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Section 6110 Index

Written
Determinations
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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.

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CC:PA:LPD:DLS, Room 5201, 1111 Constitution Avenue N.W., Washington, DC 20224; (202) 317-6840.

Department of the Treasury
Internal Revenue Service

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	• <i>Allowable Worthless Stock Loss</i> 201249005 201250010 201329001 201329007 201329008 201329009 201329010 201329011 201329012 201329013 201329014	337.16-02
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	201211009 201213013 201214012 201351004 201412012 201429016 201435002 201702035 202114014 202131008 202131009 202133012 202135001 202137001 202210015 202224004 202226008 202240004 202309010 202501010 202510008	
	• <i>Express Election</i> 201214018 201412012 201924014 202114014 202131008 202131009 202133012 202135001 202137001 202226008 202240004 202309010	338.01-00
	• <i>Time in which Election must be made</i> 201206010 201246021 201632019 201338011 201437005 201438018 201503007 201510037 201530017 201534007 201611016 201738002 201826004 201835003 201850019 201924005 202037010 202114014 202131008 202135001 202137001 202210015 202224004 202240004 202309010	338.01-02
	• <i>Qualified Stock Purchase</i> 201203004 201211009 201213013 201214012 201216026 201228011 201252011 201351004 201622012 201702035 202518014	338.02-00
	• <i>Consistency Rules</i> 201213013 201214012	338.04-00
	• <i>Elective Recognition of Gain or Loss by Target Corporation - Together with Nonrecognition of Gain or Loss on Stock Sold by Selling Consolidated Group</i> 202334005	338.05-00
	• <i>Purchase from Related Corporation</i> 201203004 201702035	338.09-00
	• <i>Deemed Asset Sale and Liquidation in 338(h)(10) Election</i> 201203004 201702035	338.80-00
Section 341	Collapsible Corporations	341.00-00
	201209025	

Section 346	(Amended-1982) Partial Liquidation Defined	346.00-00
	202146006	
Section 351	Transfer to Corporation Controlled by Transferor	351.00-00
	201201012 201212001 201214014 201224006 201228030 201232030 201232033 201240017 201249012 201250004 201252002 201252014 201312017 201314001 201330002 201731008 201330002 201333007 201348006 201350001 201350007 201411006 201412013 201415001 201416002 201422004 201424007 201424010 201431002 201436033 201437007 201437013 201438009 201446019 201505012 201506008 201511015 201641011 201746022 201810005 201820016 201822008 201835001 202048003 202125001 202309002 202426005 202524005 202524007	
	• Control v. No Control by Transferor	351.01-00
	201224006 201242007 201306006 201326014 201333007 201506008 201601001 201818010	
	• Series of Transactions	351.02-00
	201212001 201506008 201531014	
	• "Property" Defined	351.05-00
	201506008 201552026	
	• Constructive Exchange	351.11-00
	201350001	
	• Section 351 v. Section 304 (See Also 0304.01-01)	351.12-00
	201228034	
	• Investment Company Exception	351.13-00
	201547003 201622001 201622014 201633028 201716016 201716017 201716018 201716019 201716020 201810005 202016013	
	• Non-Qualified Preferred Stock	351.14-00
	201716045	
	• Exceptions	351.15-00
	201552026	
Section 354	Exchanges of Stock and Securities in Certain Reorganizations	354.00-00
	202050014 202309002	
	• Exchange v. Liquidation	354.01-00
	201423010	
	• Substantially All of the Assets	354.05-00
	201731008 202050014	

Section 355

Distribution of Stock and Securities of a Controlled Corporation

355.00-00

201202007 201208017 201213001 201213005 201216027 201228030 201228033 201229002 201232033 201236014 201238018 201240013 201244006 201245020 201252017 201305003 201306010 201310023 201312017 201323017 201325009 201328024 201330002 201330022 201612012 201634010 201731004 201330002 201330022 201333007 201334009 201334032 201337003 201338040 201339001 201340009 201341026 201347005 201349006 201352007 201402002 201407005 201411012 201416002 201416005 201418018 201418030 201419005 201419010 201419012 201422018 201423012 201424006 201424009 201424013 201426004 201437006 201441009 201441010 201441016 201503006 201505013 201512001 201524005 201535007 201537018 201601001 201603005 201603006 201603020 201624011 201626017 201633014 201634010 201641011 201643008 201644018 201651010 201706005 201716002 201721002 201734004 201740015 201801012 201805012 201817001 201818010 201827008 201848016 201851004 201852015 201919008 201920009 201921002 201921010 201930011 201931005 201940007 201944002 201948001 201949013 201949014 202009002 202010003 202019016 202022004 202026001 202029003 202033003 202035009 202036001 202036005 202045001 202045003 202047007 202051009 202118004 202123006 202126005 202132005 202132006 202145020 202150012 202151001 202152010 202201005 202218001 202218002 202220003 202223004 202224012 202225006 202227008 202231004 202231013 202235002 202236007 202243003 202244009 202246008 202248008 202304005 202304007 202305010 202322006 202322015 202328019 202330002 202332001 202339007 202340015 202343025 202344013 202345008 202347011 202349009 202350010 202351009 202404005 202419016 202421003 202421007 202425001 202429015 202438002 202441010 202443015 202445011 202451015 202505001 202511013 202521001

• Spin-Off

355.01-00

201202007 201203004 201211008 201213018 201215005 201216023 201216027 201228002 201228030 201232014 201232033 201233016 201236014 201240017 201244006 201244008 201246027 201249012 201251006 201305003 201306006 201308002 201312017 201312020 201312022 201314001 201315009 201315016 201325009 201328024 201329005 201330007 201330022 201612012 201634010 201731003 201731004 201308002 201330007 201330022 201334009 201334032 201335001 201336012 201337007 201338040 201340009 201341004 201341013 201341026 201347005 201348005 201349006 201350007 201352007 201404002 201407005 201409002 201409003 201411002 201412013 201415001 201416005 201418030 201418039 201418046 201419005 201419010 201419012 201422004 201422012 201423006 201423010 201424005 201424006 201424008 201424009 201424011 201424013 201426004 201426008 201430002 201433007 201436033 201437006 201437013 201438009 201440014 201441008 201441009 201441016 201443017 201445008 201503006 201504007 201505007 201505013 201511001 201512001 201516014 201528006 201535006 201535007 201537018 201538015 201542004 201603005 201603006 201603020 201605016 201607003 201613008 201614017 201626017 201634010 201637013 201651010 201706005 201734004 201740015 201801012 201802007 201820016 201827006 201827008 201833011 201834006 201835001 201836001 201839006 201845009 201851005 201852015 201910004 201920009 201923003 201925004 201931007 201935009 201943011 201944002 201945022 201948001 201949014 202009002 202035009 202045001 202047007 202051011 202107009 202118004 202126005 202132006 202139001 202139006 202145020 202145027 202149006 202150009 202151001 202151004 202152010 202208012 202209002 202210012 202224002 202224012 202225006 202227008 202231004 202231013 202236007 202244008 202244009 202246005 202246008 202248008 202249011 202249014 202304005 202304007 202305010 202310007 202311005 202322006 202328019 202330002 202332001 202339007 202340015 202343025 202344013 202345008 202347004 202349009 202350010 202351007 202351009 202404005 202421003 202421007 202424004 202429015 202438002 202441010 202449006 202451015 202505001 202511013 202521001 202521019

	• <i>Split-Off</i>	355.01-01
	201208017 201213001 201213002 201213005 201230007 201232033 201234009 201238018 201240016 201245020 201246027 201252017 201306010 201308017 201308018 201310023 201313016 201323017 201327003 201330002 201330007 201731003 201308017 201308018 201330002 201330007 201337003 201350007 201352007 201403002 201404002 201405003 201411002 201411012 201418019 201422017 201426007 201435005 201512001 201625012 201625013 201851004 201920008 201923003 201945016 201949013 202019016 202026001 202031006 202033005 202108010 202132005 202151001 202211009 202218002 202220003 202224002 202231013 202235002 202243003 202244009 202304005 202309013 202332001 202343025 202345008 202429015 202433001 202441010	
	• <i>Split-Up</i>	355.01-02
	201402002 201418018 201423012 201921010 201931005 201940007 202010003 202033003 202201005	
	• Non Pro Rata Distributions, etc.	355.02-00
	201233016 201625012 201625013	
	• Active Business	355.03-00
	201219003 201251006 201634010 201333003 201407005 201418039 201418046 201426007 201429006 201436033 201531014 201535007 201542004 201551009 201605016 201606014 201607003 201624004 201625012 201625013 201626002 201633009 201634010 201637013 201643008 201706005 201730010 201818010 201827008 201834006 201930011 201940007 201948001 201949012 202009002 202029003 202033005 202036001 202045001 202132006 202340015	
	• <i>Five-Year Requirement</i>	355.03-01
	201251006 201528016 201624004 201633009 201643008 201706005 202009002 202150004	
	• Business Purpose	355.04-00
	201308017 201308018 201308017 201308018 201730010	
	• Control	355.05-00
	201437013 201527003 201818010 202218002	
	• <i>Distribution of Control</i>	355.05-01
	201731004 201437013 201605016 201703012 201945022 202218002 202248008	
	• Device	355.06-00
	201734004 201743017 202051009 202113007	
	• Continuity of Interest	355.07-00
	201644018 202033005	
	• Distributions Within a Consolidated Group	355.09-00
	201305003 201352007 201445008 201730010	
	• Gain Recognition on Distributions Pursuant to Acquisitions of Greater than 50% of Distributing or Controlled	355.10-00
	201249011 201250021 201324009 201505007 201601009 201603005 201603006 201614001 201627001 201740015 201748007 201801005 201801012 201943001 202026001 202114017 202126005 202145020 202224002	
Section 356	Receipt of Additional Consideration--Boot (Gain Recognized v. Not Re- cognized)	356.00-00
	201424017 201721014	
	• Reorganization Exchange	356.01-00
	• <i>Series of Transactions</i>	356.01-02
	201614017	
	• Securities as "Other Property"	356.02-00
	201527003	

Section 357	Assumption of Liability (Gain Recognized v. Not Recognized) 202244008 202246005	357.00-00
	• Liabilities in Excess of Basis	357.02-00
	• <i>In General</i> 201721002	357.02-01
	• <i>Exceptions</i> 201230008 201348006 201431002 201542004 201627001 201703012	357.02-02
Section 358	Basis to Distributees 202051009 202218002	358.00-00
	• Allocation of Basis 201411006 201437007 202218002 202244008 202246005	358.02-00
	• Assumption of Liabilities 201721002	358.03-00
Section 361	Nonrecognition of Gain or Loss to Corporations (Recognized v. Not Recognized) 201228033 201634010 201409003 201504007 201511001 201516014 201542004 201613008 201634010 201637013 201649012 201651010 201802007 201818010 201833011 201839006 201852015 201925004 201949013 201949014 202019016 202022004 202026001 202036005 202051009 202123006 202132005 202151001 202152010 202220003 202224012 202231004 202231013 202244009 202304005 202322006 202330002 202332001 202339007 202344013 202350010 202421003 202424004 202429015 202441010 202451015 202505001	361.00-00
	• Exchanges Not Solely in Kind 201423010 201440014 201910004	361.01-00
	• Distributions 201607003 201627001 201827006 201839006 201925004 201949014 202019016 202151004 202231004 202244008 202244009 202246005 202332001 202350010 202429015	361.02-00
	• <i>Distributions of Appreciated Property</i> 201721014	361.02-01
	• <i>Certain Transfers to Creditors</i> 201228033 201731004 201409003 201511001 201537004 201601001 201627001 201703012 201721002 201802007 201833011 201839006 201851005 201852015 201925004 202019016 202022004 202050014 202051009 202139006 202231004 202244009 202322006 202330002 202332001 202350010 202449006 202451015	361.02-02
Section 362	Basis to Corporations 201411006 201418013 201418034 201418041 201418042 201441014 201502001 201502002 201505028 201839013 202050010 202051009 202203010 202430006 202450011	362.00-00
	• Property Acquired in Reorganizations and Transfers by Controlling Stockholders 201701005 201418013 201418041 201418042 201505028 201521011 201545013 201736001 201832011 201832012 202244008 202246005	362.01-00
Section 367	Foreign Corporations 201348011 201432002 201639014 201746022 201935004 201936004 202107010 202107011 202334014 202335001	367.00-00
	• Transfer to Foreign Corporations Subject to Section 367(a) 201321018 201651015 202045007	367.01-00
	• Treatment of Transfers of Stock or Securities to Foreign Corporations 201321018 201651015 201935004 202045007	367.03-00

