

Section 6110 Index

Written
Determinations
Requested After
November 1, 1976

The index is arranged by Code section with various identifying subheadings. Each ruling, technical advice memorandum, and Chief Counsel advice issued under Code section 6110 is assigned a 9-digit reference number which appears after the heading to which the ruling refers. This number also appears on the ruling, technical advice memorandum, or Chief Counsel advice itself and is to be used when requesting copies of individual rulings, technical advice memoranda, or Chief Counsel advice.

The index will be cumulated on a weekly basis. A new index will be initiated each year.

Each ruling, technical advice memorandum, or Chief Counsel advice contained in this publication is directed only to the taxpayer who requested it or with respect to whom it is issued. Section 6110(k)(3) of the Internal Revenue Code provides that letter rulings, technical advice memorandums, and Chief counsel advice may not be used or cited as precedent.

Any person having questions about this publication or about section 6110 of the Code should contact the Chief, Disclosure Unit, CC:CORP:T:D, Room 2613, 1111 Constitution Avenue, N.W., Washington, DC 20224; (202) 622-7570.

UNMATCHED TRANSACTIONS

45b0000	200103070
104 0200	200123004
104 0300	200206053
106 0000	200206053
132 0000	200206053
141 0700	200123057
146 0700	200123025
302 0000	200123053
335 0102	200123032
338 0102	200123006 200123054
351 0000	200123011
355 0000	200123011 200123020
355 0100	200123030
367 0000	200123020
367 0100	200123008
368 0400	200123011 200123030
401 0600	200123070
401 0601	200123070
403 0404	200123074
412 0100	200123068
412 0600	200123064 200123067
414 0900	200123066
461 0000	200123042

468 A0000	200123042 200123046
468 A0304	200123026
468 A0402	200123026 200123039 200123040 200123041
472 0000	200123035
501 0302	200123072
501 0331	200123072
507 0300	200123069 200123071
529 0000	200123065
565 0000	200123061
6050i0000	200103069
61 0925	200206053
61 1501	200123047
61 2802	200206053
61 5301	200206053
62 0202	200206053
62 0203	200206053
6330 0000	200103074 200113004 200123003 200123060 200130039
704 0104	200123035
721 0000	200123035
807 0300	200123024
807 0500	200123024
811 0400	200123024
877 0100	200123037 200123038 200123056

Section 25A	Hope and Lifetime Learning Credits 200137006	25A.00-00
Section 29	(Section 44 Redesignated as Section 29) Credits for Producing Fuel From a Nonconventional Source 200102010 200103008 200103009 200151012 200151013 200204030 200209014 200209044 200222017 200222018 200134017 200135003 200135003 200135003 200135003 200201015 200201015 200203032 200207009 200210013 200210017 200215005 200215007 200215008 200215009 200215017 200216002 200216003 200216004 200216011 200216015 200218027 200221041 200230009 200230009	29.00-00
Section 32	(Former Section 43 Redesignated Section 32) Earned Income Credit 200112001 200120036 200120037 200126030	32.00-00
Section 34	Certain Users of Gasoline and Special Fuels 200224020	34.00-00
Section 38	General Business Credit 200214016	38.00-00
Section 41	Credit for Increasing Research Activities 200128013 200227013	41.00-00
	• Alternative Incremental Credit 200104007 200114027 200118007 200149004 200149005 200204026 200217054 200223048 200223049 200148017 200207004 200210008 200210021 200210023	41.01-00
	• Qualified Research Expenses 200103010 200131007	41.51-00
	• <i>In-house Research Expenses</i> 200204008 200219001	41.51-01
Section 42	Low-Income Housing Credit 200226033 200226035	42.00-00
	• In General 200204006	42.01-00
	• Eligible Basis 200227009 200203011 200203012 200203013 200203014 200216027	42.04-00
	• <i>Waiver for Certain Federally-Assisted Existing Buildings</i> 200105038 200219009 200219010 200224029	42.04-07
	• Qualified Low-Income Housing Project 200137028	42.07-00
	• <i>Set-Aside Requirement</i> 200107022 200112051	42.07-01
	• <i>Date for Meeting Requirements</i> 200107022 200112051 200217013	42.07-03
	• Limitation of Low-Income Housing Credit Dollar Amount	42.08-00
	• <i>Buildings Financed with Tax-Exempt Bonds</i> 200109011 200109012 200109013 200109014 200219030 200220011 200220020 200147008 200147009 200147010 200147011	42.08-04
	• <i>Special Rules</i> 200134006	42.08-07
	• Recapture of Credit 200206037 200209011 200232018 200232019 200232020	42.10-00
	• Certifications and Other Reports to the Secretary 200137044	42.12-00

	• Responsibilities of Housing Credit Agencies	42.13-00	
	• <i>Credit Allocated Not to Exceed Amount Necessary to Assure Project Feasibility</i> 200226033 200226035	42.13-02	
	• Secretary's Authority to Provide Regulations	42.14-00	
	• <i>Correction of Administrative Errors and Omissions</i> 200226033 200226035	42.14-01	
Section 43	Enhanced Oil Recovery Credit	43.00-00	
	• Qualified Enhanced Oil Recovery Project 200227002	43.02-00	
Section 45	Electricity Produced from Certain Renewable Sources	45.00-00	
	• In General 200151033 200206034 200142018 200202048	45.01-00	
Section 49	At-Risk Rules 200213008 200225007	49.00-00	
Section 49	Termination of Regular Percentage	49.00-00	R
	• Transition Property	49.05-00	R
	• <i>Self-Constructed Property Rule</i> 200225008	49.05-06	R
Section 51	(Was Formerly Section 44B) Targeted Jobs Credit 200222002	51.00-00	
Section 52	Special Rules 200118052	52.00-00	
Section 55	Alternative Minimum Tax	55.00-00	
	• Alternative Minimum Taxable Income 200103073	55.03-00	
Section 59	Other Definitions and Special Rules	59.00-00	
	• Alternative Minimum Tax Foreign Tax Credit	59.01-00	
	• <i>Limitations and Exceptions</i> 200110019	59.01-01	
	• Optional 10-year Writeoff of Certain Tax Preferences	59.05-00	
	• <i>Elections</i> 200210055	59.05-04	
	• <i>Research and Experimental Expenditures</i> 200117006	59.05-08	
Section 61	Gross Income v. Not Gross Income 200101023 200102044 200105039 200106007 200106007 200106021 200106021 200107017 200108010 200110022 200116016 200119047 200122032 200127040 200149019 200151033 200209007 200209008 200211042 200213011 200213014 200217052 200222001 200222003 200227003 200141022 200142005 200143019 200146025 200147022 200147028 200202033 200203010 200207018 200210018 200210019 200221032 200229018 200229018 200229018 200229018 200229018 200230029 200230029	61.00-00	
	• Return of Capital v. Income	61.02-00	
	• <i>Court Awards, Settlements, etc.</i> 200111044 200128031	61.02-06	

• Loan or Mortgage v. Sale 200101023 200102044 200107017 200110022 200120001 200122032 200130009 200151033 200217052 200147022 200210019	61.03-00
• Foreign Currency Transactions 200106007 200106007	61.07-00
• Compensation for Services 200147052	61.09-00
• Interest 200145013 200203061	61.15-00
• Rents and Royalties	61.16-00
• <i>Advance Rentals and Bonuses</i> 200103006	61.16-01
• <i>Lease v. Sale</i> 200232003	61.16-03
• Dividends	61.17-00
• <i>Discharge of Stockholder's Indebtedness</i> 200203061	61.17-04
• Discharge of Indebtedness 200132035 200222026	61.22-00
• <i>Purchase Price Adjustment</i> 200101004	61.22-03
• Bonds	61.24-00
• <i>Issuance</i> 200125004	61.24-01
• Damages, Court Awards, Settlements 200116005 200137031	61.28-00
• <i>Return of Capital--Basis</i> 200108029	61.28-03
• Agents--Conduits 200151014 200136008 200136008	61.29-00
• Assignments	61.30-00
• <i>Anticipatory Assignment of Income</i> 200107019	61.30-03
• Who is the Taxpayer 200116005 200124019	61.39-00
• Governmental Benefits and Subsidies 200138007	61.40-00
• Form v. Substance 200101023 200102044 200107017 200108003 200110022 200122032 200151033 200217052 200147022 200210019	61.43-00
• <i>Lease of Property</i> 200112020 200113016 200120011 200145002 200205023 200217024 200227018 200201022 200201022 200203053	61.43-01
• Recovery of Items Previously Deducted--Tax Benefit 200136008 200136008	61.44-00
• Character of Income	61.49-00

	• <i>Capital Gain v. Ordinary Income</i> 200211042	61.49-01
Section 62	Adjusted Gross Income Defined 200115033	62.00-00
	• Trade and Business Deductions of Employees 200115033	62.02-00
	• <i>Reimbursements</i> 200115033	62.02-02
	• <i>Non-Reimbursements Arrangements</i> 200115033 200132002	62.02-03
	• <i>Tool / Equipment Rental</i> 200127004	62.02-05
Section 66	Treatment of Community Income 200102012	66.00-00
Section 71	Alimony--Separate Maintenance Payments 200127039 200141036	71.00-00
Section 72	Annuities: Endowment and Life Insurance (Included v. Not Included in Gross Income) 200113022 200117044 200117045 200121072 200128061 200222032 200225038 200225039 200148084 200208017 200230037 200230037	72.00-00
	• Amounts Not Receivable as Annuities 200115040	72.07-00
	• <i>On or After Starting Date</i> 200115040	72.07-01
	• <i>Before Starting Date</i> 200115040 200151038	72.07-02
	• <i>Lump Sum</i> 200115040	72.07-03
	• <i>Allocation of Amounts</i> 200115040	72.07-04
	• <i>Investment In Contract</i> 200115040	72.07-05
	• Distribution Of Deductible Employee Contributions 200215032	72.15-00
	• Premature Distributions From Annuity Contracts	72.17-00
	• <i>Exception</i> 200113022	72.17-01
	• Required Distributions Where Holder Dies	72.19-00
	• <i>Exceptions</i> 200151038	72.19-01
	• Tax on Early Distributions from Qualified Retirement Plans 200119060 200126037 200130057 200142022 200148051	72.20-00
	• <i>Death</i> 200110033	72.20-02
	• <i>Substantially Equal Payments</i> 200103078 200105066 200106039 200106039 200115039 200116056 200118057 200119060 200122048 200131035 200214029 200222036 200202074 200202075 200202076 200203072	72.20-04

	• Annuity Contracts Not Held By Natural Persons 200206047	72.21-00	
	• Treatment of Modified Endowment Contracts	72.22-00	
	• <i>10 Percent Additional Tax for Taxable Distributions from Modified Endowment Contracts</i> 200214034 200225040	72.22-01	
	• <i>Certain Distributions Not Subject to 10 Percent Additional Tax</i> 200214034 200225040	72.22-02	
Section 79	Group-Term Life Insurance--Employees (Payments Included v. Not Included) 200102011 200210025	79.00-00	
	• Inclusion in Employee Income 200117038	79.03-00	
	• Determination of Cost of Insurance 200117038	79.04-00	
Section 81	(Repealed-1987 Act) Certain Increases In Suspense Accounts	81.00-00	R
	• Vacation Pay 200136006 200136006	81.02-00	R
Section 83	Property Transferred in Connection With Performance of Services 200104020 200118046 200130008 200204005 200203018	83.00-00	
	• Election to Include in Gross Income in Year of Transfer	83.02-00	
	• <i>Manner of Making Election</i> 200128037	83.02-01	
	• <i>Revocability of Election</i> 200212021 200229004 200229004 200229004 200229004 200229004	83.02-04	
	• Applicability of Section 200117020 200151011 200212005 200212007 200212008	83.05-00	
	• Deduction by Employer 200110020 200206003 200136003 200136003	83.08-00	
	• Nonqualified Stock Options 200219016 200139001 200139001	83.11-00	
	• Rabbi Trusts 200127031 200128006	83.13-00	
Section 101	Certain Death Benefits (Excluded v. Not Excluded From Gross Income) 200227036	101.00-00	
	• Life Insurance Proceeds Payable by Reason of Death	101.01-00	
	• <i>Transfer for Consideration</i> 200111038 200120007	101.01-02	
Section 102	Gifts and Inheritances 200137031	102.00-00	
Section 103	Interest on State and Local Bonds (Formerly Interest on Certain Governmental Obligations) 200116012	103.00-00	
	• State and Local	103.02-00	
	• <i>Political Subdivisions</i> 200204032 200227023 200143025	103.02-01	
	• Transitional Rules	103.12-00	

	• <i>Established State Programs</i>	103.12-04
	200209005	
Section 104	Compensation for Injuries and Sickness (Excluded v. Not Excluded)	104.00-00
	200116040 200222001	
	• Health and Accident Insurance	104.01-00
	200108010 200204021 200146010 200146011 200146012	
	• Workmen's Compensation	104.02-00
	200106011 200106011 200108007 200115014 200130005 200204007 200222004 200226018 200138008 200148040 200212009	
	• Damages	104.03-00
	200121031	
Section 105	Accident and Health Plans (Excluded v. Not Excluded)	105.00-00
	200108010	
	• Attributable to Employer Contributions	105.01-00
	200226003	
Section 106	Contribution by Employer to Accident and Health Plans (Excluded v. Not Excluded)	106.00-00
	200108010 200117038 200131011 200222019 200210024	
Section 108	Income From Discharge of Indebtedness	108.00-00
	200111030 200111031 200111033 200111034 200111035 200145009 200147023	
	• Exclusion From Gross Income	108.01-00
	200111030 200111031 200111033 200111034 200111035 200147023	
	• Meaning of Terms and Special Rules	108.03-00
	• <i>S Corporations</i>	108.03-02
	200208016 200210044	
Section 111	Recovery of Certain Items Previously Deducted (Excluded v. Not Excluded)	111.00-00
	200208003	
	• Did Not Reduce Income Tax	111.01-00
	200145004	
	• Tax Refunds	111.06-00
	200106021 200106021	
Section 115	Income of States, Municipalities, etc.	115.00-00
	200109002 200112028 200116009 200127033 200129015 200214026 200201001 200201001	
	• Separate Entity v. Integral Part	115.02-00
	• <i>Political Subdivision</i>	115.02-02
	200210024	
	• Income Accruing to the State	115.06-00
	200210025	
Section 117	Qualified Scholarships	117.00-00
	200102054 200127048 200127050	
	• Qualified Scholarships	117.01-00
	• <i>Qualified Tuition and Related Expenses</i>	117.01-02
	200137006	
	• Limitation	117.05-00
	200113020	

	• <i>Determination of Amount Representing Payment For Service</i> 200226005	117.05-05
	• <i>Reporting and Withholding Requirements</i> 200226005	117.05-06
	• <i>Qualified Tuition Reduction</i> 200137041 200149030	117.06-00
	• <i>Employee, Etc.</i> 200149030	117.06-03
	• <i>Discrimination in Favor of Highly Compensated Employees</i> 200137041	117.06-05
Section 118	Contributions to the Capital of a Corporation 200134021	118.00-00
	• <i>Contributions by Shareholders</i>	118.01-00
	• <i>Shareholder Contributions</i> 200227007	118.01-01
	• <i>Nonshareholder Contributions</i> 200110002 200224023 200227007 200133036 200133037 200148002 200231015 200231015	118.01-02
	• <i>Contributions in Aid of Construction</i> 200134021 200148002	118.02-00
	• <i>Contributions v. Sale of Services</i> 200227007	118.03-00
Section 121	Exclusion of Gain from Sale of Principal Residence (Amended by P.L. 105-34, Section 312(a)) 200104005	121.00-00
	• <i>General Requirements</i>	121.01-00
	• <i>Ownership</i> 200119014	121.01-02
	• <i>Election</i> 200124011	121.03-00
Section 125	Cafeteria Plans 200117038	125.00-00
Section 132	Certain Fringe Benefits	132.00-00
	• <i>Working Condition Fringe</i> 200137039 200231016 200231016	132.03-00
	• <i>De Minimis Fringe</i>	132.04-00
	• <i>In General</i> 200219005	132.04-01
	• <i>Transit Passes / Van Pools</i> 200105007	132.10-00
Section 141	Private Activity Bond; Qualified Bond 200205009 200211003 200225010	141.00-00
	• <i>Private Business Tests</i> 200211022 200143031	141.01-00
	• <i>Business Use Test</i> 200132017 200211022	141.01-01

