32 T.C. 220 (1959)

For tax purposes, a taxpayer's "home" is their principal place of business, and travel expenses are only deductible if incurred while "away from home" in connection with employment.

Summary

The United States Tax Court addressed whether a taxpayer could deduct various travel-related expenses in computing adjusted gross income. The taxpayer, employed in two jobs, sought to deduct expenses for travel between job sites, meals, and work clothes. The court determined the taxpayer's "tax home" encompassed multiple work locations, disallowing deductions for travel within this area. However, it allowed deductions for travel to a location further away, finding those trips were "away from home." The court also disallowed meal expenses (personal) and the cost of work clothes because there was no reimbursement.

Facts

Joseph Winn, the taxpayer, worked two jobs concurrently. One involved supervising oil wells across two mineral leases and also required him to visit Kilgore, Greggton, and Shreveport, Louisiana. Winn was expected to provide his own transportation. The other job was at a gasoline plant. Winn incurred travel expenses for all of these locations and also purchased work clothes and meals during his business trips. Winn sought to deduct these expenses on his tax return. The IRS disallowed the deductions, and the Tax Court reviewed the decision.

Procedural History

The case was heard by the United States Tax Court after the Commissioner of Internal Revenue disallowed the taxpayer's claimed deductions for travel, meal, and work clothes expenses. The Tax Court reviewed the facts and legal arguments to determine the deductibility of the expenses under the relevant provisions of the Internal Revenue Code.

Issue(s)

1. Whether the taxpayer's travel expenses between the oil leases, to Kilgore, and to Greggton were deductible under section 22(n)(2) of the Internal Revenue Code (IRC) as expenses incurred while away from home?

2. Whether the taxpayer's travel expenses to Shreveport were deductible under section 22(n)(2) of the IRC?

3. Whether the amounts expended on meals and entertainment in Shreveport were deductible?

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4. Whether the amounts expended on work clothes were deductible?

Holding

1. No, because the taxpayer's tax home included these locations.

2. Yes, because these trips constituted travel "away from home" in connection with his employment.

3. No, because meal expenses were personal expenses and entertainment expenses were unsubstantiated.

4. No, because there was no reimbursement for work clothes.

Court's Reasoning

The court relied on the definition of

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