Publication 1078
Issue: 09/20/2002

# Section 6110 Index

Written Determinations Requested After November 1, 1976

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

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Department of the Treasury
**Internal Revenue Service**

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| | • *Performance-Based Compensation*<br>200104022 | *162.36-04* |
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| | • Limitation on Investment Interest in General | 163.03-00 |
| | • *Investment Income and Expenses*<br>200146018 200216012 | *163.03-03* |
| | • Personal Interest in General<br>200211018 | 163.05-00 |
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| | • Classification of Property<br>200122002 200206015 200206021 200135036 200135036 200135036 200135036 200135037 200135037 200135037 200135037 200139023 200139023 200139025 200139025 200144031 200146047 200146052 200148005 200148015 200203009 200221016 200229021 200229021 200229021 200229021 200229021 200232012 | 168.20-00 |
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| | • Percentage Limitations<br>200112064 200112065 | 170.07-00 |
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| | • Series of Transactions<br>200211030 200136022 200136022 200136023 200136023 200236008 200236008 | 351.02-00 |
| **Section 355** | **Distribution of Stock and Securities of a Controlled Corporation**<br>200103054 200104024 200104028 200105060 200107008 200108019 200108021 200109023 200109045 200114002 200116024 200118044 200118050 200119048 200121069 200122041 200125055 200128038 200128039 200129007 200131024 200149020 200151040 200204034 200209029 200224009 200227016 200234061 200234061 200234061 200234061 200234064 200234064 200234064 200234064 200133011 200133034 200135039 200135039 200135039 200135039 200138015 200138024 200139011 200139011 200139026 200139026 200139028 200139028 200140033 200140039 200142012 200143029 200146019 200148001 200148049 200201032 200201032 200212012 200215031 200221009 200229015 200229015 200229015 200229015 200229015 200229025 200229025 200229025 200229025 200229025 200230006 200230006 200236044 200236044 | **355.00-00** |
| | • Spin-Off<br>200101006 200101020 200102036 200103037 200103057 200104001 200104012 200104025 200105031 200107016 200107031 200109031 200111026 200111029 200112055 200113019 200114002 200115001 200118018 200118045 200119012 200120015 200120030 200125011 200125044 200126012 200126028 200129006 200129023 200129029 200129032 200130003 200131003 200137011 200137036 200137042 200151042 200151043 200151044 200205035 200206022 200209029 200209047 200213016 200214014 200214021 200217006 200219025 200220019 200223002 200225005 200227024 200234021 200234021 200234021 200234021 200234044 200234044 200234044 200234044 200234050 200234050 200234050 200234050 200133035 200134014 200138025 200139001 200139001 200139009 200139009 200141045 200146019 200150023 200201006 200201006 200202047 200202059 200212026 200215049 200216006 200218021 200231003 200231003 200231008 200231008 200237022 | 355.01-00 |
| | • *Split-Off*<br>200102045 200104003 200108019 200108021 200109020 200118004 200121042 200121044 200125020 200129030 200137019 200145029 200205001 200205034 200206041 200209018 200211032 200217051 200220010 200223007 200226007 200226036 200234053 200234053 200234053 200234053 200133016 200134010 200138004 200140042 200146020 200207025 200215027 200215034 200231006 200231006 | *355.01-01* |
| | • *Split-Up*<br>200116025 200121061 200202060 | *355.01-02* |
| | • Active Business<br>200104025 200108019 200108021 200112055 200126012 | 355.03-00 |

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|---|---|---|
| | • Business Purpose<br>200103054 200104025 200112052 200113017 200125011 200209018 200211032 200214025 200227016 200234025 200234025 200234025 200234025 200135038 200135038 200135038 200135038 200202059 200221009 | 355.04-00 |
| | • Control | 355.05-00 |
| | • *Distribution of Control*<br>200125083 | *355.05-01* |
| | • Distributions Within a Consolidated Group<br>200211019 | 355.09-00 |
| | • Gain Recognition on Distributions Pursuant to Acquisitions of Greater than 50% of Distributing or Controlled<br>200205035 200133035 200215047 | 355.10-00 |
| **Section 356** | **Receipt of Additional Consideration--Boot (Gain Recognized v. Not Recognized)**<br>200211032 | **356.00-00** |
| | • Reorganization Exchange<br>200118045 | 356.01-00 |
| **Section 357** | **Assumption of Liability (Gain Recognized v. Not Recognized)**<br>200121013 200122022 200237003 | **357.00-00** |
| | • Tax Avoidance Purpose v. No Avoidance Purpose<br>200206006 | 357.01-00 |
| **Section 358** | **Basis to Distributees** | **358.00-00** |
| | • Assumption of Liabilities<br>200121013 200122022 200224011 200150001 | 358.03-00 |
| **Section 362** | **Basis to Corporations**<br>200206006 200237003 | **362.00-00** |
| **Section 367** | **Foreign Corporations**<br>200106004 200106004 200114002 200137036 200209029 200203058 200212012 | **367.00-00** |
| | • Transfer to Foreign Corporations Subject to Section 367(a)<br>200221046 | 367.01-00 |
| | • Treatment of Transfers of Stock or Securities to Foreign Corporations<br>200122026 200203015 200221046 | 367.03-00 |
| | • *Reorganizations Described in Section 368(a)(1)(B)*<br>200221046 | *367.03-01* |
| | • *Transfers of Stock Subject to a Ten-Year Gain Recognition Agreement*<br>200221046 | *367.03-07* |
| | • *Requirements of Gain Recognition Agreement*<br>200147004 | *367.03-10* |
| | • Transactions Described in Section 367(b) Complete liquidation of Foreign<br>200148036 200148037 | 367.10-00 |
| | • *Subsidiary*<br>200128040 | *367.10-01* |
| | • *Attribution of Earnings and Profits on an Exchange Described in Section 351 354, or 356*<br>200148036 200148037 | *367.10-03* |
| **Section 368** | **Definitions Relating to Corporate Reorganizations**<br>200105060 200108005 200124009 200145009 200204002 200224009 200148001 200208022 200237017 | **368.00-00** |

• Statutory Merger or Consolidation (Type "A") 368.01-00
200102031 200105040 200109037 200121010 200145039 200213019 200234044
200234044 200234044 200234044 200140011 200140068 200203058

*• Using Stock of Corporation Controlling Acquiring Corporation* *368.01-01*
200119049 200132007 200236005 200236005

*• Using Stock of Corporation Controlling Merged Corporation* *368.01-02*
200136022 200136022 200136023 200136023

• Stock for Stock (Type "B") 368.02-00
200208017

• Stock for Property (Type "C") 368.03-00
200111023 200111024 200115010 200115030 200116028 200225031

*• Substantially All the Property* *368.03-01*
200103056 200115016 200115030 200116028

• Assets for Control of Transferee (Type "D") 368.04-00
200101006 200101020 200102036 200102038 200102045 200103057 200104001
200104012 200104028 200107031 200109027 200111026 200111029 200113019
200114002 200118004 200118018 200118045 200119012 200119048 200120015
200120030 200121042 200121044 200121069 200122041 200125020 200125044
200128051 200129029 200130003 200131003 200131024 200137011 200137036
200137042 200204034 200205001 200205034 200206022 200209018 200209029
200209047 200211032 200213016 200214014 200214021 200217006 200217051
200219025 200223002 200223007 200225005 200226007 200226036 200227024
200234021 200234021 200234021 200234021 200234044 200234044 200234044
200234044 200234053 200234053 200234053 200234053 200234061 200234061
200234061 200234061 200133011 200133016 200134010 200134014 200135021
200135021 200135021 200135021 200135022 200135022 200135022 200135022
200135039 200135039 200135039 200135039 200136012 200136012 200136013
200136013 200138004 200138025 200139009 200139009 200140039 200141040
200141045 200201006 200201006 200201019 200201019 200201032 200201032
200202047 200202059 200202060 200207025 200212012 200215031 200216006
200218021 200229025 200229025 200229025 200229025 200229025 200231008
200231008 200232004 200232005 200232006 200232007 200232008 200232009
200236038 200236038 200236044 200236044 200237022

• Recapitalization (Type "E") 368.05-00
200105050 200109039 200111013 200112014 200129007 200132033 200206028
200211035 200213001 200213002 200213003 200138002 200138003 200208017
200232016 200236008 200236008

• Change in Identity, etc. (Type "F") 368.06-00
200103034 200105050 200118011 200129024 200204034 200209049 200139001
200139001 200144001

• Continuity of Interest Rule 368.08-00
200118011 200125043 200213001 200213002 200213003 200138002 200138003
200144001

*• Savings and Loan or Life Insurance Companies* *368.08-01*
200115027 200121054

*• Proprietary Interest Continuity* *368.08-02*
200103034 200105050

• Plan of Reorganization 368.09-00

*• Several Steps* *368.09-01*
200118011 200144001

• Liquidation v. Reorganization 368.12-00
200117008

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|---|---|---|
| | • Transactions Involving Two or More Investment Companies<br>200103056 200115016 | 368.13-00 |
| **Section 381** | **Carryovers in Certain Corporate Acquisitions (Allowed v. Not Allowed)**<br>200105034 200105035 200150009 | **381.00-00** |
| **Section 382** | **Limitation on Net Operating Loss Carry-forwards and Built-in Losses Following Ownership Changes**<br>200130011 200140049 200143001 | **382.00-00** |
| | • General Rule<br>200225014 200207002 200238025 ***200238025*** | 382.01-00 |
| | • Scope of Section 382 Limitation | 382.02-00 |
| | • *Closing of the Books*<br>200112054 200125056 200220016 | *382.02-05* |
| | • Ownership Change | 382.07-00 |
| | • *Equity Structure Shift*<br>200207014 | *382.07-03* |
| | • Built-in Gains and Losses and Section 338 Gains | 382.08-00 |
| | • *Net Unrealized Built-in Gain*<br>200217009 | *382.08-01* |
| | • Operating Rules | 382.12-00 |
| | • *Controlled Groups*<br>200202043 200202044 | *382.12-16* |
| **Section 384** | **Limitation on Use of Preacquisition Losses to Offset Built-in Gains**<br>200125007 200238017 ***200238017*** | **384.00-00** |
| **Section 385** | **Treatment of Certain Interests in Corporations as Stock or Indebtedness**<br>200205031 200134004 200142005 200148039 | **385.00-00** |
| | • Debt v. Equity<br>200126001 200145005 200135011 200135011 200135011 200135011 200235004 200235004 | 385.01-00 |
| | • New Financial Products<br>200130010 | 385.03-00 |
| | • *Debt v. Equity Issues*<br>200130010 | *385.03-02* |
| **Section 401** | **Qualified Pension, Profit-Sharing, and Stock Bonus Plan**<br>200101037 200103075 200105058 200105067 200106045 200106045 200113032 200116046 200121072 200121079 200127031 200128056 200128061 200130057 200205050 200211047 200213029 200222032 200225038 200225039 200234070 200234070 200234070 200234070 200134031 200135044 200135044 200135044 200135044 200147056 200148077 200208028 200208029 200208030 200208033 200216034 200229048 200229048 200229048 200229048 200229048 | **401.00-00** |
| | • Discrimination as to Contributions or Benefits (See Also 401.29-01, 401.20-00, 414.00-00)<br>200137065 200230044 200230044 | 401.04-00 |
| | • Required Distributions<br>200105063 200105065 200106046 200106046 200110034 200111055 200121073 200124028 200126036 200126038 200126039 200131032 200131033 200209057 200209058 200209059 200223065 200208031 200221048 200221051 200221056 200221059 200221061 200236052 200236052 | 401.06-00 |
| | • *In General*<br>200104033 200110034 200111054 | *401.06-01* |

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|---|---|---|
| | • *Employee Dies Before Entire Interest Distributed*<br>200105063 200105065 200106046 200106046 200110033 200121073 200126036 200126038 200126039 200131032 200131033 200209062 200223065 200234074 200234074 200234074 200234074 200208031 200221048 200235038 200235038 200235039 200235039 200235040 200235040 200235041 200235041 | *401.06-02* |
| | • Union-negotiated Multiemployer Pension Plans<br>200109049 200115042 200132042 200151056 200133051 | 401.28-00 |
| | • Cash or Deferred Arrangements<br>200116050 200132043 200149036 200235043 200235043 200236047 200236047 | 401.29-00 |
| | • *Special Distribution Requirements*<br>200105064 200127053 200211049 200134034 200218039 200236053 200236053 | *401.29-02* |
| **Section 402** | **Taxability of Beneficiary of Employee's Trust (Time and Manner of Taxation)**<br>200116046 200127027 200127031 200127054 200127055 200128057 200130057 200137065 200213032 200234070 200234070 200234070 200234070 200147056 200208017 200212036 200236047 200236047 | **402.00-00** |
| | • Exempt Trust<br>200149036 200230044 200230044 | 402.01-00 |
| | • Non-Exempt Trust<br>200128006 | 402.02-00 |
| | • Amounts Distributed or Made Available to Beneficiary<br>200231019 200231019 | 402.06-00 |
| | • Unrealized Appreciation of Employer's Securities<br>200138030 200138031 200202078 | 402.07-00 |
| | • Rollover Contributions<br>200127055 200128057 200213032 | 402.08-00 |
| | • *Rollover Lump Sums*<br>200107040 200138030 200138031 200202078 200215032 | *402.08-01* |
| | • *By a Surviving Spouse*<br>200204038 200211054 200222033 | *402.08-05* |
| | • Tax on Lump Sum Distributions<br>200215032 | 402.09-00 |
| **Section 403** | **Taxation of Employee Annuities (Taxable v. Not Taxable)**<br>200101038 200104035 200113032 200113033 200113033 200116052 200117038 200121072 200124030 200128061 200141046 200148054 200148077 200208017 200210066 200231018 200231018 | **403.00-00** |
| | • Annuities Purchased by Section 501(c)(3) Organizations or Public Schools<br>200202027 | 403.04-00 |
| | • Rollover Amounts<br>200101038 200124030 | 403.05-00 |
| **Section 404** | **Deduction for Contributions of Employer to an Employee's Trust or Annuity Plan and Compensation Under a Deferred-Payment Plan (Deduct. v. Not Deduct.)**<br>200137064 200137065 200234070 200234070 200234070 200234070 200133049 200133050 200135045 200135045 200135045 200135045 200147056 200229054 200229054 200229054 200229054 200229054 200229055 200229055 200229055 200229055 200229055 200229056 200229056 200229056 200229056 200229056 200230044 200230044 | **404.00-00** |
| | • Stock Bonus and Profit-Sharing Trusts<br>200149036 | 404.02-00 |

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|---|---|---|
| | • Deferred Compensation<br>200128006 | 404.10-00 |
| | • Year of Deduction<br>200107012 | 404.11-00 |
| **Section 408** | **Individual Retirement Accounts**<br>200106047 200106047 200117038 200128056 200128058 200128061 200129040 200130056 200130058 200132038 200151049 200151050 200204048 200211047 200211048 200226046 200136030 200136030 200136031 200136031 200150036 200208017 200208028 200208029 200208030 200208033 200221051 200221057 200221062 200229048 200229048 200229048 200229048 200229048 | **408.00-00** |
| | • Qualification<br>200136031 200136031 | 408.02-00 |
| | • *Benefit Distributions*<br>200151051 200151054 200204048 200210066 | *408.02-01* |
| | • Rollover Contributions<br>200106047 200106047 200109051 200110033 200121073 200126038 200129036 200130056 200151054 200136030 200136030 200150036 200208031 200221048 | 408.03-00 |
| | • Individual Retirement Annuity<br>200222032 200225038 200225039 | 408.05-00 |
| | • Distributions<br>200126041 200127027 200217059 200235038 200235038 200235039 200235039 200235040 200235040 200235041 200235041 | 408.06-00 |
| | • Prohibited Transactions<br>200215061 | 408.07-00 |
| **Section 408A** | **Roth IRA**<br>200126040 200142022 200148051 200150034 | **408A.00-00** |
| **Section 409** | **Qualifications for Tax Credit Employee Stock Ownership Plans**<br>200223066 | **409.00-00** |
| | • Tax Credit Employee Stock Ownership Plan Defined | 409.01-00 |
| | • *Definition of Employer Securities*<br>200111053 200116051 200125090 | *409.01-09* |
| **Section 412** | **Minimum Funding Standards** | **412.00-00** |
| | • Funding Standard Account<br>200109049 200225043 | 412.01-00 |
| | • Minimum Funding Waiver<br>200101039 200109048 200121074 200121075 200121076 200127056 200137067 200149041 200149046 200214030 200134028 200135042 200135042 200135042 200135042 200135048 200135048 200135048 200135048 200141053 200141057 200141059 200148061 200148065 200148067 200148076 200148079 200202073 200210064 200229049 200229049 200229049 200229049 200229049 200230045 200230045 200235034 200235034 200236055 200236055 | 412.06-00 |
| | • Accrued Benefit Waiver<br>200103077 | 412.07-00 |
| **Section 414** | **Definitions and Special Rules**<br>200103075 200139032 200139032 200141046 200148054 200236046 200236046 | **414.00-00** |
| | • Service for Predecessor Employer<br>200109050 | 414.01-00 |
| | • Employees of Businesses Under Common Control<br>200125094 | 414.03-00 |