	• Management Contracts 200205009	141.07-00
	• <i>Safe Harbor</i> 200222006	141.07-01
Section 142	Exempt Facility Bond	142.00-00
	• Airports, Docks and Wharves, and Mass Commuting 200201008 200201008	142.03-00
	• Qualified Residential Rental Project	142.04-00
	• <i>40/60 Test</i> 200145007 200145012 200223011	142.04-02
	• Local Furnishing of Electrical Energy or Gas 200117026 200120014	142.06-00
	• Qualified Hazardous Waste Facilities 200207010	142.08-00
	• Solid Waste Disposal Facility 200226002 200146043 200207010	142.11-00
Section 143	Mortgage Revenue Bonds; Qualified Mortgage Bond and Qualified Veterans' Mortgage Bond	143.00-00
	• Purchase Price Requirement	143.07-00
	• <i>Average Area Purchase Price</i> 200147051	143.07-01
Section 144	Qualified Small Issue Bond; Qualified Student Loan Bond; Qualified Re-development Bond	144.00-00
	• Small Issue Bond Defined 200116014	144.01-00
	• <i>Manufacturing Facility</i> 200122004	144.01-10
Section 145	Qualified 501(c)(3) Bonds 200107020 200124002	145.00-00
Section 146	Volume Cap	146.00-00
	• Carryforward of Allocation 200103058 200128002 200151001 200211026 200135018 200135018 200135018 200135018 200147014 200208014 200212022 200229002 200229002 200229002 200229002 200229002 200232002	146.07-00
Section 147	Other Requirements Applicable to Certain Private Activity Bonds	147.00-00
	• Public Approval Requirement 200126006	147.06-00
Section 148	Arbitrage 200116004 200119045 200209003 200147015 200210006 200229020 200229020 200229020 200229020 200229020	148.00-00
	• Higher Yielding Investment	148.02-00
	• <i>Investment Property</i> 200116004	148.02-01
	• Temporary Period Exception 200210006	148.05-00
	• Required Rebate to the U.S. 200214005	148.08-00

	• Yield Determinations	148.12-00
	• <i>Adjustment for Administrative Costs</i> 200209003	148.12-02
Section 149	Bonds Must Be Registered To Be Tax Exempt; Other Requirements	149.00-00
	• Advance Refundings 200139007 200139007 200229020 200229020 200229020 200229020 200229020	149.03-00
Section 150	Definitions and Special Rules 200114012	150.00-00
	• General Rules	150.01-00
	• <i>Any Obligation</i> 200230039 200230039	150.01-01
Section 152	Dependent Defined	152.00-00
	• Non Relatives 200108010	152.04-00
	• Support Test for Children of Divorced Parents 200211004	152.08-00
	• <i>Release of Exemption</i> 200224005	152.08-02
Section 162	Trade or Business (Deductible v. Not Deductible) 200108001 200116043 200127022 200137050 200149013 200213004 200224011 200133006 200143001 200146008 200147012 200218022 200230044 200230044	162.00-00
	• Ordinary and Necessary (See Also Specific Headings Infra This Section) 200127031 200139005 200139005 200216013	162.02-00
	• Certain Goods and Services	162.04-00
	• <i>Insurance</i> 200121019 200209017	162.04-02
	• <i>Capture Insurance</i> 200105014 200125005 200125009 200130032 200149003	162.04-03
	• <i>Advertising--Contests, Prizes, etc.</i> 200121006	162.04-09
	• Certain Business Expenses	162.05-00
	• <i>Compromise Settlement of Claims</i> 200137065 200211041	162.05-03
	• Travel (See Also Issues 162.12-06 and 162.13-03)	162.08-00
	• <i>Reasonable v. Unreasonable</i> 200137002	162.08-20
	• Rents and Royalties	162.09-00
	• <i>Conveyance and Leaseback</i> 200217024	162.09-06
	• <i>Equipment Leasing</i> 200150011	162.09-10
	• Repairs	162.16-00
	• <i>Capital Expenditure v. Repair</i> 200202026	162.16-04
	• Expenditures Against Public Policy	162.21-00

	• <i>Fines and Penalties</i> 200210011	162.21-01
	• <i>Aerospace ISP - Deductibility of Illegal Bribes, Kickbacks and Other Payments</i> 200128004	162.21-15
	• <i>Deductible by Whom</i> 200147013	162.23-00
	• <i>Legal Expenses</i>	162.25-00
	• <i>Capital Expenditure</i> 200126018	162.25-04
	• <i>Defending, Settling, etc., Civil Action</i> 200126018 200143006 200143030	162.25-08
	• <i>Capital v. Expense</i> 200108029 200121003 200126008	162.26-00
	• <i>Year Deductible</i> 200102003	162.28-00
	• <i>Form v. Substance</i> 200105003 200128007 200217021 200224011	162.30-00
	• <i>Stock Reacquisition Expenses</i> 200206005	162.34-00
	• <i>Interest Portion</i> 200206005	162.34-04
	• <i>Million Dollar Cap - Executive Employee Compensation</i> 200139001 200139001 200229016 200229016 200229016 200229016 200229016	162.36-00
	• <i>General Rules</i> 200133014	162.36-01
	• <i>Covered Employees</i> 200115036 200129016 200219015 200216001	162.36-02
	• <i>Performance-Based Compensation</i> 200104022	162.36-04
	• <i>Stock Options</i> 200127006	162.36-08
Section 163	Interest 200111001 200116008 200131015 200143001 200146013 200150012 200203061	163.00-00
	• <i>Limitation on Investment Interest in General</i>	163.03-00
	• <i>Investment Income and Expenses</i> 200146018 200216012	163.03-03
	• <i>Personal Interest in General</i> 200211018	163.05-00
	• <i>Qualified Residence Interest</i>	163.06-00
	• <i>Qualified Residence</i> 200137033	163.06-04
	• <i>Original issue Discount</i> 200116008	163.07-00
	• <i>Related Foreign Person</i> 200135011 200135011 200135011 200135011	163.07-02

	• Debt on Corporate Owned Life Insurance (COLI) 200213010	163.12-00
	• Bond Issuance Premium 200125004 200142005	163.14-00
Section 164	Taxes	164.00-00
	• Income Taxes 200126005 200225030	164.03-00
Section 165	Deductions For Losses	165.00-00
	200106005 200106005 200119007	
	• Worthless Securities 200226004	165.06-00
	• Disaster Losses 200229007 200229007 200229007 200229007 200229007	165.07-00
	• Other 200221008	165.11-00
	• Abandonment Losses 200132031	165.13-00
Section 166	Bad Debts	166.00-00
	200120001	
	• Basis 200151011	166.01-00
	• Partially Worthless Debt 200101001 200134005	166.03-00
Section 167	Depreciation	167.00-00
	200110001 200119007	
	• Property Used in the Trade or Business 200203001	167.01-00
	• Retirement and Abandonment 200141026	167.10-00
	• Tangibles	167.13-00
	• <i>Buildings</i> 200110001	167.13-05
	• <i>Office Furniture and Equipment</i> 200110001	167.13-08
	• <i>Component Parts</i> 200110001	167.13-11
	• All Industries ISP - Amortization of Order Backlog (Inventory) 200151011	167.14-00
	• <i>Licenses and Franchises</i> 200142007	167.14-06
	• <i>Other Intangible Property</i> 200206014 200227009 200142007 200208002 200210053 200216016 200216018 200216027	167.14-11
	• Ownership of Depreciable Interest 200106019 200106019	167.15-00
	• Post-1970 CLADR Assets 200214015	167.24-00

Section 168	Modified Accelerated Cost Recovery System	168.00-00
	200137026 200206038 200227009 200216027	
	• Classification of Property	168.20-00
	200122002 200206015 200206021 200135036 200135036 200135036 200135036	
	200135037 200135037 200135037 200135037 200139023 200139023 200139025	
	200139025 200144031 200146047 200146052 200148005 200148015 200203009	
	200221016 200229021 200229021 200229021 200229021 200229021 200232012	
	• Asset Classes	168.20-02
	200216030	
	• Redeterminations, Changes in Use	168.32-00
	200216030	
	• Retirements	168.35-00
	200141026	
Section 169	Amortization of Pollution Control Facilities	169.00-00
	200116018	
Section 170	Charitable, Etc. Contributions and Gifts	170.00-00
	200112064 200112065 200117043 200122025 200149007 200213021 200143025	
	200215032 200230007 200230007	
	• Time of Making Contribution	170.01-00
	200209020 200141018 200141019 200142019 200202034 200230029 200230029	
	• Percentage Limitations	170.07-00
	200112064 200112065	
	• Churches	170.07-01
	200209055	
	• Medical Organizations and Hospitals	170.07-03
	200127052 200147059	
	• Governmental Units	170.07-05
	200140032	
	• Publicly Supported Organizations	170.07-06
	200204040 200150027	
	• Donees of Charitable Contributions in General	170.09-00
	200230005 200230005 200230007 200230007	
	• United States, States, Political Subdivisions, Etc.	170.09-01
	200151015	
	• Religious, Charitable, Etc. Organizations	170.09-02
	200121078 200149045	
	• Ordinary Income and Capital Gain Property	170.11-00
	200119005 200215020	
	• Reduction in General	170.11-01
	200125003	
	• Qualified Appreciated Stock	170.11-05
	200112022 200112024 200112025	
	• Disallowance of Deduction	170.12-00
	• Partial Interests in Property	170.12-03
	200108012 200108013 200108014 200205008 200223013 200223014 200140027	
	200207026	
	• Substantiation	170.12-09
	200101031	

	• Qualified Conservation Contribution 200208019	170.14-00
	• Recordkeeping and Return Requirements 200230005 200230005 200230007 200230007	170.18-00
Section 172	Net Operating Loss Deductions (Deductible v. Not Deductible)	172.00-00
	• Carryback and Carryover 200148003 200148009 200148010 200148012 200148013 200148014	172.01-00
	• <i>Joint Returns</i> 200118003	172.01-08
	• Deferred Statutory or Tort Liability Losses 200125006 200129002 200133005 200136002 200136002	172.07-00
Section 174	Research and Experimental Expenditures (Deductible v. Not Deductible) 200125019 200145011 200207006	174.00-00
Section 183	Activities Not Engaged in for Profit	183.00-00
	• Presumption That Activity Is Engaged In For Profit	183.03-00
	• <i>Election To Postpone Determination</i> 200201010 200201010	183.03-01
Section 197	Amortization of Goodwill & Certain Other Intangibles 200106006 200106006 200137013 200137014 200137023 200137050 200207006	197.00-00
	• Certain Elections for Intangible Property 200116042 200137047	197.01-00
Section 212	Expenses for Production of Income 200111001	212.00-00
	• Tax Matters 200115032	212.18-00
	• Transactions Lacking Economic Reality 200224011	212.19-00
	• Profit Motive 200224011	212.21-00
Section 213	Medical, Dental, etc., Expenses	213.00-00
	• Medical Care 200226003 200140017	213.05-00
Section 216	Deduction Of Taxes, Interest, And Business Depreciation By Cooperative Housing Corporation Tenant-Stockholder 200125013 200135014 200135014 200135014 200135014	216.00-00
	• Status As Cooperative Housing Corporation 200217042 200232029 200232031	216.01-00
	• Status As Tenant-Stockholder 200232029 200232031	216.02-00
Section 217	Moving Expenses (Deductible v. Not Deductible)	217.00-00
	• Year Deductible 200115034	217.13-00
Section 219	Retirement Savings	219.00-00
	• Limitations and Restrictions	219.02-00
	• <i>Maximum Deductions</i> 200151051	219.02-01

Section 245	Dividends Received From Certain Foreign Corporations	245.00-00
	• Dividends Received From FSC 200137038	245.09-00
Section 263	Capital Expenditures (Deductible v. Not Deductible)	263.00-00
	200109001 200116043 200137050 200213004 200136010 200136010 200147012 200148006 200207006 200207011 200216013	
	• Development Costs	263.02-00
	• <i>Oil and Gas Wells (See Also 291.02-01 et seq.)</i> 200102006	263.02-01
	• Permanent Improvements 200108029	263.03-00
	• <i>Determination of Useful Life</i> 200122002	263.03-01
	• Refinancing	263.05-00
	• <i>Reorganization</i> 200126008	263.05-01
	• Stocks and Bonds	263.07-00
	• <i>Commissions</i> 200114008	263.07-01
	• Leases 200145003	263.08-00
	• Advertising, Good Will, Expansion 200217007 200147035	263.11-00
	• Legal, Accounting, etc., Expenses 200103004	263.12-00
	• Acquisition of Property, Intangibles 200109001	263.13-00
	• <i>Contracts</i> 200217025	263.13-06
	• Allocation Between Capital Expenditure and Expense 200202026	263.14-00
	• Interest and Carrying Costs - Straddles 200130010 200131015 200151011 200150012	263.21-00
Section 263A	Capitalization and Inclusion in Inventory Costs of Certain Expenses	263A.00-00
	200119009 200137016 200225013 200227009 200216027	
	• Activities Subject to Capitalization 200146028	263A.01-00
	• <i>Production Activities</i> 200146009	263A.01-01
	• <i>Property Acquired for Resale</i> 200121006	263A.01-02
	• Capitalization of Costs	263A.03-00
	• <i>Indirect Costs</i> 200128003	263A.03-02
	• Allocation Methods 200144003	263A.04-00

	• <i>Simplified Resale Method</i> 200111014	263A.04-06
	• Transition Rules	263A.06-00
	• <i>3-Year Average Method</i> 200206012	263A.06-02
	• Change in Method of Accounting under Section 263A 200111014 200128003	263A.07-00
	• Interest Capitalization	263A.08-00
	• <i>Designated Property</i> 200101003	263A.08-01
	• Unit of Property 200101003	263A.10-00
Section 264	Amounts Paid in Connection With Insurance (Deductible v. Not Deductible) 200213010 200202028 200210010 200230037 200230037	264.00-00
Section 265	Expenses and Interest Relating to Tax-Exempt Income (Deductible v. Not Deductible) 200129009	265.00-00
	• Allocation of Expenses Between Exempt and Non-Exempt Income 200127041	265.01-00
	• Interest Expenses Relating to Tax-Exempts 200110024	265.04-00
Section 267	Losses, Expenses, and Interest With Respect to Transactions Between Related Parties	267.00-00
	• Expenses and Interest: In General	267.02-00
	• <i>Matching of Deduction and Payee Income</i> 200125004	267.02-01
	• Special Rules Applicable to Controlled Groups: In General 200227001	267.07-00
Section 269	Acquisitions Made to Evade or Avoid Income Tax 200204002 200205003	269.00-00
Section 274	Disallowance of Certain Entertainment, etc., Expense (Allowable v. Not Allowable)	274.00-00
	• Entertainment, Amusement, or Recreation 200214007	274.01-00
	• Treatment of Facility 200214007	274.07-00
	• Substantiation 200103015	274.08-00
	• Percentage Disallowance for Meals and Entertainment Deductions 200209028	274.14-00
Section 280A	Disallowance of Certain Expenses in Connection with Business Use of Home, Rental of Vacation Home, Etc.	280A.00-00
	• Use by Taxpayer as Employee 200121070	280A.06-00
Section 280G	Golden Parachute Payments 200110009 200110013 200110025 200212005 200212007 200212008	280G.00-00