	• <i>Reorganizations Described in Section 368(a)(1)(B)</i>	367.03-01
	201249011 201250021 201324009	
	• <i>Requirements of Gain Recognition Agreement</i>	367.03-10
	202110014	
	• <i>Treatment of Subsequent Disposition of Stock of Transferee</i>	367.03-13
	201321018	
	• <i>Transfer of Foreign Branch with Previously Deducted Losses Under Section 367(a)</i>	367.06-00
	• <i>Anti-Abuse Rule</i>	367.06-07
	201530020	
	• <i>Transactions Described in Section 367(b) Complete liquidation of Foreign</i>	367.10-00
	• <i>Deficit in Earnings and Profits</i>	367.10-05
	202504005	
	• <i>Transfers of Intangible Property to Foreign Corporations Under Section 367(d)</i>	367.30-00
	201321018 202335001 202447013	
	• <i>Treatment of Distribution Described in Section 367(e)</i>	367.40-00
	201348011 201423006 201639014 201808010	
	• <i>Liquidations Under Section 332</i>	367.40-02
	201348011 201606006 201639014 201808010	
Section 368	Definitions Relating to Corporate Reorganizations	368.00-00
	201201012 201212001 201213019 201213021 201214013 201216027 201224006	
	201228030 201236014 201238018 201239003 201240017 201247009 201249012	
	201252017 201308001 201308017 201308018 201310023 201312017 201314003	
	201325009 201330022 201308001 201308017 201308018 201330022 201341026	
	201349006 201402002 201404006 201406005 201416002 201419005 201424005	
	201424006 201424009 201424011 201426004 201512001 201746022 201839006	
	201931005 201944002 201949013 201949014 202019016 202033003 202035009	
	202036001 202107010 202107011 202118004 202126005 202132005 202132006	
	202145020 202150009 202151001 202220003 202225006 202227008 202231004	
	202235002 202236007 202243003 202244009 202246008 202248008 202304005	
	202304007 202309002 202322006 202328019 202330002 202330006 202332001	
	202334014 202340015 202343025 202344013 202345008 202349009 202350010	
	202351009 202421003 202424004 202429015 202441010 202451015 202505001	
	202511013 202524004	
	• <i>Statutory Merger or Consolidation (Type "A")</i>	368.01-00
	201213001 201213019 201213021 201228033 201232033 201252002 201252014	
	201312017 201314008 201314028 201326006 201333007 201350007 201404002	
	201423010 201436034 201438009 201505012 201535007 201625012 201625013	
	201820002 201918015 202145020 202441010	
	• <i>Using Stock of Corporation Controlling Merged Corporation</i>	368.01-02
	201820002	
	• <i>Stock for Stock (Type "B")</i>	368.02-00
	201249011 201250021 201324009 201603020	
	• <i>Liquidation Distribution</i>	368.02-02
	201418039 201418046	
	• <i>Stock for Property (Type "C")</i>	368.03-00
	201224006 201228030 201247009 201252014 201324003 201731008 201340016	
	201411002 201413003 201418039 201418046 201422004 201424007 202107010	
	202107011	

<ul style="list-style-type: none"> • <i>Substantially All the Property</i> 201247009 201731008 	368.03-01
<ul style="list-style-type: none"> • <i>Assets for Control of Transferee (Type "D")</i> 201203004 201208017 201212001 201213001 201213002 201213005 201214013 201215005 201216023 201216027 201219003 201229002 201230007 201232014 201232033 201233016 201234009 201236014 201238018 201240013 201240016 201244006 201244008 201250004 201251006 201252002 201252017 201306006 201306010 201308002 201310023 201312022 201313016 201314001 201315016 201325009 201329005 201330002 201330007 201330022 201612012 201731003 201731008 201308002 201330002 201330007 201330022 201333007 201335001 201336012 201337003 201337007 201338040 201339001 201340009 201341004 201341013 201341026 201347005 201349006 201350007 201402002 201405003 201407005 201409002 201409003 201411002 201411012 201412013 201415001 201416005 201418018 201418019 201418030 201418039 201418046 201419005 201419010 201419013 201422012 201422017 201423012 201424005 201424006 201424008 201424009 201424011 201424013 201426004 201426007 201426008 201430002 201433007 201435005 201437006 201438009 201441008 201441016 201443017 201445008 201512001 201524005 201528006 201531014 201537018 201603020 201607003 201613008 201637013 201827006 201835001 201836001 201839006 201845009 201851004 201851005 201910004 201920008 201920009 201921002 201921010 201923003 201925004 201930011 201931005 201944002 201945016 201949013 201949014 202010003 202019016 202026001 202033003 202035009 202036001 202036005 202045003 202051011 202108010 202118004 202126005 202127003 202132005 202132006 202139006 202145027 202149006 202151001 202151004 202152010 202201005 202203002 202208012 202211009 202220003 202223004 202224002 202224012 202225006 202227008 202231004 202231013 202235002 202236007 202243003 202244008 202244009 202246008 202249011 202249014 202304005 202304007 202310007 202311005 202322006 202330002 202332001 202339007 202340015 202343025 202344013 202345008 202349009 202350010 202351007 202351009 202404005 202419016 202421003 202425001 202429015 202438002 202441010 202445011 202449006 202451015 202505001 202511013 202521001 202521019 	368.04-00
<ul style="list-style-type: none"> • <i>Recapitalization (Type "E")</i> 201308001 201315009 201315020 201315021 201308001 201424010 201835001 202429001 202429002 202524007 	368.05-00
<ul style="list-style-type: none"> • <i>Change in Identity, etc. (Type "F")</i> 201201004 201201012 201208019 201228030 201236014 201239003 201250004 201252011 201252014 201314003 201316017 201322008 201326006 201328003 201330022 201330022 201333007 201339001 201404006 201411002 201418039 201418046 201445008 201511020 201611015 201635001 201638004 201737010 201746022 202031002 202102007 202107010 202107011 202334014 202339009 202426005 202429001 202429002 202433002 202524004 202524007 	368.06-00
<ul style="list-style-type: none"> • <i>Continuity of Interest Rule</i> 201214013 201224006 201247009 	368.08-00
<ul style="list-style-type: none"> • <i>Proprietary Interest Continuity</i> 202050014 	368.08-02
<ul style="list-style-type: none"> • <i>Related party Acquisitions</i> 201214013 	368.08-03
<ul style="list-style-type: none"> • <i>Following a Qualified Stock Purchase Under Section 338</i> 201918015 	368.08-05
<ul style="list-style-type: none"> • <i>Business Enterprise Continuity</i> 201247009 201314028 201413003 201644018 201918015 202145025 	368.08-06
<ul style="list-style-type: none"> • <i>Historic Business Assets</i> 201224006 	368.08-07

	• <i>Transfers to Controlled Corporations</i>	368.08-08
	201214013 201224006 201234009 201240016 201424007 201625012 201625013	
	• Plan of Reorganization	368.09-00
	201411002 201626002 201627001 202128001 202305010	
	• <i>Several Steps</i>	368.09-01
	201252014 201411002	
	• Liquidation v. Reorganization	368.12-00
	201505012	
	• Transactions Involving Two or More Investment Companies	368.13-00
	201247009	
	• Transfer by Corporation in Title 11 Case (Type "G")	368.14-00
	201208036 201230020 201523001 201644018 201716002 201805012 202050014	
Section 381	Carryovers in Certain Corporate Acquisitions (Allowed v. Not Allowed)	381.00-00
	201830005	
	• Method of Accounting	381.04-00
	201237012 201343012	
Section 382	Limitation on Net Operating Loss Carry-forwards and Built-in Losses Following Ownership Changes	382.00-00
	201208002 201215007 201228023 201229004 201251002 201306003 201308026 201308029 201309013 201314035 201322032 201326013 201328027 202021010 201308026 201308029 201335012 201345023 201350006 201403007 201412009 201432015 201443009 201549010 201750006 201902022 201949017 202017023 202140007 202142007 202142008 202146003 202345009 202433003 202503010 202515007	
	• General Rule	382.01-00
	201648004	
	• Scope of Section 382 Limitation	382.02-00
	• <i>Closing of the Books</i>	382.02-05
	201418038 201545014 201734003 201942005 202517013 202518015	
	• Value of Old Loss Corporation	382.05-00
	201435003	
	• Ownership Change	382.07-00
	201350006	
	• <i>Segregation Rules</i>	382.07-05
	201350006 201451015 202024013	
	• Built-in Gains and Losses and Section 338 Gains	382.08-00
	201629007	
	• <i>Net Unrealized Built-in Gain</i>	382.08-01
	201629007	
	• Definitions and Special Rules	382.11-00
	201215007 201403007 201902022	
	• <i>Preferred Stock</i>	382.11-05
	202131005	
	• <i>Treating Interests As Stock</i>	382.11-07
	202131005	
	• <i>5-Percent Shareholder</i>	382.11-09
	201215007 201403007 201902022	

	• Operating Rules	382.12-00
	201322032 202021010 201335012 201443009 201949017	
	• <i>Contributions to Capital</i>	382.12-01
	201350006	
	• <i>Title 11 or Similar Case</i>	382.12-08
	201306003 201322032 201328027 201435003 201648004 202342007	
	• <i>Election Out</i>	382.12-13
	201519004 201949017 202235001 202342007	
	• <i>Controlled Groups</i>	382.12-16
	201232016 201232017 202021010 201335012 201421011 201421012 201421013 201443009	
Section 384	Limitation on Use of Preacquisition Losses to Offset Built-in Gains	384.00-00
	201806005	
Section 385	Treatment of Certain Interests in Corporations as Stock or Indebtedness	385.00-00
	• Debt v. Equity	385.01-00
	201230008 201323021	
	• New Financial Products	385.03-00
	201209006 201226026	
Section 401	Qualified Pension, Profit-Sharing, and Stock Bonus Plan	401.00-00
	201205022 201234036 201238031 201242019 201242020 201338028 201650002 201650003 201750004 201837004 201923016 202035010 202042012 202044001 202114010 202114011 202114012 202125007 202202012 202202013 202240018 202305001 202417010 202443017 202524006	
	• Impossibility of Diversion	401.01-00
	202125007	
	• <i>Exclusive Benefit of Employees or Their Beneficiaries</i>	401.01-01
	201538022 201847008	
	• <i>Definitely Determinable Benefits Under a Pension Plan</i>	401.01-03
	201501025	
	• Impossibility of Diversion	401.03-00
	201228055 201839010	
	• Discrimination as to Contributions or Benefits (See Also 401.29-01, 401.20-00, 414.00-00)	401.04-00
	201440027 201605006	
	• <i>Discrimination in Availability of Form of Benefit</i>	401.04-03
	201605006	
	• <i>Comparability Among Two or More Plans</i>	401.04-04
	201810008	
	• Required Distributions	401.06-00
	201202042 201208039 201318033 201320021 202039002 201424031 201434028 201437025 201437034 201503024 201628004 201628005 201628006 201902023 201923016 201924013 202031007 202035010 202042012 202114010 202114011 202114012 202140011 202143002	
	• <i>In General</i>	401.06-01
	201203033 201210047 201228045 201228051 201241017 201422028 201422029 201422030 201422031 201424031 201427023 201430022 201431034 201434028 201840007 201909003 202035010 202140011 202506004	

	• <i>Employee Dies Before Entire Interest Distributed</i>	401.06-02
	201202042 201208039 201210045 201320021 201628004 201628005 201628006 201633025 201750004 201923016 201924013 202042012 202044001 202114010 202114012 202140011	
	• Commencement of Benefits Under Qualified Trusts	401.11-00
	201221033 201933006	
	• Additional Participation Requirements (See Also 410.00-00)	401.20-00
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	201447005 201450019 202050003 202139004	
	• Taxation of Designated Settlement Funds	468B.02-00
	201347019 201411027 201718018 201803005 201923010 201930004 202203009 202337009	
	• Other Funds	468B.06-00
	201322026 201718029 201922023 202203009	
	• Clarification Of Taxation of Certain Funds	468B.07-00
	201208036 201347019 201411027	
Section 469	Passive Activity Losses and Credits Limited	469.00-00
	201244017 201312041 201324018 201411025 201427016 201515032 201804007 202006010 202006012 202007015 202229036 202308003 202309003	
	• Disallowed Loss and Credit	469.01-00
	• <i>Closely Held C Corporation</i>	469.01-02
	201411025	
	• Passive Activity Defined	469.03-00
	201341030 202151005 202229036 202308003 202309003	
	• <i>Definition of Activity</i>	469.03-03
	201221012 201634022 201341030 201411025 201634022 201651003 201725003 201804007 202006010 202007015 202308003 202309003	
	• Rules Determining Income or Loss	469.05-00
	201348013	

	• Disposition of Entire Interest in Passive Activity 201415002 201428008	469.07-00
	• Material Participation Defined 201317010 202229036	469.08-00
	• Other Definitions and Rules 201348013	469.10-00
	• Real Property Business 201321021 201427016 201504010 201638014 201638015 201638016 201804007 202006010 202006012 202007015 202223010 202223011 202226003	469.14-00
Section 471	General Rule for Inventories 201504011 202114019	471.00-00
	• Inventories at Cost 202114019	471.03-00
Section 472	Last-In, First-Out Inventories 201836005	472.00-00
	• Election 201208033 201342009 202014014	472.01-00
	• LIFO Conformity Requirement 201550031	472.05-00
Section 475	Mark to Market Accounting Method for Dealers in Securities 201238025 201423019 201507019	475.00-00
	• Treatment of Securities Marked to Market 201314042	475.01-00
	• Exceptions to Mark to Market Treatment	475.02-00
	• <i>Securities Held for Investment</i> 201423019	475.02-01
	• <i>Identification Requirements</i> 201432016	475.02-04
	• Character of Gain or Loss 201432016	475.04-00
	• Definitions 201238025 201529006	475.05-00
	• Commodities Dealers 201623005	475.06-00
	• Commodities Traders 201623005	475.07-00
	• Securities Traders 201239004 201423019 201432016 202009013 202037007 202048009 202143004 202143005 202145015 202150001 202325003 202329006 202403006	475.08-00
Section 481	Adjustments Required by Changes in Method of Accounting 201350033 201403015 201426025 201436048 201503011 201521012 201547004 201716002 202123007	481.00-00
	• Pre-1954 Adjustments	481.02-00
	• <i>Involuntary</i> 201231004 201442049	481.02-02
	• Acceleration of Adjustment 202139004	481.07-00

