PREFACE

Boris Bittker and William Klein, our predecessors for 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 federal tax law incomprehensible.

We also were lucky to have Edward Kleinbard as a co-author on two previous editions, before losing him to cancer in 2020. He helped us to sharpen existing material, and lent his voice — informal, warm and passionate — to each chapter, and indeed each page, that he revised.

Many of the changes made in recent editions reflect an ongoing shift in the direction of legal scholarship in the field of income taxation. While this book is fundamentally a text designed for law school courses, we have endeavored, where appropriate, to incorporate perspectives on taxation from fields other than law — including history, economics, finance, and political science. In addition, because of the continuing significance of globalization and its impact on the study of law, we have begun to incorporate some materials relating to the tax systems of other countries. We also, however, emphasize the underlying practical issues that can make particular doctrinal issues especially important.

Finally, as part of our ongoing effort to keep pace with an ever-changing field of law, we have eliminated some cases and materials less relevant to the practice of tax law in the twenty-first century. The current edition incorporates data and materials available as of the date of publication.

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.

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