	• Definitions 200108008	280G.01-00
	• <i>Parachute Payment</i> 200212013	280G.01-01
Section 301	Distributions of Property 200117004 200127012 200151049 200222008	301.00-00
	• Dividend in Property 200122001	301.01-00
	• <i>Foreign Corporation Distributor</i> 200124008	301.01-02
	• Constructive Dividend 200203061	301.07-00
Section 302	Distributions in Redemption of Stock 200111032 200117004 200204035 200222008 200212030	302.00-00
	• Not Essentially Equivalent to a Dividend	302.01-00
	• <i>Meaningful Reduction of Interest</i> 200218004	302.01-04
	• Disproportionate Redemption of stock 200125010	302.02-00
	• Complete Termination of Interest 200125010 200203021	302.03-00
	• Redemption from Noncorporate Shareholder in Partial Liquidation 200229005 200229005 200229005 200229005 200229005 200230002 200230002	302.04-00
	• Constructive Ownership	302.05-00
	• <i>Waiver of Family Attribution by Individual</i> 200117016 200203021	302.05-01
	• <i>Waiver of Family Attribution by Entity</i> 200102017	302.05-02
Section 303	Distributions In Redemption of Stock to Pay Death Taxes 200141015	303.00-00
	• Stock Redemption Within Required Period 200141015	303.01-00
	• Series of Redemptions 200141015	303.02-00
Section 304	Redemption Through Use of Related Corporations	304.00-00
	• Acquisition by Subsidiary	304.01-00
	• <i>Distribution to which Section 301 Applies</i> 200141003	304.01-03
	• Acquisition by Related Corporation (Other Than Subsidiary)	304.02-00
	• <i>Distribution Treated as an Exchange Under Section 302</i> 200111004	304.02-05
Section 305	Distributions of Stock and Stock Rights (301 Distribution v. Tax Free Distribution) 200103052 200211035 200215016 200215018	305.00-00
	• Stock Dividends 200122001 200125013 200135020 200135020 200135020 200135020 200215049	305.01-00

	• Disproportionate Distributions 200116002 200117016	305.04-00
	• Certain Transactions Treated as Distributions 200116002	305.06-00
Section 311	Taxability of Corporation on Distribution 200125013 200213017	311.00-00
Section 312	Effect on Earnings and Profits (Decrease v. No Decrease) 200227001	312.00-00
Section 316	Dividend v. Not a Dividend 200225014	316.00-00
	• Sale of Property to Stockholders	316.05-00
	• <i>Bargain Purchase</i> 200215036	316.05-01
Section 317	Other Definitions	317.00-00
	• Redemption of Stock v. Not a Redemption 200212030	317.02-00
Section 318	Constructive Ownership of Stock 200201012 200201012 200202057	318.00-00
Section 331	Gain or Loss to Shareholders in Corporate Liquidations 200214016 200210035	331.00-00
	• Liquidation in Kind	331.01-00
	• <i>Valuation</i> 200213020	331.01-01
	• Liquidation v. Reorganization 200117008	331.05-00
Section 332	Complete Liquidation of Subsidiaries 200105034 200105035 200107016 200128015 200129024 200132014 200137042 200148004 200230026 200230026 200232004 200232005 200232006 200232007 200232008 200232009	332.00-00
	• Nonrecognition of Gain or Loss 200118045 200129029 200137036 200226004	332.01-00
Section 336	Gain or Loss Recognized on Property Distributed in Complete Liquidation 200103055 200214016	336.00-00
	• Liquidation in a Reorganization 200117008	336.03-00
Section 337	Gain or Loss on Sale or Exchange in Connection With Certain Liquidations (UIL for Transaction Prior to 1986 Act Effective Dates) 200103055 200105034 200105035 200128015 200132005 200204020 200204029 200217044 200139006 200139006 200146054	337.00-00
	• Conversion to Tax Exempt 200103055	337.14-00
	• Loss Disallowance 200138005	337.16-00
Section 338	Certain Stock Purchases Treated as Asset Acquisitions	338.00-00
	• Express Election	338.01-00

	• <i>Time in which Election must be made</i>	338.01-02
	200103053 200103059 200103060 200103062 200103063 200103064 200103065 200103066 200105008 200105043 200107001 200107002 200108028 200114025 200116003 200116013 200119011 200119038 200121039 200121041 200121043 200121047 200122038 200125039 200125050 200125063 200125068 200125069 200125084 200126022 200126023 200126025 200127020 200127035 200128008 200128012 200129034 200130027 200130033 200131017 200131026 200132030 200137035 200204033 200204036 200205013 200205015 200205016 200205017 200205018 200205037 200206036 200211020 200211027 200211029 200211031 200213025 200220013 200220025 200223023 200223024 200223025 200223026 200223027 200223028 200223029 200223030 200223031 200223032 200223033 200223034 200223035 200223053 200223054 200223055 200223056 200223057 200223058 200223059 200223060 200223061 200223062 200224019 200225028 200227019 200227038 200133032 200133033 200134009 200134015 200135040 200135040 200135040 200135040 200138013 200139004 200139004 200140029 200140030 200140038 200141039 200142013 200144014 200144017 200146048 200146053 200147041 200148044 200148050 200201030 200201030 200202046 200202049 200202058 200202066 200202067 200203056 200210057 200210058 200210059 200216009 200218020 200230031 200230031 200232014 200232023 200232024	
	• Qualified Stock Purchase	338.02-00
	200122007	
	• International Aspects of Section 338	338.50-00
	200103031	
	• Adjusted Gross-Up Basis (AGUB)	338.60-00
	200144028	
	• Allocation of AGUB Among Target Assets	338.70-00
	200144028	
Section 346	(Amended-1982) Partial Liquidation Defined	346.00-00
	• Termination of a Business	346.02-00
	200229005 200229005 200229005 200229005 200229005	
Section 351	Transfer to Corporation Controlled by Transferor	351.00-00
	200103034 200104025 200107016 200109039 200111013 200112014 200114002 200117039 200121013 200121071 200122022 200125007 200204002 200206006 200209029 200211030 200214025 200217021 200224011 200224026 200134008 200135001 200135001 200135001 200135001 200139002 200139002 200150001 200150009 200208022 200212012 200218022	
	• Control v. No Control by Transferor	351.01-00
	200126016	
	• Series of Transactions	351.02-00
	200211030 200136022 200136022 200136023 200136023	
Section 355	Distribution of Stock and Securities of a Controlled Corporation	355.00-00
	200103054 200104024 200104028 200105060 200107008 200108019 200108021 200109023 200109045 200114002 200116024 200118044 200118050 200119048 200121069 200122041 200125055 200128038 200128039 200129007 200131024 200149020 200151040 200204034 200209029 200224009 200227016 200133011 200133034 200135039 200135039 200135039 200135039 200138015 200138024 200139011 200139011 200139026 200139026 200139028 200139028 200140033 200140039 200142012 200143029 200146019 200148001 200148049 200201032 200201032 200212012 200215031 200221009 200229015 200229015 200229015 200229015 200229015 200229025 200229025 200229025 200229025 200229025 200230006 200230006	

	• Spin-Off	355.01-00
	200101006 200101020 200102036 200103037 200103057 200104001 200104012 200104025 200105031 200107016 200107031 200109031 200111026 200111029 200112055 200113019 200114002 200115001 200118018 200118045 200119012 200120015 200120030 200125011 200125044 200126012 200126028 200129006 200129023 200129029 200129032 200130003 200131003 200137011 200137036 200137042 200151042 200151043 200151044 200205035 200206022 200209029 200209047 200213016 200214014 200214021 200217006 200219025 200220019 200223002 200225005 200227024 200133035 200134014 200138025 200139001 200139001 200139009 200139009 200141045 200146019 200150023 200201006 200201006 200202047 200202059 200212026 200215049 200216006 200218021 200231003 200231003 200231008 200231008	
	• Split-Off	355.01-01
	200102045 200104003 200108019 200108021 200109020 200118004 200121042 200121044 200125020 200129030 200137019 200145029 200205001 200205034 200206041 200209018 200211032 200217051 200220010 200223007 200226007 200226036 200133016 200134010 200138004 200140042 200146020 200207025 200215027 200215034 200231006 200231006	
	• Split-Up	355.01-02
	200116025 200121061 200202060	
	• Active Business	355.03-00
	200104025 200108019 200108021 200112055 200126012	
	• Business Purpose	355.04-00
	200103054 200104025 200112052 200113017 200125011 200209018 200211032 200214025 200227016 200135038 200135038 200135038 200135038 200202059 200221009	
	• Control	355.05-00
	• Distribution of Control	355.05-01
	200125083	
	• Distributions Within a Consolidated Group	355.09-00
	200211019	
	• Gain Recognition on Distributions Pursuant to Acquisitions of Greater than 50% of Distributing or Controlled	355.10-00
	200205035 200133035 200215047	
Section 356	Receipt of Additional Consideration--Boot (Gain Recognized v. Not Re- cognized)	356.00-00
	200211032	
	• Reorganization Exchange	356.01-00
	200118045	
Section 357	Assumption of Liability (Gain Recognized v. Not Recognized)	357.00-00
	200121013 200122022	
	• Tax Avoidance Purpose v. No Avoidance Purpose	357.01-00
	200206006	
Section 358	Basis to Distributees	358.00-00
	• Assumption of Liabilities	358.03-00
	200121013 200122022 200224011 200150001	
Section 362	Basis to Corporations	362.00-00
	200206006	
Section 367	Foreign Corporations	367.00-00
	200106004 200106004 200114002 200137036 200209029 200203058 200212012	

• Transfer to Foreign Corporations Subject to Section 367(a) 200221046	367.01-00
• Treatment of Transfers of Stock or Securities to Foreign Corporations 200122026 200203015 200221046	367.03-00
• <i>Reorganizations Described in Section 368(a)(1)(B)</i> 200221046	367.03-01
• <i>Transfers of Stock Subject to a Ten-Year Gain Recognition Agreement</i> 200221046	367.03-07
• <i>Requirements of Gain Recognition Agreement</i> 200147004	367.03-10
• Transactions Described in Section 367(b) Complete liquidation of Foreign 200148036 200148037	367.10-00
• <i>Subsidiary</i> 200128040	367.10-01
• <i>Attribution of Earnings and Profits on an Exchange Described in Section 351 354, or 356</i> 200148036 200148037	367.10-03
Section 368 Definitions Relating to Corporate Reorganizations 200105060 200108005 200124009 200145009 200204002 200224009 200148001 200208022	368.00-00
• Statutory Merger or Consolidation (Type "A") 200102031 200105040 200109037 200121010 200145039 200213019 200140011 200140068 200203058	368.01-00
• <i>Using Stock of Corporation Controlling Acquiring Corporation</i> 200119049 200132007	368.01-01
• <i>Using Stock of Corporation Controlling Merged Corporation</i> 200136022 200136022 200136023 200136023	368.01-02
• Stock for Stock (Type "B") 200208017	368.02-00
• Stock for Property (Type "C") 200111023 200111024 200115010 200115030 200116028 200225031	368.03-00
• <i>Substantially All the Property</i> 200103056 200115016 200115030 200116028	368.03-01
• Assets for Control of Transferee (Type "D") 200101006 200101020 200102036 200102038 200102045 200103057 200104001 200104012 200104028 200107031 200109027 200111026 200111029 200113019 200114002 200118004 200118018 200118045 200119012 200119048 200120015 200120030 200121042 200121044 200121069 200122041 200125020 200125044 200128051 200129029 200130003 200131003 200131024 200137011 200137036 200137042 200204034 200205001 200205034 200206022 200209018 200209029 200209047 200211032 200213016 200214014 200214021 200217006 200217051 200219025 200223002 200223007 200225005 200226007 200226036 200227024 200133011 200133016 200134010 200134014 200135021 200135021 200135021 200135021 200135022 200135022 200135022 200135022 200135039 200135039 200135039 200135039 200136012 200136012 200136013 200136013 200138004 200138025 200139009 200139009 200140039 200141040 200141045 200201006 200201006 200201019 200201019 200201032 200201032 200202047 200202059 200202060 200207025 200212012 200215031 200216006 200218021 200229025 200229025 200229025 200229025 200229025 200231008 200231008 200232004 200232005 200232006 200232007 200232008 200232009	368.04-00

	• Recapitalization (Type "E") 200105050 200109039 200111013 200112014 200129007 200132033 200206028 200211035 200213001 200213002 200213003 200138002 200138003 200208017 200232016	368.05-00
	• Change in Identity, etc. (Type "F") 200103034 200105050 200118011 200129024 200204034 200209049 200139001 200139001 200144001	368.06-00
	• Continuity of Interest Rule 200118011 200125043 200213001 200213002 200213003 200138002 200138003 200144001	368.08-00
	• <i>Savings and Loan or Life Insurance Companies</i> 200115027 200121054	368.08-01
	• <i>Proprietary Interest Continuity</i> 200103034 200105050	368.08-02
	• Plan of Reorganization	368.09-00
	• <i>Several Steps</i> 200118011 200144001	368.09-01
	• Liquidation v. Reorganization 200117008	368.12-00
	• Transactions Involving Two or More Investment Companies 200103056 200115016	368.13-00
Section 381	Carryovers in Certain Corporate Acquisitions (Allowed v. Not Allowed) 200105034 200105035 200150009	381.00-00
Section 382	Limitation on Net Operating Loss Carry-forwards and Built-in Losses Following Ownership Changes 200130011 200140049 200143001	382.00-00
	• General Rule 200225014 200207002	382.01-00
	• Scope of Section 382 Limitation	382.02-00
	• <i>Closing of the Books</i> 200112054 200125056 200220016	382.02-05
	• Ownership Change	382.07-00
	• <i>Equity Structure Shift</i> 200207014	382.07-03
	• Built-in Gains and Losses and Section 338 Gains	382.08-00
	• <i>Net Unrealized Built-in Gain</i> 200217009	382.08-01
	• Operating Rules	382.12-00
	• <i>Controlled Groups</i> 200202043 200202044	382.12-16
Section 384	Limitation on Use of Preacquisition Losses to Offset Built-in Gains 200125007	384.00-00
Section 385	Treatment of Certain Interests in Corporations as Stock or Indebtedness 200205031 200134004 200142005 200148039	385.00-00
	• Debt v. Equity 200126001 200145005 200135011 200135011 200135011 200135011	385.01-00

	• New Financial Products 200130010	385.03-00
	• <i>Debt v. Equity Issues</i> 200130010	385.03-02
Section 401	Qualified Pension, Profit-Sharing, and Stock Bonus Plan	401.00-00
	200101037 200103075 200105058 200105067 200106045 200106045 200113032 200116046 200121072 200121079 200127031 200128056 200128061 200130057 200205050 200211047 200213029 200222032 200225038 200225039 200134031 200135044 200135044 200135044 200135044 200147056 200148077 200208028 200208029 200208030 200208033 200216034 200229048 200229048 200229048 200229048 200229048	
	• Discrimination as to Contributions or Benefits (See Also 401.29-01, 401.20-00, 414.00-00) 200137065 200230044 200230044	401.04-00
	• Required Distributions 200105063 200105065 200106046 200106046 200110034 200111055 200121073 200124028 200126036 200126038 200126039 200131032 200131033 200209057 200209058 200209059 200223065 200208031 200221048 200221051 200221056 200221059 200221061	401.06-00
	• <i>In General</i> 200104033 200110034 200111054	401.06-01
	• <i>Employee Dies Before Entire Interest Distributed</i> 200105063 200105065 200106046 200106046 200110033 200121073 200126036 200126038 200126039 200131032 200131033 200209062 200223065 200208031 200221048	401.06-02
	• Union-negotiated Multiemployer Pension Plans 200109049 200115042 200132042 200151056 200133051	401.28-00
	• Cash or Deferred Arrangements 200116050 200132043 200149036	401.29-00
	• <i>Special Distribution Requirements</i> 200105064 200127053 200211049 200134034 200218039	401.29-02
Section 402	Taxability of Beneficiary of Employee's Trust (Time and Manner of Taxation)	402.00-00
	200116046 200127027 200127031 200127054 200127055 200128057 200130057 200137065 200213032 200147056 200208017 200212036	
	• Exempt Trust 200149036 200230044 200230044	402.01-00
	• Non-Exempt Trust 200128006	402.02-00
	• Amounts Distributed or Made Available to Beneficiary 200231019 200231019	402.06-00
	• Unrealized Appreciation of Employer's Securities 200138030 200138031 200202078	402.07-00
	• Rollover Contributions 200127055 200128057 200213032	402.08-00
	• <i>Rollover Lump Sums</i> 200107040 200138030 200138031 200202078 200215032	402.08-01
	• <i>By a Surviving Spouse</i> 200204038 200211054 200222033	402.08-05

