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 congress under article i of the u s constitution section 8 providing
 in part that congress has the power to constitute tribunals inferior
 to the supreme court the tax court specializes in adjudicating
 disputes over federal income tax generally prior to the time at which
 formal tax assessments are made by the internal revenue service though
 taxpayers may choose to litigate tax matters in a variety of legal

settings outside of bankruptcy the tax court is the only forum in which taxpayers may do so without having first paid the disputed tax in full parties who contest the imposition of a tax may also bring an action in any united states district court or in the united states court of federal claims however these venues require that the tax be paid first and that the party then file a lawsuit to recover the contested amount paid the full payment rule contents 8 findings of fact 8 background 8 john hancock s history9 investment process and review10 leasing10 lilo and silo transactions 10 basic structure 15 history 17 due diligence 18 the hoosier transaction 19 the lilo test transactions 20 obb lilo20 lease and sublease23 end of sublease term25 sncb 2 and sncb 5 lot 1 lilo transactions25 lease and sublease28 end of sublease term 28 the silo test transactions 29 tiwag29 lease and sublease33 end of sublease term35 two dortmund transactions35 lease and sublease38 end of sublease39 sncb silo39 grant and subgrant42 end of subgrant term 43 tax returns notices of deficiency and trial 43 procedural history48 trial 53 opinion 53 burden of proof53 principal place of business54 leveraged lease transactions54 frank lyon58 lilo and silo litigation 77 the test transactions 78 economic substance79 objective inquiry88 subjective inquiry89 substance over form91 obb and

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Journal

1870

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Joint Documents of the State of Michigan

1879

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Proceedings of the Grand Chapter, Royal Arch Masons of the State of Tennessee

1898

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Reports of United States Tax Court, V. 141, July 1, 2013, to December 31, 2013

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of Western Michigan**

1890

Wisconsin Journal of Education

1872

Bulletin - Bureau of Chemistry

1893

Senate Bill

1971

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1878

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1942

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The Convention Manual for the Sixth New York State Constitutional Convention 1894

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1885

Statutory Instruments Other Than Those of a Local, Personal Or Temporary Character

1909

***Justice of the Peace and Local Government
Review***

1894

**Annual Report of the Superintendent of Public
Works Upon Or on the Canals and Upon [or on
The] Trade and Tonnage of the Canaas**

1884

**Minutes of the Woman's Christian Temperance
Union of the State of Indiana at the Annual**

Meeting

1882

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1916

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Ceylon, 1921. 1 v. in 2***

1924

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and Training & Model Schools in New Brunswick**

1870

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8, Clause 5, through Article 2, Section 1**

1987

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