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| | • Mergers and Consolidations of Plans or Transfers of Plan Assets<br>200230042 200230042 | 414.06-00 |
| | • Governmental Plan<br>200115043 200118056 200119058 200135043 200135043 200135043 200135043 200135049 200135049 200135049 200135049 200230042 200230042 | 414.07-00 |
| | • Church Plan<br>200107042 200108044 200108050 200124025 200125095 200149038 200136027 200136027 200141047 200148055 200207027 200229050 200229050 200229050 200229050 200229050 200230043 200230043 200235032 200235032 200236048 200236048 | 414.08-00 |
| | • Certain Employee Contributions<br>200116049 200116055 200120042 200126042 200127049 200128060 200129037 200129038 200129039 200130051 200130052 200137068 200204041 200204043 200204049 200204050 200223070 200224034 200147054 200147055 200203076 200216035 200221058 200221060 200221063 200231017 200231017 200236054 200236054 200238052 ***200238052*** | 414.09-00 |
| **Section 415** | **Limitations on Benefits and Contributions Under Qualified Plans**<br>200126042 200127049 200130057 200219042 200136024 200136024 200141046 200147056 200148054 200148075 200229051 200229051 200229051 200229051 200229051 | **415.00-00** |
| | • Limitation for Defined Benefit Plans<br>200109049 200115042 200132042 200151056 200133051 200148081 | 415.01-00 |
| | • Limitation for Defined Contribution Plans<br>200230044 200230044 | 415.02-00 |
| | *• Annual Addition*<br>200213033 | *415.02-01* |
| **Section 419** | **Treatment of Funded Welfare Benefit Plans**<br>200113009 200137066 200219002 200203071 | **419.00-00** |
| | • Qualified Asset Account<br>200137062 200203073 200203074 200203075 | 419.11-00 |
| | • Account Limit | 419.12-00 |
| | *• Collectively Bargained Funds*<br>200137062 | *419.12-02* |
| | • Ten or More Employer Plan Exception<br>200127047 200219002 200133047 | 419.14-00 |
| **Section 419A** | **Qualified Asset Account; Limitations on Additions to Account (See Also 419.00-00 et. seq.)**<br>200113009 200119064 200210025 | **419A.00-00** |
| **Section 420** | **Transfers to Retiree Health**<br>200112063 | **420.00-00** |
| **Section 422** | **Incentive Stock Options** | **422.00-00** |
| | • Stockholder Approval<br>200139001 200139001 | 422.03-00 |
| **Section 423** | **Employee Stock Purchase Plans**<br>200102042 200139001 200139001 | **423.00-00** |
| **Section 424** | **Definitions and Special Rules**<br>200112021 | **424.00-00** |
| | • Modification, Extension or Renewal of Options<br>200207005 | 424.01-00 |

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| **Section 444** | **Election of Taxable Year Other Than Required Year** | **444.00-00** |
| | • Procedural Requirements for Making Election<br>200106022 200106022 200151027 200222014 | 444.03-00 |
| **Section 446** | **General Rule for Methods of Accounting (Permissible v. Not Permissible)**<br>200110031 200122019 200225006 200234069 200234069 200234069 200234069 200146025 | **446.00-00** |
| | • Clearly v. Not Clearly Reflecting Income<br>200213004 200146028 | 446.01-00 |
| | • Reconstruction of Taxable Income | 446.02-00 |
| | *• Reasonable v. Unreasonable*<br>200140078 | *446.02-06* |
| | • Change of Methods (Permissible v. Not Permissible) | 446.04-00 |
| | *• Required by Commissioner*<br>200142001 | *446.04-02* |
| | *• Consent Needed*<br>200102004 200146056 | *446.04-03* |
| | *• Change in Method of Accounting for Depreciation*<br>200122002 200206014 200206015 200206021 200214003 200222022 200135036 200135036 200135036 200135036 200135037 200135037 200135037 200135037 200136007 200136007 200139023 200139023 200139025 200139025 200142008 200146047 200146052 200148005 200148015 200208002 200210053 200216016 200216018 200229021 200229021 200229021 200229021 200229021 | *446.04-17* |
| | *• Change in Method of Depreciation Under Rev. Proc. 84-74*<br>200106020 200106020 | *446.04-19* |
| | • Method of Accounting; Insurance Companies (Overall) | 446.20-00 |
| | *• Property and Casualty Insurance Companies*<br>200234001 200234001 200234001 200234001 200234002 200234002 200234002 200234002 | *446.20-02* |
| | • Notional Principal Contracts<br>200102005 | 446.21-00 |
| | *• Termination Payments*<br>200145010 | *446.21-03* |
| | • Mark to Market (Section 475)<br>200221008 | 446.25-00 |
| **Section 448** | **Limitation on Use of Cash Method of Accounting** | **448.00-00** |
| | • Nonaccrual of Certain Amounts by Service Providers<br>200232010 | 448.09-00 |
| **Section 451** | **General Rule for Taxable Year of Inclusion (Year Received v. Not Year Received)**<br>200102008 200105004 200105061 200110005 200117017 200151003 200209015 200222003 200225006 200227012 200141046 200147052 200148054 | **451.00-00** |
| | • Annual Theory<br>200101023 200102044 200107017 200110022 200122032 200217052 200234056 200234056 200234056 200234056 200147022 200210019 | 451.01-00 |
| | • Conditions and Contingencies<br>200118046 200236003 200236003 | 451.04-00 |
| | • Tax Refunds<br>200211043 | 451.08-00 |

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|---|---|---|
| | • Escrowed Income<br>200110002 | 451.09-00 |
| | • Prepaid and Advance Income | 451.13-00 |
| | • *Services (Rev. Rul. 71-21)*<br>200102034 200147032 | *451.13-01* |
| | • Constructive Receipt<br>200118046 200120024 200130008 200130015 200143007 200203006 | 451.14-00 |
| | • *Compensation*<br>200202027 | *451.14-04* |
| | • Income From Sales<br>200111011 | 451.15-00 |
| | • Accrual Method<br>200131006 200147032 | 451.19-00 |
| | • Special Rules for Crop Insurance Proceeds<br>200213026 | 451.23-00 |
| **Section 453** | **Installment Method (Available v. Not Available)**<br>200125073 200218034 | **453.00-00** |
| | • Revocation of Elections<br>200226039 200230016 200230016 | 453.08-00 |
| | • Contingent Payment Sales | 453.09-00 |
| | • *Alternative Basis Recovery*<br>200236036 200236036 | *453.09-01* |
| **Section 455** | **Prepaid Subscription Income**<br>200132014 | **455.00-00** |
| **Section 457** | **Deferred Compensation Plans of State and Local Governments and Tax Exempt Organizations**<br>200102013 200104026 200119017 200145006 200205007 200141046 200148054 | **457.00-00** |
| | • Year of Inclusion in Gross Income<br>200103017 200107028 200111008 200117038 200120022 200131011 200144007 200202027 | 457.01-00 |
| | • Eligible Deferred Compensation Plan Defined<br>200103017 200107028 200111008 200120022 200131011 200144007 | 457.05-00 |
| | • *Tax Exempt Organization*<br>200128006 | *457.05-03* |
| | • Distribution Requirements | 457.07-00 |
| | • *Unforeseeable Emergency*<br>200122009 | *457.07-02* |
| | • Special Rules | 457.09-00 |
| | • *Length of Service Award Plans*<br>200224002 | *457.09-08* |
| | • Ineligible Plans<br>200229001 200229001 200229001 200229001 200229001 | 457.10-00 |
| | • Exclusive Benefit Set-Asides | 457.12-00 |
| | • *Trusts*<br>200103017 | *457.12-01* |

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| | • *Custodial Accounts and Contracts*<br>200107028 200111008 200144007 | *457.12-02* |
| **Section 460** | **Special Rules for Long-Term Contracts**<br>200202045 | **460.00-00** |
| | • Definition of Long-Term Contract (See Also 451)<br>200202045 | 460.05-00 |
| **Section 461** | **General Rule for Taxable Year of Deduction (Year Paid v. Not Year Paid)**<br>200104011 200105052 200107007 200108017 200112011 200149013 200209010 200209017 200219014 200225006 200143001 200203004 200208004 200229009 200229009 200229009 200229009 200229009 200229010 200229010 200229010 200229010 200229010 | **461.00-00** |
| | • Accrual Method<br>200126008 200147032 200236007 200236007 | 461.01-00 |
| | • Cash Method<br>200106005 200106005 | 461.02-00 |
| | • Incurred Liabilities<br>200216013 | 461.06-00 |
| | • *Accrual Basis*<br>200131005 | *461.06-01* |
| | • Contested Liabilities<br>200106005 200106005 | 461.07-00 |
| | • Accrual of Other Taxes<br>200122008 | 461.16-00 |
| **Section 465** | **Deductions Limited to Amount at Risk**<br>200120020 200237003 | **465.00-00** |
| **Section 467** | **Certain Payments for the Use of Property or Services** | **467.00-00** |
| | • Recapture of Prior Understated Inclusions Under Leaseback or Long-Term Agreements<br>200105003 | 467.07-00 |
| | • *Leaseback or Long-Term Agreements*<br>200128007 | *467.07-03* |
| **Section 468** | **Special Rules for Mining and Solid Waste Reclamation and Closing Costs**<br>200235021 200235021 | **468.00-00** |
| **Section 468A** | **Special Rules for Decommissioning Cost**<br>200105052 200107007 200108017 200121028 200125066 200125067 200125072 200125074 200125075 200125076 200125078 200125080 200126011 200126014 200132020 200132022 200132024 200132031 200209010 200219014 200207016 200208004 200218019 200229009 200229009 200229009 200229009 200229009 200229010 200229010 200229010 200229010 200229010 200238046 ***200238046*** | **468A.00-00** |
| | • Income and Deductions of the Taxpayer | 468A.03-00 |
| | • *Formulas or Other Methods*<br>200107011 200109016 200109025 200112012 200112015 200112016 200112062 200113008 200119032 200119034 200119037 200120025 200120026 200121045 200121046 200128016 200129012 200129013 200129019 200129020 200137055 200137056 200137057 200137058 200146014 200201033 200201033 200202025 200203008 200203038 200203039 200203040 200203062 200203064 200203065 200232021 200232022 | *468A.03-04* |
| | • Ruling Amount | 468A.04-00 |

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| | • *Revised Schedules*<br>200104017 200105036 200105037 200105047 200107005 200107011 200108016 200109016 200109025 200110017 200110018 200112007 200112012 200112015 200112016 200112026 200112062 200113008 200114011 200114013 200114014 200114015 200114016 200115006 200119032 200119034 200119037 200120025 200120026 200121014 200121017 200121020 200121021 200121029 200121030 200121045 200121046 200122020 200122029 200122030 200122031 200122037 200125049 200125052 200128009 200128010 200128016 200128020 200129005 200129012 200129013 200129019 200129020 200129025 200132019 200137055 200137056 200137057 200137058 200141016 200146014 200147024 200147025 200147027 200147029 200147030 200201033 200201033 200202025 200202035 200203008 200203038 200203039 200203040 200203062 200203064 200203065 200210036 200210039 200232021 200232022 200236034 200236034 | *468A.04-02* |
| **Section 468B** | **Special Rules For Designated Settlement Funds**<br>200106021 200106021 200213015 200222001 200138006 | **468B.00-00** |
| | • Taxation of Designated Settlement Funds<br>200104030 | 468B.02-00 |
| | • Other Funds<br>200149013 | 468B.06-00 |
| | • Clarification Of Taxation of Certain Funds<br>200113025 | 468B.07-00 |
| **Section 469** | **Passive Activity Losses and Credits Limited**<br>200102018 200106018 200106018 200111001 200144013 | **469.00-00** |
| | • Passive Activity Defined<br>200206016 200234049 200234049 200234049 200234049 | 469.03-00 |
| **Section 471** | **General Rule for Inventories**<br>200125001 | **471.00-00** |
| | • Need for Inventories<br>200121006 | 471.01-00 |
| | • Items Includible v. Not Includible in Inventory<br>200203001 | 471.09-00 |
| **Section 472** | **Last-In, First-Out Inventories** | **472.00-00** |
| | • Election<br>200106035 200106035 200106036 200106036 200118036 200223005 200223017 200234048 200234048 200234048 200234048 200234052 200234052 200234052 200234052 | 472.01-00 |
| | • Dollar Value Method<br>200128003 | 472.08-00 |
| | • Inventory Price Index Method<br>200121022 | 472.09-00 |
| | • Bargain Purchase<br>200121022 | 472.15-00 |
| **Section 475** | **Mark to Market Accounting Method for Dealers in Securities**<br>200120001 200150008 | **475.00-00** |
| | • Treatment of Securities Marked to Market<br>200150008 | 475.01-00 |
| | • Definitions | 475.05-00 |
| | • *Items that are not Securities*<br>200150008 | *475.05-03* |

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| | • Securities Traders<br>200209052 200209053 200209054 | 475.08-00 |
| **Section 481** | **Adjustments Required by Changes in Method of Accounting**<br>200151004 200209025 | **481.00-00** |
| **Section 482** | **Allocation of Income and Deductions Among Taxpayers**<br>200108003 200117039 200121071 200125007 200149019 200205003 200206006 200217021 200224011 200139008 200139008 200150001 200237003 200238022<br>***200238022 200238025 200238025*** | **482.00-00** |
| | • Correlative Adjustments<br>200148016 | 482.03-00 |
| | • Applicability to Nonrecognition Transactions<br>200135001 200135001 200135001 200135001 | 482.06-00 |
| | • Services<br>200230001 200230001 | 482.09-00 |
| | • Transfer or Use of Intangibles<br>200230001 200230001 | 482.11-00 |
| | *• Cost Sharing Agreements*<br>200103024 200225009 | *482.11-08* |
| | • Sale of Tangible Property<br>200148025 | 482.12-00 |
| | *• Rate of Return/Profit Split*<br>200148025 | *482.12-05* |
| | • Allocation of Net Income<br>200203053 | 482.13-00 |
| | • Sham Transaction<br>200108003 | 482.15-00 |
| | • Allocation of Deductions<br>200203053 | 482.17-00 |
| | • Rev. Proc. 65-17<br>200229019 200229019 200229019 200229019 200229019 | 482.23-00 |
| **Section 483** | **Interest on Certain Deferred Payments** | **483.00-00** |
| | • Exceptions and Limitations | 483.04-00 |
| | *• Original Issue Discount*<br>200116008 | *483.04-02* |
| **Section 501** | **Exemption From Tax on Corporations, Certain Trusts, etc. (Exempt v. Not Exempt)**<br>200101036 200102052 200102053 200116007 200117043 200120002 200120003 200124021 200127055 200128057 200128059 200149045 200217044 200135047 200135047 200135047 200135047 200230018 200230018 200236049 200236049 | **501.00-00** |
| | • Title-Holding Company<br>200214035 200214036 | 501.02-00 |
| | • Religious, Charitable, etc., Institutions and Community Chest<br>200103084 200121078 200127052 200132040 200211051 200222030 200225042 200140084 200147059 200150027 200216037 | 501.03-00 |

• *Foundations* — *501.03-02*
200103076 200103082 200103085 200104036 200104037 200107036 200107039 200115038 200116048 200117042 200151057 200204039 200205048 200205049 200206057 200219036 200219039 200222034 200225042 200233027 200233028 200233029 200233030 200234065 200234065 200234065 200234065 200234066 200234066 200234066 200234066 200234067 200234067 200234067 200234067 200234068 200234068 200234068 200234068 200234072 200234072 200234072 200234072 200140085 200140086 200148080 200218036 200218041 200218042 200221050 200232036 200238050 ***200238050***

• *Educational Organizations* — *501.03-08*
200225046 200203069 200236051 200236051

• *Homes for Aged and Related Organizations (See Also 0501.04-02)* — *501.03-10*
200150038

• *Hospitals and Health Clinics (See Also 0501.06-03)* — *501.03-11*
200101034 200103083 200106037 200106037 200106038 200106038 200106042 200106042 200106043 200106043 200106044 200106044 200108045 200108046 200108047 200108048 200108049 200110030 200118054 200132039 200151045 200206058 200211051 200214035 200214036 200233025 200134027 200203070 200216036 200218037 200238051 ***200238051***

• *Labor Organizations (See Also 0501.05-00)* — *501.03-12*
200233024

• *Political Action Organizations* — *501.03-17*
200151060

• *Scientific Organizations* — *501.03-24*
200149035

• *Social Welfare Groups (See Also 0501.04-00)* — *501.03-25*
200211052

• *State Instrumentalities* — *501.03-26*
200126032 200216037

• *Testing for Public Safety* — *501.03-28*
200215057 200215058 200215059 200215060

• *Organizational and Operational Tests* — *501.03-30*
200114040 200219036 200219039 200225046 200218036 200218041 200218042

• *Lessening the Burdens of Government* — *501.03-33*
200124022

• Civic Leagues and Social Welfare Groups (See Also 0501.03-25) — 501.04-00

• *Local Associations of Employees* — *501.04-01*
200219037

• Business Leagues, Chambers of Commerce, Real Estate Boards, or Boards of Trade — 501.06-00
200103084 200223067 200150026

• Social Clubs — 501.07-00

• *Business with Nonmembers* — *501.07-05*
200104038

• Fraternal Beneficiary Societies (See Also 0501.03-09) — 501.08-00
200222032 200225038 200225039

• Voluntary Employees' Beneficiary Associations (See Also 0501.03-01) — 501.09-00
200108010 200204045 200225041