	• Tax on Lump Sum Distributions 200215032	402.09-00
Section 403	Taxation of Employee Annuities (Taxable v. Not Taxable) 200101038 200104035 200113032 200113033 200113033 200116052 200117038 200121072 200124030 200128061 200141046 200148054 200148077 200208017 200210066 200231018 200231018	403.00-00
	• Annuities Purchased by Section 501(c)(3) Organizations or Public Schools 200202027	403.04-00
	• Rollover Amounts 200101038 200124030	403.05-00
Section 404	Deduction for Contributions of Employer to an Employee's Trust or Annuity Plan and Compensation Under a Deferred-Payment Plan (Deduct. v. Not Deduct.) 200137064 200137065 200133049 200133050 200135045 200135045 200135045 200135045 200147056 200229054 200229054 200229054 200229054 200229054 200229055 200229055 200229055 200229055 200229055 200229056 200229056 200229056 200229056 200229056 200230044 200230044	404.00-00
	• Stock Bonus and Profit-Sharing Trusts 200149036	404.02-00
	• Deferred Compensation 200128006	404.10-00
	• Year of Deduction 200107012	404.11-00
Section 408	Individual Retirement Accounts 200106047 200106047 200117038 200128056 200128058 200128061 200129040 200130056 200130058 200132038 200151049 200151050 200204048 200211047 200211048 200226046 200136030 200136030 200136031 200136031 200150036 200208017 200208028 200208029 200208030 200208033 200221051 200221057 200221062 200229048 200229048 200229048 200229048 200229048	408.00-00
	• Qualification 200136031 200136031	408.02-00
	• <i>Benefit Distributions</i> 200151051 200151054 200204048 200210066	408.02-01
	• Rollover Contributions 200106047 200106047 200109051 200110033 200121073 200126038 200129036 200130056 200151054 200136030 200136030 200150036 200208031 200221048	408.03-00
	• Individual Retirement Annuity 200222032 200225038 200225039	408.05-00
	• Distributions 200126041 200127027 200217059	408.06-00
	• Prohibited Transactions 200215061	408.07-00
Section 408A	Roth IRA 200126040 200142022 200148051 200150034	408A.00-00
Section 409	Qualifications for Tax Credit Employee Stock Ownership Plans 200223066	409.00-00
	• Tax Credit Employee Stock Ownership Plan Defined	409.01-00
	• <i>Definition of Employer Securities</i> 200111053 200116051 200125090	409.01-09

Section 412	Minimum Funding Standards	412.00-00
	• Funding Standard Account 200109049 200225043	412.01-00
	• Minimum Funding Waiver 200101039 200109048 200121074 200121075 200121076 200127056 200137067 200149041 200149046 200214030 200134028 200135042 200135042 200135042 200135042 200135048 200135048 200135048 200135048 200141053 200141057 200141059 200148061 200148065 200148067 200148076 200148079 200202073 200210064 200229049 200229049 200229049 200229049 200229049 200230045 200230045	412.06-00
	• Accrued Benefit Waiver 200103077	412.07-00
Section 414	Definitions and Special Rules	414.00-00
	200103075 200139032 200139032 200141046 200148054	
	• Service for Predecessor Employer 200109050	414.01-00
	• Employees of Businesses Under Common Control 200125094	414.03-00
	• Mergers and Consolidations of Plans or Transfers of Plan Assets 200230042 200230042	414.06-00
	• Governmental Plan 200115043 200118056 200119058 200135043 200135043 200135043 200135043 200135049 200135049 200135049 200135049 200230042 200230042	414.07-00
	• Church Plan 200107042 200108044 200108050 200124025 200125095 200149038 200136027 200136027 200141047 200148055 200207027 200229050 200229050 200229050 200229050 200229050 200230043 200230043	414.08-00
	• Certain Employee Contributions 200116049 200116055 200120042 200126042 200127049 200128060 200129037 200129038 200129039 200130051 200130052 200137068 200204041 200204043 200204049 200204050 200223070 200224034 200147054 200147055 200203076 200216035 200221058 200221060 200221063 200231017 200231017	414.09-00
Section 415	Limitations on Benefits and Contributions Under Qualified Plans	415.00-00
	200126042 200127049 200130057 200219042 200136024 200136024 200141046 200147056 200148054 200148075 200229051 200229051 200229051 200229051 200229051	
	• Limitation for Defined Benefit Plans 200109049 200115042 200132042 200151056 200133051 200148081	415.01-00
	• Limitation for Defined Contribution Plans 200230044 200230044	415.02-00
	• Annual Addition 200213033	415.02-01
Section 419	Treatment of Funded Welfare Benefit Plans	419.00-00
	200113009 200137066 200219002 200203071	
	• Qualified Asset Account 200137062 200203073 200203074 200203075	419.11-00
	• Account Limit	419.12-00
	• Collectively Bargained Funds 200137062	419.12-02

	• Ten or More Employer Plan Exception 200127047 200219002 200133047	419.14-00
Section 419A	Qualified Asset Account; Limitations on Additions to Account (See Also 419.00-00 et. seq.) 200113009 200119064 200210025	419A.00-00
Section 420	Transfers to Retiree Health 200112063	420.00-00
Section 422	Incentive Stock Options • Stockholder Approval 200139001 200139001	422.00-00 422.03-00
Section 423	Employee Stock Purchase Plans 200102042 200139001 200139001	423.00-00
Section 424	Definitions and Special Rules 200112021 • Modification, Extension or Renewal of Options 200207005	424.00-00 424.01-00
Section 444	Election of Taxable Year Other Than Required Year • Procedural Requirements for Making Election 200106022 200106022 200151027 200222014	444.00-00 444.03-00
Section 446	General Rule for Methods of Accounting (Permissible v. Not Permissible) 200110031 200122019 200225006 200146025 • Clearly v. Not Clearly Reflecting Income 200213004 200146028 • Reconstruction of Taxable Income • <i>Reasonable v. Unreasonable</i> 200140078 • Change of Methods (Permissible v. Not Permissible) • <i>Required by Commissioner</i> 200142001 • <i>Consent Needed</i> 200102004 200146056 • <i>Change in Method of Accounting for Depreciation</i> 200122002 200206014 200206015 200206021 200214003 200222022 200135036 200135036 200135036 200135036 200135037 200135037 200135037 200135037 200136007 200136007 200139023 200139023 200139025 200139025 200142008 200146047 200146052 200148005 200148015 200208002 200210053 200216016 200216018 200229021 200229021 200229021 200229021 200229021 • <i>Change in Method of Depreciation Under Rev. Proc. 84-74</i> 200106020 200106020 • Notional Principal Contracts 200102005 • <i>Termination Payments</i> 200145010 • Mark to Market (Section 475) 200221008	446.00-00 446.01-00 446.02-00 446.02-06 446.04-00 446.04-02 446.04-03 446.04-17 446.04-19 446.21-00 446.21-03 446.25-00
Section 448	Limitation on Use of Cash Method of Accounting	448.00-00

	• Nonaccrual of Certain Amounts by Service Providers 200232010	448.09-00
Section 451	General Rule for Taxable Year of Inclusion (Year Received v. Not Year Received) 200102008 200105004 200105061 200110005 200117017 200151003 200209015 200222003 200225006 200227012 200141046 200147052 200148054	451.00-00
	• Annual Theory 200101023 200102044 200107017 200110022 200122032 200217052 200147022 200210019	451.01-00
	• Conditions and Contingencies 200118046	451.04-00
	• Tax Refunds 200211043	451.08-00
	• Escrowed Income 200110002	451.09-00
	• Prepaid and Advance Income	451.13-00
	• <i>Services (Rev. Rul. 71-21)</i> 200102034 200147032	451.13-01
	• Constructive Receipt 200118046 200120024 200130008 200130015 200143007 200203006	451.14-00
	• <i>Compensation</i> 200202027	451.14-04
	• Income From Sales 200111011	451.15-00
	• Accrual Method 200131006 200147032	451.19-00
	• Special Rules for Crop Insurance Proceeds 200213026	451.23-00
Section 453	Installment Method (Available v. Not Available) 200125073 200218034	453.00-00
	• Revocation of Elections 200226039 200230016 200230016	453.08-00
Section 455	Prepaid Subscription Income 200132014	455.00-00
Section 457	Deferred Compensation Plans of State and Local Governments and Tax Exempt Organizations 200102013 200104026 200119017 200145006 200205007 200141046 200148054	457.00-00
	• Year of Inclusion in Gross Income 200103017 200107028 200111008 200117038 200120022 200131011 200144007 200202027	457.01-00
	• Eligible Deferred Compensation Plan Defined 200103017 200107028 200111008 200120022 200131011 200144007	457.05-00
	• <i>Tax Exempt Organization</i> 200128006	457.05-03
	• Distribution Requirements	457.07-00
	• <i>Unforeseeable Emergency</i> 200122009	457.07-02
	• Special Rules	457.09-00

	• <i>Length of Service Award Plans</i> 200224002	457.09-08
	• <i>Ineligible Plans</i> 200229001 200229001 200229001 200229001 200229001	457.10-00
	• <i>Exclusive Benefit Set-Asides</i>	457.12-00
	• <i>Trusts</i> 200103017	457.12-01
	• <i>Custodial Accounts and Contracts</i> 200107028 200111008 200144007	457.12-02
Section 460	Special Rules for Long-Term Contracts 200202045	460.00-00
	• <i>Definition of Long-Term Contract (See Also 451)</i> 200202045	460.05-00
Section 461	General Rule for Taxable Year of Deduction (Year Paid v. Not Year Paid) 200104011 200105052 200107007 200108017 200112011 200149013 200209010 200209017 200219014 200225006 200143001 200203004 200208004 200229009 200229009 200229009 200229009 200229009 200229010 200229010 200229010 200229010 200229010	461.00-00
	• <i>Accrual Method</i> 200126008 200147032	461.01-00
	• <i>Cash Method</i> 200106005 200106005	461.02-00
	• <i>Incurred Liabilities</i> 200216013	461.06-00
	• <i>Accrual Basis</i> 200131005	461.06-01
	• <i>Contested Liabilities</i> 200106005 200106005	461.07-00
	• <i>Accrual of Other Taxes</i> 200122008	461.16-00
Section 465	Deductions Limited to Amount at Risk 200120020	465.00-00
Section 467	Certain Payments for the Use of Property or Services	467.00-00
	• <i>Recapture of Prior Understated Inclusions Under Leaseback or Long-Term Agreements</i> 200105003	467.07-00
	• <i>Leaseback or Long-Term Agreements</i> 200128007	467.07-03
Section 468A	Special Rules for Decommissioning Cost 200105052 200107007 200108017 200121028 200125066 200125067 200125072 200125074 200125075 200125076 200125078 200125080 200126011 200126014 200132020 200132022 200132024 200132031 200209010 200219014 200207016 200208004 200218019 200229009 200229009 200229009 200229009 200229009 200229010 200229010 200229010 200229010 200229010	468A.00-00
	• <i>Income and Deductions of the Taxpayer</i>	468A.03-00

	• <i>Formulas or Other Methods</i>	468A.03-04
	200107011 200109016 200109025 200112012 200112015 200112016 200112062 200113008 200119032 200119034 200119037 200120025 200120026 200121045 200121046 200128016 200129012 200129013 200129019 200129020 200137055 200137056 200137057 200137058 200146014 200201033 200201033 200202025 200203008 200203038 200203039 200203040 200203062 200203064 200203065 200232021 200232022	
	• Ruling Amount	468A.04-00
	• <i>Revised Schedules</i>	468A.04-02
	200104017 200105036 200105037 200105047 200107005 200107011 200108016 200109016 200109025 200110017 200110018 200112007 200112012 200112015 200112016 200112026 200112062 200113008 200114011 200114013 200114014 200114015 200114016 200115006 200119032 200119034 200119037 200120025 200120026 200121014 200121017 200121020 200121021 200121029 200121030 200121045 200121046 200122020 200122029 200122030 200122031 200122037 200125049 200125052 200128009 200128010 200128016 200128020 200129005 200129012 200129013 200129019 200129020 200129025 200132019 200137055 200137056 200137057 200137058 200141016 200146014 200147024 200147025 200147027 200147029 200147030 200201033 200201033 200202025 200202035 200203008 200203038 200203039 200203040 200203062 200203064 200203065 200210036 200210039 200232021 200232022	
Section 468B	Special Rules For Designated Settlement Funds	468B.00-00
	200106021 200106021 200213015 200222001 200138006	
	• Taxation of Designated Settlement Funds	468B.02-00
	200104030	
	• Other Funds	468B.06-00
	200149013	
	• Clarification Of Taxation of Certain Funds	468B.07-00
	200113025	
Section 469	Passive Activity Losses and Credits Limited	469.00-00
	200102018 200106018 200106018 200111001 200144013	
	• Passive Activity Defined	469.03-00
	200206016	
Section 471	General Rule for Inventories	471.00-00
	200125001	
	• Need for Inventories	471.01-00
	200121006	
	• Items Includible v. Not Includible in Inventory	471.09-00
	200203001	
Section 472	Last-In, First-Out Inventories	472.00-00
	• Election	472.01-00
	200106035 200106035 200106036 200106036 200118036 200223005 200223017	
	• Dollar Value Method	472.08-00
	200128003	
	• Inventory Price Index Method	472.09-00
	200121022	
	• Bargain Purchase	472.15-00
	200121022	
Section 475	Mark to Market Accounting Method for Dealers in Securities	475.00-00
	200120001 200150008	

	• Treatment of Securities Marked to Market 200150008	475.01-00
	• Definitions	475.05-00
	• <i>Items that are not Securities</i> 200150008	475.05-03
	• Securities Traders 200209052 200209053 200209054	475.08-00
Section 481	Adjustments Required by Changes in Method of Accounting 200151004 200209025	481.00-00
Section 482	Allocation of Income and Deductions Among Taxpayers 200108003 200117039 200121071 200125007 200149019 200205003 200206006 200217021 200224011 200139008 200139008 200150001	482.00-00
	• Correlative Adjustments 200148016	482.03-00
	• Applicability to Nonrecognition Transactions 200135001 200135001 200135001 200135001	482.06-00
	• Services 200230001 200230001	482.09-00
	• Transfer or Use of Intangibles 200230001 200230001	482.11-00
	• <i>Cost Sharing Agreements</i> 200103024 200225009	482.11-08
	• Sale of Tangible Property 200148025	482.12-00
	• <i>Rate of Return/Profit Split</i> 200148025	482.12-05
	• Allocation of Net Income 200203053	482.13-00
	• Sham Transaction 200108003	482.15-00
	• Allocation of Deductions 200203053	482.17-00
	• Rev. Proc. 65-17 200229019 200229019 200229019 200229019 200229019	482.23-00
Section 483	Interest on Certain Deferred Payments	483.00-00
	• Exceptions and Limitations	483.04-00
	• <i>Original Issue Discount</i> 200116008	483.04-02
Section 501	Exemption From Tax on Corporations, Certain Trusts, etc. (Exempt v. Not Exempt) 200101036 200102052 200102053 200116007 200117043 200120002 200120003 200124021 200127055 200128057 200128059 200149045 200217044 200135047 200135047 200135047 200135047 200230018 200230018	501.00-00
	• Title-Holding Company 200214035 200214036	501.02-00
	• Religious, Charitable, etc., Institutions and Community Chest 200103084 200121078 200127052 200132040 200211051 200222030 200225042 200140084 200147059 200150027 200216037	501.03-00

