.
3. [LO 1] Whether a business expense is "reasonable in amount" is often a difficult question. Explain why determining reasonableness is difficult, and describe a circumstance where reasonableness is likely to be questioned by the IRS.
Reasonableness is an issue of fact and circumstance, and extravagance is difficult to determine because of the subjectivity and multitude of factors involved in determining price. Reasonableness is most likely to be an issue when a payment is made to a related individual or the taxpayer enjoys some personal benefit incidental to the expenditure.
4. [LO 1] Jake is a professional dog trainer who purchases and trains dogs for use by law enforcement agencies. Last year Jake purchased 500 bags of dog food from a large pet food company at an average cost of \$30 per bag. This year, however, Jake purchased 500 bags of dog food from a local pet food company at an average cost of \$45 per bag. Under what circumstances would the IRS likely challenge the cost of Jake's dog food as unreasonable?
A common test for reasonableness is whether the expenditure is comparable to an arm's length amount - a price charged by objective (unrelated) individuals who do not receive any incidental personal benefits. Hence, the IRS is most likely to challenge the cost of the dog food if Jake's relatives control or own the local pet food company and was benefiting from the increased price.

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Victor M. Corman



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