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| | • *Permissible Benefits*<br>200211053 | *501.09-01* |
| | • *Inurement*<br>200211053 200223068 200203073 200203074 200203075 | *501.09-03* |
| | • Local Benevolent Life Insurance Associations, etc. | 501.12-00 |
| | • *Mutual or Cooperative Electric Companies*<br>200148085 | *501.12-03* |
| | • Income Inures v. does Not Inure to Private Individual<br>200230005 200230005 | 501.32-00 |
| | • Legislative and Political Propaganda Activities<br>200151060 | 501.38-00 |
| **Section 502** | **Feeder Organizations (Exempt v. Not Exempt)** | **502.00-00** |
| | • Section 501 (c)(3) Organizations<br>200149044 | 502.01-00 |
| **Section 507** | **Termination of Private Foundation Status**<br>200103076 200103079 200103082 200103085 200104036 200104037 200106040 200106040 200107036 200107039 200111045 200111049 200111050 200114036 200114037 200114043 200115038 200116048 200119056 200119057 200120041 200120043 200121080 200121081 200121082 200124023 200124024 200124026 200124027 200125092 200125093 200127051 200130053 200130054 200151057 200151058 200151059 200204042 200204053 200205048 200205049 200206057 200219043 200219044 200226045 200233027 200233028 200233029 200233030 200234065 200234065 200234065 200234065 200234066 200234066 200234066 200234066 200234067 200234067 200234067 200234067 200234068 200234068 200234068 200234068 200234072 200234072 200234072 200234072 200140083 200140084 200140085 200140086 200143028 200148082 200148083 200150031 200150039 200201035 200201035 200201036 200201036 200215054 200215055 200215056 200216032 200216033 200221064 200221065 200221066 200221067 200221068 200221069 200229052 200229052 200229052 200229052 200229052 200229053 200229053 200229053 200229053 200229053 200238048 ***200238048*** 200238049 ***200238049 200238050 200238050*** | **507.00-00** |
| | • Termination Under Section 507(a)(1)<br>200101035 200111045 200117042 200137060 | 507.01-00 |
| | • *Special Rules*<br>200151052 200151053 | *507.01-01* |
| | • Termination Under Section 507(a)(2)(A)<br>200111045 200221050 | 507.02-00 |
| | • Termination Under Section 507(b)(1)(A)<br>200115044 200225045 | 507.03-00 |
| | • Termination Under Section 507(b)(1)(B)<br>200204039 200220030 200225045 | 507.04-00 |
| | • Liability of Transferee Organizations<br>200117042 200204039 200140083 200140084 200221050 | 507.05-00 |
| | • Imposition of Tax<br>200204039 | 507.06-00 |
| | • Aggregate Tax Benefit<br>200204039 | 507.07-00 |
| **Section 508** | **Special Rules With Respect to Section 501 (c)(3) Organizations**<br>200226012 200150027 | **508.00-00** |

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| **Section 509** | **Private Foundation Defined**<br>200106042 200106042 200106043 200106043 200106044 200106044 200117043 200135047 200135047 200135047 200135047 | **509.00-00** |
| | • Definitions<br>200108045 200108046 200108047 200108049 | 509.01-00 |
| | *• Private Foundation*<br>200137060 | *509.01-01* |
| | *• Support*<br>200150039 | *509.01-02* |
| | • Exceptions to Private Foundation Status<br>200106042 200106042 200106043 200106043 200106044 200106044 200127052 200147059 | 509.02-00 |
| | *• Publicly Supported Organizations*<br>200127052 200130048 200130049 200130055 200147059 200150027 | *509.02-01* |
| | *• Supporting Organizations*<br>200115044 200127052 200130048 200130049 200130055 200149045 200204040 200147059 200208027 200215048 200218037 | *509.02-02* |
| | • Continuation of Private Foundation Status<br>200103076 200103082 200103085 200104036 200104037 200106040 200106040 200107036 200107039 200115038 200116048 200151057 200205048 200205049 200206057 200233027 200233028 200233029 200233030 200234065 200234065 200234065 200234065 200234066 200234066 200234066 200234066 200234067 200234067 200234067 200234067 200234068 200234068 200234068 200234068 200234072 200234072 200234072 200234072 200140085 200140086 200216032 200216033 200238050 ***200238050*** | 509.03-00 |
| **Section 511** | **Tax on Unrelated Business Income of Charitable, etc, Organizations (Taxable v. Not Taxable)**<br>200102052 200102053 200103076 200103085 200106042 200106042 200106043 200106043 200106044 200106044 200108051 200112064 200112065 200117043 200119061 200126033 200126034 200126035 200131034 200132040 200211051 200213021 200214035 200214036 200225044 200233031 200141058 200147059 200148066 200150032 200150033 200150035 200215057 200215058 200215059 200215060 200216036 | **511.00-00** |
| | • Organizations Subject to Tax<br>200101036 200236049 200236049 | 511.01-00 |
| | • Section 501(c)(2) Corporations<br>200214035 200214036 | 511.02-00 |
| **Section 512** | **Unrelated Business Taxable Income (Taxable v. Not Taxable)**<br>200102051 200108045 200108046 200108047 200108049 200114039 200117043 200127052 200128059 200130048 200130049 200130055 200149044 200149045 200151046 200151047 200211051 200213027 200214035 200214036 200220028 200223067 200233024 200233031 200141049 200147058 200147059 200148057 200148074 200150026 200208027 200216036 200236049 200236049 200237027 | **512.00-00** |
| | • Exception, Additions, and Limitations on Unrelated Income<br>200102051 200104038 200106042 200106042 200106043 200106043 200106044 200106044 200127052 200132040 200225046 200234071 200234071 200234071 200234071 | 512.01-00 |
| | *• Rents and Royalties*<br>200104031 200149043 200219037 200222030 200225046 200136025 200136025 | *512.01-01* |
| | *• Rent v. Ordinary Business Profits*<br>200149035 | *512.01-02* |

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| | • Partnerships<br>200118054 200151045 200206058 200218037 | 512.02-00 |
| | • Advertising (See Also 0501.26-02)<br>200102051 200128059 | 512.05-00 |
| | • Definitions | 512.09-00 |
| | *• General*<br>200225044 | *512.09-01* |
| | *• Section 501(c)(7), (9), (17), or (20) Organizations (See Also 419.00-00 et. seq.)*<br>200104038 200137062 200223068 | *512.09-03* |
| | • Modifications<br>200151062 | 512.10-00 |
| **Section 513** | **Unrelated v. Not Unrelated Trade or Business**<br>200102051 200106042 200106042 200106043 200106043 200106044 200106044 200107036 200108048 200114039 200117043 200126033 200149044 200151047 200204051 200206058 200211051 200213027 200214035 200214036 200222031 200222032 200225038 200225039 200225044 200147059 200150026 200203069 200216037 200218037 200230005 200230005 200236049 200236049 200236051 200236051 | **513.00-00** |
| | • Advertising, etc., Activities<br>200102051 200225046 | 513.02-00 |
| | • Cooperatives<br>200223067 200148085 | 513.03-00 |
| | • Sales and Service to Public<br>200124022 200151061 200222030 | 513.04-00 |
| **Section 514** | **Unrelated Debt-Financed Income**<br>200125096 200213027 200214035 200214036 200233031 200233032 200216036 200235042 200235042 200237027 | **514.00-00** |
| | • Rent and Deductions<br>200132040 | 514.01-00 |
| | • Definitions--Debt-Financed Property<br>200211052 | 514.06-00 |
| | • Acquisition Indebtedness<br>200137061 200224014 200233023 200134025 | 514.07-00 |
| **Section 527** | **Political Organizations**<br>200103084 | **527.00-00** |
| | • Political Expenditures by Exempt Organizations<br>200151060 | 527.04-00 |
| **Section 528** | **Certain Homeowners Associations**<br>200203027 | **528.00-00** |
| **Section 529** | **Qualified State Tuition Programs**<br>200214032 200134032 200231020 200231020 200232035 | **529.00-00** |
| **Section 541** | **Imposition of Personal Holding Company Tax (Imposed v. Not Imposed)**<br>200105032 200132023 | **541.00-00** |
| **Section 552** | **Definition of Foreign Personal Holding Company** | **552.00-00** |
| | • Certain Excluded Banks and Corporations<br>200102016 | 552.02-00 |
| **Section 561** | **Deduction v. Not a Deduction for Dividends Paid** | **561.00-00** |

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| | • Date of Payment<br>200213017 | 561.02-00 |
| | • Regulated Investment Companies<br>200111021 200111028 200113010 200113011 200113012 200113013 200113014 200113015 200121004 200121016 200143023 | 561.05-00 |
| | • Real Estate Investment Trusts<br>200122001 | 561.06-00 |
| **Section 562** | **Dividends Eligible v. Not Eligible for Dividends-Paid Deduction**<br>200122001 | **562.00-00** |
| | • Distributions in Liquidation<br>200121016 | 562.02-00 |
| | • Preferential Dividends<br>200121002 200213017 | 562.03-00 |
| | *• Class of Stock*<br>200111021 200111028 200113010 200113011 200113012 200113013 200113014 200113015 200121004 200143023 | *562.03-02* |
| **Section 565** | **Consent Dividends**<br>200147005 | **565.00-00** |
| | • General Rule | 565.01-00 |
| | *• Making and Filing Consents*<br>200105032 200132023 | *565.01-02* |
| **Section 584** | **Common Trust Funds**<br>200145041 | **584.00-00** |
| | • Merger of Common Trust Funds<br>200132010 | 584.04-00 |
| **Section 595** | **Foreclosure on Property Securing Loans**<br>200129003 | **595.00-00** |
| **Section 597** | **Federal Financial Assistance Provided**<br>200119007 | **597.00-00** |
| **Section 613** | **Percentage Depletion**<br>200219004 | **613.00-00** |
| | • Gross Income From Property<br>200146046 | 613.02-00 |
| | *• Depletable Gross Income*<br>200110008 | *613.02-08* |
| **Section 616** | **Development Expenditures**<br>200102007 | **616.00-00** |
| **Section 631** | **Gain or Loss in the Case of Timber, Coal, or Domestic Iron Ore** | **631.00-00** |
| | • Election to Consider Cutting as Sale or Exchange<br>200151046 200229007 200229007 200229007 200229007 200229007 | 631.01-00 |
| | *• Fair Market Value of Timber (See Also 611.07-02 et seq.)*<br>200229007 200229007 200229007 200229007 200229007 | *631.01-01* |
| | • Disposal of Timber With a Retained Economic Interest (See Also 631.04-00)<br>200151046 | 631.02-00 |
| **Section 641** | **Imposition of Tax**<br>200229018 200229018 200229018 200229018 200229018 | **641.00-00** |

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| | • Termination of Estates and Trusts<br>200226031 | 641.03-00 |
| **Section 642** | **Special Rules for Credits and Deductions**<br>200142011 | **642.00-00** |
| | • Foreign Tax Credit<br>200105001 | 642.01-00 |
| | • Charitable Deduction<br>200138027 200140080 | 642.03-00 |
| | *• Paid or Permanently Set Aside*<br>200221011 | *642.03-03* |
| | *• Pooled Income Funds*<br>200214017 200214018 | *642.03-06* |
| **Section 643** | **Definitions Applicable to Subparts A, B, C, and D**<br>200116016 | **643.00-00** |
| | • Income Defined<br>200226015 200210002 | 643.02-00 |
| | • Multiple Trusts<br>200105039 200105044 200127037 200149016 200209007 200209008 200210056 200210061 | 643.06-00 |
| **Section 651** | **Deductions for Trusts Distributing Current Income Only**<br>200140080 | **651.00-00** |
| **Section 661** | **Deduction for Estates and Trusts Accumulating Income or Distributing Corpus**<br>200140080 200207018 | **661.00-00** |
| | • Amounts Paid, Credited, or Required to Be Distributed<br>200226031 200210002 | 661.01-00 |
| **Section 662** | **Inclusion of Amounts in Gross Income of Beneficiaries of Estates and TrustsAccumulating Income or Distributing Corpus**<br>200210002 | **662.00-00** |
| **Section 663** | **Special Rules Applicable to Sections 661 and 662** | **663.00-00** |
| | • Separate Share Rule<br>200210002 | 663.05-00 |
| **Section 664** | **Charitable Remainder Trusts**<br>200109006 200127038 200205008 200219012 200140027 200202078 200203034 200207026 200221042 200229046 200229046 200229046 200229046 200229046 200230004 200230004 | **664.00-00** |
| | • Character of Distribution<br>200127023 200215032 | 664.01-00 |
| | • Definitions<br>200218008 | 664.03-00 |
| | *• Charitable Remainder Unitrust*<br>200108035 200120016 200122045 200124010 200233005 200233006 200233007 200233008 200234038 200234038 200234038 200234038 200143028 200150019 200232015 | *664.03-02* |
| | *• Unitrust With Income Exception*<br>200215042 | *664.03-03* |
| | • Valuation<br>200150019 | 664.04-00 |

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| **Section 671** | **Trust Income, Deductions, and Credits Attributable to Grantors and OthersAs Substantial Owners**<br>200108032 200119019 200209007 200209008 200227022 200148028 200210018 | **671.00-00** |
| | • Persons Treated as Grantors<br>200209015 200227020 | 671.02-00 |
| | • Allocation of Income and Deductions<br>200128006 | 671.03-00 |
| | • Method of Reporting<br>200207007 | 671.04-00 |
| **Section 672** | **Definitions and Rules** | **672.00-00** |
| | • Related or Subordinate Party<br>200229013 200229013 200229013 200229013 200229013 | 672.02-00 |
| **Section 676** | **Power to Revoke**<br>200209015 | **676.00-00** |
| **Section 677** | **Income for Benefit of Grantor**<br>200124011 200128006 200222003 | **677.00-00** |
| **Section 678** | **Person Other Than Grantor Treated as Substantial Owner**<br>200147044 200235007 200235007 200235008 200235008 200235009 200235009 200238004 ***200238004 200238005 200238005 200238006 200238006 200238007 200238007 200238008 200238008 200238009 200238009 200238010 200238010*** 200238011 ***200238011 200238012 200238012*** | **678.00-00** |
| **Section 681** | **Limitation on Charitable Deduction**<br>200140080 | **681.00-00** |
| **Section 691** | **Recipients of Income in Respect of Decedents**<br>200209026 200234019 200234019 200234019 200234019 200221011 200230018 200230018 | **691.00-00** |
| **Section 701** | **Partners, Not Partnerships, Subject to Tax** | **701.00-00** |
| | • Partnership ISP - Subchapter K Anti-Abuse Rule Regulation Section 1.701-2<br>200118005 200128040 200128053 200205021 | 701.01-00 |
| **Section 702** | **Income and Credits of Partner**<br>200111021 200113010 200113011 200113012 200113013 200113014 200113015 200121016 200214016 | **702.00-00** |
| | • Partner's Distributive Share<br>200102012 | 702.01-00 |
| | *• Taxes Paid (Section 901)*<br>200144006 | *702.01-04* |
| | *• Credits*<br>200215005 200215017 200216003 200216004 200216011 200216015 | *702.01-09* |
| **Section 703** | **Partnership Computations** | **703.00-00** |
| | • Partnership Elections<br>200106035 200106035 | 703.05-00 |
| **Section 704** | **Partner's Distributive Share**<br>200131013 200137059 200204013 200204015 200204016 200204017 200204018 200204023 200214016 200133003 200203043 200203044 200203046 200203047 200203048 200203049 200203050 200203051 200203052 | **704.00-00** |
| | • Partnership Agreement<br>200210047 | 704.01-00 |

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|---|---|---|
| | • *Economic Effect Substantiality*<br>200108003 200131013 | *704.01-01* |
| | • *Economic Effect*<br>200111021 200113010 200113011 200113012 200113013 200113014 200113015 200121016 200125053 | *704.01-02* |
| | • *Substantiality*<br>200108003 200131013 | *704.01-03* |
| | • *Section 704(c) Considerations*<br>200105009 200105010 200105011 200105012 200105013 200105015 200105016 200105017 200105018 200105019 200105020 200105021 200105022 200105023 200105024 200105025 200105026 200105027 200118039 200118040 200118041 200140060 200140061 200140062 200140063 200140065 | *704.01-04* |
| | • Partner's Interest in Partnership<br>200108003 200131013 | 704.02-00 |
| | • Contributed Property<br>200149019 | 704.05-00 |
| **Section 707** | **Transactions Between Partner and Partnership**<br>200128040 200146025 | **707.00-00** |
| **Section 708** | **Continuation of Partnership**<br>200219008 | **708.00-00** |
| | • Termination<br>200103051 200132009 200214016 | 708.01-00 |
| **Section 721** | **Nonrecognition of Gain or Loss on Contributions**<br>200105009 200105010 200105011 200105012 200105013 200105015 200105016 200105017 200105018 200105019 200105020 200105021 200105022 200105023 200105024 200105025 200105026 200105027 200111021 200118039 200118040 200118041 200125013 200125053 200211017 200214016 200210047 | **721.00-00** |
| **Section 722** | **Basis of Contributing Partner's Interest**<br>200125013 200214016 | **722.00-00** |
| **Section 723** | **Basis of Property Contributed to Partnership**<br>200125013 200214016 | **723.00-00** |
| **Section 731** | **Extent of Recognition of Gain or Loss on Distribution**<br>200102012 200223036 200223037 200223038 200223039 200223040 200223041 200223042 200223043 200223044 200223045 | **731.00-00** |
| **Section 743** | **Optional Adjustments to Basis of Partnership Property**<br>200234006 200234006 200234006 200234006 | **743.00-00** |
| **Section 752** | **Treatment of Certain Liabilities**<br>200118005 200120020 200131013 200233018 | **752.00-00** |
| | • Sharing Recourse Liabilities<br>200131013 | 752.06-00 |
| | • Sharing Non-recourse Liabilities<br>200131013 | 752.07-00 |
| **Section 754** | **Manner of Electing Optional Adjustment to Basis of Partnership Property**<br>200101016 200121058 200121059 200121060 200121062 200121063 200121064 200121065 200121066 200121067 200121068 200202022 | **754.00-00** |