• <i>Foundations</i>	501.03-02
200103076 200103082 200103085 200104036 200104037 200107036 200107039 200115038 200116048 200117042 200151057 200204039 200205048 200205049 200206057 200219036 200219039 200222034 200225042 200140085 200140086 200148080 200218036 200218041 200218042 200221050 200232036	
• <i>Educational Organizations</i>	501.03-08
200225046 200203069	
• <i>Homes for Aged and Related Organizations (See Also 0501.04-02)</i>	501.03-10
200150038	
• <i>Hospitals and Health Clinics (See Also 0501.06-03)</i>	501.03-11
200101034 200103083 200106037 200106037 200106038 200106038 200106042 200106042 200106043 200106043 200106044 200106044 200108045 200108046 200108047 200108048 200108049 200110030 200118054 200132039 200151045 200206058 200211051 200214035 200214036 200134027 200203070 200216036 200218037	
• <i>Political Action Organizations</i>	501.03-17
200151060	
• <i>Scientific Organizations</i>	501.03-24
200149035	
• <i>Social Welfare Groups (See Also 0501.04-00)</i>	501.03-25
200211052	
• <i>State Instrumentalities</i>	501.03-26
200126032 200216037	
• <i>Testing for Public Safety</i>	501.03-28
200215057 200215058 200215059 200215060	
• <i>Organizational and Operational Tests</i>	501.03-30
200114040 200219036 200219039 200225046 200218036 200218041 200218042	
• <i>Lessening the Burdens of Government</i>	501.03-33
200124022	
• <i>Civic Leagues and Social Welfare Groups (See Also 0501.03-25)</i>	501.04-00
• <i>Local Associations of Employees</i>	501.04-01
200219037	
• <i>Business Leagues, Chambers of Commerce, Real Estate Boards, or Boards of Trade</i>	501.06-00
200103084 200223067 200150026	
• <i>Social Clubs</i>	501.07-00
• <i>Business with Nonmembers</i>	501.07-05
200104038	
• <i>Fraternal Beneficiary Societies (See Also 0501.03-09)</i>	501.08-00
200222032 200225038 200225039	
• <i>Voluntary Employees' Beneficiary Associations (See Also 0501.03-01)</i>	501.09-00
200108010 200204045 200225041	
• <i>Permissible Benefits</i>	501.09-01
200211053	
• <i>Inurement</i>	501.09-03
200211053 200223068 200203073 200203074 200203075	
• <i>Local Benevolent Life Insurance Associations, etc.</i>	501.12-00

	• <i>Mutual or Cooperative Electric Companies</i> 200148085	501.12-03
	• <i>Income Inures v. does Not Inure to Private Individual</i> 200230005 200230005	501.32-00
	• <i>Legislative and Political Propaganda Activities</i> 200151060	501.38-00
Section 502	Feeder Organizations (Exempt v. Not Exempt)	502.00-00
	• <i>Section 501 (c)(3) Organizations</i> 200149044	502.01-00
Section 507	Termination of Private Foundation Status	507.00-00
	200103076 200103079 200103082 200103085 200104036 200104037 200106040 200106040 200107036 200107039 200111045 200111049 200111050 200114036 200114037 200114043 200115038 200116048 200119056 200119057 200120041 200120043 200121080 200121081 200121082 200124023 200124024 200124026 200124027 200125092 200125093 200127051 200130053 200130054 200151057 200151058 200151059 200204042 200204053 200205048 200205049 200206057 200219043 200219044 200226045 200140083 200140084 200140085 200140086 200143028 200148082 200148083 200150031 200150039 200201035 200201035 200201036 200201036 200215054 200215055 200215056 200216032 200216033 200221064 200221065 200221066 200221067 200221068 200221069 200229052 200229052 200229052 200229052 200229052 200229053 200229053 200229053 200229053 200229053	
	• <i>Termination Under Section 507(a)(1)</i> 200101035 200111045 200117042 200137060	507.01-00
	• <i>Special Rules</i> 200151052 200151053	507.01-01
	• <i>Termination Under Section 507(a)(2)(A)</i> 200111045 200221050	507.02-00
	• <i>Termination Under Section 507(b)(1)(A)</i> 200115044 200225045	507.03-00
	• <i>Termination Under Section 507(b)(1)(B)</i> 200204039 200220030 200225045	507.04-00
	• <i>Liability of Transferee Organizations</i> 200117042 200204039 200140083 200140084 200221050	507.05-00
	• <i>Imposition of Tax</i> 200204039	507.06-00
	• <i>Aggregate Tax Benefit</i> 200204039	507.07-00
Section 508	Special Rules With Respect to Section 501 (c)(3) Organizations	508.00-00
	200226012 200150027	
Section 509	Private Foundation Defined	509.00-00
	200106042 200106042 200106043 200106043 200106044 200106044 200117043 200135047 200135047 200135047 200135047	
	• <i>Definitions</i> 200108045 200108046 200108047 200108049	509.01-00
	• <i>Private Foundation</i> 200137060	509.01-01
	• <i>Support</i> 200150039	509.01-02

	• Exceptions to Private Foundation Status 200106042 200106042 200106043 200106043 200106044 200106044 200127052 200147059	509.02-00
	• <i>Publicly Supported Organizations</i> 200127052 200130048 200130049 200130055 200147059 200150027	509.02-01
	• <i>Supporting Organizations</i> 200115044 200127052 200130048 200130049 200130055 200149045 200204040 200147059 200208027 200215048 200218037	509.02-02
	• Continuation of Private Foundation Status 200103076 200103082 200103085 200104036 200104037 200106040 200106040 200107036 200107039 200115038 200116048 200151057 200205048 200205049 200206057 200140085 200140086 200216032 200216033	509.03-00
Section 511	Tax on Unrelated Business Income of Charitable, etc, Organizations (Taxable v. Not Taxable) 200102052 200102053 200103076 200103085 200106042 200106042 200106043 200106043 200106044 200106044 200108051 200112064 200112065 200117043 200119061 200126033 200126034 200126035 200131034 200132040 200211051 200213021 200214035 200214036 200225044 200141058 200147059 200148063 200150032 200150033 200150035 200215057 200215058 200215059 200215060 200216036	511.00-00
	• Organizations Subject to Tax 200101036	511.01-00
	• Section 501(c)(2) Corporations 200214035 200214036	511.02-00
Section 512	Unrelated Business Taxable Income (Taxable v. Not Taxable) 200102051 200108045 200108046 200108047 200108049 200114039 200117043 200127052 200128059 200130048 200130049 200130055 200149044 200149045 200151046 200151047 200211051 200213027 200214035 200214036 200220028 200223067 200141049 200147058 200147059 200148057 200148074 200150026 200208027 200216036	512.00-00
	• Exception, Additions, and Limitations on Unrelated Income 200102051 200104038 200106042 200106042 200106043 200106043 200106044 200106044 200127052 200132040 200225046	512.01-00
	• <i>Rents and Royalties</i> 200104031 200149043 200219037 200222030 200225046 200136025 200136025	512.01-01
	• <i>Rent v. Ordinary Business Profits</i> 200149035	512.01-02
	• Partnerships 200118054 200151045 200206058 200218037	512.02-00
	• Advertising (See Also 0501.26-02) 200102051 200128059	512.05-00
	• Definitions	512.09-00
	• <i>General</i> 200225044	512.09-01
	• <i>Section 501(c)(7), (9), (17), or (20) Organizations (See Also 419.00-00 et seq.)</i> 200104038 200137062 200223068	512.09-03
	• Modifications 200151062	512.10-00

Section 513	Unrelated v. Not Unrelated Trade or Business	513.00-00
	200102051 200106042 200106042 200106043 200106044 200106044 200107036 200108048 200114039 200117043 200126033 200149044 200151047 200204051 200206058 200211051 200213027 200214035 200214036 200222031 200222032 200225038 200225039 200225044 200147059 200150026 200203069 200216037 200218037 200230005 200230005	
	• Advertising, etc., Activities 200102051 200225046	513.02-00
	• Cooperatives 200223067 200148085	513.03-00
	• Sales and Service to Public 200124022 200151061 200222030	513.04-00
Section 514	Unrelated Debt-Financed Income	514.00-00
	200125096 200213027 200214035 200214036 200216036	
	• Rent and Deductions 200132040	514.01-00
	• Definitions--Debt-Financed Property 200211052	514.06-00
	• Acquisition Indebtedness 200137061 200224014 200134025	514.07-00
Section 527	Political Organizations	527.00-00
	200103084	
	• Political Expenditures by Exempt Organizations 200151060	527.04-00
Section 528	Certain Homeowners Associations	528.00-00
	200203027	
Section 529	Qualified State Tuition Programs	529.00-00
	200214032 200134032 200231020 200231020 200232035	
Section 541	Imposition of Personal Holding Company Tax (Imposed v. Not Imposed)	541.00-00
	200105032 200132023	
Section 552	Definition of Foreign Personal Holding Company	552.00-00
	• Certain Excluded Banks and Corporations 200102016	552.02-00
Section 561	Deduction v. Not a Deduction for Dividends Paid	561.00-00
	• Date of Payment 200213017	561.02-00
	• Regulated Investment Companies 200111021 200111028 200113010 200113011 200113012 200113013 200113014 200113015 200121004 200121016 200143023	561.05-00
	• Real Estate Investment Trusts 200122001	561.06-00
Section 562	Dividends Eligible v. Not Eligible for Dividends-Paid Deduction	562.00-00
	200122001	
	• Distributions in Liquidation 200121016	562.02-00
	• Preferential Dividends 200121002 200213017	562.03-00

	• <i>Class of Stock</i> 200111021 200111028 200113010 200113011 200113012 200113013 200113014 200113015 200121004 200143023	562.03-02
Section 565	Consent Dividends 200147005 • General Rule • <i>Making and Filing Consents</i>	565.00-00 565.01-00 565.01-02
Section 584	Common Trust Funds 200145041 • Merger of Common Trust Funds	584.00-00 584.04-00
Section 595	Foreclosure on Property Securing Loans 200129003	595.00-00
Section 597	Federal Financial Assistance Provided 200119007	597.00-00
Section 613	Percentage Depletion 200219004 • Gross Income From Property • <i>Depletable Gross Income</i>	613.00-00 613.02-00 613.02-08
Section 616	Development Expenditures 200102007	616.00-00
Section 631	Gain or Loss in the Case of Timber, Coal, or Domestic Iron Ore • Election to Consider Cutting as Sale or Exchange • <i>Fair Market Value of Timber (See Also 611.07-02 et seq.)</i> • Disposal of Timber With a Retained Economic Interest (See Also 631.04-00)	631.00-00 631.01-00 631.01-01 631.02-00
Section 641	Imposition of Tax 200229018 200229018 200229018 200229018 200229018 • Termination of Estates and Trusts	641.00-00 641.03-00
Section 642	Special Rules for Credits and Deductions 200142011 • Foreign Tax Credit • Charitable Deduction • <i>Paid or Permanently Set Aside</i> • <i>Pooled Income Funds</i>	642.00-00 642.01-00 642.03-00 642.03-03 642.03-06
Section 643	Definitions Applicable to Subparts A, B, C, and D 200116016	643.00-00

	• Income Defined 200226015 200210002	643.02-00
	• Multiple Trusts 200105039 200105044 200127037 200149016 200209007 200209008 200210056 200210061	643.06-00
Section 651	Deductions for Trusts Distributing Current Income Only 200140080	651.00-00
Section 661	Deduction for Estates and Trusts Accumulating Income or Distributing Corpus 200140080 200207018	661.00-00
	• Amounts Paid, Credited, or Required to Be Distributed 200226031 200210002	661.01-00
Section 662	Inclusion of Amounts in Gross Income of Beneficiaries of Estates and Trusts Accumulating Income or Distributing Corpus 200210002	662.00-00
Section 663	Special Rules Applicable to Sections 661 and 662	663.00-00
	• Separate Share Rule 200210002	663.05-00
Section 664	Charitable Remainder Trusts 200109006 200127038 200205008 200219012 200140027 200202078 200203034 200207026 200221042 200229046 200229046 200229046 200229046 200229046 200230004 200230004	664.00-00
	• Character of Distribution 200127023 200215032	664.01-00
	• Definitions 200218008	664.03-00
	• <i>Charitable Remainder Unitrust</i> 200108035 200120016 200122045 200124010 200143028 200150019 200232015	664.03-02
	• <i>Unitrust With Income Exception</i> 200215042	664.03-03
	• Valuation 200150019	664.04-00
Section 671	Trust Income, Deductions, and Credits Attributable to Grantors and Others As Substantial Owners 200108032 200119019 200209007 200209008 200227022 200148028 200210018	671.00-00
	• Persons Treated as Grantors 200209015 200227020	671.02-00
	• Allocation of Income and Deductions 200128006	671.03-00
	• Method of Reporting 200207007	671.04-00
Section 672	Definitions and Rules	672.00-00
	• Related or Subordinate Party 200229013 200229013 200229013 200229013 200229013	672.02-00
Section 676	Power to Revoke 200209015	676.00-00
Section 677	Income for Benefit of Grantor 200124011 200128006 200222003	677.00-00

Section 678	Person Other Than Grantor Treated as Substantial Owner 200147044	678.00-00
Section 681	Limitation on Charitable Deduction 200140080	681.00-00
Section 691	Recipients of Income in Respect of Decedents 200209026 200221011 200230018 200230018	691.00-00
Section 701	Partners, Not Partnerships, Subject to Tax • Partnership ISP - Subchapter K Anti-Abuse Rule Regulation Section 1.701-2 200118005 200128040 200128053 200205021	701.00-00 701.01-00
Section 702	Income and Credits of Partner 200111021 200113010 200113011 200113012 200113013 200113014 200113015 200121016 200214016 • Partner's Distributive Share 200102012 • Taxes Paid (Section 901) 200144006 • Credits 200215005 200215017 200216003 200216004 200216011 200216015	702.00-00 702.01-00 702.01-04 702.01-09
Section 703	Partnership Computations • Partnership Elections 200106035 200106035	703.00-00 703.05-00
Section 704	Partner's Distributive Share 200131013 200137059 200204013 200204015 200204016 200204017 200204018 200204023 200214016 200133003 200203043 200203044 200203046 200203047 200203048 200203049 200203050 200203051 200203052 • Partnership Agreement 200210047 • Economic Effect Substantiality 200108003 200131013 • Economic Effect 200111021 200113010 200113011 200113012 200113013 200113014 200113015 200121016 200125053 • Substantiality 200108003 200131013 • Section 704(c) Considerations 200105009 200105010 200105011 200105012 200105013 200105015 200105016 200105017 200105018 200105019 200105020 200105021 200105022 200105023 200105024 200105025 200105026 200105027 200118039 200118040 200118041 200140060 200140061 200140062 200140063 200140065 • Partner's Interest in Partnership 200108003 200131013 • Contributed Property 200149019	704.00-00 704.01-00 704.01-01 704.01-02 704.01-03 704.01-04 704.02-00 704.05-00
Section 707	Transactions Between Partner and Partnership 200128040 200146025	707.00-00
Section 708	Continuation of Partnership 200219008	708.00-00

	• Termination 200103051 200132009 200214016	708.01-00
Section 721	Nonrecognition of Gain or Loss on Contributions 200105009 200105010 200105011 200105012 200105013 200105015 200105016 200105017 200105018 200105019 200105020 200105021 200105022 200105023 200105024 200105025 200105026 200105027 200111021 200118039 200118040 200118041 200125013 200125053 200211017 200214016 200210047	721.00-00
Section 722	Basis of Contributing Partner's Interest 200125013 200214016	722.00-00
Section 723	Basis of Property Contributed to Partnership 200125013 200214016	723.00-00
Section 731	Extent of Recognition of Gain or Loss on Distribution 200102012 200223036 200223037 200223038 200223039 200223040 200223041 200223042 200223043 200223044 200223045	731.00-00
Section 752	Treatment of Certain Liabilities 200118005 200120020 200131013	752.00-00
	• Sharing Recourse Liabilities 200131013	752.06-00
	• Sharing Non-recourse Liabilities 200131013	752.07-00
Section 754	Manner of Electing Optional Adjustment to Basis of Partnership Property 200101016 200121058 200121059 200121060 200121062 200121063 200121064 200121065 200121066 200121067 200121068 200202022	754.00-00
	• Timeliness of Election 200110023 200120032 200130025 200205025 200209046 200202053 200202055 200215011 200229028 200229028 200229028 200229028 200229028	754.02-00
Section 761	Terms Defined 200214016	761.00-00
	• Partnership	761.01-00
	• <i>Organizations Treated as a Partnership</i> 200120007 200139005 200139005 200144005 200202022	761.01-01
	• <i>Organizations Not Treated as a Partnership</i> 200216005	761.01-02
	• Partner 200120007	761.02-00
Section 775	Electing Large Partnership Defined 200221020	775.00-00
Section 807	Rules for Certain Reserves 200125043	807.00-00
	• Items Taken Into Account 200108002	807.02-00
	• Method of Computing Reserves for Purposes of Computing Income 200108002	807.03-00
	• Adjustments for Change in Computing Reserves	807.05-00
	• <i>Insurance, Life ISP - IRC Section 807 Basis Adjustment - Change in Basis v. Correction of Error</i> 200108002	807.05-01