Section 482	Allocation of Income and Deductions Among Taxpayers 201945026 202107010 202107011 202118013	482.00-00
	<ul style="list-style-type: none"> • Control 201751014 • Services 201751014 • Transfer or Use of Intangibles 202118013 • <i>Cost Sharing Agreements</i> 202118013 	482.02-00 482.09-00 482.11-00 482.11-08
Section 483	Interest on Certain Deferred Payments	483.00-00
	<ul style="list-style-type: none"> • Payments to Which Section Applies • <i>Indefinite as to Time, Liability, or Amount (Contingent)</i> 201451003 	483.02-00 483.02-01
Section 501	Exemption From Tax on Corporations, Certain Trusts, etc. (Exempt v. Not Exempt)	501.00-00
	201204019 201210044 201216040 201217018 201217019 201218041 201219024 201219025 201221023 201224033 201224036 201229001 201229010 201230025 201232036 201233017 201234030 201236032 201242014 201242015 201242017 201244021 201245021 201303017 201305013 201311028 201311029 201313034 201317011 201319031 201322041 201323024 201325017 201701021 201731016 202021026 201333014 201335014 201338052 201340020 201347022 201350044 201407014 201410035 201411037 201415008 201415010 201417017 201419015 201424024 201429027 201431032 201433016 201433017 201433020 201434022 201434023 201451030 201451033 201505040 201505041 201505042 201507026 201517008 201614040 201620011 201641025 201652029 201710035 201710036 201718036 201720010 201733015 201744020 201822029 201827013 201827014 201832013 201832015 201835009 201838008 201841007 201841008 201847011 201904008 201917008 201918018 201918019 201925017 201928016 201931012 201932016 201935013 201940010 201940011 201941030 201942011 201944015 201947020 202004012 202005022 202009025 202009028 202014017 202014022 202015019 202015022 202015025 202015027 202016025 202016028 202017026 202022006 202022007 202031010 202032007 202032008 202033006 202034012 202036008 202041007 202041009 202044011 202046010 202047009 202047010 202047012 202047014 202049005 202052040 202102009 202102010 202102011 202102012 202102013 202105008 202105009 202105011 202107012 202109007 202109008 202110044 202113009 202114023 202117014 202117023 202119002 202122011 202122012 202124009 202124010 202124011 202124012 202124013 202126024 202129015 202129016 202138008 202141024 202141025 202145028 202145031 202150020 202152019 202152022 202213011 202217008 202218025 202218026 202221009 202222007 202223016 202224015 202227010 202231015 202232017 202232020 202232021 202232022 202232023 202233019 202234007 202235012 202237011 202237019 202240028 202242009 202242012 202242015 202242016 202242023 202243019 202244020 202244021 202245009 202247015 202247016 202302017 202305015 202306011 202309017 202310013 202315011 202316009 202316011 202321016 202323011 202326008 202327019 202331003 202331004 202332018 202339039 202343037 202346030 202347002 202352021 202402012 202405008 202405009 202408009 202411012 202414005 202414008 202416014 202416015 202421010 202422012 202422013 202422014 202424022 202429021 202431012 202431014 202433014 202434014 202442010 202443020 202443023 202443025 202448012 202448013 202501013 202504019 202510014 202512003	501.01-00
	<ul style="list-style-type: none"> • Instrumentalities of U.S. 201749019 201503016 201503019 201509039 202340020 202344017 202413013 202419025 	

• Title-Holding Company
201309014 202001027 201552033 201617011 202101005 202221008

501.02-00

• Religious, Charitable, etc., Institutions and Community Chest

501.03-00

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• *Employee Benefit Organization (See Also 0501.09-00)* 501.03-01
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• *Foundations* 501.03-02
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• *Trusts* 501.03-03
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• *Unincorporated Associations* 501.03-04
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<ul style="list-style-type: none"> • <i>Civil Rights Groups</i> 	501.03-07
<p>201217021 201701023 201640019</p>	
<ul style="list-style-type: none"> • <i>Educational Organizations</i> 	501.03-08
<p>201252025 201303018 201304011 201305013 201323025 201327015 202134018 201345032 201405024 201415009 201417017 201417018 201424024 201426035 201433020 201435015 201440023 201445014 201503017 201509040 201510059 201516069 201527044 201550043 201608016 201619010 201621016 201644019 201717048 201741001 201819011 201902032 201945029 202222007 202224013 202235012 202304014 202322019 202426015 202451009 202521024</p>	
<ul style="list-style-type: none"> • <i>Fraternal Beneficiary Societies; Secret Societies (See Also 0501.08-00)</i> 	501.03-09
<p>201951012</p>	
<ul style="list-style-type: none"> • <i>Hospitals and Health Clinics (See Also 0501.06-03)</i> 	501.03-11
<p>201210041 201317012 201328035 201445015 201451037 201702002 201703005 201744019 202004012</p>	
<ul style="list-style-type: none"> • <i>Libraries, Museums, etc.</i> 	501.03-13
<p>201221024 201517011</p>	
<ul style="list-style-type: none"> • <i>Literary Organizations</i> 	501.03-14
<p>201433020</p>	
<ul style="list-style-type: none"> • <i>Organizations With Charitable Activities Outside U.S. (See Also 0501.28-00)</i> 	501.03-15
<p>201215011 201322041 201335024 201438032 202429017</p>	
<ul style="list-style-type: none"> • <i>Political Action Organizations</i> 	501.03-17
<p>201712015 202005020</p>	
<ul style="list-style-type: none"> • <i>Prevention of Cruelty Groups</i> 	501.03-18
<p>201337017 201831013 202404008</p>	
<ul style="list-style-type: none"> • <i>Public Recreation Facilities and Athletic Organizations</i> 	501.03-19
<p>201204020 201340021 201343028 201619010 201918018 202131011 202140017 202144030 202152019 202152022 202328021 202349013 202351016 202521023</p>	
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<p>201232034 201236033 201246041 201251018 201310045 201325017 201327018 201632021 201350047 201414024 201417017 201420020 201523022 201904008 202007019 202138010</p>	
<ul style="list-style-type: none"> • <i>Research Organizations</i> 	501.03-21
<p>201701022 202129017</p>	

<ul style="list-style-type: none"> • <i>Scholarships, Endowment Funds and Trusts, Student Loans</i> 201237020 201251022 201634025 201415003 201423030 201432037 201652029 202207010 202409019 	501.03-22
<ul style="list-style-type: none"> • <i>Scientific Organizations</i> 201311030 201313032 201701022 201717048 201818018 202126024 202521024 	501.03-24
<ul style="list-style-type: none"> • <i>Social Welfare Groups (See Also 0501.04-00)</i> 201304011 201632022 201340021 201415007 201451036 201505042 201716048 202004015 	501.03-25
<ul style="list-style-type: none"> • <i>State Instrumentalities</i> 201411018 	501.03-26
<ul style="list-style-type: none"> • <i>Organizational and Operational Tests</i> 201203024 201205012 201210043 201215011 201216040 201234030 201250027 201250028 201305013 201306028 201314047 201314049 201317012 201322041 201323037 201327017 201330037 201632020 201632021 201632023 201731016 201911016 202021021 202021026 201330037 201331007 201334043 201340021 201341037 201349023 201351029 201407016 201407017 201410043 201410044 201411038 201411042 201412022 201414024 201414033 201417024 201423030 201424027 201428031 201430014 201433016 201441017 201446029 201510059 201511024 201517015 201525011 201525012 201526020 201526021 201526023 201541012 201543019 201604018 201610026 201615016 201615017 201617012 201619010 201648020 201649016 201710033 201712017 201718039 201729023 201734010 201736024 201736025 201737013 201738012 201739016 201740023 201742028 201743018 201743019 201747008 201802015 201802016 201810009 201814009 201816011 201819011 201822032 201823006 201824012 201831014 201832019 201833018 201838008 201838009 201844013 201847010 201852020 201904015 201904016 201907008 201921019 201927022 201929021 201931011 201931012 201935013 201936010 201940008 201940010 201940011 201941030 201942011 201944017 201947020 201951012 202004011 202004015 202005021 202011008 202012013 202014017 202014022 202015017 202015027 202016019 202016023 202016024 202016028 202017030 202017031 202017034 202017035 202022006 202022007 202031011 202033006 202034011 202047009 202047012 202052022 202102009 202102010 202102011 202102012 202102013 202105009 202107012 202109007 202117017 202122014 202122018 202124012 202124013 202125020 202125022 202131011 202138007 202138008 202139011 202141024 202141025 202141027 202141029 202145028 202145031 202150031 202152020 202202017 202213013 202214014 202217008 202217009 202218026 202221011 202221019 202222007 202226018 202231015 202234007 202236011 202237019 202238010 202240028 202242009 202242012 202242015 202242023 202243019 202244018 202244020 202244021 202247015 202247016 202302017 202304014 202305015 202305017 202307007 202308012 202309017 202310011 202310013 202311007 202314016 202316010 202323011 202324011 202332015 202332018 202335019 202336030 202348011 202349013 202351015 202402012 202403013 202403015 202405006 202405009 202405013 202408009 202409020 202411013 202413012 202414007 202416015 202419020 202419025 202420031 202421010 202422012 202424022 202426015 202431012 202431013 202432020 202437006 202442010 202443020 202443025 202446012 202446013 202446014 202448016 202449015 202449016 202449018 202451019 202452014 202452017 202501013 202504019 202504020 202508005 202510014 202512003 202514009 202515015 202515016 202516008 202517017 202520011 202523007 202523008 	501.03-30
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<ul style="list-style-type: none"> • <i>Lessening the Burdens of Government</i> 201213029 201214034 201413012 201531022 201945029 202118021 202131013 202351013 202351014 202405007 202517019 202520011 	501.03-33

<ul style="list-style-type: none"> • Civic Leagues and Social Welfare Groups (See Also 0501.03-25) 	501.04-00
<p>201204018 201205014 201213032 201214035 201215014 201219030 201219031 201221025 201221026 201221027 201221028 201221029 201224031 201224034 201234028 201252029 201313031 201317013 201318010 201318011 201318013 201318014 201318015 201318016 201318018 201318019 201318020 201318021 201318022 201318023 201318024 201318025 201318028 201319031 201321032 201321037 201321039 201323026 201323031 201323036 201323038 201323039 201325016 201327016 201329022 201731017 201749020 202021024 201331006 201333017 201333018 201334045 201335017 201338053 201338055 201349018 201351024 201403019 201403020 201406019 201409013 201411039 201414028 201424028 201425013 201429031 201443021 201449002 201451033 201503020 201505043 201507025 201511025 201518018 201552032 201615014 201640021 201641026 201642037 201710032 201710034 201736026 201750019 201801014 201802018 201803010 201810010 201820020 201832016 201832017 201907013 201922039 201932016 201933014 201933015 201941028 201951011 201951014 202009025 202014018 202015024 202015028 202017039 202022009 202023008 202047015 202052012 202105008 202110020 202120016 202124010 202126025 202128009 202130015 202135009 202145030 202151006 202210023 202214013 202216018 202227011 202227012 202228016 202230013 202232019 202233017 202235011 202244016 202247012 202251008 202306010 202306011 202306013 202317021 202319023 202321015 202323013 202331004 202333005 202336028 202347017 202402015 202414009 202434013 202501016 202502006</p>	
<ul style="list-style-type: none"> • Local Associations of Employees 	501.04-01
<p>201321033 201321035 201321036 201321038 201323027 201323032 201443020 201736026 201810010</p>	
<ul style="list-style-type: none"> • Prepaid Medical Care Association (See Also 0501.03-10) 	501.04-02
<p>201406019 201451033 202101007 202331004</p>	
<ul style="list-style-type: none"> • Political Activities Organizations 	501.04-03
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<ul style="list-style-type: none"> • Community 	501.04-06
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- Business Leagues, Chambers of Commerce, Real Estate Boards, or Boards of Trade 501.06-00

201205014 201205015 201213032 201215014 201218018 201231013 201237021
201246039 201321026 201329023 201329024 201646005 201701019 201731015
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- *Performance of Particular Services for Members* 501.06-01

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- *Conduct of Business for Profit* 501.06-02

201327015 201810011 201814011 202018008 202117016 202122016 202221016
- *Professional Associations (See Also 0501.03-11)* 501.06-03

201217022 201347022 201621017 201746028

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<ul style="list-style-type: none"> • Control of Corporation 201224031 201224034 201247017 201428029 201433017 201839015 202020024 202101008 202504021 	501.30-00
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<ul style="list-style-type: none"> • <i>Dealings With Controlling Interests</i> 201237019 201307009 201345032 201350047 	501.30-02
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<ul style="list-style-type: none"> • <i>Domestic Fraternal Societies</i> 201404012 	501.31-01
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• Private v. Public Interest Served

501.33-00

201202038 201202039 201203024 201203025 201204019 201204020 201205010
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• Trustees Serve Private Interest

501.33-01

201226029 201228041 201236033 201315028 201350043 201414024 201451043
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- "Exclusively" Test 501.35-00
 201221023 201228040 201237019 201303019 201303020 201306026 201322053
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 201204021 201205013 201210041 201233017 201234030 201236033 201242017
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	• Division	708.03-00
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Section 754

