Endnotes

1 Christopher Yan, Economic Substance: A Machine Learning Perspective on the Multi-Factorial Analysis, Lexology (Jul. 11, 2019), https://www.lexology.com/library/detail.aspx?g=281977be-06e5-4e77-a57f-fe0caa4defc7.
2 IRC §§ 6662(a) and (b)(6); § 6676(a).
3 IRC §§ 6662(i)(1) and (2).
4 IRC § 6676(c).
5 Gregory v. Helvering, 293 U.S. 465 (1935).
6 *Id*. at 470.
7 *Id*.at 469.
8 *Id*. at 470.
9 IRS LB&I Directive "Exhibit 4.46.4-4 Guidance for Examiners and Managers on the Codified Economic Substance Doctrine and Related Penalties", https://www.irs.gov/irm/part4/irm_04-046-004#idm139936223748640.
10 *Frank Lyon Company v. United States*, 435 U.S. 691, 582 (1978).
11 *Boca Investerings Partnership v. United States*, 314 F.3d 625, 631 (D.C. Cir. 2003).
12 *Id*. at 632.
13 *Knetsch v. United States*, 364 U.S. 361, 366 (1960).
14 *Id*. at 366.
15 *Higgins v. Smith*, 308 U.S. 473, 474 (1940).
16 Id. at 476.
17 *Frank Lyon Company v. United States*, 435 U.S. 561, 583 (1978).
18 *Id*. at 577.
19 *Id*. at 583, 584.