

**Volume 9 | Issue 1**

**Winter 2020**

**ISSN: 2381-3679**

**The Contemporary Tax Journal**  
**A Publication of the SJSU MST Program**

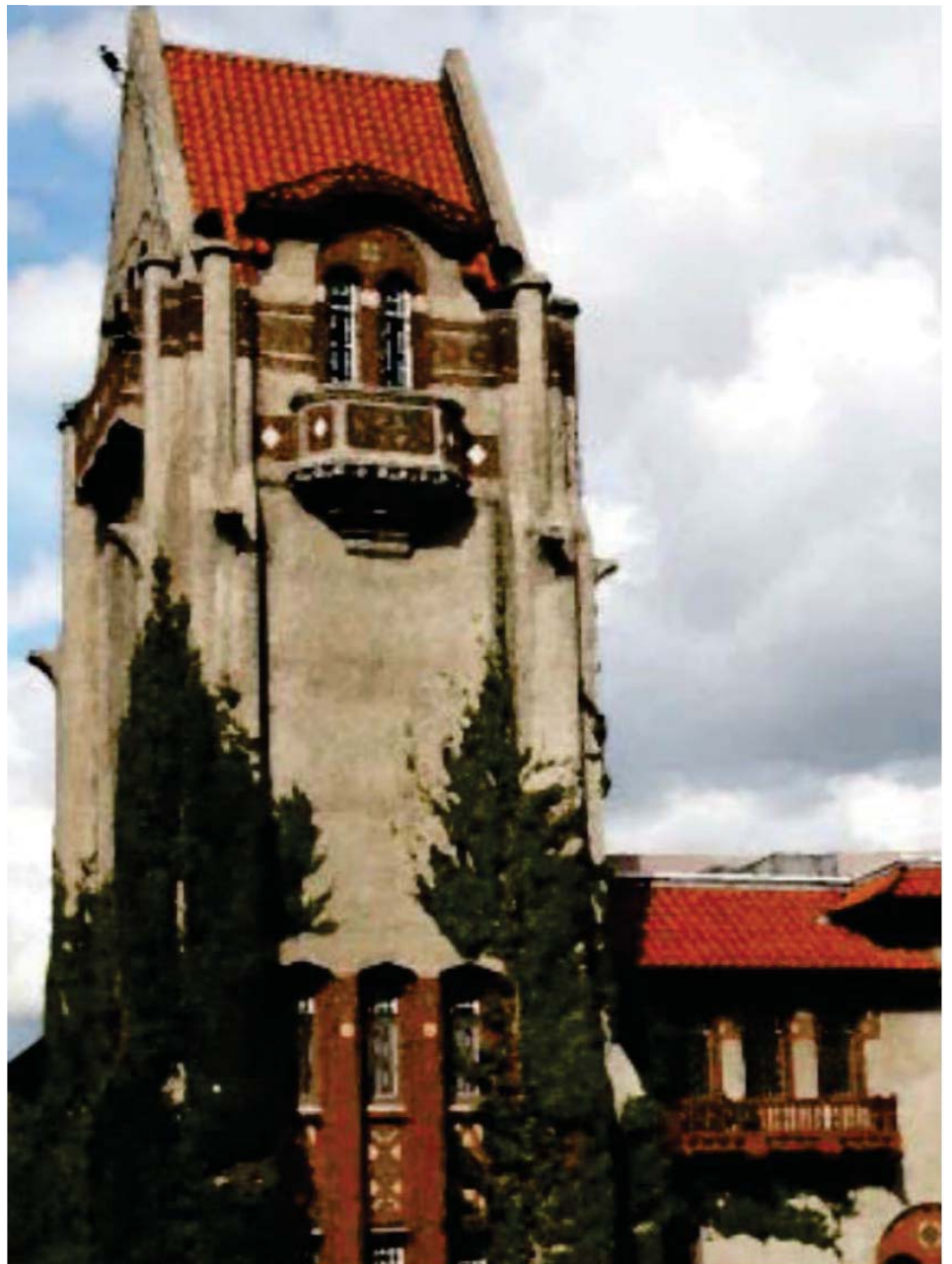
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The Contemporary Tax