Manner of Electing Optional Adjustment to Basis of Partnership Property

754.00-00

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202523003 **202524010**

• **Timeliness of Election**

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201201007 201201014 201251004 201314013 201632006 201632007 201632008
201632009 201341002 201410014 201410019 201410020 201410021 201410022
201410023 201410025 201410026 201426012 201440003 201442003 201443011
201444016 201444017 201448002 201505017 201505018 201505019 201505020
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201605007 201611008 201624005 201629002 201640011 201645001 201645008
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201709009 201718013 201719006 201719007 201722013 201726002 201726010
201729015 201736004 201738007 201742001 201804006 201816006 201818003
201818007 201819005 201819010 201823001 201830010 201833007 201839004
201840003 201840005 201841003 201851006 201851007 201909004 201918012
201920010 201924008 201924012 201926003 201929016 201933002 201934002
201943017 201947014 201949010 202005014 202006007 202007003 202007004
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202138006 202143006 202143007 202144016 202144017 202144018 202144019
202144020 202144021 202144022 202144023 202144024 202211003 202214012
202215001 202219010 202222002 202244002 202250002 202250003 202308002
202320003 202328003 202336015 202341007 202352014 202411008 202411009
202411010 202411011 202416010 202418006 202418009 202432014 202439011
202440001 202441002 202441003 202444002 202447009 202451012 202452008
202452009 202501001 202505004 202505005 202505006 202505007 202505008
202509004 202515004 202516006 202521005 202521012 202522003 **202524010**

Section 761

Terms Defined

761.00-00

201747001

• **Partnership**

761.01-00

201235015 201323015 201329003

	• <i>Organizations Treated as a Partnership</i> 201329003	761.01-01
	• Partner 201411035	761.02-00
	• Partnership Agreement 201517006	761.03-00
	• Distributions of Partnership Interests Treated as Exchanges 201929019	761.05-00
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Section 805	General Deductions 201845020 202235004	805.00-00
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	• Adjustments for Increase or Decrease 201845020 202235004	807.01-00
	• Method of Computing Reserves for Purposes of Computing Income 201312031 201939003	807.03-00
	• <i>Amount of Reserve</i> 201844009	807.03-01
	• <i>Applicable Federal Interest Rate/Prevailing State Assumed Interest Rate</i> 201640008 201645010 201939003	807.03-03
	• <i>Prevailing Commissioners' Standard Tables</i> 201230009	807.03-04
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	• Treatment Nondiversified Contracts	817.08-00
	• <i>Look-Through Diversification</i> 201540004	817.08-04

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	• <i>Special Rules for Reinsurance</i> 201501011 201642032	848.05-03
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	• <i>Exceptions</i> 201746022	848.06-02
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	• Gross Income Requirement 201206015 201319003 201406007 201425009 201524020 201716001 201716024 201716025 201716026 201716027 201716028 201716029 201716030 201716031 201716032 201716033 201716034 201716035 201716036 201716037 201716038 201716039 201716040 201716041 201716042 201716046 201717020 201717021 201717022 201717024 201717025 201717026 201717027 201717028 201717029 201717031 201717032 201717033 201717034 201717035 201718030 201718032 201719021	851.02-00
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	• Election 201629004 201705005 201707009 201734001 201845015 201845016 201845017 201845018 201845019 202017016 202146004 202202004 202203006	853.01-00
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	• General Rule 201244003	855.01-00

Section 856

Definition of Real Estate Investment Trust

856.00-00

201204006 201205004 201208007 201208012 201208014 201214009 201216031
201218007 201226004 201232032 201234006 201238009 201244012 201250019
201251005 201252009 201304004 201310020 201311009 201313017 201314002
201315007 201316013 201317001 201320007 201323016 201327006 201328018
202001011 201341032 201407011 201418037 201423011 201424020 201427001
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201716043 201720008 201725002 201732012 201819006 201828008 201828009
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202349012 202401011 202402002 202405001 202413004 202414004 202421004
202424011 202432017 202440007 202505013 202506007 202510011 202510012
202517001 202517004 202517012 202518002 202518003 202518004 202518005
202520010 202522005

• **Income Requirements**

856.01-00

201225008 201225009 201246013 201407011 201418022 201428002 201433005
201518010 201522002 201524017 201527012 201527013 201546006 201602003
201605005 201620001 201649013 201652012 201722016 201732012 201742008
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201816003 201820012 201841002 201845001 201848013 201901001 201907001
201910002 201928013 201939001 202005017 202005018 202006001 202024003
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202305009 202317017 202317018 202334007 202335004 202335005 202346008
202409002 202410005 202415001 202419004 202419005 202419006 202419007
202419008 202419009 202424011 202506007 202522001

• **Investment Requirements**

856.02-00

201236006 201315007 201406009 201428002 201450017 201503010 201515009
201518010 201521006 201524017 201551007 201602003 201628009 201740017
201820012 201930003 202002009 202002012 202031001 202424011 202506007

• **Other Requirements**

856.03-00

201225008 201225009 201530014 201848008 201917006 202038009

• **Rents From Real Property**

856.04-00

201206001 201225008 201225009 201250003 201250008 201301007 201320001
201320002 201334033 201341015 201450017 201549013 201716044 201740017
201751011 201812009 201901001 201907001 201930003 201944011 202002009
202002012 202013006 202013007 202031001 202047003 202132002 202133003
202150014 202205001 202211002 202304003 202317017 202317018 202413004
202415001 202510011 202510012

• **Interest**

856.05-00

202510011 202510012

• **Not Dependent on Profit**

856.05-01

202205001

	• Treatment of Wholly Owned Subsidiaries	856.07-00
	201210021 201214002 201232011 201311009 201345021 201424016 201426017 201432011 201433001 201452013 201511019 201516018 201521015 201527016 201530005 201532006 201533005 201533006 201539007 201539008 201550025 201552009 201614022 201615007 201628020 201628021 201638010 201638021 201640002 201652005 201653016 201710012 201722017 201723012 201726011 201736008 201738004 201748006 201751013 201802006 201811010 201815014 201844007 201844008 201920004 201920011 201926005 201952003 202349012 202414004 202432017	
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	201315004 201340004 201346005 201609004 202024003 202235006	
	• Requirements to be Taxed as a REIT	857.01-00
	201717005	
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	• <i>Income from Foreclosure Property</i>	857.02-02
	201623007	
	• <i>Income from Prohibited Transactions</i>	857.02-03
	201614009 201640007 201707010 201844003	
	• Earnings and Profits	857.05-00
	201652012 202024003	
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	201244009	
	• Receipt by Shareholders	858.01-00
	201816001	
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	201727004 202207002 202233007 202233008	
	• Interest and Addition to Tax	860.02-00
	201727004	
	• Adjustments	860.03-00
	201239006	
	• Determination	860.04-00
	201727004	
	• Claim Required for Dividend Deduction	860.06-00
	201727004	
	• Suspension of Statute of Limitations	860.07-00
	201727004	
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	202035003	
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	201306021	
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	201713007 201731001 201731002 201749005 201749008 201601005 201649006 201649009 201649010 201650011 201714017 201730006 201738001 201738003 201742007	
	• Election	860D.01-00
	202323007 202341006	
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	• Treatment of Transfers to the REMIC 201517007	860F.04-00
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	• Interest 201205007 201447030	861.02-00
	• Compensation for Labor or Services 201438027	861.04-00
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	• Allocation and Apportionment of Deductions (In General) 201446018	861.08-00
	• <i>Apportionment</i> 201614031	861.08-02
	• <i>Net Operating Losses</i> 201228013	861.08-12
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	• <i>Apportionment Rules -- Corporations</i> 201423001 201718034	861.09-05
	• <i>Asset Method of Apportionment</i> 201210019 201210020 201223001 201320017 201701018 201335008 201505036 201638012 201702036 201744014	861.09-06
	• <i>Fair Market Value Method</i> 201320017 201701018 201335008 201423001 201505036 201638012 201702036 201718034 201718035 201744014 201744015 201744016	861.09-07
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	• Effectively Connected Income 201325012 201908016	864.02-00
	• <i>U.S. Source Interest, Dividends, etc.</i> 201325012	864.02-01
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	• <i>Incorporation of a U. S. Business</i> 202245005 202249013	884.08-40

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	• <i>Post-1986 Foreign Income Taxes</i> 201441015 201444039	902.01-02
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	• <i>Overall Foreign Loss Accounts</i> 201452002	904.05-04
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	• <i>Pooling Adjustments</i> 201441015 201444039 202518006	905.03-02

	• <i>Redetermination of U.S. Liability</i> 201444039	905.03-03
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	• <i>Election</i> 201507013 201507016 201539018 201620006 201650006	911.11-00
	• <i>Timely filed returns</i> 201507013 201507016 201539018 201650006	911.11-01
	• <i>Reelection</i> 201231006 201308023 201308023 201344007 201347016 201429015 201433002 201444023 201504002 201509027 201511017 201517004 201538016 201620006 201743014 201909006 202122001 202303010 202336002 202408006	911.11-03
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	• <i>Bona Fide Residents of the Virgin Islands</i> 201503012	932.02-00
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	• <i>Definition of U.S. shareholder</i> 202502003 202524012	951.02-00
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	• <i>Election by Foreign Insurance Company to be Treated as Domestic Corporation</i> 201303005 201612007 202021019 202134017 201351010 201451012 201537009 201539006 201611001 201722003 201730007 201744009 201807007 201845024 201845025 201905003 201950003 202037005 202040004 202051007 202102008 202422010 202515009	953.06-00
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	• <i>Foreign Personal Holding Company Income</i> 201201016 201228020 201407010 201503009 201504006 201504008 201637005 201644008 201644009 201644010 201648015 201648016 201718020 201739009	954.02-00
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	• <i>Commodities Transactions</i> 201330006 201330006	954.02-06
	• <i>Nonfunctional Currency Transactions</i> 201226011 201241002	954.02-07
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	• U.S. Property Defined 201516064	956.03-00
	• Pledges and Guarantees 201203010 201436047	956.05-00
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	• Motion to Quash 202038001	982.05-00
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	• Definition of Section 988 Transaction and Other Terms 202142001	988.01-00
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	• Definition of Qualified Business Unit 201902030	989.01-00
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	• Definition of DISC	992.01-00
	• <i>Qualified Export Assets</i> 201735003	992.01-02
	• <i>Capitalization</i> 201444018	992.01-03

- Election 992.02-00

201216006 201221003 201224025 201237006 201242001 201304001 201305002
201310018 201327001 201327004 201327005 201618007 201634002 201634020
201701003 201701010 202021017 201335002 201336013 201341023 201343011
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201722010 201722024 201726009 201736005 201744010 201745003 201746018
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201817007 201833001 201839007 201839008 201842005 201904009 201909001
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202317016 202322017 202347003 202347010 202411002 202436001 202506010
202515010 202517016

Section 1001 Determination of Amount of and Recognition of Gain or Loss 1001.00-00

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202318014 202322005 202432012 202432013 202504006 202504007

- Amount Realized 1001.02-00

201221004 201525010 201730012 201730017 201730018 201730019

- Sale or Other Disposition of Certain Term Interest After October 9, 1969 1001.02-03

202339008

- Property Differing Materially 1001.02-07

201443004 201516022 201516023

Section 1011 Adjusted Basis for Determining Gain or Loss 1011.00-00

201418007 201845020 202235004

- Allocation of Basis 1011.01-00

201709001

Section 1012 Basis of Property--Costs 1012.00-00

201617002

	• Special Rule for Outdoor Advertising Displays 201450004 202344008	1033.07-00
	• Special Rule for Principal Residences Destroyed in Presidentially Declared Disasters 201240006	1033.10-00
Section 1035	Exchanges of Insurance Policies 201304003 201330016 201330016	1035.00-00
Section 1041	Transfers of Property Between Spouses or Incident to Divorce 201206005 201707007 201707008 201927003 202137005 202137006	1041.00-00
	• Transfers Incident to Divorce 201901003	1041.01-00
Section 1042	Sales of Stock to Employee Stock Ownership Plans or Certain Cooper- atives	1042.00-00
	• Nonrecognition of Gain 201435014	1042.01-00
	• Recapture on Disposition of Qualified Replacement Property 202206009	1042.05-00
Section 1045	Rollover of Gain from One Qualified Business Stock to Another 201650010 202244004 202245003 202317008 202419010	1045.00-00
Section 1059	Corporate Shareholder's Basis in Stock Reduced by Non-taxed Portion of Extraordinary Dividends	1059.00-00
	• Election to Substitute Fair Market Value 202114016 202137003 202227009	1059.06-00
	• <i>Written Determination</i> 202114016 202137003 202227009	1059.06-02
Section 1060	Special Allocation Rules for Certain Asset Acquisitions 201501011 201642032	1060.00-00
	• Applicable Asset Acquisition 202449012 202449013	1060.03-00
Section 1091	Loss From Wash Sales of Stock or Securities 201737011	1091.00-00
Section 1092	Straddles 201515001 201543008 202415004 202446010	1092.00-00
	• Special Rule for Identified Straddles 201241005 201515001	1092.02-00
	• <i>Defined</i> 201515001 202445015 202503002	1092.02-01
	• Mixed Straddles 201543008 201615001 201637011 201639004 201820014 202107004 202107005 202107006 202107007 202107008 202210009 202344011 202415004 202446010	1092.05-00
	• <i>Mixed Straddle Account</i> 201327007 201516010 201637011 201820014 201848015 202415004 202446010	1092.05-02
	• Straddle Defined 201310027	1092.06-00
	• Qualified Covered Call Options 201317009	1092.07-00
	• Definitions and Special Rules 201241005	1092.08-00