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|---|---|---|---|
| | • Timeliness of Election<br>200110023 200120032 200130025 200205025 200209046 200234031 200234031 200234031 200234031 200234032 200234032 200234032 200234032 200234033 200234033 200234033 200234033 200234034 200234034 200234034 200234034 200234035 200234035 200234035 200234035 200202053 200202055 200215011 200229028 200229028 200229028 200229028 200229028 | 754.02-00 | |
| **Section 761** | **Terms Defined**<br>200214016 | **761.00-00** | |
| | • Partnership | 761.01-00 | |
| | • *Organizations Treated as a Partnership*<br>200120007 200139005 200139005 200144005 200202022 | *761.01-01* | |
| | • *Organizations Not Treated as a Partnership*<br>200216005 | *761.01-02* | |
| | • Partner<br>200120007 | 761.02-00 | |
| **Section 775** | **Electing Large Partnership Defined**<br>200221020 | **775.00-00** | |
| **Section 807** | **Rules for Certain Reserves**<br>200125043 | **807.00-00** | |
| | • Items Taken Into Account<br>200108002 | 807.02-00 | |
| | • Method of Computing Reserves for Purposes of Computing Income<br>200108002 | 807.03-00 | |
| | • Adjustments for Change in Computing Reserves | 807.05-00 | |
| | • *Insurance, Life ISP - IRC Section 807 Basis Adjustment - Change in Basis v. Correction of Error*<br>200108002 | *807.05-01* | |
| **Section 809** | **Mutual Life Insurance Companies Reduction in Deductions**<br>200125043 | **809.00-00** | |
| **Section 817** | **Treatment of Variable Contracts**<br>200108038 200223012 200221036 | **817.00-00** | |
| | • Variable Contract Defined<br>200119036 200206047 | 817.04-00 | |
| **Section 817** | **(Repealed - 1984 Act) Rules Relating to Certain Gains and Losses** | **817.00-00** | **R** |
| | • Reinsurance Transactions After 1968<br>200144028 | 817.06-00 | R |
| | • Treatment Nondiversified Contracts | 817.08-00 | |
| | • *Look-Through Diversification*<br>200108038 200115028 200122013 | *817.08-04* | |
| **Section 831** | **Tax On Insurance Companies Other Than Life Insurance Companies**<br>200121040 200133020 200140057 200202002 | **831.00-00** | |
| | • Alternative Tax Small Companies<br>200121040 200223015 200133020 200133029 200142014 | 831.02-00 | |
| | • Whether Company Qualifies as Insurance Company<br>200119039 200149003 200138010 200138014 200140057 200147052 200237010 | 831.03-00 | |
| **Section 832** | **Insurance Company Taxable Income**<br>200119039 200234001 200234001 200234001 200234001 200234002 200234002 200234002 200234002 200138010 200147052 200237010 | **832.00-00** | |

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| | • Premiums Earned<br>200116041 200132006 200203016 | 832.05-00 |
| | • Losses Incurred | 832.06-00 |
| | • *Unpaid Losses*<br>200115002 | *832.06-02* |
| | • Reduction of Deduction<br>200234013 200234013 200234013 200234013 | 832.07-00 |
| **Section 833** | **Treatment of Blue Cross Blue Shield Organizations**<br>200201004 200201004 | **833.00-00** |
| **Section 834** | **Determination of Taxable Investment Income** | **834.00-00** |
| | • Deductions | 834.02-00 |
| | • *Special Deduction*<br>200120004 | *834.02-07* |
| **Section 842** | **Foreign Corporation Carrying on Insurance Business** | **842.00-00** |
| | • Taxation<br>200147007 | 842.01-00 |
| **Section 847** | **Special Estimated Tax Payments**<br>200118001 200222039 | **847.00-00** |
| **Section 848** | **Capitalization of Policy Acquisition Expenses**<br>200125043 | **848.00-00** |
| **Section 851** | **Definition of Regulated Investment Company**<br>200111028 200111036 200113010 200113011 200113012 200113013 200113014 200113015 200121002 200121004 200121016 200125053 200143023 | **851.00-00** |
| | • Gross Income Requirement<br>200111021 200118039 200118040 200118041 | 851.02-00 |
| | • Diversification Requirement<br>200111021 200118039 200118040 200118041 | 851.03-00 |
| **Section 852** | **Taxation of Regulated Investment Companies and Their Shareholders**<br>200121004 200143023 | **852.00-00** |
| | • Investment Company Taxable Income<br>200111028 | 852.01-00 |
| | • Taxable Income of a Regulated Investment Company<br>200148030 | 852.10-00 |
| **Section 853** | **Foreign Tax Credit Allowed Shareholders**<br>200135019 200135019 200135019 200135019 | **853.00-00** |
| **Section 855** | **Dividends Paid by Regulated Investment Company After Close of Taxable Year**<br>200107009 200111036 200121005 200121027 200125018 200206027 200135019 200135019 200135019 200135019 200142016 | **855.00-00** |
| **Section 856** | **Definition of Real Estate Investment Trust**<br>200119010 200132008 200225033 200226013 200234054 200234054 200234054 200234054 200134022 200134023 200140026 | **856.00-00** |
| | • Income Requirements<br>200115023 200127024 200132008 200236037 200236037 | 856.01-00 |
| | • Other Requirements<br>200106016 200106016 | 856.03-00 |

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|---|---|---|
| | • Rents From Real Property<br>200101012 200103033 200115023 200132008 200234054 200234054 200234054 200234054 | 856.04-00 |
| **Section 857** | **Taxation of Real Estate Investment Trusts and Their Beneficiaries**<br>200122001 | **857.00-00** |
| | • Requirements to be Taxed as a REIT<br>200213017 | 857.01-00 |
| **Section 860D** | **REMIC Defined** | **860D.00-00** |
| | • Election<br>200101017 200117030 200117032 200124015 200131010 | 860D.01-00 |
| **Section 861** | **Income From Sources Within the U.S.**<br>200139022 200139022 200147033 | **861.00-00** |
| | • Gross Income From Sources Within U.S. | 861.01-00 |
| | • *Allocation to U.S. Source*<br>200217002 | *861.01-01* |
| | • Rents and Royalties<br>200222011 | 861.05-00 |
| | • Allocation and Apportionment of Deductions (In General)<br>200215010 | 861.08-00 |
| | • *Allocation*<br>200234020 200234020 200234020 200234020 200235022 200235022 | *861.08-01* |
| | • *Apportionment*<br>200203020 | *861.08-02* |
| | • *Research and Experimental Expenditures -- Allocation*<br>200207012 | *861.08-05* |
| | • *Research and Experimental Expenditures -- Apportionment -- Sales Method*<br>200207012 | *861.08-06* |
| | • *Research and Experimental Expenditures -- Apportionment -- Gross Income Method*<br>200207012 | *861.08-07* |
| | • Allocation and Apportionment of Interest Expense (In General)<br>200134007 | 861.09-00 |
| | • *Asset Method of Apportionment*<br>200102041 200112056 200117018 200220012 200138012 200201009 200201009 200207003 200212001 200221043 200221044 | *861.09-06* |
| | • Allocation Apportionment of Research and Experimental Expenditures (In General)<br>200207012 | 861.15-00 |
| **Section 862** | **Income From Sources Without U.S.**<br>200222011 200139022 200139022 | **862.00-00** |
| **Section 863** | **Items Not Specified in Sections 861 or 862** | **863.00-00** |
| | • Allocation of Gross Income<br>200141010 | 863.01-00 |
| **Section 864** | **Definitions**<br>200224003 | **864.00-00** |
| | • Effectively Connected Income | 864.02-00 |

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| | • *Deferred Payments*<br>200128037 | *864.02-06* |
| | • *Property Formerly Used in U.S. Business*<br>200125030 | *864.02-07* |
| | • Rules for Allocating Interest, etc. (See Also 861.08 through 861.14)<br>200201009 200201009 | 864.04-00 |
| **Section 865** | **Source Rules for Personal Property Sales** | **865.00-00** |
| | • Sale Through Office or Fixed Place of Business | 865.05-00 |
| | • *Sales by Nonresidents*<br>200128037 | *865.05-02* |
| **Section 871** | **Tax on Nonresident Alien Individuals** | **871.00-00** |
| | • Tax on Nonresident Aliens | 871.02-00 |
| | • *Fixed or Determinable Annual Or Periodical Income*<br>200141020 | *871.02-03* |
| | • *Social Security Benefits*<br>200235026 200235026 | *871.02-06* |
| | • *Engaged in U.S. Trade or Business or Treated as Having Effectively Connected Income*<br>200128037 | *871.02-07* |
| | • *Certain Annuities Received Under Qualified Plans*<br>200105005 | *871.02-12* |
| **Section 877** | **Expatriation to Avoid Tax**<br>200102029 200102030 200132018 200132021 200137029 200211015 200133046 200143020 200143022 200221037 | **877.00-00** |
| | • Principal Purpose--the Avoidance of Tax<br>200103067 200105051 200105054 200109008 200109009 200109042 200109043 200109044 200110006 200111002 200111005 200114003 200115024 200117027 200118042 200119043 200119044 200119050 200121035 200125015 200125016 200125051 200126016 200126024 200128022 200128027 200130013 200130019 200130023 200130024 200137030 200137043 200145021 200206029 200209027 200209030 200211033 200214013 200214022 200214024 200217043 200219031 200219033 200220017 200222027 200224015 200224024 200225011 200225035 200227030 200234046 200234046 200234046 200234046 200234060 200234060 200234060 200234060 200133023 200133024 200133027 200133039 200134011 200139021 200139021 200140051 200140067 200146022 200146035 200201029 200201029 200207001 200208001 200208015 200210005 200212018 200212019 200212020 200215044 200216019 200218002 200218024 200218028 200218032 200229012 200229012 200229012 200229012 200230021 200230021 200235003 200235003 200235014 200235014 200236029 200236029 200236033 200236033 200238013 ***200238013 200238014 200238014 200238015 200238015*** | 877.01-00 |
| | • Ruling Submission by Expatriating Citizen<br>200111009 200116029 | 877.07-00 |
| | • Ruling Submission by Expatriating Long-Term Resident<br>200108036 200108037 200116030 200116034 200116035 200119042 200119046 200125059 200128041 200131025 200234036 200234036 200234036 200234036 200133021 200133022 200133026 200141042 200210049 200210050 200216020 200216021 200221039 | 877.08-00 |
| **Section 881** | **Tax on Income of Foreign Corporations Not Connected with United States Business**<br>200206008 200227006 | **881.00-00** |

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| | • Repeal of Tax On Interest of Foreign Corporations Received From Certain Portfolio Debt Investments | 881.02-00 |
| | • *Exclusion of Interest Received By CFC From Related Person*<br>200203026 | *881.02-10* |
| **Section 882** | **Tax on Income of Foreign Corporations Connected with United States Business** | **882.00-00** |
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| | • *Liability/Asset Ratio*<br>200125088 200232025 | *882.07-02* |
| **Section 884** | **Branch Tax**<br>200111040 200111041 | **884.00-00** |
| **Section 892** | **Income of Foreign Governments and of International Organizations** | **892.00-00** |
| | • Foreign Governments Qualifying For Exemption Under Section 892 | 892.01-00 |
| | • *Controlled Entities of a Foreign Sovereign*<br>200216025 | *892.01-02* |
| **Section 894** | **Income Affected by Treaty**<br>200145041 200209026 | **894.00-00** |
| | • Dividends<br>200105001 | 894.02-00 |
| **Section 897** | **Disposition of Investment in United States Real Property**<br>200117039 | **897.00-00** |
| | • U.S. Real Property Interest<br>200201023 200201023 | 897.02-00 |
| | • Coordination With Nonrecognition Provisions Such As Exchange of U.S. Real Property Interest By Nonresident Alien Individual or Foreign Corporation<br>200137037 | 897.06-00 |
| **Section 901** | **Taxes of Foreign Countries and of Possessions of U.S.**<br>200112019 200225032 200139008 200139008 | **901.00-00** |
| | • Allowance of Credit<br>200110019 200127010 | 901.01-00 |
| | • *Definition of Income Tax*<br>200112011 200146001 | *901.01-03* |
| | • Amount Allowed | 901.02-00 |
| | • *Partnerships and Estates*<br>200105001 | *901.02-05* |
| **Section 902** | **Deemed Paid Credit Where Domestic Corporation Owns 10 Percent or More of Voting Stock of Foreign Corporation (See Also 960.00-00 et. seq.)**<br>200135020 200135020 200135020 200135020 | **902.00-00** |
| | • Computation of Credit<br>200103031 | 902.01-00 |
| **Section 903** | **Credit for Taxes in Lieu of Income, etc., Taxes**<br>200110021 | **903.00-00** |
| **Section 904** | **Limitation on Credit** | **904.00-00** |
| | • Taxable Income<br>200134007 | 904.01-00 |
| | • Separate Application of Section With Respect to Certain Categories - Income | 904.03-00 |

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| | • *Active Rents/Royalties*<br>200203053 | *904.03-02* |
| | • *Look-Through Rules*<br>200206010 | *904.03-20* |
| | • *Apportionment to more than one separate category*<br>200210026 | *904.03-31* |
| **Section 905** | **Applicable Rules** | **905.00-00** |
| | • Adjustments on Payment of Accrued Taxes<br>200127011 | 905.03-00 |
| **Section 907** | **Special Rules in Case of Foreign Oil and Gas Income**<br>200101005 200104019 | **907.00-00** |
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| **Section 911** | **Citizens or Residents of the United States Living Abroad** | **911.00-00** |
| | • Election<br>200226010 200202072 | 911.11-00 |
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| **Section 924** | **Foreign Trading Gross Receipts**<br>200149019 | **924.00-00** |
| | • Definition of Foreign Trading Gross Receipts<br>200112030 200125021 200131012 | 924.01-00 |
| | • Foreign Economic Process Requirements<br>200147037 | 924.03-00 |
| **Section 925** | **Transfer Pricing Rules**<br>200149002 200215003 | **925.00-00** |
| | • Computation of Transfer Pricing<br>200147037 200237024 | 925.01-00 |
| | • *Election of Grouping*<br>200121018 200151019 200227014 | *925.01-01* |
| **Section 926** | **Distributions to Shareholders**<br>200128011 | **926.00-00** |
| **Section 927** | **Other Definitions and Special Rules**<br>200146046 | **927.00-00** |
| | • Definition of Export Property<br>200131012 200231014 200231014 | 927.01-00 |
| | • Election and Termination of Election<br>200110027 200111042 200221040 | 927.04-00 |
| **Section 933** | **Income From Sources Within Puerto Rico**<br>200215019 | **933.00-00** |
| **Section 936** | **Puerto Rico and Possession Tax Credit**<br>200126015 | **936.00-00** |
| | • Intangible Property Income | 936.03-00 |
| | • *Cost Sharing Election*<br>200122005 200148025 | *936.03-04* |
| **Section 952** | **Subpart F Income Defined** | **952.00-00** |

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| | • Earnings and Profits Limitations<br>200130007 | 952.05-00 | |
| | • *Chain Deficits*<br>200130007 | *952.05-04* | |
| **Section 953** | **Insurance Income** | **953.00-00** | |
| | • Election by Foreign Insurance Company to be Treated as Domestic Corporation<br>200201021 200201021 | 953.06-00 | |
| **Section 954** | **Foreign Base Company Income** | **954.00-00** | |
| | • Foreign Personal Holding Company Income<br>200206010 200224007 | 954.02-00 | |
| | • Foreign Base Company Sales Income<br>200220005 | 954.03-00 | |
| **Section 955** | **Withdrawal Previously Excluded Subpart F Income From Qualified Investment** | **955.00-00** | |
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| | • *Related Group Elections*<br>200235010 200235010 | *955.02-01* | |
| **Section 956** | **Investment of Earnings in U.S. Property**<br>200127005 200216022 | **956.00-00** | |
| | • U.S. Property Defined<br>200137005 200229030 200229030 200229030 200229030 200229030 | 956.03-00 | |
| | • Pledges and Guarantees<br>200216022 | 956.05-00 | |
| | • Earnings Invested in Excess Passive Assets<br>200134004 | 956.07-00 | R |
| **Section 960** | **Special Rules for Foreign Tax Credit** | **960.00-00** | |
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| **Section 961** | **Adjustments to Basis of Stock In Controlled Foreign Corporations and of Other Property (Increase v. Reduction)**<br>200141003 | **961.00-00** | |
| **Section 964** | **Miscellaneous Provisions**<br>200142005 | **964.00-00** | |
| **Section 985** | **Functional Currency**<br>200221017 | **985.00-00** | |
| **Section 986** | **Determination of Foreign Corporation's Earnings & Profits and Foreign Taxes** | **986.00-00** | |
| | • Previously Taxed Earnings and Profits<br>200141003 | 986.03-00 | |
| **Section 988** | **Treatment of Certain Foreign Currency Transactions**<br>200149017 200206006 200237003 | **988.00-00** | |
| | • Computation of Exchange Gain or Loss | 988.02-00 | |
| | • *Debt Instruments*<br>200133013 | *988.02-02* | |
| **Section 989** | **Other Definitions and Special Rules** | **989.00-00** | |