Section 809	Mutual Life Insurance Companies Reduction in Deductions 200125043	809.00-00	
Section 817	Treatment of Variable Contracts 200108038 200223012 200221036	817.00-00	
	• Variable Contract Defined 200119036 200206047	817.04-00	
Section 817	(Repealed - 1984 Act) Rules Relating to Certain Gains and Losses	817.00-00	R
	• Reinsurance Transactions After 1968 200144028	817.06-00	R
	• Treatment Nondiversified Contracts	817.08-00	
	• <i>Look-Through Diversification</i> 200108038 200115028 200122013	817.08-04	
Section 831	Tax On Insurance Companies Other Than Life Insurance Companies 200121040 200133020 200140057 200202002	831.00-00	
	• Alternative Tax Small Companies 200121040 200223015 200133020 200133029 200142014	831.02-00	
	• Whether Company Qualifies as Insurance Company 200119039 200149003 200138010 200138014 200140057 200147052	831.03-00	
Section 832	Insurance Company Taxable Income 200119039 200138010 200147052	832.00-00	
	• Premiums Earned 200116041 200132006 200203016	832.05-00	
	• Losses Incurred	832.06-00	
	• <i>Unpaid Losses</i> 200115002	832.06-02	
Section 833	Treatment of Blue Cross Blue Shield Organizations 200201004 200201004	833.00-00	
Section 834	Determination of Taxable Investment Income	834.00-00	
	• Deductions	834.02-00	
	• <i>Special Deduction</i> 200120004	834.02-07	
Section 842	Foreign Corporation Carrying on Insurance Business	842.00-00	
	• Taxation 200147007	842.01-00	
Section 847	Special Estimated Tax Payments 200118001 200222039	847.00-00	
Section 848	Capitalization of Policy Acquisition Expenses 200125043	848.00-00	
Section 851	Definition of Regulated Investment Company 200111028 200111036 200113010 200113011 200113012 200113013 200113014 200113015 200121002 200121004 200121016 200125053 200143023	851.00-00	
	• Gross Income Requirement 200111021 200118039 200118040 200118041	851.02-00	
	• Diversification Requirement 200111021 200118039 200118040 200118041	851.03-00	

Section 852	Taxation of Regulated Investment Companies and Their Shareholders 200121004 200143023	852.00-00
	• Investment Company Taxable Income 200111028	852.01-00
	• Taxable Income of a Regulated Investment Company 200148030	852.10-00
Section 853	Foreign Tax Credit Allowed Shareholders 200135019 200135019 200135019 200135019	853.00-00
Section 855	Dividends Paid by Regulated Investment Company After Close of Taxable Year 200107009 200111036 200121005 200121027 200125018 200206027 200135019 200135019 200135019 200135019 200142016	855.00-00
Section 856	Definition of Real Estate Investment Trust 200119010 200132008 200225033 200226013 200134022 200134023 200140026	856.00-00
	• Income Requirements 200115023 200127024 200132008	856.01-00
	• Other Requirements 200106016 200106016	856.03-00
	• Rents From Real Property 200101012 200103033 200115023 200132008	856.04-00
Section 857	Taxation of Real Estate Investment Trusts and Their Beneficiaries 200122001	857.00-00
	• Requirements to be Taxed as a REIT 200213017	857.01-00
Section 860D	REMIC Defined	860D.00-00
	• Election 200101017 200117030 200117032 200124015 200131010	860D.01-00
Section 861	Income From Sources Within the U.S. 200139022 200139022 200147033	861.00-00
	• Gross Income From Sources Within U.S.	861.01-00
	• <i>Allocation to U.S. Source</i> 200217002	861.01-01
	• Rents and Royalties 200222011	861.05-00
	• Allocation and Apportionment of Deductions (In General) 200215010	861.08-00
	• <i>Apportionment</i> 200203020	861.08-02
	• <i>Research and Experimental Expenditures -- Allocation</i> 200207012	861.08-05
	• <i>Research and Experimental Expenditures -- Apportionment -- Sales Method</i> 200207012	861.08-06
	• <i>Research and Experimental Expenditures -- Apportionment -- Gross Income Method</i> 200207012	861.08-07
	• Allocation and Apportionment of Interest Expense (In General) 200134007	861.09-00

	• <i>Asset Method of Apportionment</i>	861.09-06
	200102041 200112056 200117018 200220012 200138012 200201009 200201009 200207003 200212001 200221043 200221044	
	• Allocation Apportionment of Research and Experimental Expenditures (In General)	861.15-00
	200207012	
Section 862	Income From Sources Without U.S.	862.00-00
	200222011 200139022 200139022	
Section 863	Items Not Specified in Sections 861 or 862	863.00-00
	• Allocation of Gross Income	863.01-00
	200141010	
Section 864	Definitions	864.00-00
	200224003	
	• Effectively Connected Income	864.02-00
	• <i>Deferred Payments</i>	864.02-06
	200128037	
	• <i>Property Formerly Used in U.S. Business</i>	864.02-07
	200125030	
	• Rules for Allocating Interest, etc. (See Also 861.08 through 861.14)	864.04-00
	200201009 200201009	
Section 865	Source Rules for Personal Property Sales	865.00-00
	• Sale Through Office or Fixed Place of Business	865.05-00
	• <i>Sales by Nonresidents</i>	865.05-02
	200128037	
Section 871	Tax on Nonresident Alien Individuals	871.00-00
	• Tax on Nonresident Aliens	871.02-00
	• <i>Fixed or Determinable Annual Or Periodical Income</i>	871.02-03
	200141020	
	• <i>Engaged in U.S. Trade or Business or Treated as Having Effectively Connected Income</i>	871.02-07
	200128037	
	• <i>Certain Annuities Received Under Qualified Plans</i>	871.02-12
	200105005	
Section 877	Expatriation to Avoid Tax	877.00-00
	200102029 200102030 200132018 200132021 200137029 200211015 200133046 200143020 200143022 200221037	
	• Principal Purpose--the Avoidance of Tax	877.01-00
	200103067 200105051 200105054 200109008 200109009 200109042 200109043 200109044 200110006 200111002 200111005 200114003 200115024 200117027 200118042 200119043 200119044 200119050 200121035 200125015 200125016 200125051 200126016 200126024 200128022 200128027 200130013 200130019 200130023 200130024 200137030 200137043 200145021 200206029 200209027 200209030 200211033 200214013 200214022 200214024 200217043 200219031 200219033 200220017 200222027 200224015 200224024 200225011 200225035 200227030 200133023 200133024 200133027 200133039 200134011 200139021 200139021 200140051 200140067 200146022 200146035 200201029 200201029 200207001 200208001 200208015 200210005 200212018 200212019 200212020 200215044 200216019 200218002 200218024 200218028 200218032 200229012 200229012 200229012 200229012 200229012 200230021 200230021	

	• Ruling Submission by Expatriating Citizen 200111009 200116029	877.07-00
	• Ruling Submission by Expatriating Long-Term Resident 200108036 200108037 200116030 200116034 200116035 200119042 200119046 200125059 200128041 200131025 200133021 200133022 200133026 200141042 200210049 200210050 200216020 200216021 200221039	877.08-00
Section 881	Tax on Income of Foreign Corporations Not Connected with United States Business 200206008 200227006	881.00-00
	• Repeal of Tax On Interest of Foreign Corporations Received From Certain Portfolio Debt Investments	881.02-00
	• <i>Exclusion of Interest Received By CFC From Related Person</i> 200203026	881.02-10
Section 882	Tax on Income of Foreign Corporations Connected with United States Business	882.00-00
	• Interest deductions 200149002	882.07-00
	• <i>Liability/Asset Ratio</i> 200125088 200232025	882.07-02
Section 884	Branch Tax 200111040 200111041	884.00-00
Section 892	Income of Foreign Governments and of International Organizations	892.00-00
	• Foreign Governments Qualifying For Exemption Under Section 892	892.01-00
	• <i>Controlled Entities of a Foreign Sovereign</i> 200216025	892.01-02
Section 894	Income Affected by Treaty 200145041 200209026	894.00-00
	• Dividends 200105001	894.02-00
Section 897	Disposition of Investment in United States Real Property 200117039	897.00-00
	• U.S. Real Property Interest 200201023 200201023	897.02-00
	• Coordination With Nonrecognition Provisions Such As Exchange of U.S. Real Property Interest By Nonresident Alien Individual or Foreign Corporation 200137037	897.06-00
Section 901	Taxes of Foreign Countries and of Possessions of U.S. 200112019 200225032 200139008 200139008	901.00-00
	• Allowance of Credit 200110019 200127010	901.01-00
	• <i>Definition of Income Tax</i> 200112011 200146001	901.01-03
	• Amount Allowed	901.02-00
	• <i>Partnerships and Estates</i> 200105001	901.02-05
Section 902	Deemed Paid Credit Where Domestic Corporation Owns 10 Percent or More of Voting Stock of Foreign Corporation (See Also 960.00-00 et. seq.) 200135020 200135020 200135020 200135020	902.00-00

	• Computation of Credit 200103031	902.01-00
Section 903	Credit for Taxes in Lieu of Income, etc., Taxes 200110021	903.00-00
Section 904	Limitation on Credit	904.00-00
	• Taxable Income 200134007	904.01-00
	• Separate Application of Section With Respect to Certain Categories - Income	904.03-00
	• <i>Active Rents/Royalties</i> 200203053	904.03-02
	• <i>Look-Through Rules</i> 200206010	904.03-20
	• <i>Apportionment to more than one separate category</i> 200210026	904.03-31
Section 905	Applicable Rules	905.00-00
	• Adjustments on Payment of Accrued Taxes 200127011	905.03-00
Section 907	Special Rules in Case of Foreign Oil and Gas Income 200101005 200104019	907.00-00
	• Definition of Foreign Oil and Gas Extraction Income 200101005 200104019	907.02-00
Section 911	Citizens or Residents of the United States Living Abroad	911.00-00
	• Election 200226010 200202072	911.11-00
	• <i>Reelection</i> 200230012 200230012	911.11-03
Section 924	Foreign Trading Gross Receipts 200149019	924.00-00
	• Definition of Foreign Trading Gross Receipts 200112030 200125021 200131012	924.01-00
	• Foreign Economic Process Requirements 200147037	924.03-00
Section 925	Transfer Pricing Rules 200149002 200215003	925.00-00
	• Computation of Transfer Pricing 200147037	925.01-00
	• <i>Election of Grouping</i> 200121018 200151019 200227014	925.01-01
Section 926	Distributions to Shareholders 200128011	926.00-00
Section 927	Other Definitions and Special Rules 200146046	927.00-00
	• Definition of Export Property 200131012 200231014 200231014	927.01-00
	• Election and Termination of Election 200110027 200111042 200221040	927.04-00

Section 933	Income From Sources Within Puerto Rico 200215019	933.00-00	
Section 936	Puerto Rico and Possession Tax Credit 200126015	936.00-00	
	• Intangible Property Income	936.03-00	
	• <i>Cost Sharing Election</i> 200122005 200148025	936.03-04	
Section 952	Subpart F Income Defined	952.00-00	
	• Earnings and Profits Limitations 200130007	952.05-00	
	• <i>Chain Deficits</i> 200130007	952.05-04	
Section 953	Insurance Income	953.00-00	
	• Election by Foreign Insurance Company to be Treated as Domestic Corporation 200201021 200201021	953.06-00	
Section 954	Foreign Base Company Income	954.00-00	
	• Foreign Personal Holding Company Income 200206010 200224007	954.02-00	
	• Foreign Base Company Sales Income 200220005	954.03-00	
Section 956	Investment of Earnings in U.S. Property 200127005 200216022	956.00-00	
	• U.S. Property Defined 200137005 200229030 200229030 200229030 200229030 200229030	956.03-00	
	• Pledges and Guarantees 200216022	956.05-00	
	• Earnings Invested in Excess Passive Assets 200134004	956.07-00	R
Section 960	Special Rules for Foreign Tax Credit	960.00-00	
	• Taxes Paid by Foreign Corporation and not Previously Deemed Paid by Domestic Corporation 200223022	960.03-00	
Section 961	Adjustments to Basis of Stock In Controlled Foreign Corporations and of Other Property (Increase v. Reduction) 200141003	961.00-00	
Section 964	Miscellaneous Provisions 200142005	964.00-00	
Section 985	Functional Currency 200221017	985.00-00	
Section 986	Determination of Foreign Corporation's Earnings & Profits and Foreign Taxes	986.00-00	
	• Previously Taxed Earnings and Profits 200141003	986.03-00	
Section 988	Treatment of Certain Foreign Currency Transactions 200149017 200206006	988.00-00	
	• Computation of Exchange Gain or Loss	988.02-00	

	• <i>Debt Instruments</i> 200133013	988.02-02
Section 989	Other Definitions and Special Rules	989.00-00
	• Definition of Appropriate Exchange Rate 200141003	989.02-00
Section 992	Requirements of a Domestic International Sales Corporation	992.00-00
	• Distributions to Meet Qualification Requirements 200135005 200135005 200135005 200135005	992.03-00
Section 1001	Determination of Amount of and Recognition of Gain or Loss	1001.00-00
	200103001 200103002 200103003 200103007 200103049 200105039 200105044 200112031 200113007 200116016 200117002 200118038 200119047 200121023 200121024 200127023 200127037 200128035 200130010 200209007 200209008 200213011 200213014 200217024 200217036 200217037 200223019 200224001 200226042 200133002 200135002 200135002 200135002 200135002 200135007 200135007 200135007 200135007 200141022 200143019 200147028 200202033 200207018 200210018 200210056 200210061 200215032 200221032 200229018 200229018 200229018 200229018 200229018 200229046 200229046 200229046 200229046 200229046 200231011 200231011	
	• Allocation of Sales Price 200116012	1001.01-00
	• Amount Realized 200112030 200112038 200113006 200120001 200130009	1001.02-00
	• <i>Property Differing Materially</i> 200103034 200105050 200227020 200210029	1001.02-07
	• Fair Market Value of Property 200123008	1001.05-00
Section 1011	Adjusted Basis for Determining Gain or Loss	1011.00-00
	200120001	
	• Allocation of Basis 200115003	1011.01-00
Section 1012	Basis of Property--Costs	1012.00-00
	• Liabilities Assumed as Purchase Price 200105052 200107007 200108017 200121028 200123042 200123046 200125066 200125067 200125072 200125074 200125075 200125076 200125078 200125080 200126011 200126014 200132024 200209010 200219014 200208004 200229009 200229009 200229009 200229009 200229009 200229010 200229010 200229010 200229010 200229010	1012.06-00
	• Conversion of Property 200133001	1012.14-00
Section 1014	Basis of Property Acquired From a Decedent	1014.00-00
	• Appreciated Property Acquired By Decedent by Gift Within One Year of Death 200210051	1014.06-00
Section 1015	Basis of Property Acquired by Gift or Transfer in Trust	1015.00-00
	200105039 200105044 200116016 200118038 200202033 200221032	
	• Transfer in Trust After December 31, 1920 200113007 200117002 200127023 200127037 200213014	1015.03-00
	• <i>Basis in Hands of Trustee or Beneficiaries of an Irrevocable Trust</i> 200120016	1015.03-01
Section 1016	Adjustment v. No Adjustment to Basis	1016.00-00