Section 1202	50-Percent Exclusion for Gain from Certain Small Business Stocks 201436001 201603010 201603011 201603012 201603013 201603014 201636003 201717010 202114002 202125004 202144026 202204007 202221006 202319013 202342013 202342014 202342015 202352009 202418001	1202.00-00
Section 1221	Capital Asset v. Not a Capital Asset 201203003 201208038 201209014 202309015 • Property Held Properly In Inventory 202309015 • Property Held Primarily For Sale In Ordinary Course of Business 202309015 • Securities 202419005 • <i>Business Hedges</i> 202419004 202419006 202419007 202419008 202419009	1221.00-00 1221.01-00 1221.02-00 1221.12-00 1221.12-02
Section 1222	Other Terms Relating to Capital Gains and Losses 201642035	1222.00-00
Section 1223	Holding Period of Capital Assets 201204001 201204002 201204003 201204004 201204005 201216010 202134003 202134004 201418007 201436043 201443004 201516022 201516023 201525001 202133005 202303004 202303005 202303006 202303007 202303008 202303009 202303012 202322005 202432012 202432013 • Reorganization 202244008 202246005	1223.00-00 1223.10-00
Section 1234	Option to Buy or Sell 201547004 • Gain or Loss of Purchaser 201214021 • Sale v. Option 201547004	1234.00-00 1234.01-00 1234.03-00
Section 1234A	Gains or Losses From Certain Terminations 201642035 • Right or Obligation With Respect to Personal Property 202224010	1234A.00-00 1234A.01-00
Section 1235	Sale or Exchange of Patents (Capital Transaction v. Not a Capital Transaction) 201701009	1235.00-00
Section 1248	Gain From Certain Sales or Exchanges of Stock in Certain Foreign Corporations 201423006 201426008	1248.00-00
Section 1250	Gain From Dispositions of Certain Depreciable Realty • Section 1250 Property 201243003 • Exceptions and Limitations • <i>Gifts</i> 201318003	1250.00-00 1250.01-00 1250.04-00 1250.04-01
Section 1253	Transfers of Franchises, Trademarks, and Trade Names 201322020 202120005	1253.00-00
Section 1256	Section 1256 Contracts Marked to Market	1256.00-00

	• Definitions	1256.07-00
	• <i>Qualified Board or Exchange</i>	1256.07-05
	201322033 202451018 202506011	
Section 1258	Recharacterization of Gain from Certain Transactions	1258.00-00
	201501012	
Section 1272	Current Inclusion in Income of Original Issue Discount	1272.00-00
	• OID Election	1272.05-00
	201435004 201720004 202340007	
Section 1275	Other Definitions & Special Rules	1275.00-00
	• Integration	1275.08-00
	201614010 202034003 202116008 202118006 202122011 202201010 202223013 202223014	
Section 1276	Disposition Gain Representing Accrued Market Discount Treated as Ordinary Income	1276.00-00
	202328019	
	• Accrued Market Discount	1276.02-00
	• <i>Constant Interest Rate Election</i>	1276.02-02
	201619004 202124006 202124007	
	• Treatment of Nonrecognition Transactions	1276.03-00
	202328019	
	• <i>Transferred Basis Property</i>	1276.03-01
	202328019	
	• Special Rules	1276.04-00
	202328019	
Section 1278	Definitions and Special Rules	1278.00-00
	• Election to Include Market Discount Currently	1278.02-00
	202340007	
Section 1286	Tax Treatment of Stripped Bonds	1286.00-00
	201229003 201701017 201502006 201502007 202446009	
Section 1295	Qualified Electing Fund	1295.00-00
	202344015 202432003	
	• Time For Making Election	1295.02-00
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	• <i>Retroactive Elections</i>	1295.02-02
	201201013 201210017 201248009 201248010 201302010 201302011 201302019 201302020 201314026 201319006 201319007 201321010 201322017 201322018 201330019 201330020 201330021 201911001 201330019 201330020 201330021 201333004 201334007 201334034 201340008 201344008 201349002 201349010 201349011 201349012 201350011 201350012 201350013 201350014 201350015 201350016 201350017 201350018 201350019 201350020 201350021 201350022 201350023 201350024 201350025 201411001 201412006 201412010 201417009 201417010 201417011 201417012 201417013 201417014 201417015 201417016 201422002 201422003 201422019 201422021 201423002 201423004 201423008 201423015 201427002 201427003 201427004 201427005 201427006 201429002 201429003 201429004 201429011 201429021 201431021 201431022 201431023 201431024 201431025 201431026 201431027 201431028 201431029 201442004 201442005 201442006 201445006 201447022 201447024 201448004 201451020 201451021 201451022 201508008 201508009 201508010 201509028 201510040 201510041 201510042 201516062 201516063 201519022 201528008 201528009 201528036 201546010 201548018 201604002 201622028 201622029 201622030 201629005 201630006 201642025 201651004 201702001 201729003 201739006 201744004 201808012 201809006 201812006 201814006 201837001 201925002 202023004 202023005 202038002 202111001 202111002 202128002 202128007 202201011 202203001 202207001 202220014 202229008 202229034 202252006 202252007 202319001 202330005 202334006 202350015 202412001 202412002 202412003 202413001 202413002 202419001 202420002 202420003 202420004 202420005 202420006 202422001 202422002 202424001 202424002 202438001	
Section 1296	Passive Foreign Investment Company	1296.00-00
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	• Characterization of Income	1296.02-00
	• <i>Application of Income Look-Through Rules</i>	1296.02-02
	201445005	
Section 1297	Special Rules	1297.00-00
	201322009 201515006	
Section 1301	Averaging of Farm Income	1301.00-00
	• Engaged in Farm Business	1301.01-00
	201435006	
Section 1311	Correction of Error	1311.00-00
	201208027 201313027	
	• Inconsistent Position v. No Inconsistent Position	1311.01-00
	201710029	
	• Correction Not Barred v. Barred at Time of Error	1311.02-00
	201823004	
Section 1313	Definitions	1313.00-00
	• Determination v. No Determination	1313.01-00
	201247001 201247011 201622032	
Section 1341	Computation of Tax Where Taxpayer Restores Substantial Amount Held Under Claim of Right	1341.00-00
	201224029 201328031	

Section 1361

Definitions

1361.00-00

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• **Small Business Corporation v. Not a Small Business Corporation** 1361.01-00
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• **Number of Shareholders** 1361.01-01
201926008 202343022

• **Shareholder Not an Individual or Permitted Trust or Estate** 1361.01-02
201205002 201208013 201218005 201237014 201250013 201250018 202021007
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• **Non-Resident Alien as Shareholder** 1361.01-03
201312023 201545015 202004001 202344002 202419011 202430002

• **More than One Class of Stock** 1361.01-04
201207002 201214001 201218004 201234001 201236003 201309003 201314014
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• *Ineligible Corporation* 1361.01-05
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• *Certain Trusts Permitted as Shareholders* 1361.03-00
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• *Grantor Trusts* 1361.03-01
201216025 201216034 201252007 202305004 202317014 202317015 202340002
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• *Qualified Subchapter S Trusts* 1361.03-02
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• *Electing Small Business Trusts* 1361.03-03
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• Qualified Subchapter S Subsidiary

1361.05-00

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• Eligible v. Ineligible

1362.01-00

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201451019 201515013 201516003 201516009 201519016 201528017 201537001
201608007 201611010 201634003 201634004 201634006 201636015 201638003
201702014 201709015 201710017 201710021 201710022 201714018 201729016
201730002 201732015 201732020 201801007 201801008 201807002 201807003
201807004 201815003 201815004 201817015 201823002 201831008 201839011
201845011 201849005 201849006 201852002 201852003 201902001 201902002
201902003 201902004 201902005 201902006 201902007 201902008 201902009
201902010 201902011 201902012 201902013 201902014 201902015 201902016
201902017 201902018 201902019 201902020 201902021 201905002 201908009
201918002 201918011 201922001 201922002 201922003 201936005 201938007
201948008 202005002 202007014 202009015 202010001 202017020 202019010
202020016 202024001 202027001 202046002 202049003 202110003 202110009
202126004 202145017 202145018 202239008 202242001 202246001 202304004
202316002 202317014 202317015 202318005 202322009 202322010 202327001
202340008 202340009 202340011 202342001 202343024 202345006 202349004
202349005 202349006 202401004 202405003 202410003 202420010 202420011
202420012 202420013 202420014 202422006 202428003 202429008 202431003
202432015 202435015 202509001

• Shareholder Consent

1362.01-01

201634003 201634004 202001001 202021007 202021016 201516009 201528017
201539019 201610005 201634003 201634004 201638003 201714018 201724021
201801004 201804001 201815003 201824004 201831008 201905002 201928012
201933004 202007014 202105005 202110009 202126004 202140001 202147002
202210002 202223006 202304004 202322004 202322011 202429008

• Election After Termination

1362.01-02

201206009 201217009 201312023 201320012 201550022 201645007 201702014
201709015 201710017 201710021 201710022 201729016 201732020 201801008
201839011 201845011 201908009 202009015 202229031 202240002 202330009
202340008 202340009 202343024 202428003 202442001 202451004 202451005
202501005 202501006

• *Late Elections*

1362.01-03

201201006 201202016 201203009 201203011 201204007 201207004 201208015
201208016 201208018 201208024 201210010 201210016 201210024 201210025
201213003 201213009 201213020 201214008 201214011 201214017 201215001
201216016 201216028 201216030 201217007 201217016 201219008 201219014
201221007 201223008 201224004 201224026 201225001 201226001 201226016
201226017 201227003 201227004 201228001 201228003 201228006 201228022
201228027 201228028 201230015 201230016 201233001 201233002 201233004
201233012 201234003 201234010 201234011 201234014 201234019 201234022
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201238007 201238008 201243002 201246001 201246019 201247007 201248013
201249006 201249009 201250011 201251010 201252013 201301002 201301008
201301012 201302013 201307002 201310017 201310019 201310021 201310035
201311015 201311017 201314030 201314031 201314034 201314036 201314040
201314041 201315010 201320010 201321008 201321009 201321016 201322028
201324001 201324007 201324012 201325001 201328001 201634008 201731007
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201414011 201414012 201418036 201420001 201420003 201422020 201425008
201436004 201440018 201441011 201442010 201442038 201443006 201444014
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201516053 201516054 201519007 201519009 201519013 201519025 201523006
201523010 201524019 201524023 201528019 201541007 201550002 201550022
201603001 201604006 201611010 201614025 201634008 201636023 201645007
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201719001 201724006 201728016 201729002 201730016 201732015 201743016
201807002 201807003 201807004 201807006 201822006 201823002 201837002
201845013 201845021 201845026 201845028 201848003 201849005 201849006
201852004 201918011 201930010 201943002 201943019 201944004 202005015
202006008 202019013 202019021 202045006 202049003 202051010 202110006
202116009 202130004 202135005 202141003 202145016 202145017 202145018
202149004 202201002 202236003 202240002 202240014 202240015 202241002
202247002 202249003 202326002 202327001 202334003 202334004 202334010
202348003 202401003 202410003 202410004 202410007 202415002 202420010
202420011 202420012 202420013 202420014 202432015 202435012 202435015
202437004 202439003 202441001 202445004 202447004 202451013 202509006
202518001 202521010 202522004

• *Termination of Election*

1362.02-00

201201006 201205002 201206009 201217009 201226013 201232023 201237001
201238017 201243009 201252001 201306004 201306005 201320008 202021016
201337001 201345021 201418008 201420002 201432006 201434010 201434011
201434012 201434013 201434014 201443014 201444007 201450014 201508002
201523008 201526006 201538010 201702014 201709015 201710017 201710021
201710022 201722019 201729016 201732020 201738011 201801008 201815004
201817015 201831005 201846001 201848004 201919005 201922001 201922002
201922003 201933001 201935006 201938003 201943015 201947011 201949009
202005004 202009001 202017020 202024001 202027001 202046002 202052003
202053005 202101001 202105005 202110003 202126004 202138003 202139005
202140015 202141002 202142003 202147002 202147004 202207007 202210014
202215003 202218004 202218005 202218006 202233004 202233005 202233006
202238009 202247004 202249004 202250007 202251005 202301008 202304004
202305002 202305004 202310001 202315001 202315004 202317014 202317015
202319003 202322009 202322010 202340002 202340008 202340009 202343022
202344002 202344004 202345001 202345006 202352017 202403002 202405003
202413006 202416005 202418008 202419011 202428003 202430003 202431003
202450002 202451004 202451005 202506003 202521004

<ul style="list-style-type: none"> • <i>Ceases to be Small Business Corporation</i> 	1362.02-02
201206009 201217009 201252001 201324004 201330017 201330018 201330017 201330018 201426018 201432006 201443014 201444007 201508002 201516001 201516002 201644007 201702014 201709015 201710017 201710021 201710022 201729016 201730021 201732020 201737005 201751007 201801008 201811001 201824001 201824002 201824003 201845008 201846001 201852001 201852002 201908012 201908015 201908017 201918001 201918003 201919001 201922021 201933001 201938003 201943015 201947011 201949003 201949015 201949016 202007001 202008001 202008008 202009001 202009003 202009011 202019007 202046002 202139005 202140015 202147004 202207007 202209001 202218004 202218005 202218006 202238009 202250007 202305002 202305004 202317014 202317015 202322009 202322010 202340002 202340008 202340009 202343022 202344002 202345006 202428003 202430003 202438003 202438004 202438005 202438006 202438007 202438008 202438009 202438010 202438011 202506003	
<ul style="list-style-type: none"> • <i>Passive Investment Income</i> 	1362.02-03
201223007 201226013 201229007 201232023 201244002 201248001 201306004 201306005 201310008 201320008 201328006 201328007 201328008 201328009 201328010 201328011 201328012 201328013 201328014 201328015 201328016 201328017 201330010 201330010 201350005 201351013 201420002 201426010 201441013 201450014 201515011 201516015 201519008 201519018 201523004 201523005 201523008 201528028 201538010 201541003 201629001 201710013 201722019 201738011 201827010 201831005 201848004 201935006 202005004 202040006 202138003 202524003	
<ul style="list-style-type: none"> • S Termination Year 	1362.03-00
201507011 201706013 202521004	