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| | • Definition of Appropriate Exchange Rate<br>200141003 | 989.02-00 |
| **Section 992** | **Requirements of a Domestic International Sales Corporation** | **992.00-00** |
| | • Distributions to Meet Qualification Requirements<br>200135005 200135005 200135005 200135005 | 992.03-00 |
| **Section 1001** | **Determination of Amount of and Recognition of Gain or Loss**<br>200103001 200103002 200103003 200103007 200103049 200105039 200105044 200112031 200113007 200116016 200117002 200118038 200119047 200121023 200121024 200127023 200127037 200128035 200130010 200209007 200209008 200213011 200213014 200217024 200217036 200217037 200223019 200224001 200226042 200234043 200234043 200234043 200234043 200133002 200135002 200135002 200135002 200135002 200135007 200135007 200135007 200135007 200141022 200143019 200147028 200202033 200207018 200210018 200210056 200210061 200215032 200221032 200229018 200229018 200229018 200229018 200229018 200229046 200229046 200229046 200229046 200229046 200231011 200231011 200236030 200236030 200238034 ***200238034 200238041 200238041*** | **1001.00-00** |
| | • Allocation of Sales Price<br>200116012 | 1001.01-00 |
| | • Amount Realized<br>200112030 200112038 200113006 200120001 200130009 | 1001.02-00 |
| | • *Property Differing Materially*<br>200103034 200105050 200227020 200210029 | *1001.02-07* |
| | • Fair Market Value of Property<br>200123008 | 1001.05-00 |
| **Section 1011** | **Adjusted Basis for Determining Gain or Loss**<br>200120001 | **1011.00-00** |
| | • Allocation of Basis<br>200115003 | 1011.01-00 |
| **Section 1012** | **Basis of Property--Costs** | **1012.00-00** |
| | • Liabilities Assumed as Purchase Price<br>200105052 200107007 200108017 200121028 200123042 200123046 200125066 200125067 200125072 200125074 200125075 200125076 200125078 200125080 200126011 200126014 200132024 200209010 200219014 200208004 200229009 200229009 200229009 200229009 200229009 200229010 200229010 200229010 200229010 200229010 | 1012.06-00 |
| | • Conversion of Property<br>200133001 | 1012.14-00 |
| **Section 1014** | **Basis of Property Acquired From a Decedent** | **1014.00-00** |
| | • Appreciated Property Acquired By Decedent by Gift Within One Year of Death<br>200210051 | 1014.06-00 |
| **Section 1015** | **Basis of Property Acquired by Gift or Transfer in Trust**<br>200105039 200105044 200116016 200118038 200234043 200234043 200234043 200234043 200202033 200221032 200236030 200236030 | **1015.00-00** |
| | • Transfer in Trust After December 31, 1920<br>200113007 200117002 200127023 200127037 200213014 | 1015.03-00 |
| | • *Basis in Hands of Trustee or Beneficiaries of an Irrevocable Trust*<br>200120016 | *1015.03-01* |
| **Section 1016** | **Adjustment v. No Adjustment to Basis** | **1016.00-00** |

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| | • Organizations Previously Exempt<br>200133001 | 1016.03-00 |
| | • Improvements, Additions, Other Capital Charges<br>200229014 200229014 200229014 200229014 200229014 | 1016.07-00 |
| **Section 1031** | **Exchange of Property Held for Productive Use or Investment**<br>200105004 200118023 200131014 200137032 200151017 200209010 200148042 200201007 200201007 200203033 200203042 200208004 | **1031.00-00** |
| | • Like Kind Property<br>200224004 | 1031.02-00 |
| | • Like Kind Real Estate<br>200111025 200137003 200219006 | 1031.03-00 |
| | • Deferred Exchanges<br>200109022 200130001 200211016 200236026 200236026 | 1031.05-00 |
| | • Multi-Party Exchanges<br>200126007 | 1031.06-00 |
| **Section 1032** | **Exchange of Stock for Property (Recognition v. Nonrecognition)**<br>200143001 200232028 | **1032.00-00** |
| **Section 1033** | **Involuntary Conversion**<br>200109005 200118010 200126010 200127001 200236003 200236003 | **1033.00-00** |
| | • General Rule<br>200147053 | 1033.01-00 |
| | • Definition of Involuntary Conversion Events<br>200145001 200217001 200219006 | 1033.02-00 |
| **Section 1041** | **Transfers of Property Between Spouses or Incident to Divorce**<br>200120007 200233022 200221042 | **1041.00-00** |
| | • Transfers Incident to Divorce<br>200120016 200221021 | 1041.01-00 |
| **Section 1042** | **Sales of Stock to Employee Stock Ownership Plans or Certain Cooperatives**<br>200151008 200151010 200234003 200234003 200234003 200234003 | **1042.00-00** |
| **Section 1059** | **Corporate Shareholder's Basis in Stock Reduced by Non-taxed Portion of Extraordinary Dividends** | **1059.00-00** |
| | • In General | 1059.01-00 |
| | *• Reduction in Basis Rule*<br>200218004 | *1059.01-01* |
| **Section 1060** | **Special Allocation Rules for Certain Asset Acquisitions**<br>200105052 200107007 200108017 200121028 200123042 200123046 200125066 200125067 200125072 200125074 200125075 200125078 200125080 200126011 200126014 200132024 200209010 200219014 200144028 200208004 200229009 200229009 200229009 200229009 200229009 200229010 200229010 200229010 200229010 200229010 | **1060.00-00** |
| | • General Rule/Residual Method | 1060.01-00 |
| | *• Class IV Assets*<br>200144028 | *1060.01-04* |
| **Section 1092** | **Straddles**<br>200130010 200131015 200150012 | **1092.00-00** |
| | • Mixed Straddles | 1092.05-00 |

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|---|---|---|
| | • *Mixed Straddle Account*<br>200120034 200206048 200206049 200212003 | *1092.05-02* |
| | • Hedging Transactions<br>200151011 | 1092.09-00 |
| **Section 1221** | **Capital Asset v. Not a Capital Asset**<br>200151011 200211042 200215037 200218034 | **1221.00-00** |
| | • Copyright, Literacy, Musical, or Artistic Composition, Letter or Memorandum | 1221.03-00 |
| | • *Similar Property*<br>200125003 | *1221.03-01* |
| | • Sale of Entire Business<br>200130002 | 1221.08-00 |
| | • Securities | 1221.12-00 |
| | • *Business Hedges*<br>200146046 200221008 | *1221.12-02* |
| **Section 1222** | **Other Terms Relating to Capital Gains and Losses**<br>200209007 200209008 200215037 | **1222.00-00** |
| **Section 1223** | **Holding Period of Capital Assets**<br>200103001 200103002 200103003 200103049 200105039 200113007 200116016 200120016 200127037 200131028 200234043 200234043 200234043 200234043 200202033 200202078 200210056 200210061 200221032 200230017 200230017 200236030 200236030 | **1223.00-00** |
| | • Decedent and Estate<br>200213014 | 1223.01-00 |
| **Section 1231** | **Property Used in the Trade or Business and Involuntary Conversions (Capital Gain v. Ordinary Income Treatment)**<br>200215037 | **1231.00-00** |
| **Section 1234A** | **Gains or Losses From Certain Terminations**<br>200209007 200209008 | **1234A.00-00** |
| **Section 1235** | **Sale or Exchange of Patents (Capital Transaction v. Not a Capital Transaction)**<br>200219017 200219019 200219020 200219021 200219026 200135015 200135015 200135015 200135015 | **1235.00-00** |
| **Section 1239** | **Gain from Sale of Depreciable Property Between Certain Related Taxpayers**<br>200133030 | **1239.00-00** |
| **Section 1241** | **Cancellation of Lease or Distributor's Agreement (Sale or Exchange v. Not a Sale or Exchange)**<br>200218034 | **1241.00-00** |
| **Section 1245** | **Gain From Dispositions of Certain Depreciable Property** | **1245.00-00** |
| | • General Rule | 1245.01-00 |
| | • *Section 1245 Property*<br>200104031 | *1245.01-03* |
| **Section 1248** | **Gain From Certain Sales or Exchanges of Stock in Certain Foreign Corporations**<br>200104024 | **1248.00-00** |
| | • Non-Recognition Provisions<br>200104024 | 1248.06-00 |
| **Section 1256** | **Section 1256 Contracts Marked to Market** | **1256.00-00** |

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|---|---|---|
| | • Special Rules | 1256.06-00 |
| | • *Property That is Part of a Hedging Transaction* 200151011 | *1256.06-01* |
| **Section 1259** | **Constructive Sales of Appreciated Financial Positions** 200217039 200236045 200236045 | **1259.00-00** |
| **Section 1272** | **Current Inclusion in Income of Original Issue Discount** | **1272.00-00** |
| | • Constant Interest Rate (Economic Accrual) 200142005 | 1272.01-00 |
| | • *Yield To Maturity* 200142005 | *1272.01-03* |
| | • *Put/Call Options* 200142005 | *1272.01-04* |
| | • OID Accrual - Principal Subject to Acceleration | 1272.06-00 |
| | • *Pools* 200145013 | *1272.06-02* |
| **Section 1273** | **Determination of Amount of Original Issue Discount** 200115015 200135011 200135011 200135011 200135011 | **1273.00-00** |
| | • Issue Price | 1273.02-00 |
| | • *Investment Units* 200115015 | *1273.02-06* |
| **Section 1274** | **Determination of Issue Price in the Case of Certain Debt Instruments Issued for Property** | **1274.00-00** |
| | • Debt Instruments Subject to Section 1274 200116008 | 1274.04-00 |
| **Section 1275** | **Other Definitions & Special Rules** | **1275.00-00** |
| | • Definitions | 1275.01-00 |
| | • *Debt Instrument* 200116008 | *1275.01-01* |
| **Section 1276** | **Disposition Gain Representing Accrued Market Discount Treated as Ordinary Income** 200120001 | **1276.00-00** |
| **Section 1278** | **Definitions and Special Rules** | **1278.00-00** |
| | • In General | 1278.01-00 |
| | • *Market Discount Bond* 200120001 | *1278.01-01* |
| | • *Market Discount* 200120001 | *1278.01-02* |
| **Section 1286** | **Tax Treatment of Stripped Bonds** 200130009 200151011 | **1286.00-00** |
| **Section 1291** | **PFIC Interest on Tax Deferral** | **1291.00-00** |
| | • Paying Elections by QEF Shareholders | 1291.06-00 |
| | • *Deemed Dividend Election by Shareholder of Controlled Foreign Corporation* 200124016 | *1291.06-02* |
| **Section 1295** | **Qualified Electing Fund** | **1295.00-00** |
| | • Time For Making Election | 1295.02-00 |

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|---|---|---|
| | • *Retroactive Elections*<br>200212014 | *1295.02-02* |
| **Section 1297** | **Special Rules** | **1297.00-00** |
| | • Stock in Former PFIC<br>200124016 | 1297.02-00 |
| **Section 1301** | **Averaging of Farm Income**<br>200213026 | **1301.00-00** |
| **Section 1311** | **Correction of Error**<br>200143003 200144004 200232001 | **1311.00-00** |
| | • Inconsistent Position v. No Inconsistent Position | 1311.01-00 |
| | • *Taxpayer*<br>200133004 | *1311.01-01* |
| **Section 1341** | **Computation of Tax Where Taxpayer Restores Substantial Amount Held Under Claim of Right**<br>200129001 200235030 200235030 | **1341.00-00** |
| | • Method Used to Compute<br>200102009 | 1341.03-00 |
| **Section 1361** | **Definitions**<br>200105034 200105035 200118046 200130018 200211032 200234062 200234062 200234062 200234062 200135004 200135004 200135004 200135004 200138017 200150009 200215006 200229037 200229037 200229037 200229037 200229037 200229038 200229038 200229038 200229038 200235007 200235007 200235008 200235008 200235009 200235009 200238004 ***200238004 200238005 200238005 200238006 200238006 200238007 200238007 200238008 200238008*** 200238009 ***200238009 200238010 200238010 200238011 200238011 200238012 200238012*** | **1361.00-00** |
| | • Small Business Corporation v. Not a Small Business Corporation<br>200205044 200201005 200201005 | 1361.01-00 |
| | • *Non-Resident Alien as Shareholder*<br>200226031 | *1361.01-03* |
| | • *More than One Class of Stock*<br>200103061 200118046 200130008 200226032 200221035 | *1361.01-04* |
| | • Certain Trusts Permitted as Shareholders | 1361.03-00 |
| | • *Grantor Trusts*<br>200147044 | *1361.03-01* |
| | • *Qualified Subchapter S Trusts*<br>200106017 200106017 200125045 200217011 200227022 200227027 200233020 200140040 200140043 200140046 200218031 200238023 ***200238023*** | *1361.03-02* |
| | • *Electing Small Business Trusts*<br>200103040 200103041 200103042 200103043 200103044 200103045 200103046 200103047 200103048 200103050 200104013 200104014 200227021 | *1361.03-03* |
| | • Qualified Subchapter S Subsidiary<br>200107018 200111026 200112060 200113018 200114022 200120033 200125090 200127019 200145025 200145030 200204011 200205036 200206026 200217053 200219032 200222009 200223004 200223050 200208006 200208012 200218007 200229039 200229039 200229039 200229039 200229039 | 1361.05-00 |

**Section 1362** **Election by Small Business Corporation** **1362.00-00**
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200221003 200221005 200221007 200221024 200236012 200236012

• Eligible v. Ineligible 1362.01-00
200114029 200123058 200217048 200222009

• *Shareholder Consent* *1362.01-01*
200115022

• *Election After Termination* *1362.01-02*
200108023 200139017 200139017 200147038 200218017

• *Late Elections*

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200212023 200215012 200215013 200215014 200215021 200215033 200215038
200215040 200215041 200215046 200218006 200218025 200218026 200218030
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200236015 200237013 200238024 ***200238024 200238027 200238027 200238036***
***200238036***

• Termination of Election — 1362.02-00
200117013 200226009 200215039

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

• *Passive Investment Income* — *1362.02-03*
200102024 200104010 200106030 200106030 200106034 200106034 200111019
200112032 200112035 200114024 200114030 200119028 200122028 200123036
200125089 200128025 200137020 200145019 200205019 200206023 200206030
200206031 200211001 200217008 200217012 200217023 200217034 200217045
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• S Termination Year — 1362.03-00
200145037 200219013 200227028 200207021 200210043 200229039 200229039
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| | • Inadvertent Terminations<br>200101024 200103022 200107021 200107030 200110026 200111018 200112006 200114009 200115020 200115022 200117031 200118025 200119033 200119040 200121033 200123052 200125045 200125061 200125091 200127015 200128032 200129031 200130016 200130020 200131019 200131022 200137040 200145019 200145020 200145028 200145033 200145034 200149027 200151032 200204027 200205004 200205024 200206011 200209019 200217010 200217011 200222016 200223003 200226006 200226027 200227004 200227026 200227027 200227031 200227033 200227034 200227035 200233019 200233020 200234022 200234022 200234022 200234022 200138009 200138016 200139019 200139019 200139024 200139024 200140050 200140070 200144016 200146030 200146051 200147043 200147045 200147046 200148031 200148035 200150017 200201027 200201027 200203057 200207017 200212010 200212011 200215043 200216008 200218007 200221014 200229024 200229024 200229024 200229024 200229024 200235015 200235015 200235016 200235016 200236013 200236013 200237009 200237011 200237012 200237014 200237023 200238021 ***200238021 200238023 200238023*** | 1362.04-00 |
| **Section 1366** | **Pass-Thru of Items to Shareholders**<br>200223052 200207015 200230030 200230030 | **1366.00-00** |
| **Section 1367** | **Adjustment to Basis of Stock of, and Indebtedness Owing, Shareholders**<br>200106009 200106009 200117008 200223052 | **1367.00-00** |
| **Section 1368** | **Distributions**<br>200111004 200117008 | **1368.00-00** |
| | • Accumulated Adjustments Account<br>200110004 | 1368.01-00 |
| **Section 1371** | **Coordination with Subchapter C Rules**<br>200111004 | **1371.00-00** |
| **Section 1374** | **Tax Imposed On Certain Built-In Gains (for Corporations Electing S Status After 12/31/86)**<br>200205028 200134022 200134023 200150009 | **1374.00-00** |
| **Section 1375** | **Tax Imposed On Certain Passive Investment Income**<br>200141028 200147034 200210041 200210042 200210045 200210046 200218033 | **1375.00-00** |
| **Section 1377** | **Definitions and Special Rules**<br>200117008 | **1377.00-00** |
| | • Post-termination Transition Period<br>200223052 200207015 200230030 200230030 | 1377.02-00 |
| **Section 1381** | **Organizations to Which Part Applies**<br>200119016 200123033 200209024 200224017 200210033 | **1381.00-00** |
| **Section 1388** | **Definitions; Special Rules**<br>200206044 200226037 | **1388.00-00** |
| **Section 1394** | **Tax-Exempt Enterprise Zone Facility Bonds**<br>200137004 | **1394.00-00** |
| **Section 1396** | **Empowerment Zone Employment Credit**<br>200214016 | **1396.00-00** |
| **Section 1397E** | **Qualified Zone Academy Bonds**<br>200127044 | **1397E.00-00** |
| **Section 1398** | **Rules Relating to Individual's Title 11 Cases**<br>200127022 | **1398.00-00** |
| | • Cases Under Chapter 7 or 11<br>200217003 | 1398.01-00 |

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|---|---|---|---|
| | • Debtor Succeeds to Tax Attributes of Estate<br>200118003 | 1398.09-00 | |
| **Section 1400B** | **Zero Percent Capital Gains Rate**<br>200102015 | **1400B.00-00** | |
| **Section 1401** | **Rate and Applicability of Self-Employment Tax**<br>200113002 200222008 | **1401.00-00** | |
| **Section 1402** | **Definitions**<br>200212027 | **1402.00-00** | |
| | • Net Earnings From Self-Employment<br>200131002 | 1402.01-00 | |
| | • Ministers, Members of Religious Orders, Christian Science Practitioners (Election)<br>200106015 200106015 200143017 | 1402.05-00 | |
| | • Partner's Taxable Year Ending as the Result of Death | 1402.06-00 | |
| | *• Retirement Payments to Retired Partners*<br>200142004 | *1402.06-01* | |
| **Section 1441** | **Withholding of Tax on Nonresident Aliens (Required v. Not Required)**<br>200219011 | **1441.00-00** | |
| | • Income Subject to Withholding v. Not Subject to Withholding<br>200222001 | 1441.02-00 | |
| **Section 1445** | **Withholding of Tax on Dispositions of United States Real Property Interests (See Also 897.00-00).** | **1445.00-00** | |
| | • Special Rules For Distributions by Corporations, Partnerships, Trusts and Estates<br>200223009 | 1445.07-00 | |
| **Section 1446** | **Withholding Tax Paid by Partnerships with Foreign Partners**<br>200144005 | **1446.00-00** | |
| **Section 1491** | **Imposition of Tax**<br>200128040 | **1491.00-00** | **R** |
| **Section 1492** | **Nontaxable Transfers** | **1492.00-00** | **R** |
| | • Excise Tax Imposed by Section 1491 Shall Not Apply | 1492.01-00 | R |
| | *• Transfer Described in Section 367 or Where Election to Apply Section 367 Principles is Made*<br>200128040 | *1492.01-02* | *R* |
| **Section 1494** | **Payment and Collection**<br>200128040 | **1494.00-00** | **R** |
| **Section 1502** | **Regulations Governing Consolidated Returns (May v. May Not File Consolidated Returns)**<br>200136001 200136001 | **1502.00-00** | |
| | • Liability for Tax<br>200122023 | 1502.06-00 | |
| | • Separate Taxable Income<br>200123048 200149009 | 1502.12-00 | |
| | • Intercompany Transactions<br>200108024 200209025 | 1502.13-00 | |
| | *• Stock of Members*<br>200150008 200232028 | *1502.13-01* | |

