

# Income tax in the united states and dividend income



**ASSIGN  
BUSTER**

Please explain. No they have not recorded them properly, according to Rev. Ruling 82-11, Coyote Corp.. Actually includes the dividend income for federal tax purposes because they are contractually entitled to receive the dividend on the date of record. Fox does not include the dividend income on their federal return. Rev. Rule 82-11 says: " Therefore, in the present situation, the ex- dividend rules of a stock exchange will not control the determination of when a shareholder becomes entitled to a dividend for federal income tax purposes.

Y cannot shift the burden of income taxation on dividends by selling the underlying shares of stock to Z after the dividends have been declared and determined owing to Y as the record holder of the shares on the record date because it is the holder on the record date who is entitled to a declared dividend. " " Accordingly, the amount paid by Z to Y represents payment for two separate items, specifically, the right to receive the dividend and consideration for the underlying shares of stock. " " Therefore, only xx dollars of the amount received by Y is treated as received in exchange for the X stock.

The remaining xx dollars received by Y is treated as evident income and, therefore, Y is entitled to a dividends received deduction under section 243 of the Code with respect to this amount. " Thus, Coyote recognizes the dividend income and is allowed the dividends received deduction under 5243 for the amount received from Fox as payment for the entitlement to the dividend of \$4000, even though the dividend is paid from Jackal directly to Fox per the agreement. The remainder of \$71 , OHO paid to Coyote is

treated as the payment for the stock, which would result in a \$26,000 LATCH for Coyote (71 basis).

Fox does not recognize dividend income and therefore is not entitled to a 5243 deduction. 2) What is Fox's stock basis in the 1,000 shares it holds? Fox's basis in the stock according to 51012 of the IIRC shall be the cost, which would be the \$71,000 attributable to the stock purchase. The other \$4,000 was deemed payment for the Loveland Income Ana would not be included in the Oasis. The deemed payment according to Rev. Rule 82-11 is broken into two pieces, only the amount attributable to the stock is included in basis, the other amount is for the right to receive the dividend payment.