• Inadvertent Terminations

1362.04-00

201201005 201201006 201201009 201202002 201202003 201203002 201203007
201203008 201203011 201203012 201205002 201205006 201206009 201208013
201208023 201209005 201211002 201211004 201211005 201211006 201211007
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201221006 201221008 201221009 201221010 201223007 201224007 201224013
201224014 201225003 201225005 201226013 201227003 201228009 201228010
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201240014 201242009 201243009 201244002 201245001 201245002 201245014
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201308008 201308009 201308022 201310008 201312016 201313002 201314006
201314012 201314014 201315003 201315012 201317004 201320006 201320008
201322006 201322016 201323012 201323013 201323014 201324011 201325003
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201523016 201524006 201524009 201525004 201525005 201525006 201525009
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201744013 201745008 201745009 201745010 201745011 201747004 201748003
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 202228013 202229026 202231009 202233001 202233004 202233005 202233006
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 202345001 202345006 202346002 202347005 202347006 202348006 202349004
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 202511002 202511005 202511010 202511011 202515001 202515006 202516002
 202517002 202517003 202518007 202520002 202520003 202521004 **202524002**
202524003

Section 1366

Pass-Thru of Items to Shareholders

1366.00-00

201327009 201333008 201429025 202335014

Section 1367	Adjustment to Basis of Stock of, and Indebtedness Owing, Shareholders 201237017 201421015 201440013	1367.00-00
Section 1368	Distributions 201207002 201216027 201328025 202345005	1368.00-00
	• Accumulated Adjustments Account 201421015 201440013 201446021	1368.01-00
Section 1374	Tax Imposed On Certain Built-In Gains (for Corporations Electing S Status After 12/31/86) 201202014 201219003 201314008 201348007 201722008	1374.00-00
Section 1375	Tax Imposed On Certain Passive Investment Income 202005004 202524003	1375.00-00
Section 1378	Taxable Year of S Corporations 202141023	1378.00-00
Section 1381	Organizations to Which Part Applies 201507004 201515012 201524002 201524003 201524004 201529004 201536011 201545001	1381.00-00
	• Certain Other Cooperatives 201228014	1381.02-00
Section 1382	Taxable Income of Cooperatives 201208008 201216011 201219001 201234018 201250009 201413002 201601004 201619003 201750003 201945011 202014011 202214004 202224003 202326010	1382.00-00
	• Gross Income 201852003 201902001 202048004	1382.01-00
	• Patronage Dividends 201228035 201809005 202035006	1382.02-00
	• Exceptions 201407003 201852001	1382.04-00
Section 1385	Amounts Includible in Patron's Gross Income 201604008 201750003	1385.00-00
Section 1388	Definitions; Special Rules 201234018 201750003 201809005 201945011 202014011 202035006 202214004 202224003 202326010	1388.00-00
Section 1400	Establishment of DC Enterprise Zone	1400.00-00
	• Applicable DC Area 202440004 202442003 202448006 202448009 202448011 202502004 202504001 202504012 202506008 202508004 202515005 202520009 202522002	1400.02-00
Section 1402	Definitions 201402004	1402.00-00
	• Net Earnings From Self-Employment 201916005 202009024 202151005	1402.01-00
	• <i>Rentals from Real Estate</i> 202151005	1402.01-01
	• <i>Limited Partners</i> 201436049 201640014	1402.01-03
	• Ministers, Members of Religious Orders, Christian Science Practitioners (Election) 201340015	1402.05-00

Section 1441	Withholding of Tax on Nonresident Aliens (Required v. Not Required) 201202001 201311006 201727005 201727006	1441.00-00
	• Who must Withhold	1441.01-00
	• <i>Liability of Withholding Agent</i> 201428007	1441.01-02
	• Income Subject to Withholding v. Not Subject to Withholding	1441.02-00
	• <i>Sale or Exchange of Capital Assets</i> 201343020	1441.02-03
	• Exemptions from Withholding	1441.03-00
	• <i>Effectively Connected Income</i> 201428007	1441.03-01
Section 1442	Withholding of Tax on Foreign Corporations (Required v. Not Required) 202134017 201808010	1442.00-00
Section 1443	Foreign Tax-Exempt Organizations (Subject v. Not Subject to Withholding)	1443.00-00
	• Income Subject to Withholding 201808010	1443.02-00
Section 1445	Withholding of Tax on Dispositions of United States Real Property Interests (See Also 897.00-00). 202449011	1445.00-00
	• Withholding With Respect to Distributions From Publicly Traded Partnerships Trusts and REITs. 202449011	1445.08-00
Section 1461	Liability for Withheld Tax 201503013	1461.00-00
Section 1501	Privilege to File Consolidated Returns (May v. May Not File Consolidated Return) 201213012 201306007 201726015 202035012 202111013 202130016 202234012 202428009 202435016	1501.00-00
Section 1502	Regulations Governing Consolidated Returns (May v. May Not File Consolidated Returns) 201201010 201213012 201213013 201214012 201214015 201217014 201243014 201250017 201307001 201311010 201312027 201749002 201341018 201342004 201402001 201414009 201418033 201418043 201930012 201936004 201949008 202008002 202013008 202035012 202111013 202121004 202229030 202231014 202236007 202248009 202249009 202310014 202317019 202334014 202340016 202348015 202352022 202406004 202417006 202417018 202427004 202436008 202445003 202515008 202516005 202519003 202524004	1502.00-00
	• Computation of Tax Liability 202412009	1502.02-00
	• Consolidated Investment Credit 202347009	1502.03-00
	• Consolidated Foreign Tax Credit 202348014	1502.04-00
	• Liability for Tax 201644018	1502.06-00
	• Overall Foreign Loss Recapture Rules 201452002	1502.08-00

<ul style="list-style-type: none"> • Intercompany Transactions 	1502.13-00	
201208034 201243013 201312027 201612006 201336018 201339001 201402001 201411007 201507006 201524016 201528007 201540001 201603002 201605014 201610004 201722012 201723008 201723009 201726012 201828006 201830005 201936004 202126003 202219002 202236007 202240017 202248009 202305010 202334014 202417006 202417018 202516005		
<ul style="list-style-type: none"> • Stock of Members 	1502.13-01	
201210018 201228011 201312027 201322002 201341022 201605013 201722012 201810001 201810002 202203009 202219002 202248009		
<ul style="list-style-type: none"> • Obligations of Members 	1502.13-02	
201707006		
<ul style="list-style-type: none"> • Anti-Avoidance 	1502.13-03	
201640018		
<ul style="list-style-type: none"> • Stock, Bonds, and Other Obligations of Members 	1502.14-00	R
201208034		
<ul style="list-style-type: none"> • Limitation on Built-in Losses 	1502.15-00	
201232011		
<ul style="list-style-type: none"> • Excess Losses 	1502.19-00	
201749002 201350007 201441010 201930012 202305010		
<ul style="list-style-type: none"> • Consolidated Net Operating Loss Deduction 	1502.21-00	
201206006 201208001 201208032 201214019 201223003 201223004 201224003 201226006 201226008 201226020 201228004 201228007 201228008 201230003 201230004 201230005 201233006 201234012 201234023 201235005 201236015 201237010 201242008 201242010 201245009 201247005 201248012 201249004 201249010 201250002 201301009 201305005 201305010 201306001 201310024 201310025 201312025 201315002 201322034 201323011 201328028 201330001 201632002 201330001 201332003 201335007 201336002 201336004 201336008 201338019 201340003 201342005 201342008 201344005 201349008 201349009 201351016 201352005 201411011 201412004 201418016 201418020 201418033 201418043 201423003 201424001 201424015 201426024 201431005 201431008 201431009 201431010 201431012 201431013 201431014 201431015 201431016 201434001 201438004 201438019 201442013 201444015 201448001 201503008 201521007 201523011 201527038 201530015 201532004 201532030 201544021 201601010 201605018 201610010 201610011 201611005 201613013 201616006 201620009 201628003 201630003 201630004 201636016 201637002 201637003 201644005 201651011 201703010 201717039 201717040 201738005 201752007 201817017 201825002 201825015 201837003 201901006 201901007 201903016 201904014 201905004 202053006 202117010 202117011 202228001 202229006 202249009 202314014 202319014 202340017 202349011 202427004 202445013 202524008		
<ul style="list-style-type: none"> • Basis of Property 	1502.31-00	
201828006		
<ul style="list-style-type: none"> • Investment Adjustment 	1502.32-00	
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<ul style="list-style-type: none"> • Earnings and Profits 	1502.33-00	
201411007 201936004		
<ul style="list-style-type: none"> • Accumulated Earnings Tax on Separate Basis 	1502.47-00	
201316008		
<ul style="list-style-type: none"> • Life and Non-Life 	1502.50-00	
201210015 201213012 202045003 202445003		

• Filing Requirements	1502.75-00
201202008 201202009 201214015 201217014 201225010 201232015 201249007 201250017 201251008 201307001 201310009 201311010 201313019 201317005 201319005 201323010 201324010 201329006 201332002 201336007 201338017 201338025 201341008 201347011 201407012 201411016 201442018 201507003 201514007 201524008 201527036 201529001 201533004 201541006 201542005 201548016 201550033 201601007 201606019 201631004 201648012 201648014 201702019 201711008 201716007 201717018 201717023 201728002 201730008 201732025 201738006 201744011 201751012 201802009 201813006 201819008 201825016 201827007 201833009 201839009 201902029 201921011 201929001 201933009 201949008 201951004 202008002 202011006 202013008 202031004 202031005 202045005 202101003 202111013 202121004 202130016 202234012 202249010 202309002 202317019 202318016 202406004 202423008 202428009 202435016 202436008 202519003	
• <i>When Group Remains in Existence</i>	1502.75-10
201228002 201314028 201350007 201424010 201505006 201933009 202218001 202309002 202426005 202524004 202524007	
• <i>Common Parent No Longer in Existence</i>	1502.75-11
201250017 201326006	
• Taxable Year of Members of Group	1502.76-00
201520001 201414015 201520001 201843002 201933009 202032004	
• <i>Income Allocation</i>	1502.76-01
201235003 201542007	
• Common Parent Agent for Subsidiaries	1502.77-00
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• Separate Return Years	1502.79-00
201251003 201324004	
• Applicability of Other Provisions of Law	1502.80-00
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• Consolidated Returns for Subsequent Years	1502.89-00
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• <i>Stock Ownership Requirement</i>	1502.91-01
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201208034 201402001 202145025 202335001	
• Stock Transactions	1502.94-00
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201414009 201511012 202229030	
• <i>Rules Upon Becoming a Member</i>	1502.98-03
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	• <i>Limitation on Use of Credits and Net Capital Losses</i>	1502.98-08
	201435012	
	• <i>Regulations Governing Consolidated Returns--Issue Not Contained in Present List</i>	1502.99-00
	201216018 201249005 201250010 201252006 201323008 201329001 201329007	
	201329008 201329009 201329010 201329011 201329012 201329013 201329014	
	202334014 202335001	
Section 1503	Computation and Payment of Taxes	1503.00-00
	• <i>Dual Consolidated Loss</i>	1503.04-00
	202110015 202304008	
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	201451009 201504007 201641012 201815008 201927002 202417008	
	• <i>Affiliated Group v. Not an Affiliated Group</i>	1504.01-00
	201306007 201306008 201310016 201315019 201325010 201328027 201430002	
	201435005 201505006 201538015 201649012 201709004 202049002	
	• <i>Includible Corporation v. Not an Includible Corporation</i>	1504.02-00
	201213012 201214020 201251003 201429007 201433013 201815008 202045003	
	202417008 202423008	
	• <i>Foreign Subsidiary Formed to Comply With Foreign Law May Be An Includible Corporation</i>	1504.02-01
	201248002	
	• <i>Maquiladora ISP - IRC Section 1504(d) Election</i>	1504.02-02
	201248002	
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	201405009	
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	201205001 201208005 201243006 201418017 201418031 201418032 201516008	
	201516020 201530008 201530009 201530010 201530011 201530012 201530013	
	201531003 201531004 201531005 201531006 201531007 201532008 201532009	
	201532010 201532011 201532012 201532013 201732029 201817012 201817013	
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	• <i>Determination of Amount of Taxable Estate</i>	2001.01-00
	202322005	
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	201612005 201612009 201612010 201618006 201632001 201632003 201632005	
	201632014 201632017 201632018 201701008 202134001 202134014 202134015	
	201410013 201418009 201421002 201532002 201537010 201550032 201603007	
	201603021 201604014 201604016 201605009 201605010 201605011 201606013	
	201608010 201613010 201613011 201614020 201614021 201614023 201614027	
	201614028 201614030 201615009 201615010 201617003 201620008 201621007	
	201622027 201624002 201624014 201624017 201624018 201624019 201626015	
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	201631003 201633002 201633008 201638013 201638018 201640004 201641005	
	201641008 201641009 201641010 201642014 201642015 201642016 201642017	
	201642018 201652008 201652009 201702020 201702025 201702028 201702030	
	201702031 201702032 201702033 201703006 201703007 201703008 201706011	
	201709012 201709013 201709014 201709019 201709022 201710004 201710010	
	201710011 201710014 201712009 201716008 201716013 201716015 201717004	
	201717007 201718024 201718025 201718027 201719013 201719015 201719017	
	201719019 202046006 202152011 202439006 202443011	