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| | • *Obligations of Members*<br>200121013 200122022 | *1502.13-02* |
| | • Loss Disallowance Rule<br>200108009 200110010 200115008 200117025 200118009 200121013 200122022 200128014 200128043 200130004 200137054 200151034 200206050 200209051 | 1502.20-00 |
| | • Consolidated Net Operating Loss Deduction<br>200124007 200209002 200214023 | 1502.21-00 |
| | • Investment Adjustment<br>200128014 200215002 | 1502.32-00 |
| | • Earnings and Profits<br>200225014 | 1502.33-00 |
| | • Life and Non-Life<br>200105002 | 1502.50-00 |
| | • Filing Requirements<br>200101009 200104027 200118006 200123043 200127008 200132036 200220018 200133010 200135041 200135041 200135041 200135041 200136018 200136018 200203059 200238026 ***200238026*** | 1502.75-00 |
| | • *When Group Remains in Existence*<br>200136001 200136001 200232016 | *1502.75-10* |
| | • Taxable Year of Members of Group<br>200101008 200127008 200227001 200136001 200136001 | 1502.76-00 |
| | • Common Parent Agent for Subsidiaries<br>200111003 200122018 200122023 200125031 200125060 200130012 200132001 200203007 200210012 200235011 200235011 | 1502.77-00 |
| | • *Alternative Agents of the Group*<br>200130012 200235011 200235011 | *1502.77-01* |
| | • Exercise of Privilege<br>200137012 | 1502.88-00 |
| | • Application of Section 382 with Respect to a Consolidated Group<br>200203007 | 1502.98-00 |
| **Section 1503** | **Computation and Payment of Taxes**<br>200101007 | **1503.00-00** |
| | • Dual Consolidated Loss<br>200221018 | 1503.04-00 |
| | • *Dual Resident Corporation*<br>200102035 200107026 200111039 200115025 200118051 200119004 200120028 200120029 200121049 200132027 200137025 200149001 200149021 200149023 200205043 200213022 200213023 200213024 200214004 200219027 200227032 200136020 200136020 200136021 200136021 200140074 200146021 200146050 200201028 200201028 200201031 200201031 200203068 200208023 200210062 200216014 200216023 200216024 200229022 200229022 200229022 200229022 200229022 200229029 200229029 200229029 200229029 200229029 200229040 200229040 200229040 200229040 200229040 200229044 200229044 200229044 200229044 200229044 200230027 200230027 200232017 200232026 200236035 200236035 | *1503.04-04* |
| **Section 1504** | **Definitions**<br>200145008 200135032 200135032 200135032 200135032 200201014 200201014 200238029 ***200238029*** | **1504.00-00** |
| | • Includible Corporation v. Not an Includible Corporation | 1504.02-00 |

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|---|---|---|
| | • *Foreign Subsidiary Formed to Comply With Foreign Law May Be An Includible Corporation*<br>200213018 | *1504.02-01* |
| **Section 2001** | **Imposition and Rate of Tax** | **2001.00-00** |
| | • Determination of Amount of Adjusted Taxable Gifts<br>200118002 | 2001.02-00 |
| **Section 2011** | **Credit for State Death Taxes**<br>200108040 | **2011.00-00** |
| **Section 2013** | **Credit for tax on Prior transfers**<br>200218003 | **2013.00-00** |
| **Section 2016** | **Recovery of Taxes Claimed as Credit**<br>200108040 | **2016.00-00** |
| **Section 2031** | **Definition**<br>200128021 200205002 200202032 | **2031.00-00** |
| | • Valuation of Stocks and Bonds for Which There is No Market | 2031.03-00 |
| | • *Open-End Investment Company Shares*<br>200119013 | *2031.03-20* |
| **Section 2032** | **Alternate Valuation**<br>200203031 200236041 200236041 | **2032.00-00** |
| | • Exercise of Election<br>200227029 200234037 200234037 200234037 200234037 | 2032.01-00 |
| **Section 2032A** | **Valuation of Farm Real Property**<br>200143014 | **2032A.00-00** |
| | • Method of Election | 2032A.08-00 |
| | • *Perfecting Elections and Agreements*<br>200234055 200234055 200234055 200234055 | *2032A.08-04* |
| **Section 2033** | **Property in Which Decedent Had an Interest**<br>200101021 200108032 200112023 200113006 200123055 200127037 200128035 200223013 200223014 200210051 200231011 200231011 | **2033.00-00** |
| | • Interest v. No Interest at Time of Death<br>200105044 | 2033.01-00 |
| | • Life Estate<br>200213014 | 2033.09-00 |
| **Section 2035** | **Adjustments for Certain Gifts Made Within 3 Years of Decedent's Death** | **2035.00-00** |
| | • Inclusion of Certain Property in Gross Estate<br>200127042 | 2035.01-00 |
| | • Inclusion of Gift Tax in Gross Estate<br>200122011 | 2035.02-00 |
| **Section 2036** | **Transfers With Retained Life Estate (Included v. Not Included in Gross Estate)**<br>200103001 200103002 200103003 200103049 200113006 200120021 200123034 200125038 200127037 200205002 200213013 200203045 200210018 | **2036.00-00** |
| | • Retention of Right to Designate Who Shall Enjoy Property or Income<br>200138018 | 2036.02-00 |
| | • Life Insurance Trusts<br>200127042 | 2036.07-00 |

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| | • Transfer v. Not a Transfer<br>200213014 | 2036.11-00 |
| | • Amount Included<br>200210009 | 2036.23-00 |
| **Section 2037** | **Transfers Taking Effect at Death (Included v. Not Included in Gross Estate)**<br>200113006 200213014 | **2037.00-00** |
| **Section 2038** | **Revocable Transfers (Included v. Not Included in Gross Estate)**<br>200101021 200113006 200123034 200125038 200205002 200213013 200213014 200210051 | **2038.00-00** |
| | • Insurance Trusts<br>200127042 | 2038.04-00 |
| **Section 2039** | **Annuities (Included v. Not Included in Gross Estate)**<br>200105058 200112023 | **2039.00-00** |
| | • Amount to Be Included<br>200210009 | 2039.02-00 |
| **Section 2040** | **Joint Interests (Included v. Not Included in Gross Estate)**<br>200104008 | **2040.00-00** |
| **Section 2041** | **Powers of Appointment (Included v. Not Included in Gross Estate)**<br>200105039 200105044 200112031 200124006 200125038 200206045 200219028 200219029 200219034 200225015 200144018 200150020 200210038 200210051 200210056 200210061 200229013 200229013 200229013 200229013 200229013 | **2041.00-00** |
| | • Pre-1942 Powers<br>200127037 200205033 | 2041.01-00 |
| | • General Power v. Not a General Power<br>200101021 200123045 200227020 200234047 200234047 200234047 200234047 | 2041.03-00 |
| **Section 2042** | **Proceeds of Life Insurance (Included v. Not Included in Gross Estate)**<br>200127042 200147039 | **2042.00-00** |
| | • Insurance Receivable by Other Beneficiaries | 2042.04-00 |
| | *• Insurance or Purchase of Decedent's Interest in Business*<br>200214028 | *2042.04-03* |
| | • Possession of Incidents of Ownership<br>200111038 | 2042.05-00 |
| **Section 2044** | **Certain Property for which Marital Deduction was Previously Allowed**<br>200205002 200219003 200223020 200223047 200203045 200236021 200236021 | **2044.00-00** |
| | • Inclusion of Property in which Decedent had Qualifying Income Interest for Life | 2044.01-00 |
| | *• Deduction Allowed with Respect to Transfer of Property to Decedent under Section 2056 or 2523*<br>200224016 | *2044.01-01* |
| **Section 2053** | **Expenses, Indebtedness, and Taxes (Deductible v. Not Deductible)**<br>200104008 200132004 | **2053.00-00** |
| | • Claims Against the Estate | 2053.09-00 |
| | *• Claim Extinguished - Effect of Post Death Events*<br>200217022 | *2053.09-13* |

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| **Section 2055** | **Transfers for Public, Charitable, and Religious Uses(Deductible v. Not Deductible)**<br>200116007 200120002 200120003 200204022 200223013 200223014 200234038 200234038 200234038 200234038 200229046 200229046 200229046 200229046 200230018 200230018 200232015 | **2055.00-00** |
| | • To U.S., any State, Territory, Political Subdivision, or District of Columbia<br>200128005 | 2055.01-00 |
| | • To Trustee or Fraternal Society for Charitable Purposes<br>200127007 | 2055.03-00 |
| | • *Presently Ascertainable Charitable Remainder*<br>200227015 | *2055.03-03* |
| | • Transfers Not Exclusively for Charitable Purposes | 2055.07-00 |
| | • *Transfers Subject to Condition*<br>200202032 | *2055.07-02* |
| | • Disclaimers<br>200149015 | 2055.08-00 |
| | • Modification of Will<br>200127038 | 2055.09-00 |
| | • *Compromise*<br>200128005 | *2055.09-01* |
| | • Charitable and Noncharitable Interest (Tax Reform Act of 1969)<br>200127038 200232015 | 2055.12-00 |
| | • *Unitrust Lead Interest*<br>200218029 | *2055.12-06* |
| | • *Guaranteed Annuity Lead Interest*<br>200230022 200230022 | *2055.12-07* |
| | • *Reformations of Nonqualifying Interests*<br>200105059 200122045 200224006 200201026 200201026 200230022 200230022 200232015 | *2055.12-10* |
| | • Transfers of Easements in Real Property<br>200143011 | 2055.14-00 |
| **Section 2056** | **Bequests, etc., to Surviving Spouse (Marital Deduction v. No Marital Deduction)**<br>200104008 200106008 200106008 200127027 200132004 200211028 200219003 200223013 200223014 200234017 200234017 200234017 200234017 200236021 200236021 | **2056.00-00** |
| | • Terminable Interests<br>200131001 | 2056.01-00 |
| | • *Life Estate*<br>200125012 200222024 200224016 | *2056.01-01* |
| | • Qualified Terminable Interest Property<br>200119030 200130034 200226020 200218003 | 2056.07-00 |
| | • *Effective Election*<br>200112009 200117007 200133015 200143013 200229043 200229043 200229043 200229043 200229043 200232030 200236017 200236017 | *2056.07-01* |
| | • Special Rule for Charitable Remainder Trusts<br>200127038 200204022 200232015 | 2056.08-00 |
| | • Disallowance of Deduction Where Surviving Spouse Not U.S. Citizen | 2056.19-00 |

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| | • *Exception For Property Transferred to Qualified Domestic Trust*<br>200146015 | *2056.19-02* |
| **Section 2056A** | **Qualified Domestic Trusts (Deductible v. Not Deductible)**<br>200132013 | **2056A.00-00** |
| | • Effective Election<br>200211021 | 2056A.04-00 |
| **Section 2205** | **Reimbursement Out of Estate** | **2205.00-00** |
| | • Apportionment of Tax According to State Law<br>200206024 | 2205.01-00 |
| **Section 2207A** | **Right of Recovery in the Case of Certain Marital Deduction Property**<br>200223047 | **2207A.00-00** |
| | • Recovery With Respect to Estate Tax<br>200127007 | 2207A.01-00 |
| | • Recovery With Respect to Gift Tax<br>200106029 200106029 200116006 200137022 200224016 200230017 200230017 | 2207A.02-00 |
| **Section 2209** | **Certain Residents of Possessions Considered NonresidentD Not Citizens of the United States**<br>200105048 | **2209.00-00** |
| **Section 2501** | **Imposition of Gift Tax (Imposed v. Not Imposed)**<br>200101021 200103001 200103002 200103003 200103007 200103049 200105039 200105048 200105048 200112023 200113006 200116016 200119047 200123055 200127027 200127037 200128035 200213011 200213013 200223019 200224001 200227020 200234043 200234043 200234043 200234043 200133002 200141022 200148028 200150020 200202033 200203045 200210018 200210051 200210056 200212006 200221032 200229018 200229018 200229018 200229018 200229018 200231011 200231011 200236030 200236030 | **2501.00-00** |
| | • Gift v. Not a Gift<br>200105044 200203045 200210029 200229013 200229013 200229013 200229013 200229013 | 2501.01-00 |
| **Section 2503** | **Taxable Gifts (Annual Exclusion Allowed v. Not Allowed)** | **2503.00-00** |
| | • Trusts for Minor Beneficiaries | 2503.11-00 |
| | • *Withdrawal Powers ("Crummey" Issue)*<br>200123034 200130030 | *2503.11-06* |
| **Section 2511** | **Transfers in General (Gift v. Not a Gift)**<br>200105049 200113007 200122011 200128011 200213011 200141022 200148028 200202033 200202036 200212006 | **2511.00-00** |
| | • Consideration<br>200209007 200209008 | 2511.02-00 |
| | • Cessation of Donor's Dominion and Control<br>200122045 | 2511.03-00 |
| | • Gifts Indirectly Made<br>200143004 | 2511.04-00 |
| | • Transfer of Life Estate or Other Right Over Income<br>200106029 200106029 | 2511.10-00 |
| | • Gift of Remainder<br>200118031 200220014 200220015 200238039 ***200238039*** | 2511.11-00 |
| | • Renunciation of Testate or Intestate Share<br>200109041 | 2511.18-00 |

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| **Section 2512** | **Valuation of Gifts**<br>200122036 200223013 200223014 200233022 200212006 | **2512.00-00** |
| | • Closely Held Stock<br>200143004 | 2512.08-00 |
| **Section 2513** | **Gifts by Husband or Wife to Third Party (Gift Splitting) (Allowed v. Not Allowed)**<br>200130030 200205027 200213013 200147021 | **2513.00-00** |
| | • Joint and Several Liability<br>200205027 | 2513.03-00 |
| **Section 2514** | **Powers of Appointment (Transfer v. Not a Transfer)**<br>200105039 200105044 200112031 200144018 200148028 200150020 | **2514.00-00** |
| | • Power Created on or Before October 21, 1942<br>200127037 200205033 | 2514.01-00 |
| | • Definition of General Power of Appointment<br>200104023 200234047 200234047 200234047 200234047 | 2514.03-00 |
| **Section 2515** | **Treatment of Generation-Skipping Transfer Tax**<br>200147021 | **2515.00-00** |
| **Section 2516** | **Certain Property Settlements (Exempt v. Not Exempt >From Gift Tax)**<br>200221021 200221042 | **2516.00-00** |
| | • Settlement of Marital or Property Rights<br>200120016 | 2516.01-00 |
| **Section 2518** | **Disclaimers**<br>200105058 200122036 200204022 200225015 200208028 200208029 200208030 200208033 200232015 | **2518.00-00** |
| | • Requirements for a Qualified Disclaimer<br>200127007 | 2518.01-00 |
| | • Disclaimer of Less than an Entire Interest<br>200130034 200230022 200230022 | 2518.02-00 |
| | • Undivided Portion of an Interest<br>200149015 | 2518.03-00 |
| **Section 2519** | **Disposition of Certain Life Estates**<br>200106029 200106029 200116006 200122025 200122036 200137022 200223047 200224016 200230017 200230017 200236021 200236021 | **2519.00-00** |
| **Section 2522** | **Charitable and Similar Gifts (Deductible v. Not Deductible)**<br>200108032 200223013 200223014 200226012 200138018 | **2522.00-00** |
| | • Transfer Not Exclusively for Charitable etc. Purposes | 2522.02-00 |
| | *• Transfer of Partial Interests*<br>200122011 | *2522.02-01* |
| | *• Charitable Remainder Trusts*<br>200108035 200205008 200140027 200207026 200215032 | *2522.02-03* |
| | *• Guaranteed Annuity and Unitrust Interests*<br>200149016 | *2522.02-04* |
| | • Reformations<br>200122045 | 2522.03-00 |
| **Section 2523** | **Gift to Spouse (Marital Deduction Allowed v. Not Allowed)**<br>200101021 200223013 200223014 200210051 | **2523.00-00** |

