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Movie: Titanic (1997) Story: William walsh (Leo Di Caprio) is a non-noble young artist who was educated with an artistic mother.. Khatrimaza's Titanic.Direct link to download The Piracy Movie 'Titanic' from 'Titanic," watch online full movie with no registration at 123movie8. Movie: Titanic (1997) Story: William walsh (Leo Di Caprio) is a non-noble young artist who was educated with an artistic mother.. Free movie, easy to download and share on your favorite social network. to borrow at present, and yet, in the long run, this is not where the case lies. There is no question that the Youngs borrowed and perhaps overborrowed. But is a debt service to be characterized as simply something out of borrowed money, irrespective of whether there is a genuine obligation to pay the debt? The answer lies in how the same thing would be characterized if Young were someone financially well off who was able to retire the debt without incurring a heavy tax bill. As the Tax Court pointed out in Young & Simmons, a tax is imposed when borrowed money is used to pay a debt. Under the approach urged by the Commissioner, a taxpayer who borrows and takes an out-of-pocket loss on the debt would have the same tax consequences as a taxpayer who borrows and earns a profit on the debt. Young & Simmons, 54 T.C.at 628. The Tax Court, and we, will not add a gloss to the tax law so that a taxpayer who has an actual obligation to pay can escape the fact that his indebtedness is a "debt" within the meaning of the tax laws. 16 The Youngs' second objection, that the loan is not a bona fide debt because the Commissioner did not give a formal, arm's length assurance to the bank, is simply a restatement of the first. They argue that it would have been more appropriate for the Commissioner to have followed the regulations which permit a taxpayer to treat a debt as a bona fide debt when it is actually an investment credit. See 26 C.F.R. Sec. 1.6631-2. Again, while a formal arm's length transaction would have increased the credibility of the Youngs' evidence, we agree with the Tax Court that the formal aspect alone is not determinative. 17 The Tax Court 6d1f23a050

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