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	• Interest v. No Interest at Time of Death 201323007	2033.01-00
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	• Retention of Possession or Enjoyment of Right to Income From Property 201735005 201947001 201947002 201947003 201947004 201947005 201947006 202303004 202303005 202303006 202303007 202303008 202303009 202303012	2036.01-00
	• Retention of Right to Designate Who Shall Enjoy Property or Income 201323007	2036.02-00

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	201323007 201342001 201345004 201345026 201345027 201345028 201418007 201432005 201433006 201434004 201434005 201436003 201509002 201509003 201509004 201509005 201509006 201509007 201509008 201509009 201509010 201509011 201509012 201509013 201509014 201509015 201509016 201509017 201509018 201510009 201510010 201510011 201510012 201510013 201510014 201510015 201510016 201510017 201510018 201510019 201510020 201510021 201510022 201510023 201511002 201511003 201511004 201511005 201511006 201511007 201511008 201511009 201511010 201515002 201515003 201515004 201515005 201525001 201647001 201702005 201702006 201709020 201722007 201947001 201947002 201947003 201947004 201947005 201947006 202228003 202228004 202228005 202228006 202228007 202228008 202228009 202228010 202228011 202228012 202229010 202229011 202229012 202229013 202229014 202229015 202229016 202229017 202229018 202229019 202229020 202229021 202229022 202229023	
Section 2038	Revocable Transfers (Included v. Not Included in Gross Estate)	2038.00-00
	201218003 201223012 201233008 201235006 201322025 201330033 201330033 201345004 201345026 201345027 201345028 201417001 201417002 201429009 201432005 201433006 201434004 201434005 201436003 201442042 201442043 201442044 201442045 201442046 201443004 201509002 201509003 201509004 201509005 201509006 201509007 201509009 201509010 201509011 201509012 201509013 201509014 201509015 201509016 201509017 201509018 201510009 201510010 201510011 201510012 201510013 201510014 201510015 201510016 201510017 201510018 201510019 201510020 201510021 201510022 201510023 201511002 201511003 201511004 201511005 201511006 201511007 201511008 201511009 201511010 201515002 201515003 201515004 201515005 201516022 201516023 201525001 201544005 201604001 201647001 201702005 201709020 201722007 201723002 201723003 201837005 201837006 201837007 201837008 201837009 201843005 201843006 201843007 201843008 201845029 201947001 201947002 201947003 201947004 201947005 201947006 202009012 202216001 202216002 202216003 202216004 202216005 202216006 202228003 202228004 202228005 202228006 202228007 202228008 202228009 202228010 202228011 202228012 202229010 202229011 202229012 202229013 202229014 202229015 202229016 202229017 202229018 202229019 202229020 202229021 202229022 202229023 202303004 202303005 202303006 202303007 202303008 202303009 202303012	
	• Power to Alter or Amend 201342001	2038.01-00
	• <i>Power to Change Beneficiaries or Their Shares</i> 201323007 201928004	2038.01-01
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	201216005	

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	201209003 201210008 201214022 201218003 201229005 201231007 201243001 201634015 201427008 201427010 201427011 201427012 201427013 201427014 201427015 201429009 201436036 201444002 201444003 201444004 201444005 201444006 201446001 201446002 201446003 201446004 201446005 201446006 201446007 201446008 201446009 201446010 201446011 201613007 201614006 201614007 201614008 201634015 201636027 201636028 201636029 201636030 201636031 201636032 201641020 201650005 201653001 201653002 201653003 201653004 201653005 201653006 201718003 201718004 201718005 201718006 201718007 201718008 201718009 201718010 201718012 201737001 201737008 201742006 201744006 201744007 201744008 201751001 201751002 201751003 201803003 201817002 201817003 201836006 201837005 201837006 201837007 201837008 201837009 201843005 201843006 201843007 201843008 201845006 201845029 201852009 201852014 201908003 201908004 201908005 201908006 201908007 201908008 201925005 201925006 201925007 201925008 201925009 201925010 201941008 201941009 201941010 201941011 201941012 201941013 201941014 201941015 201941016 201941017 201941018 201941019 201941020 201941021 201941022 201941023 202009012 202014001 202014002 202014003 202014004 202014005 202020008 202020009 202020010 202108001 202108002 202108003 202108004 202108005 202108006 202120003 202152006 202217005 202228003 202228004 202228005 202228006 202228007 202228008 202228009 202228010 202228011 202228012 202229010 202229011 202229012 202229013 202229014 202229015 202229016 202229017 202229018 202229019 202229020 202229021 202229022 202229023	
	• Pre-1942 Powers 201707003 201707004 201707005 201735009	2041.01-00
	• Post-1942 Powers 201427008 201427010 201427011 201427012 201427013 201427014 201427015 201615004 202206008	2041.02-00
	• General Power v. Not a General Power 201207001 201208003 201208004 201634016 201634017 201345004 201345026 201345027 201345028 201407008 201427008 201427010 201427011 201427012 201427013 201427014 201427015 201432005 201433006 201434004 201434005 201436003 201444002 201444003 201444004 201444005 201444006 201446001 201446002 201446003 201446004 201446005 201446006 201446007 201446008 201446009 201446010 201446011 201634016 201634017 201642027 201642028 201642029 201642030 201702016 201702017 201702018 201707007 201707008 201729009 201838002 201838003 201838004 201838005 201838006 201838007 201850001 201850002 201850003 201850004 201850005 201850006 202006002 202006003 202006004 202006005 202006006 202007010 202017018	2041.03-00
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	• Effect of State Laws 201920001 201920002 201920003	2041.12-00
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	• Transfer of Policy Within 3 Years of Death	2042.07-00
	• <i>Incidents of Ownership Held by Insured</i> 201327010	2042.07-09
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	• Special Rule for Charitable Remainder Trusts 202233014	2056.08-00
	• Passed From Decedent v. Not Passed From Decedent 201410011 201416007	2056.13-00
	• Disallowance of Deduction Where Surviving Spouse Not U.S. Citizen 201634018 201634018 201830001	2056.19-00
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Section 2501

Imposition of Gift Tax (Imposed v. Not Imposed)

2501.00-00

201216010 201218003 201223012 201233008 201243001 201245007 201310002
201310003 201310004 201310005 201310006 201320009 201322025 202134004
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202406009 202406010 202406011 202406012 202406013 202432012 202432013
202509010

	• Gift v. Not a Gift	2501.01-00
	201205001 201207001 201208003 201208004 201208006 201208031 201209001 201209002 201210001 201210002 201243006 201342001 201345004 201345026 201345027 201345028 201407008 201418017 201418031 201418032 201432005 201433006 201434004 201434005 201436003 201521002 201521003 201521004 201527032 201544005 201642027 201642028 201642029 201642030 201707003 201707004 201707005 201928004 201932002 201932005 201932009 201932010 201947001 201947002 201947003 201947004 201947005 201947006 202116002 202116003 202116004	
	• Transfers of Intangible Property By Non-Resident Not Citizens	2501.03-00
	201250001	
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	201811002 201811003	
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	201206005 201243004 201244014 201334001 201422005 201440007 201507008 201525002 201525003 201528014 201536010 201721006 201834011 201837005 201837006 201837007 201837008 201837009 201843005 201843006 201843007 201843008 201845002 201845029 201946009 202006002 202006003 202006004 202006005 202006006 202007010 202016001 202016002 202016003 202016004 202016005 202016006 202118008 202146001 202339008 202406001 202406002 202406005 202406006 202406007 202406008 202406009 202406010 202406011 202406012 202406013	
	• Gifts Indirectly Made	2511.04-00
	201208026 201442053	
	• Gift of Remainder	2511.11-00
	201407009 201440007 201845002	
	• Renunciation of Testate or Intestate Share	2511.18-00
	201228017 201334001 201403005 201540006 201831003 201921004 201921012	
Section 2512	Valuation of Gifts	2512.00-00
	201206005 201330033 201330033 201928003 202152018	
	• Listed Stock	2512.07-00
	201939002	
	• Transfers for Insufficient Consideration	2512.13-00
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	201745012	
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	201240003 201240004 201523003 201644002 201724007 201811002 201811003	

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2514.00-00

201210008 201310002 201310003 201310004 201310005 201310006 201634015
201345004 201345026 201345027 201345028 201410001 201410002 201410003
201410004 201410005 201410006 201410007 201410008 201410009 201410010
201426014 201430003 201430004 201430005 201430006 201430007 201432005
201433006 201434004 201434005 201436003 201436008 201436009 201436010
201436011 201436012 201436013 201436014 201436015 201436016 201436017
201436018 201436019 201436020 201436021 201436022 201436023 201436024
201436025 201436026 201436027 201436028 201436029 201436030 201436031
201436032 201436036 201438010 201438011 201438012 201438013 201440008
201440009 201440010 201440011 201440012 201510001 201510002 201510003
201510004 201510005 201510006 201510007 201510008 201550005 201550006
201550007 201550008 201550009 201550010 201550011 201550012 201613007
201614006 201614007 201614008 201628010 201634015 201636027 201636028
201636029 201636030 201636031 201636032 201641020 201650005 201653001
201653002 201653003 201653004 201653005 201653006 201653007 201653008
201653009 201702016 201702017 201702018 201707007 201707008 201718003
201718004 201718005 201718006 201718008 201718009 201718010 201718012
201737001 201737008 201742006 201744006 201744007 201744008 201751001
201751002 201751003 201817002 201817003 201832005 201832006 201832007
201832008 201832009 201836006 201837005 201837006 201837007 201837008
201837009 201843005 201843006 201843007 201843008 201845029 201848002
201848009 201852009 201852014 201908003 201908004 201908005 201908006
201908007 201920001 201920002 201920003 201925005 201925006 201925007
201925008 201925009 201925010 201941008 201941009 201941010 201941011
201941012 201941013 201941014 201941015 201941016 201941017 201941018
201941019 201941020 201941021 201941022 201941023 202014001 202014002
202014003 202014004 202014005 202017018 202020008 202020009 202020010
202152006 202217005

• Power Created on or Before October 21, 1942 2514.01-00
201707003 201707004 201707005

• Power Created After October 21, 1942 2514.02-00
201435007 201615004 201729009 201838002 201838003 201838004 201838005
201838006 201838007 201850001 201850002 201850003 201850004 201850005
201850006

• Definition of General Power of Appointment 2514.03-00
201634016 201634017 201634016 201634017 202006002 202006003 202006004
202006005 202006006 202007010 202020008 202020009 202020010

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201206005 201901003

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201208005 201245004 201516056 201803003 202045011 202228003 202228004
202228005 202228006 202228007 202228008 202228009 202228010 202228011
202228012 202229010 202229011 202229012 202229013 202229014 202229015
202229016 202229017 202229018 202229019 202229020 202229021 202229022
202229023

• Requirements for a Qualified Disclaimer 2518.01-00
201516056

• *Time Limit* 2518.01-01
201707003 201707004 201707005

• *Acceptance of Benefits* 2518.01-02
201516056

• *Joint Property* 2518.01-03
201516056

	• <i>Passage Without Direction by Disclaimant</i> 201516056	2518.01-04
	• Disclaimer of Less than an Entire Interest	2518.02-00
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	• Disclaimer by Surviving Spouse 201516056	2518.04-00
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	• Transfer Not Exclusively for Charitable etc. Purposes	2522.02-00
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201204001 201204002 201204003 201204004 201204005 201208005 201209003
201216010 201218001 201218002 201218003 201223012 201233008 201234016
201243001 201245007 201246004 201314017 201320009 201634016 201634017
202134003 202134004 201341005 201345005 201406008 201418001 201434019
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201443004 201448018 201451005 201509002 201509003 201509004 201509005
201509006 201509007 201509008 201509009 201509010 201509011 201509012
201509013 201509014 201509015 201509016 201509017 201509018 201510009
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201510017 201510018 201510019 201510020 201510021 201510022 201510023
201511002 201511003 201511004 201511005 201511006 201511007 201511008
201511009 201511010 201515002 201515003 201515004 201515005 201516008
201516019 201516020 201516022 201516023 201516036 201521002 201521003
201521004 201525001 201527011 201528029 201530008 201530009 201530010
201530011 201530012 201530013 201531003 201531004 201531005 201531006
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201647001 201706002 201711002 201712003 201712004 201712005 201718014
201719008 201723002 201723003 201735005 201735009 201803003 201812001
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201932004 201932005 201932006 201932007 201932008 201932009 201932010
201938004 201938005 201938006 201947001 201947002 201947003 201947004
201947005 201947006 202009012 202011001 202011002 202011003 202011004
202011005 202013001 202013002 202013003 202013004 202013005 202014006
202014007 202014008 202014009 202014010 202015004 202015005 202015006
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202215015 202216001 202216002 202216003 202216004 202216005 202216006
202217005 202224008 202228003 202228004 202228005 202228006 202228007
202228008 202228009 202228010 202228011 202228012 202229010 202229011
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202229019 202229020 202229021 202229022 202229023 202239004 202301001
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202432016 202446006 202446007 202509010 202518008 202518009

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201928004 201932001 202116002 202116003 202116004