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| **Section 2601** | **Tax On Generation Skipping Transfers**<br>200101011 200101015 200102039 200102040 200103001 200103002 200103003 200103007 200103012 200103049 200105039 200105058 200107003 200108011 200108015 200109015 200112031 200112036 200112037 200112038 200112040 200112041 200112042 200112043 200112044 200112046 200112047 200112048 200112049 200112050 200113006 200113007 200116016 200118038 200119027 200119047 200123045 200124006 200124012 200125038 200125070 200125077 200125079 200125082 200125085 200125086 200125087 200126013 200127037 200128035 200132015 200132016 200206045 200209022 200209033 200209034 200209037 200209038 200211008 200213011 200213013 200213014 200214002 200214012 200214019 200214020 200219028 200219029 200223019 200224001 200225029 200226042 200234043 200234043 200234043 200234043 200133002 200134012 200135007 200135007 200135007 200135007 200141022 200141024 200143019 200144008 200146042 200146045 200147028 200147042 200148034 200148041 200150016 200202033 200203029 200203030 200210029 200210054 200210056 200215001 200218023 200218035 200221032 200229013 200229013 200229013 200229013 200229013 200229018 200229018 200229018 200229018 200229018 200229034 200229034 200229034 200229034 200229034 200230038 200230038 200231011 200231011 200236030 200236030 200238034 ***200238034*** | **2601.00-00** |
| | • Exceptions<br>200203029 | 2601.03-00 |
| | • *Irrevocable Trusts*<br>200116031 200117002 200119023 200123012 200123013 200123014 200125037 200211034 200217035 200222012 200234062 200234062 200234062 200234062 200201017 200201017 200201020 200201020 200203029 200207018 200229041 200229041 200229041 200229041 200229041 200229042 200229042 200229042 200229042 200229042 | *2601.03-01* |
| | • *Additions to Irrevocable Trusts*<br>200120007 | *2601.03-05* |
| | • *Constructive Additions*<br>200105044 | *2601.03-08* |
| | • Transitional Rules | 2601.04-00 |
| | • *Wills or Revocable Trusts Executed Before October 22, 1986*<br>200104023 200217036 200217037 200227020 | *2601.04-01* |
| | • *Amendments to Wills or Revocable Trusts*<br>200209007 200209008 200234047 200234047 200234047 200234047 | *2601.04-03* |
| | • *Cases of Mental Incompetency*<br>200119029 200119031 200209032 200209035 200209036 200209039 200209042 200209043 200209045 200230019 200230019 | *2601.04-05* |
| **Section 2613** | **Skip Person and Non-Skip Person**<br>200215001 | **2613.00-00** |
| **Section 2631** | **GST Exemption**<br>200227022 | **2631.00-00** |
| **Section 2632** | **Special Rules for Allocation of GST Exemption**<br>200102014 200224018 200218001 | **2632.00-00** |
| | • Time and Manner of Allocation<br>200223016 200227017 200212024 200212025 200218010 200218011 200218012 200218015 200235013 200235013 | 2632.01-00 |
| | • Deemed Allocation to Certain Lifetime Direct Skips<br>200201002 200201002 200201003 200201003 | 2632.02-00 |
| | • Allocation of Unused GST Exemption<br>200112009 | 2632.03-00 |

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| **Section 2642** | **Inclusion Ratio**<br>200118043 200213014 200233021 200229032 200229032 200229032 200229032 200229032 200229033 200229033 200229033 200229033 200229033 200236016 200236016 200236019 200236019 200236020 200236020 200237021 200238003 ***200238003 200238018 200238018 200238028 200238028 200238035 200238035*** | **2642.00-00** |
| | • Inclusion Ratio Defined<br>200234026 200234026 200234026 200234026 200236004 200236004 | 2642.01-00 |
| | • Treatment of Certain Direct Skips Which Are Nontaxable Gifts<br>200114026 | 2642.03-00 |
| | • Special Rule For Charitable Lead Annuity Trusts<br>200107015 | 2642.05-00 |
| **Section 2651** | **Generation Assignment**<br>200150003 | **2651.00-00** |
| **Section 2652** | **Other Definitions**<br>200123045 200215001 200236021 200236021 | **2652.00-00** |
| | • Transferor Defined<br>200107015 200120019 | 2652.01-00 |
| | *• Gift Splitting by Married Couples*<br>200130030 200218001 | *2652.01-01* |
| | *• Special Election for QTIP*<br>200109007 200111007 200112009 200117007 200118037 200125040 200205040 200214011 200226026 200226041 200208018 200215026 200229043 200229043 200229043 200229043 200229043 200230024 200230024 200231010 200231010 200232027 200232030 | *2652.01-02* |
| | • Interest Defined<br>200232027 | 2652.03-00 |
| **Section 2654** | **Special Rules**<br>200118043 | **2654.00-00** |
| | • Basis Adjustment<br>200125040 | 2654.01-00 |
| | • Separate Shares<br>200117007 200226026 | 2654.03-00 |
| **Section 2701** | **Special Valuation Rules for Transfers of Interests in Corporations or Partnerships** | **2701.00-00** |
| | • Valuation Rules<br>200138028 | 2701.01-00 |
| | • Applicable Retained Interests<br>200138028 | 2701.04-00 |
| | • Qualified Payments<br>200114004 | 2701.07-00 |
| **Section 2702** | **Special Valuation Rules for Transfers in Trust**<br>200112023 200116006 200121015 200137022 200223047 200224016 200229018 200229018 200229018 200229018 200229018 200230003 200230003 200230017 200230017 | **2702.00-00** |
| | • Exceptions | 2702.02-00 |
| | *• Personal Residence in Trust*<br>200109017 200112018 200117021 200118031 200126026 200211036 200220014 200220015 | *2702.02-02* |

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| **Section 2703** | **Certain Rights and Restrictions Disregarded**<br>200103038 200122024 | **2703.00-00** |
| | • General Rule | 2703.01-00 |
| | • *Right to Sell or Use Restrictions*<br>200143004 | *2703.01-02* |
| | • Exceptions<br>200143004 | 2703.02-00 |
| **Section 2704** | **Treatment of Lapsing Rights and Restrictions** | **2704.00-00** |
| | • Certain Restrictions on Liquidations Disregarded<br>200143004 | 2704.02-00 |
| **Section 3102** | **Deduction of Tax From Wages; Liability for and Payment of Tax**<br>200108010 | **3102.00-00** |
| **Section 3121** | **Definitions**<br>200222029 200235029 200235029 | **3121.00-00** |
| | • Wages<br>200108010 | 3121.01-00 |
| | • *Back Pay*<br>200214001 | *3121.01-01* |
| | • *Payment Under Employers' Plans for Retirement, Disability, Death, etc.*<br>200124003 200133009 | *3121.01-12* |
| | • *Tax-Exempt Trusts and Certain Annuity Plans*<br>200234009 200234009 200234009 200234009 200210014 | *3121.01-15* |
| | • *Standby Employee Wages*<br>200206053 | *3121.01-17* |
| | • Employment<br>200211005 200136019 200136019 | 3121.02-00 |
| | • *Voluntary Coverage of State, etc., Employees*<br>200206053 | *3121.02-06* |
| | • *Mandatory Coverage of State, etc., Employees*<br>200128018 200206053 | *3121.02-07* |
| | • *Services of Ministers or Members of an Order*<br>200106015 200106015 200143017 | *3121.02-08* |
| | • *Student Employee of School, etc.*<br>200123001 200145040 200212029 200215048 | *3121.02-10* |
| | • Employees<br>200118008 200126004 200129004 200222005 200146006 200215053 | 3121.04-00 |
| | • *Common Law Tests*<br>200113024 200117003 200119035 200129014 200206053 200234007 200234007 200234007 200234007 200147006 | *3121.04-01* |
| | • *Insurance Salesmen*<br>200203005 | *3121.04-18* |
| | • Employer v. Not an Employer<br>200113024 200125008 | 3121.05-00 |
| | • Not Employees Under Section 530 of 1978 Revenue Act | 3121.10-00 |
| | • *In General*<br>200211037 | *3121.10-01* |

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| | • Application of Hospital Insurance Tax to Federal, State, and Local Government<br>200206053 200147006 | 3121.15-00 |
| | • Treatment of Certain Deferred Compensation and Salary Reduction Arrangements<br>200117038 | 3121.16-00 |
| | • *Employer Contributions*<br>200124017 200229017 200229017 200229017 200229017 200229017 | *3121.16-01* |
| | • Benefits Provided Under Certain Employee Benefit Plans<br>200117038 | 3121.17-00 |
| **Section 3231** | **Definitions** | **3231.00-00** |
| | • Employers v. Not Employers<br>200149022 200149024 200149025 200151002 200151016 200205030 200206020 200211038 200211039 200214006 200214008 200214009 200214010 200217019 200140001 200140002 200140003 200140004 200140005 200140006 200140007 200140008 200140009 200140010 200140012 200140013 200140014 200140016 200140022 200140023 200140024 200140025 200140041 200141001 200141002 200141004 200141005 200141006 200141007 200141008 200141009 200141029 200141030 200141031 200141032 200143002 200146002 200146003 200146004 200146005 200146007 200147001 200147002 200147003 200147016 200147017 200148007 200148008 200148011 200148018 200148019 200148026 200148029 200148045 200148046 200148047 200148048 200150005 200150006 200202050 200203023 200203024 200203025 200203028 200210016 | 3231.01-00 |
| **Section 3306** | **Definitions** | **3306.00-00** |
| | • Wages<br>200108010 | 3306.02-00 |
| | • Employment<br>200125008 200136019 200136019 | 3306.03-00 |
| | • *Services for U.S. or an Instrumentality Excepted*<br>200238001 ***200238001*** | *3306.03-01* |
| | • Employees<br>200118008 200126004 200129004 200222005 200234007 200234007 200234007 200234007 | 3306.05-00 |
| **Section 3401** | **Definitions**<br>200103075 | **3401.00-00** |
| | • Wages Subject to Withholding<br>200108010 | 3401.01-00 |
| | • Renumeration Not Subject to Withholding | 3401.02-00 |
| | • *Exclusions From Wages*<br>200106015 200106015 200143017 | *3401.02-01* |
| | • Employer-Employee Relationship<br>200118008 200126004 200129004 200222005 | 3401.04-00 |
| | • *Employer v. Not an Employer*<br>200108010 200128018 200214001 200233004 200146006 | *3401.04-01* |
| | • *Employee v. Not an Employee*<br>200119035 200129014 200234007 200234007 200234007 200234007 | *3401.04-02* |
| | • Number of Withholding Exemptions Claimed<br>200206053 | 3401.05-00 |
| | • Not Employees Under Section 530 of 1978 Revenue Act | 3401.06-00 |

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| | • *In General*<br>200129008 | *3401.06-01* |
| **Section 3402** | **Income Tax Collected at Source**<br>200108010 | **3402.00-00** |
| | • Employee Incurring No Income Tax Liability<br>200206053 | 3402.10-00 |
| | • Withholding on Payments of Indian Casino Profits<br>200222003 | 3402.20-00 |
| **Section 3405** | **Special Rules for Pensions, Annuities, and Certain Other Deferred Income**<br>200124001 200128061 | **3405.00-00** |
| **Section 3406** | **Backup Withholding**<br>200107027 200121072 200124001 200206053 | **3406.00-00** |
| | • Reportable Payment<br>200226018 | 3406.02-00 |
| **Section 3504** | **Acts to be Performed by Agents**<br>200149034 | **3504.00-00** |
| **Section 4051** | **Imposition of Tax on Heavy Trucks and Trailers Sold at Retail (Taxable v. Non-Taxable)**<br>200119024 200126002 200227005 200146024 200202021 200202068 200215004 200221019 200237002 | **4051.00-00** |
| **Section 4053** | **Exemptions**<br>200125033 | **4053.00-00** |
| **Section 4081** | **Gasoline and Diesel Fuels**<br>200118012 200120005 | **4081.00-00** |
| **Section 4161** | **Sporting Goods Taxes**<br>200221015 | **4161.00-00** |
| | • Sport Fishing Equipment<br>200103005 | 4161.01-00 |
| **Section 4251** | **Communications Tax (Taxable v. Not Taxable)**<br>200227008 200133008 | **4251.00-00** |
| **Section 4252** | **Definitions**<br>200149012 | **4252.00-00** |
| **Section 4253** | **Exemptions** | **4253.00-00** |
| | • Common Carriers and Communication Companies<br>200149012 200227008 | 4253.06-00 |
| **Section 4261** | **Transportation of Persons by Air (Taxable v. Nontaxable)**<br>200122006 200203019 | **4261.00-00** |
| **Section 4282** | **Transportation by Air for Other Members of Affiliated Group**<br>200123002 | **4282.00-00** |
| **Section 4371** | **Foreign Insurers Policies Tax (Taxable v. Not Taxable)**<br>200119051 200122044 200132032 200224025 200216010 200216029 200236023 200236023 | **4371.00-00** |
| | • Reinsurance<br>200117040 | 4371.03-00 |
| **Section 4471** | **Transportation By Water**<br>200123018 | **4471.00-00** |

**Section 4940** **Excise Tax on Net Investment Income (Applicable v. Not Applicable)** **4940.00-00**
200103076 200103082 200103085 200104032 200106040 200106040 200107036 200115038 200116048 200117041 200117042 200123069 200123071 200124023 200127052 200137060 200151052 200151053 200151057 200204042 200204053 200205048 200205049 200206057 200224035 200233027 200233028 200233029 200233030 200234065 200234065 200234065 200234065 200234066 200234066 200234066 200234066 200234066 200234067 200234067 200234067 200234067 200234068 200234068 200234068 200234068 200234072 200234072 200234072 200234072 200138029 200140083 200140084 200140086 200141058 200148066 200216033 200238050 ***200238050***

• Alternative Excise Tax on Non-Exempt Private Foundations 4940.01-00
200101035 200112064 200112065 200204044 200204046 200204047

• Computation of Net Investment Income 4940.02-00
200133048

• *Gross Investment Income--Items Included* *4940.02-01*
200204039 200221050

• *Exclusions, Deductions, and Special Rules* *4940.02-02*
200137063

**Section 4941** **Excise Taxes on Acts of Self-Dealing** **4941.00-00**
200103076 200103085 200112064 200112065 200114036 200114037 200117016 200123069 200123071 200124023 200124024 200124029 200125092 200125093 200132037 200149040 200151052 200151053 200204039 200219036 200219039 200225042 200227043 200135047 200135047 200135047 200135047 200141058 200141061 200143028 200148066 200148069 200150031 200207028 200207029 200218036 200218041 200218042 200232033

• Special Rules as to Liability 4941.03-00
200219036 200219039 200218036 200218041 200218042 200221050 200232033

• Definition of Self-Dealing 4941.04-00
200102055 200103082 200104032 200106040 200106040 200107036 200107039 200111051 200111052 200114040 200115038 200116047 200116048 200117041 200117042 200121078 200123072 200126033 200129041 200137060 200137063 200151057 200204042 200204044 200204046 200204047 200204053 200205048 200205049 200206057 200213028 200217056 200219036 200219038 200219039 200222034 200222037 200222038 200224033 200225037 200225042 200225045 200227044 200233027 200233028 200233029 200233030 200233031 200234065 200234065 200234065 200234065 200234066 200234066 200234066 200234066 200234067 200234067 200234067 200234067 200234068 200234068 200234068 200234068 200234072 200234072 200234072 200133048 200134033 200138029 200140083 200140084 200140085 200140086 200141063 200141064 200148071 200148072 200148080 200208039 200216032 200216033 200218041 200218042 200221050 200232033 200232036 200238050 ***200238050 200238053 200238053***

**Section 4942** **Taxes on Failure to Distribute Income** **4942.00-00**
200101035 200112064 200112065 200114036 200114037 200114038 200123069 200123071 200124023 200125092 200125093 200209061 200224035 200216032

• Definitions of Principal Terms 4942.03-00
200136029 200136029

• *Undistributed Income* *4942.03-01*
200133048

• *Distributable Amount* *4942.03-02*
200204039 200204044 200204046 200204047

• *Minimum Investment Return* *4942.03-03*
200103082 200107036 200107039 200205049 200148078 200207031

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| | • *Qualifying Distribution*<br>200103082 200104032 200104036 200104037 200106040 200106040 200107036 200107039 200115038 200116048 200117041 200121078 200137060 200137063 200204039 200204042 200204053 200205049 200209055 200233027 200233028 200233029 200233030 200234065 200234065 200234065 200234065 200234066 200234066 200234066 200234066 200234067 200234067 200234067 200234067 200234068 200234068 200234068 200234072 200234072 200234072 200234072 200138029 200140083 200140084 200140086 200207031 200212034 200238050 ***200238050*** | *4942.03-05* |
| | • *Set-Asides*<br>200104034 200107041 200116054 200118055 200121077 200132041 200149039 200204037 200224031 200224032 200225036 200134030 200147057 200150037 200207030 200212034 200230040 200230040 200235036 200235036 | *4942.03-07* |
| | • Other Definitions<br>200232036 | 4942.04-00 |
| | • Operating Foundations | 4942.05-00 |
| | • *Active Conduct of Exempt Purpose Activities*<br>200126033 | *4942.05-01* |
| | • *Functionally Related Business*<br>200148078 | *4942.05-02* |
| **Section 4943** | **Excise Taxes on Excess Business Holdings**<br>200103082 200116048 200119062 200137060 200204042 200204044 200204046 200204047 200204053 200233027 200233028 200233029 200234065 200234065 200234065 200234065 200234066 200234066 200234066 200234066 | **4943.00-00** |
| | • Definition of Excess Business Holdings<br>200117042 200137063 200204039 | 4943.03-00 |
| | • *Permitted Holdings*<br>200134026 200136025 200136025 200148078 | *4943.03-01* |
| | • Other Definitions and Rules<br>200119062 200136025 200136025 | 4943.04-00 |
| | • *Business Enterprise*<br>200222034 200136025 200136025 200148078 200202077 | *4943.04-03* |
| **Section 4944** | **Excise Tax on "Jeopardizing" Investments**<br>200103076 200103082 200103085 200107036 200107039 200115038 200116048 200123069 200123071 200124023 200137060 200137063 200204039 200204042 200204044 200204046 200204047 200204053 200205048 200205049 200206057 200233027 200233028 200233029 200233030 200234065 200234065 200234065 200234065 200234066 200234066 200234066 200234066 200234072 200234072 200234072 200234072 200140084 200140086 200141061 200148069 200150031 200218038 200232036 | **4944.00-00** |
| | • Exception for Program-Related Investments<br>200117042 200222034 200136026 200136026 200148078 200218038 | 4944.03-00 |
| | • Definitions<br>200104032 200151057 | 4944.05-00 |

**Section 4945** **Excise Taxes on Taxable Expenditures** **4945.00-00**
200101035 200102054 200103080 200103081 200114036 200114037 200115041 200116045 200119063 200120044 200123069 200123071 200123073 200124023 200125092 200125093 200127048 200127050 200130050 200132037 200151048 200204042 200204053 200217057 200219036 200219039 200224030 200227039 200233026 200134029 200135046 200135046 200135046 200135046 200135047 200135047 200135047 200135047 200141048 200141050 200141051 200141052 200141054 200141055 200141062 200143028 200148056 200148058 200148059 200148060 200148062 200148063 200148070 200150029 200150031 200218036 200218041 200218042 200230041 200230041 200235037 200235037 200238054 ***200238054***