	• Organizations Previously Exempt 200133001	1016.03-00
	• Improvements, Additions, Other Capital Charges 200229014 200229014 200229014 200229014 200229014	1016.07-00
Section 1031	Exchange of Property Held for Productive Use or Investment 200105004 200118023 200131014 200137032 200151017 200209010 200148042 200201007 200201007 200203033 200203042 200208004	1031.00-00
	• Like Kind Property 200224004	1031.02-00
	• Like Kind Real Estate 200111025 200137003 200219006	1031.03-00
	• Deferred Exchanges 200109022 200130001 200211016	1031.05-00
	• Multi-Party Exchanges 200126007	1031.06-00
Section 1032	Exchange of Stock for Property (Recognition v. Nonrecognition) 200143001 200232028	1032.00-00
Section 1033	Involuntary Conversion 200109005 200118010 200126010 200127001	1033.00-00
	• General Rule 200147053	1033.01-00
	• Definition of Involuntary Conversion Events 200145001 200217001 200219006	1033.02-00
Section 1041	Transfers of Property Between Spouses or Incident to Divorce 200120007 200221042	1041.00-00
	• Transfers Incident to Divorce 200120016 200221021	1041.01-00
Section 1042	Sales of Stock to Employee Stock Ownership Plans or Certain Cooperatives 200151008 200151010	1042.00-00
Section 1059	Corporate Shareholder's Basis in Stock Reduced by Non-taxed Portion of Extraordinary Dividends	1059.00-00
	• In General	1059.01-00
	• <i>Reduction in Basis Rule</i> 200218004	1059.01-01
Section 1060	Special Allocation Rules for Certain Asset Acquisitions 200105052 200107007 200108017 200121028 200123042 200123046 200125066 200125067 200125072 200125074 200125075 200125078 200125080 200126011 200126014 200132024 200209010 200219014 200144028 200208004 200229009 200229009 200229009 200229009 200229009 200229010 200229010 200229010 200229010 200229010	1060.00-00
	• General Rule/Residual Method	1060.01-00
	• <i>Class IV Assets</i> 200144028	1060.01-04
Section 1092	Straddles 200130010 200131015 200150012	1092.00-00
	• Mixed Straddles	1092.05-00

	• <i>Mixed Straddle Account</i>	1092.05-02
	200120034 200206048 200206049 200212003	
	• Hedging Transactions	1092.09-00
	200151011	
Section 1221	Capital Asset v. Not a Capital Asset	1221.00-00
	200151011 200211042 200215037 200218034	
	• Copyright, Literacy, Musical, or Artistic Composition, Letter or Memorandum	1221.03-00
	• <i>Similar Property</i>	1221.03-01
	200125003	
	• Sale of Entire Business	1221.08-00
	200130002	
	• Securities	1221.12-00
	• <i>Business Hedges</i>	1221.12-02
	200146046 200221008	
Section 1222	Other Terms Relating to Capital Gains and Losses	1222.00-00
	200209007 200209008 200215037	
Section 1223	Holding Period of Capital Assets	1223.00-00
	200103001 200103002 200103003 200103049 200105039 200113007 200116016	
	200120016 200127037 200131028 200202033 200202078 200210056 200210061	
	200221032 200230017 200230017	
	• Decedent and Estate	1223.01-00
	200213014	
Section 1231	Property Used in the Trade or Business and Involuntary Conversions (Capital Gain v. Ordinary Income Treatment)	1231.00-00
	200215037	
Section 1234A	Gains or Losses From Certain Terminations	1234A.00-00
	200209007 200209008	
Section 1235	Sale or Exchange of Patents (Capital Transaction v. Not a Capital Trans- action)	1235.00-00
	200219017 200219019 200219020 200219021 200219026 200135015 200135015	
	200135015 200135015	
Section 1239	Gain from Sale of Depreciable Property Between Certain Related Tax- payers	1239.00-00
	200133030	
Section 1241	Cancellation of Lease or Distributor's Agreement (Sale or Exchange v. Not a Sale or Exchange)	1241.00-00
	200218034	
Section 1245	Gain From Dispositions of Certain Depreciable Property	1245.00-00
	• General Rule	1245.01-00
	• <i>Section 1245 Property</i>	1245.01-03
	200104031	
Section 1248	Gain From Certain Sales or Exchanges of Stock in Certain Foreign Cor- porations	1248.00-00
	200104024	
	• Non-Recognition Provisions	1248.06-00
	200104024	
Section 1256	Section 1256 Contracts Marked to Market	1256.00-00
	• Special Rules	1256.06-00

	• <i>Property That is Part of a Hedging Transaction</i> 200151011	1256.06-01
Section 1259	Constructive Sales of Appreciated Financial Positions 200217039	1259.00-00
Section 1272	Current Inclusion in Income of Original Issue Discount	1272.00-00
	• Constant Interest Rate (Economic Accrual) 200142005	1272.01-00
	• <i>Yield To Maturity</i> 200142005	1272.01-03
	• <i>Put/Call Options</i> 200142005	1272.01-04
	• OID Accrual - Principal Subject to Acceleration	1272.06-00
	• <i>Pools</i> 200145013	1272.06-02
Section 1273	Determination of Amount of Original Issue Discount 200115015 200135011 200135011 200135011 200135011	1273.00-00
	• Issue Price	1273.02-00
	• <i>Investment Units</i> 200115015	1273.02-06
Section 1274	Determination of Issue Price in the Case of Certain Debt Instruments Issued for Property	1274.00-00
	• Debt Instruments Subject to Section 1274 200116008	1274.04-00
Section 1275	Other Definitions & Special Rules	1275.00-00
	• Definitions	1275.01-00
	• <i>Debt Instrument</i> 200116008	1275.01-01
Section 1276	Disposition Gain Representing Accrued Market Discount Treated as Ordinary Income 200120001	1276.00-00
Section 1278	Definitions and Special Rules	1278.00-00
	• In General	1278.01-00
	• <i>Market Discount Bond</i> 200120001	1278.01-01
	• <i>Market Discount</i> 200120001	1278.01-02
Section 1286	Tax Treatment of Stripped Bonds 200130009 200151011	1286.00-00
Section 1291	PFIC Interest on Tax Deferral	1291.00-00
	• Paying Elections by QEF Shareholders	1291.06-00
	• <i>Deemed Dividend Election by Shareholder of Controlled Foreign Corporation</i> 200124016	1291.06-02
Section 1295	Qualified Electing Fund	1295.00-00
	• Time For Making Election	1295.02-00

	• <i>Retroactive Elections</i> 200212014	1295.02-02
Section 1297	Special Rules	1297.00-00
	• <i>Stock in Former PFIC</i> 200124016	1297.02-00
Section 1301	Averaging of Farm Income 200213026	1301.00-00
Section 1311	Correction of Error 200143003 200144004 200232001	1311.00-00
	• <i>Inconsistent Position v. No Inconsistent Position</i>	1311.01-00
	• <i>Taxpayer</i> 200133004	1311.01-01
Section 1341	Computation of Tax Where Taxpayer Restores Substantial Amount Held Under Claim of Right 200129001	1341.00-00
	• <i>Method Used to Compute</i> 200102009	1341.03-00
Section 1361	Definitions	1361.00-00
	200105034 200105035 200118046 200130018 200211032 200135004 200135004 200135004 200135004 200138017 200150009 200215006 200229037 200229037 200229037 200229037 200229037 200229038 200229038 200229038 200229038 200229038	
	• <i>Small Business Corporation v. Not a Small Business Corporation</i> 200205044 200201005 200201005	1361.01-00
	• <i>Non-Resident Alien as Shareholder</i> 200226031	1361.01-03
	• <i>More than One Class of Stock</i> 200103061 200118046 200130008 200226032 200221035	1361.01-04
	• <i>Certain Trusts Permitted as Shareholders</i>	1361.03-00
	• <i>Grantor Trusts</i> 200147044	1361.03-01
	• <i>Qualified Subchapter S Trusts</i> 200106017 200106017 200125045 200217011 200227022 200227027 200140040 200140043 200140046 200218031	1361.03-02
	• <i>Electing Small Business Trusts</i> 200103040 200103041 200103042 200103043 200103044 200103045 200103046 200103047 200103048 200103050 200104013 200104014 200227021	1361.03-03
	• <i>Qualified Subchapter S Subsidiary</i> 200107018 200111026 200112060 200113018 200114022 200120033 200125090 200127019 200145025 200145030 200204011 200205036 200206026 200217053 200219032 200222009 200223004 200223050 200208006 200208012 200218007 200229039 200229039 200229039 200229039 200229039	1361.05-00

Section 1362**Election by Small Business Corporation****1362.00-00**

200103016 200103030 200103039 200105033 200106028 200106028 200108026
200108031 200109018 200112034 200117011 200119015 200121055 200121056
200122042 200122043 200123015 200123016 200123022 200123031 200125027
200125046 200127014 200127021 200127026 200127028 200128028 200128044
200130017 200130022 200130031 200145026 200217014 200217026 200219023
200220021 200220022 200220023 200226021 200227021 200227025 200135035
200135035 200135035 200135035 200136015 200136015 200136016 200136016
200140047 200140075 200140076 200147031 200202023 200210048 200215035
200221003 200221005 200221007 200221024

- *Eligible v. Ineligible*

1362.01-00

200114029 200123058 200217048 200222009

- *Shareholder Consent*

1362.01-01

200115022

- *Election After Termination*

1362.01-02

200108023 200139017 200139017 200147038 200218017

• Late Elections

1362.01-03

200101010 200101013 200101014 200101018 200101022 200101025 200101026
200101027 200101028 200102019 200102020 200102022 200102023 200102026
200102027 200102032 200102033 200102050 200103018 200103019 200103020
200103021 200103023 200103025 200103028 200103029 200103035 200103036
200104009 200104018 200104021 200105006 200105029 200105030 200105041
200105046 200105053 200105055 200105056 200105057 200106023 200106023
200106024 200106024 200106025 200106025 200106026 200106026 200106027
200106027 200106031 200106031 200107010 200107013 200107014 200107023
200107029 200108006 200108020 200108025 200108027 200108030 200108033
200108034 200109021 200109024 200109026 200109028 200109029 200109030
200109035 200109038 200109040 200110012 200110015 200111012 200111016
200111017 200111020 200111022 200112008 200112027 200112039 200112045
200112053 200112057 200112058 200114007 200114010 200114018 200114019
200114020 200114021 200114023 200115004 200115005 200115007 200115011
200115012 200115013 200115017 200115018 200115021 200115029 200116015
200116019 200116020 200116021 200116022 200116033 200116036 200116037
200116038 200116039 200117009 200117012 200117014 200117015 200117022
200117023 200117024 200117028 200117029 200118013 200118014 200118017
200118019 200118020 200118021 200118022 200118024 200118026 200118027
200118029 200118030 200118032 200118033 200118034 200118035 200118047
200118048 200118049 200119020 200119022 200119026 200119041 200120012
200120013 200120018 200120027 200120031 200121011 200121025 200121026
200121032 200121036 200121037 200121038 200121048 200121051 200121052
200121057 200122003 200122014 200122015 200122016 200122017 200122021
200122027 200122039 200122040 200122046 200123017 200123019 200123021
200123023 200123044 200123050 200123051 200124013 200125002 200125022
200125023 200125024 200125025 200125026 200125029 200125041 200125042
200125047 200125048 200125054 200125057 200125062 200125081 200126017
200126020 200126021 200126029 200127002 200127013 200127016 200127017
200127018 200127025 200127029 200127030 200127032 200127034 200128017
200128019 200128023 200128024 200128030 200128036 200128045 200129022
200129026 200129027 200129028 200129033 200129035 200130021 200130028
200130029 200130035 200131004 200131009 200131021 200131023 200132011
200132012 200132025 200132026 200137015 200137017 200137027 200137034
200145014 200145015 200145017 200145018 200145023 200145031 200145032
200145035 200145036 200145038 200149018 200149026 200149029 200151020
200151021 200151022 200151023 200151024 200151025 200151026 200151028
200151029 200151030 200151036 200204009 200204010 200204012 200205006
200205010 200205011 200205012 200205020 200205022 200205026 200205029
200205032 200205038 200205039 200205041 200206004 200206007 200206013
200206017 200206032 200206033 200206035 200206039 200206042 200206043
200206046 200206052 200209012 200209013 200209023 200209031 200209050
200211002 200211009 200211010 200211011 200211012 200211013 200211014
200211023 200214027 200217004 200217015 200217016 200217018 200217027
200217028 200217029 200217030 200217032 200217033 200217038 200217040
200217041 200217046 200217049 200217050 200220003 200220004 200220007
200222009 200222013 200222015 200222020 200222021 200222023 200222025
200223006 200223010 200223046 200224012 200224027 200224028 200226011
200226016 200226017 200226019 200226022 200226023 200226028 200226029
200226030 200226034 200226038 200226040 200227037 200133025 200133031
200134016 200134018 200134019 200134020 200135006 200135006 200135006
200135006 200135008 200135008 200135008 200135008 200135010 200135010
200135010 200135010 200135012 200135012 200135012 200135012 200135017
200135017 200135017 200135017 200135033 200135033 200135033 200135033
200135034 200135034 200135034 200135034 200136014 200136014 200136017
200136017 200138019 200138020 200138021 200138022 200138023 200139012
200139012 200139014 200139014 200139015 200139015 200139027 200139027
200140034 200140035 200140036 200140044 200140045 200140048 200140054
200140055 200140056 200140064 200140069 200140071 200140077 200141023

200141025 200141035 200141038 200142017 200143015 200143016 200143018
 200143021 200143024 200143026 200143027 200144009 200144010 200144011
 200144015 200144019 200144020 200144022 200144023 200144024 200144025
 200144026 200146017 200146031 200146032 200146034 200146036 200146037
 200146038 200146040 200146041 200146044 200146049 200147036 200147038
 200147047 200148027 200148033 200150002 200150015 200150021 200150022
 200150024 200150025 200201011 200201011 200201016 200201016 200201018
 200201018 200201034 200201034 200202029 200202030 200202031 200202037
 200202038 200202039 200202040 200202041 200202042 200202051 200202054
 200202061 200202062 200202064 200203022 200203041 200203054 200203055
 200203063 200203067 200207008 200207022 200207023 200208005 200208008
 200208009 200208020 200208021 200210027 200210030 200210031 200210034
 200210037 200210040 200210052 200210060 200212015 200212016 200212017
 200212023 200215012 200215013 200215014 200215021 200215033 200215038
 200215040 200215041 200215046 200218006 200218025 200218026 200218030
 200221012 200221013 200221023 200221025 200221026 200221028 200221029
 200221030 200221031 200221033 200221034 200229023 200229023 200229023
 200229023 200229023 200229026 200229026 200229026 200229026 200229026
 200229045 200229045 200229045 200229045 200229045 200229047 200229047
 200229047 200229047 200229047 200230008 200230008 200230010 200230010
 200230011 200230011 200230028 200230028 200231004 200231004 200231005
 200231005 200231009 200231009 200231012 200231012 **200232011 200232032**

• Termination of Election 1362.02-00
 200117013 200226009 200215039

• Ceases to be Small Business Corporation 1362.02-02
 200107025 200122034 200145028

• Passive Investment Income 1362.02-03

200102024 200104010 200106030 200106030 200106034 200106034 200111019
 200112032 200112035 200114024 200114030 200119028 200122028 200123036
 200125089 200128025 200137020 200145019 200205019 200206023 200206030
 200206031 200211001 200217008 200217012 200217023 200217034 200217045
 200220024 200224021 200226024 200226025 200227004 200133019 200135009
 200135009 200135009 200135009 200141028 200143012 200144021 200147034
 200147040 200147050 200148021 200148023 200148024 200148032 200150013
 200203017 200208007 200210041 200210042 200210045 200210046 200215045
 200218033 200221027 200229003 200229003 200229003 200229003 200229003
 200229027 200229027 200229027 200229027 200229027 200229036 200229036
 200229036 200229036 200229036

• S Termination Year 1362.03-00
 200145037 200219013 200227028 200207021 200210043 200229039 200229039
 200229039 200229039 200229039

• Inadvertent Terminations 1362.04-00

200101024 200103022 200107021 200107030 200110026 200111018 200112006
 200114009 200115020 200115022 200117031 200118025 200119033 200119040
 200121033 200123052 200125045 200125061 200125091 200127015 200128032
 200129031 200130016 200130020 200131019 200131022 200137040 200145019
 200145020 200145028 200145033 200145034 200149027 200151032 200204027
 200205004 200205024 200206011 200209019 200217010 200217011 200222016
 200223003 200226006 200226027 200227004 200227026 200227027 200227031
 200227033 200227034 200227035 200138009 200138016 200139019 200139019
 200139024 200139024 200140050 200140070 200144016 200146030 200146051
 200147043 200147045 200147046 200148031 200148035 200150017 200201027
 200201027 200203057 200207017 200212010 200212011 200215043 200216008
 200218007 200221014 200229024 200229024 200229024 200229024 200229024

