

## PREFACE

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Boris Bittker, who single-handedly wrote the first few editions of this book, had a unique gift for presenting complex material in an easy-to-understand way. We have tried to preserve that quality, despite the unceasing efforts of Congress (aided at times by taxpayers, their advisors, and the courts) to make the tax law incomprehensible. In this fifteenth edition, we have maintained the approachable style that is the legacy of this book while also keeping it up to date in an era of perpetual change.

This edition features a handful of new judicial opinions and other illustrative legal authorities, including a recent IRS Chief Counsel memorandum concerning the taxation of same-sex partners and a private letter ruling on a like-kind exchange involving a conservation easement. We have also expanded the discussion of several important topics, such as the earned income tax credit and the deduction for state and local taxes. A revised section on constructive sales incorporates an excerpt from the legislative history of section 1259, along with a problem designed to highlight lingering ambiguity in that provision and the tax lawyer's role in giving advice in the face of legal uncertainty.

In addition to these changes, the fifteenth edition also features a few innovations. For the first time, we have included images of the Form 1040, along with several of its accompanying schedules. Rather than simply reproducing the forms, we have chosen to include the most recent federal income tax return of America's first family. In addition, we have included throughout the book several new shaded passages under the heading Comparative Focus. These are brief descriptions of how other countries have approached particular tax policy issues in the design of their income taxes.

As with each of the prior editions, the overall objective has been to give students a basic framework for understanding federal income tax law and policy. While tax may be a field famous for its ever-changing legal details, our hope is that this book will help students develop a durable and adaptive knowledge base that will serve them well beyond future amendments to the tax code.

William A. Klein  
Joseph Bankman  
Daniel N. Shaviro  
Kirk J. Stark

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