• Initial 10% Tax on Expenditures 4945.01-00
200102054 200127048 200127050

• Definition of Taxable Expenditure 4945.04-00
200104032 200106041 200106041 200117042 200117046 200137063 200204039 200219036 200219039 200222037 200222038 200225045 200227044 200136026 200136026 200138029 200141056 200148064 200218036 200218041 200218042 200232036

• *Grants to Individuals* *4945.04-04*
200102057 200114041 200114042 200117046 200122049 200126033 200131030 200131031 200221052

• *Grants to Organizations* *4945.04-05*
200121078 200126033 200129041 200222034 200140083 200140084

• *Expenditure Responsibility* *4945.04-06*
200103076 200103082 200103085 200104036 200104037 200107036 200107039 200115038 200116048 200117041 200129041 200137060 200137063 200151057 200204044 200204046 200204047 200205048 200205049 200206057 200209055 200222034 200233027 200233028 200233029 200233030 200234065 200234065 200234065 200234065 200234066 200234066 200234066 200234066 200234067 200234067 200234067 200234067 200234068 200234068 200234068 200234068 200234072 200234072 200234072 200133048 200140085 200140086 200216032 200216033 200238050 ***200238050***

• Other Definitions 4945.05-00
200106041 200106041

**Section 4946** **Definitions and Special Rules** **4946.00-00**
200114040 200126033

• Disqualified Person 4946.01-00
200107036 200124029 200204039 200213028

• Foundation Manager 4946.02-00
200117041 200137063 200149040 200151052 200151053 200204044 200204046 200204047 200213028 200133048 200138029

**Section 4947** **Treatment of Certain Nonexempt Trusts as Charitable Foundations** **4947.00-00**
200223008

• All Unexpired Interests Devoted to Section 170(c)(2)(B) Purposes 4947.01-00
200235035 200235035

• Split-Interest Trusts 4947.02-00
200143028

• *Exclusions Involving Status of Income Interests* *4947.02-01*
200224035

**Section 4948** **Special Tax Rules for Certain Foreign Organizations** **4948.00-00**
200226012

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| **Section 4951** | **Taxes on Self-Dealing** | **4951.00-00** |
| | • Self-Dealing<br>200102056 | 4951.04-00 |
| **Section 4952** | **Taxes on Taxable Expenditures** | **4952.00-00** |
| | • Taxable Expenditure<br>200102056 | 4952.04-00 |
| **Section 4955** | **Taxes on Political Expenditures of Section 501(c)(3) Organizations** | **4955.00-00** |
| | • Political Expenditure<br>200151060 | 4955.04-00 |
| **Section 4971** | **Taxes on Failure to Meet Minimum Funding Standards**<br>200120038 200120039 200204052 200219041 | **4971.00-00** |
| | • Additional Tax<br>200123064 200141060 200148068 200236050 200236050 | 4971.02-00 |
| **Section 4972** | **Tax on Excess Contributions for Self-Employed Individuals (Repealed TEFRA -1984)**<br>200121072 200137065 200147056 200230044 200230044 | **4972.00-00** |
| | • Tax on Nondeductible Contributions to Qualified Employer Plans<br>200211050 | 4972.04-00 |
| **Section 4973** | **Tax on Excess Contributions to Individual Retirement Accounts, Certain 403(b) Contracts and Certain Individual Retirement Annuities**<br>200121072 200142022 200148051 | **4973.00-00** |
| | • Tax Imposed<br>200126038 | 4973.01-00 |
| | • Excess Contributions<br>200151051 | 4973.02-00 |
| **Section 4974** | **Excise Tax on Certain Accumulations in Qualified Retirement Plans**<br>200126038 200204038 200222033 | **4974.00-00** |
| **Section 4975** | **Tax on Prohibited Transactions**<br>200223066 200234070 200234070 200234070 200234070 200237026 | **4975.00-00** |
| | • Prohibited Transaction | 4975.03-00 |
| | *• Sale/Exchange*<br>200109010 | *4975.03-01* |
| | *• IRA's*<br>200215061 | *4975.03-03* |
| | • Statutory Exemptions<br>200108043 | 4975.04-00 |
| | *• ESOP Loans*<br>200213033 200210065 | *4975.04-02* |
| | *• Qualifying Employer Real Property/Securities*<br>200109010 | *4975.04-03* |
| | • Definitions<br>200125090 | 4975.05-00 |
| | • Notification of Secretary of Labor<br>200118016 | 4975.07-00 |
| **Section 4976** | **Taxes with Respect to Funded Welfare Benefit Plans**<br>200111046 200111047 200111048 200113009 200122047 200122051 200126034 200126035 200211053 200219002 | **4976.00-00** |

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|---|---|---|
| | • Disqualified Benefits<br>200113009 200204045 200206056 200219002 200223068 200136028 200136028 200150030 200203073 200203074 200203075 200208003 200210025 | 4976.01-00 |
| **Section 4979** | **Tax on Certain Excess Contributions**<br>200121072 200128061 | **4979.00-00** |
| **Section 4980** | **Tax on Reversion of Qualified Plan Assets to Employer**<br>200107038 200109052 200214031 200222035 200226001 200227040 200227041 200150028 200208037 200212035 200221049 | **4980.00-00** |
| | • Amount of Reversion<br>200227040 200227041 200221049 | 4980.01-00 |
| **Section 4982** | **Excise Tax on Undistributed Income of Regulated Investment Companies**<br>200106033 200106033 200130014 200205042 200135016 200135016 200135016 200135016 200144027 200202065 200207020 200216031 | **4982.00-00** |
| **Section 4999** | **Golden Parachute Payments**<br>200108008 200110025 200212005 200212007 200212008 | **4999.00-00** |
| **Section 6001** | **Notice or Regulations Requiring Records, Statements, and Special Returns (Sufficient v. Insufficient Records) (See 7602.00-00)**<br>200229011 200229011 200229011 200229011 200229011 | **6001.00-00** |
| | • Required Records Doctrine<br>200209028 | 6001.02-00 |
| **Section 6011** | **General Requirement of Return, Statement, or List**<br>200235002 200235002 | **6011.00-00** |
| | • Form of Return<br>200107035 200203003 | 6011.06-00 |
| **Section 6012** | **Persons Required to Make Returns of Income (Required v. Not Required)**<br>200217055 200219018 200236043 200236043 | **6012.00-00** |
| | • Individuals<br>200103072 200230033 200230033 | 6012.01-00 |
| | • Receivers<br>200219018 | 6012.04-00 |
| **Section 6013** | **Joint Returns of Income Tax by Husband and Wife** | **6013.00-00** |
| | • Marital Status<br>200202001 | 6013.03-00 |
| | • Joint and Several Liability | 6013.04-00 |
| | • *Innocent Spouse Relief*<br>200112001 200117005 200120009 200149010 | *6013.04-01* |
| **Section 6015** | **Declaration of Estimated Income Tax by Individual (Repealed 1984) (See Also 6654.00-00)**<br>200204003 200213006 | **6015.00-00** |
| **Section 6020** | **Returns Prepared for or Executed by Secretary**<br>200142024 | **6020.00-00** |
| | • Return Prepared by IRS Personnel<br>200102048 | 6020.02-00 |
| **Section 6031** | **Return of Partnership Income**<br>200106035 200106035 200108004 | **6031.00-00** |
| **Section 6033** | **Returns by Exempt Organizations (Section 501 Organizations)**<br>200204044 200204046 200204047 | **6033.00-00** |

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| | • Exempt v. Non Exempt From Filing<br>200214026 | 6033.01-00 |
| | • Required Information | 6033.02-00 |
| | • *Private Foundation*<br>200103076 200103085 200107036 200107039 200115038 200116048 200137060 200137063 200234065 200234065 200234065 200234065 200234066 200234066 200234066 200234066 200234072 200234072 200234072 200234072 | *6033.02-01* |
| **Section 6038A** | **Information with Respect to Certain Foreign Corporations**<br>200132003 | **6038A.00-00** |
| | • Definitions | 6038A.02-00 |
| | • *Related Party*<br>200238044 ***200238044*** | *6038A.02-01* |
| | • Summons | 6038A.05-00 |
| | • *Failure to Authorize*<br>200132003 | *6038A.05-02* |
| **Section 6038B** | **Notice of Certain Transfers to Foreign Persons**<br>200128040 200221046 | **6038B.00-00** |
| | • Reasonable Cause<br>200132029 | 6038B.03-00 |
| **Section 6039** | **Information Required in Connection With Certain Options**<br>200114001 | **6039.00-00** |
| **Section 6041** | **Information at Source**<br>200124001 200206053 200222001 200224008 | **6041.00-00** |
| | • Payments in Course of Trade or Business<br>200148022 | 6041.02-00 |
| | • Fixed or Determinable Gains, Profits, or Income<br>200106021 200106021 200226018 | 6041.03-00 |
| | • Exceptions<br>200106032 200106032 200148022 | 6041.06-00 |
| | • Payments Other Than in Cash<br>200130038 | 6041.07-00 |
| | • Magnetic Media Reporting<br>200113001 | 6041.11-00 |
| **Section 6043** | **Returns Regarding Liquidation, Dissolution, Termination, or Contraction** | **6043.00-00** |
| | • Exempt Organizations<br>200103076 200103085 200117041 200137063 200133048 | 6043.01-00 |
| **Section 6045** | **Returns of Brokers** | **6045.00-00** |
| | • Payments to Attorneys<br>200206053 | 6045.07-00 |
| **Section 6049** | **Returns Regarding Payments of Interest** | **6049.00-00** |
| | • Reportable Interest<br>200226018 | 6049.01-00 |
| **Section 6050E** | **State and Local Income Tax Refunds**<br>200106021 200106021 | **6050E.00-00** |
| **Section 6050I** | **Returns Relating to Cash Received in Trade or Business**<br>200102049 200211046 200212002 | **6050I.00-00** |

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| **Section 6050L** | **Returns Relating to Certain Dispositions of Donated Property**<br>200101031 | **6050L.00-00** |
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| | • Transitional Rule for Existing Partnerships<br>200102028 200110011 | 7704.05-00 |
| **Section 7805** | **Rules and Regulations**<br>200107020 | **7805.00-00** |
| | • Prospective Application of Changes in Regulations | 7805.01-00 |
| | • *Prospective Application of Rulings*<br>200116032 200210028 | *7805.01-01* |
| | • Effect of Private Rulings<br>200151011 200227009 200203011 200203012 200203013 200203014 200216027 | 7805.05-00 |
| **Section 7809** | **Deposit of Collections**<br>200133045 | **7809.00-00** |
| **Section 7871** | **Indian Tribal Governments Treated As States For Certain Purposes**<br>200112013 200148020 200148038 200207013 200229008 200229008 200229008 200229008 200229008 | **7871.00-00** |

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• Section 42; Low-Income Housing Credit 9100.01-00
200107022 200112051 200122050 200217013

• Section 59(e) 9100.02-00

• *R and D Expenditures* *9100.02-03*
200210055

• Section 338(g); Election Under Section 1.338-1T(c)(1) 9100.06-00
200105043 200107001 200107002 200108028 200114025 200119011 200119038 200121041 200125050 200125063 200130033 200131017 200131026 200204033 200205013 200205015 200205016 200205017 200205018 200205037 200206036 200209021 200211020 200211029 200211031 200220025 200223023 200223025 200223026 200223027 200223028 200223029 200223030 200223031 200223032 200223033 200223034 200223035 200223053 200223054 200223055 200223056 200223057 200223058 200223059 200223060 200223061 200223062 200225028 200133032 200133033 200138013 200140038 200141039 200143009 200144017 200146018 200201030 200201030 200202046 200202049 200202058 200202067 200210057 200210058 200210059 200218020 200230031 200230031 200232014 200237018

• Section 338(h)(1); Election Under Section 1.338(h)(10)-1T 9100.07-00
200103053 200103059 200103060 200103062 200103063 200103064 200103065 200103066 200105008 200115026 200115037 200116003 200116013 200121039 200121043 200121047 200122038 200123006 200123032 200123054 200125039 200125068 200125069 200125084 200126022 200126023 200126025 200127020 200127035 200128008 200128012 200129034 200130027 200132030 200137035 200204036 200211027 200213025 200220013 200224019 200227019 200227038 200234027 200234027 200234027 200234027 200234027 200234028 200234028 200234028 200234028 200134009 200134015 200135040 200135040 200135040 200135040 200139004 200139004 200140029 200140030 200142013 200144014 200146048 200146053 200147041 200148044 200148050 200202066 200203056 200216009 200232023 200232024 200235017 200235017 200235019 200235019 200237025 200238033 ***200238033 200238037 200238037***

• Section 367; Foreign Corporations 9100.08-00
200147004

• Section 442; Accounting Periods 9100.09-00
200103013 200103014 200105042 200106022 200106022 200107004 200107006 200109003 200111015 200112010 200112033 200112059 200112061 200113021 200113023 200116026 200120017 200123005 200123007 200123027 200123028 200123029 200124004 200128049 200137007 200137008 200137009 200151027 200151031 200151037 200151041 200209016 200217047 200222014 200227010 200233009 200133012 200134013 200140052 200146016 200201013 200201013 200203060 200218013 200218016 200230025 200230025 200235012 200235012 200236039 200236039 200238038 ***200238038***

• Section 472; LIFO Election 9100.11-00
200106035 200106035 200106036 200106036 200118036 200223005 200223017 200234048 200234048 200234048 200234048 200234052 200234052 200234052 200234052

• Section 754; Manner of Electing Optional Adjustment to Basis of Partnership Property 9100.15-00
200110023 200119018 200120023 200120032 200123049 200125065 200128052 200145016 200145022 200145024 200229028 200229028 200229028 200229028 200229028

• Section 911; Citizens or Residents of the United States Living Abroad 9100.17-00
200116027

• Section 927; FSC Election 9100.18-00
200111042 200210062 200221040

• Section 1502; Election to File Consolidated Return 9100.20-00
200102025 200104027 200118006 200123043 200137012 200220018 200133010 200135041 200135041 200135041 200135041 200136018 200136018 200203059 200238026 ***200238026***

• Other 9100.22-00
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• Section 642(c); Election for Estate Trust to Deduct Charitable Payments inthe Tax Year Even Though Not Paid Until Subsequent Year 9100.26-00
200138027

• Regulation Section 1.1502-20; Loss Disallowance Rule 9100.28-00
200115008 200128043 200130004 200137054 200151034 200206050

• Reg. 301.7701-3 Classification of Certain Business Entities 9100.31-00
200107024 200108018 200109036 200117010 200118028 200121053 200122033 200122035 200125017 200125028 200125032 200125058 200128026 200128033 200128042 200128046 200128047 200128048 200130026 200131016 200151005 200151006 200151007 200151009 200204019 200204024 200204025 200205005 200206018 200206019 200206040 200209040 200209041 200209048 200211025 200213005 200217020 200220008 200220009 200222010 200224010 200224013 200225012 200226040 200233010 200233012 200133018 200133038 200139016 200139016 200140048 200141035 200142010 200142015 200144012 200146023 200146029 200147026 200147048 200147049 200202003 200202004 200202005 200202006 200202007 200202008 200202009 200202010 200202011 200202012 200202013 200202014 200202015 200202016 200202017 200202018 200202019 200202020 200207019 200215012 200215022 200215023 200215024 200218018 200221022 200221038 200221047 200230023 200230023 200230032 200230032 200231002 200231002 200236015 200236015 200236018 200236018 200237019

**Section 9111** **Miscellaneous Legal Proceedings** **9111.00-00**

• Res Judicata 9111.14-00
200221002

• Collateral Estoppel 9111.19-00
200221002

• *Related Criminal Action* *9111.19-01*
200143005

• *Related Civil Action* *9111.19-02*
200206008 200221002

**Section 9114** **Tax Conventions (See Also 894.01-00 through 894.12-00)** **9114.00-00**

• U.S. Income Tax Treaties 9114.03-00

| | | |
|---|---|---|
| | • *Canada*<br>200110019 200111027 200111037 200134007 | *9114.03-06* |
| | • *Indonesia*<br>200118015 | *9114.03-18* |
| | • *Ireland*<br>200122044 200132032 200149031 200216010 200236023 200236023 200238031 ***200238031*** | *9114.03-19* |
| | • *Japan*<br>200111010 200222011 200146055 | *9114.03-22* |
| | • *Switzerland*<br>200224025 200201025 200201025 | *9114.03-38* |
| | • *United Kingdom*<br>200101005 200225016 | *9114.03-42* |
| | • *Israel*<br>200141020 | *9114.03-44* |
| | • Administrative Assistance Treaties<br>200143032 | 9114.09-00 |
| **Section 9115** | **(Effective October 1, 1979) Bankruptcy Code (See Also 9104.00-00)** | **9115.00-00** |
| | • Priorities (Section 507) | 9115.30-00 |
| | • *Penalties*<br>200109010 | *9115.30-09* |
| **Section 9200** | **Tax Shelter (Use This Category Only When No Other Category Is Appropriate)**<br>200133017 | **9200.00-00** |
| **Section 9214** | **Leasing Shelter**<br>200224011 200227018 200134002 200218022 | **9214.00-00** |
| | • Computer Leasing<br>200209001 | 9214.04-00 |
| **Section 9999** | **Miscellaneous Issues**<br>200220001 200220002 | **9999.00-00** |
| | • Issues Related to Statutes Other Than Contained in Internal Revenue Code<br>200106001 200106001 200120035 | 9999.92-00 |
| | • Substance v. Form Issues Not Contained in Present List<br>200126001 200226014 200146025 | 9999.97-00 |

• Not Able to Identify Under Present List

200101002 200102001 200102002 200102021 200102046 200103026 200103068
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