Section 1366

Pass-Thru of Items to Shareholders
 200223052 200207015 200230030 200230030

1366.00-00

Section 1367	Adjustment to Basis of Stock of, and Indebtedness Owing, Shareholders 200106009 200106009 200117008 200223052	1367.00-00
Section 1368	Distributions 200111004 200117008 • Accumulated Adjustments Account 200110004	1368.00-00 1368.01-00
Section 1371	Coordination with Subchapter C Rules 200111004	1371.00-00
Section 1374	Tax Imposed On Certain Built-In Gains (for Corporations Electing S Status After 12/31/86) 200205028 200134022 200134023 200150009	1374.00-00
Section 1375	Tax Imposed On Certain Passive Investment Income 200141028 200147034 200210041 200210042 200210045 200210046 200218033	1375.00-00
Section 1377	Definitions and Special Rules 200117008 • Post-termination Transition Period 200223052 200207015 200230030 200230030	1377.00-00 1377.02-00
Section 1381	Organizations to Which Part Applies 200119016 200123033 200209024 200224017 200210033	1381.00-00
Section 1388	Definitions; Special Rules 200206044 200226037	1388.00-00
Section 1394	Tax-Exempt Enterprise Zone Facility Bonds 200137004	1394.00-00
Section 1396	Empowerment Zone Employment Credit 200214016	1396.00-00
Section 1397E	Qualified Zone Academy Bonds 200127044	1397E.00-00
Section 1398	Rules Relating to Individual's Title 11 Cases 200127022 • Cases Under Chapter 7 or 11 200217003 • Debtor Succeeds to Tax Attributes of Estate 200118003	1398.00-00 1398.01-00 1398.09-00
Section 1400B	Zero Percent Capital Gains Rate 200102015	1400B.00-00
Section 1401	Rate and Applicability of Self-Employment Tax 200113002 200222008	1401.00-00
Section 1402	Definitions 200212027 • Net Earnings From Self-Employment 200131002 • Ministers, Members of Religious Orders, Christian Science Practitioners (Election) 200106015 200106015 200143017 • Partner's Taxable Year Ending as the Result of Death • Retirement Payments to Retired Partners 200142004	1402.00-00 1402.01-00 1402.05-00 1402.06-00 1402.06-01

Section 1441	Withholding of Tax on Nonresident Aliens (Required v. Not Required) 200219011	1441.00-00	
	• Income Subject to Withholding v. Not Subject to Withholding 200222001	1441.02-00	
Section 1445	Withholding of Tax on Dispositions of United States Real Property Interests (See Also 897.00-00).	1445.00-00	
	• Special Rules For Distributions by Corporations, Partnerships, Trusts and Estates 200223009	1445.07-00	
Section 1446	Withholding Tax Paid by Partnerships with Foreign Partners 200144005	1446.00-00	
Section 1491	Imposition of Tax 200128040	1491.00-00	R
Section 1492	Nontaxable Transfers	1492.00-00	R
	• Excise Tax Imposed by Section 1491 Shall Not Apply	1492.01-00	R
	• <i>Transfer Described in Section 367 or Where Election to Apply Section 367 Principles is Made</i> 200128040	1492.01-02	R
Section 1494	Payment and Collection 200128040	1494.00-00	R
Section 1502	Regulations Governing Consolidated Returns (May v. May Not File Consolidated Returns) 200136001 200136001	1502.00-00	
	• Liability for Tax 200122023	1502.06-00	
	• Separate Taxable Income 200123048 200149009	1502.12-00	
	• Intercompany Transactions 200108024 200209025	1502.13-00	
	• <i>Stock of Members</i> 200150008 200232028	1502.13-01	
	• <i>Obligations of Members</i> 200121013 200122022	1502.13-02	
	• Loss Disallowance Rule 200108009 200110010 200115008 200117025 200118009 200121013 200122022 200128014 200128043 200130004 200137054 200151034 200206050 200209051	1502.20-00	
	• Consolidated Net Operating Loss Deduction 200124007 200209002 200214023	1502.21-00	
	• Investment Adjustment 200128014 200215002	1502.32-00	
	• Earnings and Profits 200225014	1502.33-00	
	• Life and Non-Life 200105002	1502.50-00	
	• Filing Requirements 200101009 200104027 200118006 200123043 200127008 200132036 200220018 200133010 200135041 200135041 200135041 200135041 200136018 200136018 200203059	1502.75-00	

	• <i>When Group Remains in Existence</i>	1502.75-10
	200136001 200136001 200232016	
	• <i>Taxable Year of Members of Group</i>	1502.76-00
	200101008 200127008 200227001 200136001 200136001	
	• <i>Common Parent Agent for Subsidiaries</i>	1502.77-00
	200111003 200122018 200122023 200125031 200125060 200130012 200132001 200203007 200210012	
	• <i>Alternative Agents of the Group</i>	1502.77-01
	200130012	
	• <i>Exercise of Privilege</i>	1502.88-00
	200137012	
	• <i>Application of Section 382 with Respect to a Consolidated Group</i>	1502.98-00
	200203007	
Section 1503	Computation and Payment of Taxes	1503.00-00
	200101007	
	• <i>Dual Consolidated Loss</i>	1503.04-00
	200221018	
	• <i>Dual Resident Corporation</i>	1503.04-04
	200102035 200107026 200111039 200115025 200118051 200119004 200120028 200120029 200121049 200132027 200137025 200149001 200149021 200149023 200205043 200213022 200213023 200213024 200214004 200219027 200227032 200136020 200136020 200136021 200136021 200140074 200146021 200146050 200201028 200201028 200201031 200201031 200203068 200208023 200210062 200216014 200216023 200216024 200229022 200229022 200229022 200229022 200229022 200229029 200229029 200229029 200229029 200229029 200229040 200229040 200229040 200229040 200229040 200229044 200229044 200229044 200229044 200229044 200230027 200230027 200232017 200232026	
Section 1504	Definitions	1504.00-00
	200145008 200135032 200135032 200135032 200135032 200201014 200201014	
	• <i>Includible Corporation v. Not an Includible Corporation</i>	1504.02-00
	• <i>Foreign Subsidiary Formed to Comply With Foreign Law May Be An Includible Corporation</i>	1504.02-01
	200213018	
Section 2001	Imposition and Rate of Tax	2001.00-00
	• <i>Determination of Amount of Adjusted Taxable Gifts</i>	2001.02-00
	200118002	
Section 2011	Credit for State Death Taxes	2011.00-00
	200108040	
Section 2013	Credit for tax on Prior transfers	2013.00-00
	200218003	
Section 2016	Recovery of Taxes Claimed as Credit	2016.00-00
	200108040	
Section 2031	Definition	2031.00-00
	200128021 200205002 200202032	
	• <i>Valuation of Stocks and Bonds for Which There is No Market</i>	2031.03-00
	• <i>Open-End Investment Company Shares</i>	2031.03-20
	200119013	
Section 2032	Alternate Valuation	2032.00-00
	200203031	

	• Exercise of Election 200227029	2032.01-00
Section 2032A	Valuation of Farm Real Property 200143014	2032A.00-00
Section 2033	Property in Which Decedent Had an Interest 200101021 200108032 200112023 200113006 200123055 200127037 200128035 200223013 200223014 200210051 200231011 200231011	2033.00-00
	• Interest v. No Interest at Time of Death 200105044	2033.01-00
	• Life Estate 200213014	2033.09-00
Section 2035	Adjustments for Certain Gifts Made Within 3 Years of Decedent's Death	2035.00-00
	• Inclusion of Certain Property in Gross Estate 200127042	2035.01-00
	• Inclusion of Gift Tax in Gross Estate 200122011	2035.02-00
Section 2036	Transfers With Retained Life Estate (Included v. Not Included in Gross Estate) 200103001 200103002 200103003 200103049 200113006 200120021 200123034 200125038 200127037 200205002 200213013 200203045 200210018	2036.00-00
	• Retention of Right to Designate Who Shall Enjoy Property or Income 200138018	2036.02-00
	• Life Insurance Trusts 200127042	2036.07-00
	• Transfer v. Not a Transfer 200213014	2036.11-00
	• Amount Included 200210009	2036.23-00
Section 2037	Transfers Taking Effect at Death (Included v. Not Included in Gross Estate) 200113006 200213014	2037.00-00
Section 2038	Revocable Transfers (Included v. Not Included in Gross Estate) 200101021 200113006 200123034 200125038 200205002 200213013 200213014 200210051	2038.00-00
	• Insurance Trusts 200127042	2038.04-00
Section 2039	Annuities (Included v. Not Included in Gross Estate) 200105058 200112023	2039.00-00
	• Amount to Be Included 200210009	2039.02-00
Section 2040	Joint Interests (Included v. Not Included in Gross Estate) 200104008	2040.00-00
Section 2041	Powers of Appointment (Included v. Not Included in Gross Estate) 200105039 200105044 200112031 200124006 200125038 200206045 200219028 200219029 200219034 200225015 200144018 200150020 200210038 200210051 200210056 200210061 200229013 200229013 200229013 200229013 200229013	2041.00-00
	• Pre-1942 Powers 200127037 200205033	2041.01-00

	• General Power v. Not a General Power 200101021 200123045 200227020	2041.03-00
Section 2042	Proceeds of Life Insurance (Included v. Not Included in Gross Estate) 200127042 200147039 • Insurance Receivable by Other Beneficiaries • <i>Insurance or Purchase of Decedent's Interest in Business</i> • Possession of Incidents of Ownership	2042.00-00 2042.04-00 2042.04-03 2042.05-00
Section 2044	Certain Property for which Marital Deduction was Previously Allowed 200205002 200219003 200223020 200223047 200203045 • Inclusion of Property in which Decedent had Qualifying Income Interest for Life • <i>Deduction Allowed with Respect to Transfer of Property to Decedent under Section 2056 or 2523</i>	2044.00-00 2044.01-00 2044.01-01
Section 2053	Expenses, Indebtedness, and Taxes (Deductible v. Not Deductible) 200104008 200132004 • Claims Against the Estate • <i>Claim Extinguished - Effect of Post Death Events</i>	2053.00-00 2053.09-00 2053.09-13
Section 2055	Transfers for Public, Charitable, and Religious Uses(Deductible v. Not Deductible) 200116007 200120002 200120003 200204022 200223013 200223014 200229046 200229046 200229046 200229046 200230018 200230018 200232015 • To U.S., any State, Territory, Political Subdivision, or District of Columbia • To Trustee or Fraternal Society for Charitable Purposes • <i>Presently Ascertainable Charitable Remainder</i> • Transfers Not Exclusively for Charitable Purposes • <i>Transfers Subject to Condition</i> • Disclaimers • Modification of Will • <i>Compromise</i> • Charitable and Noncharitable Interest (Tax Reform Act of 1969) • <i>Unitrust Lead Interest</i> • <i>Guaranteed Annuity Lead Interest</i>	2055.00-00 2055.01-00 2055.03-00 2055.03-03 2055.07-00 2055.07-02 2055.08-00 2055.09-00 2055.09-01 2055.12-00 2055.12-06 2055.12-07

	• <i>Reformations of Nonqualifying Interests</i> 2055.12-10 200105059 200122045 200224006 200201026 200201026 200230022 200230022 200232015	
	• Transfers of Easements in Real Property 2055.14-00 200143011	
Section 2056	Bequests, etc., to Surviving Spouse (Marital Deduction v. No Marital De- duction) 2056.00-00 200104008 200106008 200106008 200127027 200132004 200211028 200219003 200223013 200223014 • Terminable Interests 2056.01-00 200131001 • <i>Life Estate</i> 2056.01-01 200125012 200222024 200224016 • Qualified Terminable Interest Property 2056.07-00 200119030 200130034 200226020 200218003 • <i>Effective Election</i> 2056.07-01 200112009 200117007 200133015 200143013 200229043 200229043 200229043 200229043 200229043 200232030 • Special Rule for Charitable Remainder Trusts 2056.08-00 200127038 200204022 200232015 • Disallowance of Deduction Where Surviving Spouse Not U.S. Citizen 2056.19-00 • <i>Exception For Property Transferred to Qualified Domestic Trust</i> 2056.19-02 200146015	
Section 2056A	Qualified Domestic Trusts (Deductible v. Not Deductible) 2056A.00-00 200132013 • Effective Election 2056A.04-00 200211021	
Section 2205	Reimbursement Out of Estate 2205.00-00 • Apportionment of Tax According to State Law 2205.01-00 200206024	
Section 2207A	Right of Recovery in the Case of Certain Marital Deduction Property 2207A.00-00 200223047 • Recovery With Respect to Estate Tax 2207A.01-00 200127007 • Recovery With Respect to Gift Tax 2207A.02-00 200106029 200106029 200116006 200137022 200224016 200230017 200230017	
Section 2209	Certain Residents of Possessions Considered NonresidentD Not Citizens of the United States 2209.00-00 200105048 • Gift v. Not a Gift 2501.01-00 200105044 200203045 200210029 200229013 200229013 200229013 200229013 200229013	
Section 2501	Imposition of Gift Tax (Imposed v. Not Imposed) 2501.00-00 200101021 200103001 200103002 200103003 200103007 200103049 200105039 200105048 200105048 200112023 200113006 200116016 200119047 200123055 200127027 200127037 200128035 200213011 200213013 200223019 200224001 200227020 200133002 200141022 200148028 200150020 200202033 200203045 200210018 200210051 200210056 200212006 200221032 200229018 200229018 200229018 200229018 200229018 200231011 200231011 • Gift v. Not a Gift 2501.01-00 200105044 200203045 200210029 200229013 200229013 200229013 200229013 200229013	

Section 2503	Taxable Gifts (Annual Exclusion Allowed v. Not Allowed)	2503.00-00
	• Trusts for Minor Beneficiaries	2503.11-00
	• <i>Withdrawal Powers ("Crummey" Issue)</i>	2503.11-06
	200123034 200130030	
Section 2511	Transfers in General (Gift v. Not a Gift)	2511.00-00
	200105049 200113007 200122011 200128011 200213011 200141022 200148028 200202033 200202036 200212006	
	• Consideration	2511.02-00
	200209007 200209008	
	• Cessation of Donor's Dominion and Control	2511.03-00
	200122045	
	• Gifts Indirectly Made	2511.04-00
	200143004	
	• Transfer of Life Estate or Other Right Over Income	2511.10-00
	200106029 200106029	
	• Gift of Remainder	2511.11-00
	200118031 200220014 200220015	
	• Renunciation of Testate or Intestate Share	2511.18-00
	200109041	
Section 2512	Valuation of Gifts	2512.00-00
	200122036 200223013 200223014 200212006	
	• Closely Held Stock	2512.08-00
	200143004	
Section 2513	Gifts by Husband or Wife to Third Party (Gift Splitting) (Allowed v. Not Allowed)	2513.00-00
	200130030 200205027 200213013 200147021	
	• Joint and Several Liability	2513.03-00
	200205027	
Section 2514	Powers of Appointment (Transfer v. Not a Transfer)	2514.00-00
	200105039 200105044 200112031 200144018 200148028 200150020	
	• Power Created on or Before October 21, 1942	2514.01-00
	200127037 200205033	
	• Definition of General Power of Appointment	2514.03-00
	200104023	
Section 2515	Treatment of Generation-Skipping Transfer Tax	2515.00-00
	200147021	
Section 2516	Certain Property Settlements (Exempt v. Not Exempt >From Gift Tax)	2516.00-00
	200221021 200221042	
	• Settlement of Marital or Property Rights	2516.01-00
	200120016	
Section 2518	Disclaimers	2518.00-00
	200105058 200122036 200204022 200225015 200208028 200208029 200208030 200208033 200232015	
	• Requirements for a Qualified Disclaimer	2518.01-00
	200127007	
	• Disclaimer of Less than an Entire Interest	2518.02-00
	200130034 200230022 200230022	