Journal

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## The Contemporary Tax Journal Winter 2020

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### **Special Thanks to**

**Steven Shee**

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## TABLE OF CONTENTS

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|   |           |
|---|-----------|
| <b>LETTER FROM THE EDITOR.....</b>  | <b>4</b>  |
| <b>FEATURED ARTICLE</b>   |           |
| FINANCE THEORY MEETS TAX LAW: HOW A RISK-BASED RULE CAN RATIONALIZE THE DEBT VERSUS EQUITY DISTINCTION..... | 5         |
| <b>TAX ENLIGHTENMENT</b>  |           |
| TREATMENT OF MEDICAID WAIVER PAYMENTS FOR PURPOSE OF EITC AND ACTC.....                                     | 43        |
| TAXATION OF EARLY DISTRIBUTIONS FROM A 401(K) RETIREMENT PLAN.....  | 46        |
| DIGITAL TAXATION – A VIRTUAL REALITY.....   | 49        |
| <b>TAX FEATURES – SUMMARIES FROM THE 2019 35<sup>TH</sup> ANNUAL TEI-SJSU HIGH TECH TAX INSTITUTE</b>       |           |
| STILL KEEPING TO THE BEAT.....  | 55        |
| TRANSFER PRICING.....   | 59        |
| U.S. INTERNATIONAL TAX ISSUES AND DEVELOPMENTS SUMMARY.....   | 63        |
| <b>TAX MAVEN.....</b>   | <b>66</b> |
| <b>FUN TAX FACTS.....</b>   | <b>69</b> |
| <b>CPA REVIEW QUESTIONS.....</b>  | <b>71</b> |
| <b>FOCUS ON TAX POLICY.....</b>   | <b>76</b> |

## Letter from the Editor

Entering our ninth year of publishing, we are honored to present you the Winter 2020 issue of *The Contemporary Tax Journal*, a publication of San Jose State University's MST Program.

This issue begins with an article on the distinction between debt and equity in corporate tax. Mr. Ted Gkoo, an LL.M. candidate at Yale Law School, proposed a general rule based on risk analysis that can replace the current multi-factor approach in classifying public traded hybrid securities.

Next, is our regular feature called *Tax Enlightenment* consisting of articles written by SJSU MST students. Liubov Shilkova presents taxation of early distributions from a 401(k) retirement plan involving the case, *Soltani-Amadi v. Commissioner*. I analyze whether Medicaid waiver income is included in gross income and the relevance for the earned income tax credit per the *Feigh* case decided in 2019. Rachana Khandelwal, an MST alum, helps us understand how digitalization has challenged the current international tax environment.

This spring 2020 issue also includes selected topics covered at the 35<sup>th</sup> Annual TEI-SJSU High Tech Tax Institute held in November 2019 summarized by MST students. The topics include the BEAT, transfer pricing updates, and U.S. international tax issues and developments.

It was my honor to interview Mr. Steven Shee, Vice President of Tax at Applied Materials Inc. He shares his remarkable experiences in our *Tax Maven* section. He offers valuable advice for students. I hope you enjoy his humor and wise advice as I do.

Our special section, *Fun Tax Facts*, was introduced in Winter 2019 by Rachana Khandelwal, MST. We would like to thank her for her generous contributions to our Winter 2020 journal.

The CPA Exam Review section includes a few multiple-choice questions provided by the AICPA. We thank the AICPA for their support and hope you find this section helpful in preparing for the CPA exam. For those of you who have already passed the exam, you may also find these current sample questions of interest.

Finally, I sincerely appreciate all the contributors to this issue. Especially, I would like to send my gratitude to Professor Annette Nellen for editing suggestions and invaluable input. I thank my student assistant editor, Liubov Shilkova, alum and dedicated journal supporter Rachana Khandelwal, MST, and Catherine Dougherty, our MST coordinator for their contributions to enhancing this journal.

Please enjoy the Spring 2020 issue of *The Contemporary Tax Journal*.

Xiaoyue (Tina) Tan

Student Editor