• Exceptions 2601.03-00

201735009

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201205001 201207001 201208003 201208004 201208006 201208031 201209001
201209002 201210001 201210002 201243006 201320009 201345004 201345026
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201642027 201642028 201642029 201642030 201702016 201702017 201702018
201706002 201707007 201707008 201735009 202452005 202452006 202452007

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201342001 202120003

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201518002 201518003 201518004 201518005 201519012 201626016

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	201250001 201418005 201425007 201735009	
	• <i>Transitional Rules</i>	2601.04-00
	201216010 201314017 201320009 201345005 201406008 201422011 201550013 201614015 201706002 201711002 201818005 201833015	
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	201322010 201322011 201322012 201322013 201322014 201322015 201345005 201416001 201516028 201516036 201527032 201707003 201707004 201707005 201818005 201833015	
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	201516036	
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201210008 201231002 201232028 201242002 201302001 201306002 201307004
201310011 201310012 201312018 201314032 201315014 201316011 201731005
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202439009 202440002 202440003 202447003 202449004 202449005 202450001
202451010 202451011 202501004 202507008 202520007

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2632.01-00

201252003 201252004 201314018 201316001 201316002 201320004 201633006
201633015 201929003 201929004 201929005 201929006 202209006

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2632.02-00

201242005 201321005 201321006 201330015 202001002 202001003 201330015
201407001 201418026 201419004 201433008 201438001 201444019 201517001
201532031 201548001 201548002 201714008 201743004 201743005 201834005
202210010

• Allocation of Unused GST Exemption

2632.03-00

201731006 201340014 201447013 201624015 201937011 202116006 202202007
202229028 202242002 202343029 202346006 202351004 202351005

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	201217011 201217012 201232002 201233013 201240003 201240004 201240010 201242005 201243001 201251001 201302002 201302003 201303006 201306002 201307004 201312018 201313003 201314018 201315005 201321002 201322025 201330015 201634016 201634017 201731005 201731010 202001002 202001003 202134005 202134006 201330015 201338002 201340013 201341021 201345017 201345029 201407001 201414005 201417003 201418001 201418003 201418026 201419004 201432004 201437001 201437003 201438001 201444019 201447026 201450018 201517001 201519014 201526004 201526005 201527001 201527002 201529002 201529003 201532031 201536007 201536012 201536013 201537011 201548001 201548002 201549025 201606001 201607022 201607023 201608009 201611009 201611014 201615005 201615006 201622005 201622006 201628013 201634016 201634017 201636020 201638017 201640013 201644001 201644002 201648010 201653013 201705002 201711001 201724008 201724018 201724022 201724023 201725004 201725005 201725006 201725007 201725010 201729007 201729018 201732029 201736017 201737006 201737007 201738008 201738009 201743004 201743005 201747002 201801001 201802001 201802002 201806006 201811003 201815012 201817005 201825023 201826001 201826006 201834002 201839001 201839003 201839012 201839014 201840001 201840002 201843005 201843006 201843007 201843008 201845007 201847002 201847003 201849007 201849008 201852005 201852006 201852007 201852008 201903001 201903002 201903003 201903004 201903005 201903006 201903013 201923022 201927013 201927014 201927015 201929003 201929004 201929005 201929006 201929010 201929011 201937009 201937010 201942001 201944008 202005003 202007011 202007012 202007013 202017009 202017010 202019011 202107001 202107002 202116006 202117001 202117002 202117003 202120001 202133006 202133007 202133008 202145014 202148002 202148003 202210011 202220009 202233002 202247007 202248001 202248006 202309006 202313004 202313008 202316006 202326011 202326012 202326016 202337003 202337006 202342008 202343030 202346006 202351004 202351005 202403008 202403009 202420007 202420008 202425004 202425005 202428002 202428004 202434009 202434010 202435010 202435011 202439005 202439009 202440002 202440003 202447003 202449004 202449005 202450001 202451010 202451011 202501004 202507003 202507005	
	• Inclusion Ratio Defined	2642.01-00
	201210008 201803001 201803002	
	• Treatment of Certain Direct Skips Which Are Nontaxable Gifts	2642.03-00
	201422007	
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	201315006 202326005 202450001	
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	201243001 201731006 201523003 201526004 201526005 201636022 201642004 201724007 201829005 201937011 202152006 202503007 202507008	
	• Transferor Defined	2652.01-00
	201210008 201320005 201731006 201352001 201352002 201352003 201447008 201636022 201937011 202116006 202202007 202343029 202351004 202351005	
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	• <i>Gross Investment Income--Items Included</i> 201441018 201448026 201603033 201603034 201609001	4940.02-01
	• Exempt Operating Foundations 201306023	4940.03-00

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	201216045 201221031 201230026 201231014 201231015 201243015 201301015 201316021 201317018 201321027 201321034 201325018 201325019 201325020 201325021 201345033 201345034 201347024 201407021 201407023 201417021 201417022 201421023 201421024 201423032 201423033 201426006 201427019 201432025 201433021 201433022 201433023 201433024 201435016 201435017 201441018 201441020 201446024 201510050 201603034 201642001 201652004 201718002 201723005 201723006 201724001 201725008 201725009 201730012 201730017 201730018 201730019 201825004 201850012 201907004 201937003 201937004 202016001 202016002 202016003 202016004 202016005 202016006 202017026 202035002 202037009 202042007 202101002 202119002 202204003 202231005 202231006 202231007 202231008 202328004 202328005 202432004 202432005 202432006 202432007 202432008 202504014	
	• Definition of Self-Dealing	4941.04-00
	201206019 201221031 201301015 201311034 201321024 202021001 201346011 201418060 201432025 201436051 201445017 201447043 201448023 201448024 201448025 201448026 201448027 201448028 201448031 201513005 201514016 201603033 201606030 201609001 201624001 201624013 201630009 201642001 201703003 201703004 201710005 201714002 201714003 201719004 201723005 201723006 201745001 201831009 201849009 201907004 202034001 202037009 202042007 202101002	
	• Other Definitions	4941.05-00
	• <i>Amount Involved</i> 202243008	4941.05-02
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	201216045 201230026 201243015 201315031 201335020 201336019 201415010 201417020 201417021 201417022 201652004 201724001 201725008 201825004 201831007 201851003 202017026 202035002 202119002 202123004 202137007 202204003 202231005 202231006 202231007 202231008 202231010 202328004 202328005 202342009	
	• Initial 15% Tax on Undistributed Income	4942.01-00
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	• Definitions of Principal Terms 201243015 201335019 202231010	4942.03-00
	• <i>Distributable Amount</i> 201231016 201418060 201625003 201852012	4942.03-02
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	• <i>Contributions to "Pass-Through" Organizations</i> 201231016 201852012 202231010	4942.03-06

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	201210040 201233019 201237023 201302044 201307010 201307011 201307012 202039021 201449003 201452021 201501016 201503022 201503023 201522007 201529014 201533015 201533016 201534018 201606033 201627005 201628022 201641031 201710005 201727009 201727010 201728024 201736029 201738014 201821015 201821016 201823010 201823011 201824015 201833027 201835013 201835014 201843017 201848018 201904017 201904019 201905007 201908026 201919017 202005025 202005027 202009030 202010007 202011012 202017032 202017036 202023011 202025001 202028001 202032005 202043010 202049004 202050018 202053017 202102014 202109009 202118024 202122021 202126030 202136005 202141030 202141031 202143010 202211010 202213014 202234008 202234009 202234010 202234011 202242024 202249022 202250015 202302014 202305018 202308013 202321017 202333008 202337011 202344022 202345013 202345014 202347020 202349015 202408010 202408011 202419027 202432022 202446016 202501017 202514012 202517024 202518020 202519011 202521027 202521028 202521029 202523018 202523019 202523026	
	• Other Definitions	4942.04-00
	201335019 201603034	
	• Operating Foundations	4942.05-00
	201829003	
	• <i>Active Conduct of Exempt Purpose Activities</i>	4942.05-01
	201829003	
	• <i>Functionally Related Business</i>	4942.05-02
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	201216045 201228039 201232038 201236032 201303021 201329026 201329027 201701002 201335014 201407021 201407023 201414031 201422027 201430017 201433021 201433022 201433023 201433024 201441021 201441022 201510055 201510056 201636021 201645011 201723006 202037009 202101002 202140009 202251003 202328018 202426013 202432004 202432005 202432006 202432007 202432008 202440009 202503009	
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	201229011 201333020	
	• Definition of Excess Business Holdings	4943.03-00
	201323029 201420023 201447043 201603032 201703003 201723006 201737003 201849009 202037009 202040002 202142004 202143001	
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	201630009 202342002 202342003	
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	201311035 201328034	
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	201422027 201430017 201435017 201703003 201710005 201723006 202037009	
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	201216045 201230026 201231014 201231015 201415010 201417020 201417021 201427019 201430017 201652004 201724001 202017026 202123004 202231005 202231006 202231007 202231008 202328004 202328005 202504014	
	• Initial 5% Tax on Investments	4944.01-00
	201329028 201333020	
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	201442061 201821005	

	• Definitions	4944.05-00
	201335019 201418060 201447043 201513005 201514016 201609001 201630009	
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	201427019 201435016 201445018 201511027 201645018 201652004 201724001	
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	202137007 202231005 202231006 202231007 202231008 202328004 202328005	
	• Definition of Taxable Expenditure	4945.04-00
	201418060 201436051 201448026 201603033 201606030 201609001 201710005	
	201745001 201830003 202034001 202303014	
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	201307013 201531023	

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 201243015 201335019 201513005 201514016

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• *Other Definitions* 4945.05-00
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 201303021 201435016 201723005 201723006 201907004

• *Disqualified Person* 4946.01-00
 201301015 201432025 201642001 201723005 201723006 201907004

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 201332011 201332012 201831009 201907004 201908008 202426013

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201336020 201825004 202133014

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	• Exceptions 201538022 201626003 201626005 201839010 201847008 201935003 201951001 202045002 202111004 202111005 202348005	4980.02-00
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	• <i>Capital Gain Net Income</i> 201305004	4982.05-01
	• Election to Use Taxable Year 201202006 201412008 201709017 201709018 201932011 201932012 201934004	4982.06-00
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	• Individuals 201211015	6012.01-00
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	• Inadvertent Termination	7704.04-00
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	• Transitional Rule for Existing Partnerships	7704.05-00
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Section 7803	Other Personnel	7803.00-00
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Section 7805	Rules and Regulations	7805.00-00
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	• Prospective Application of Changes in Regulations	7805.01-00
	• <i>Prospective Application of Rulings</i>	7805.01-01
	201537023 202022004	
	• Reversals of Regulations or Rulings With Retroactive Effect	7805.03-00
	201413013	
	• Retroactive Effect of Regulation	7805.04-00
	• <i>Retroactive Application of Rulings</i>	7805.04-01
	201216051 201233011 201245017 201927012	
	• Effect of Private Rulings	7805.05-00
	201927012	
Section 7811	Taxpayer Assistance Orders	7811.00-00
	• Authority to Issue	7811.01-00
	201739012	
Section 7852	Other Applicable Rules	7852.00-00
	202504017	
Section 7871	Indian Tribal Governments Treated As States For Certain Purposes	7871.00-00
	201445002	
	• Charitable Purposes	7871.01-00
	201525014 201551003	
	• Tax Exempt Bonds	7871.03-00
	201630002 201937016	
Section 7872	Treatment of Loans with Below Market Interest Rates	7872.00-00
	201426002	

• Types of Below Market Loans Subject to Section 7872 7872.05-00
202334009 202335006 202335007 202335008 202335009 202336007 202336008
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Section 7873 **Federal Tax Treatment of Income Derived By Indians >From Exercise of** **7873.00-00**
Fishing Rights Secured by Treaty, Etc.
202053014

Section 9100

Extension of Time for Making Certain Elections

9100.00-00

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• Section 42; Low-Income Housing Credit

9100.01-00

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• Section 367; Foreign Corporations 201725012	9100.08-00
• Section 442; Accounting Periods 201224024 201305009 201311019 201311020 201312026 201347017 201436044 201438007 201447021 201452004 201524001 201535005 201537013 201552021 201604012 201606007 201606008 201709021 201712012 201726003 201735004 201802010 201802011 201802012 201802013 201819009 201922024 202008004 202008006 202013014 202144025 202314004 202314015 202319011 202320002 202321001 202328020 202424006 202438014 202447014	9100.09-00
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• Section 472; LIFO Election 201208033 201232012 201232013 201233005 201317006 201333001 201342009 201405006 201448017 201610014 201801002 201830009 201850017 202014014	9100.11-00
• Section 663; Special Rules Applicable to Sections 661 and 662 201245008 201348008 202012001 202227003 202332010	9100.12-00

• Section 754; Manner of Electing Optional Adjustment to Basis of Partnership Property 9100.15-00

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• Section 911; Citizens or Residents of the United States Living Abroad 9100.17-00
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• Extension of Time For Filing Return 9100.19-00
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- Section 1502; Election to File Consolidated Return 9100.20-00
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- Section 6(c)(3) of PL 97-354; Qualified Oil Corporation 9100.21-00
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• Other

9100.22-00

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- Section 709; Election to Amortize Organizational Expenses Provided in Section 709(b)
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- Section 642(c); Election for Estate Trust to Deduct Charitable Payments in the Tax Year Even Though Not Paid Until Subsequent Year 9100.26-00
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- Regulation Section 1.337(d); Loss on Stock of Subsidiary 9100.29-00
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- Section 195; Start-Up Expenditures 9100.30-00
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• Reg. 301.7701-3 Classification of Certain Business Entities

9100.31-00

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