Publication 1078
Issue: 1/24/2003

# 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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| | • Legal And Accounting Expense<br>200246003 200246003 200246003 | 212.09-00 |
| | • Transactions Lacking Economic Reality<br>200224011 | 212.19-00 |

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| | • Profit Motive<br>200224011 | 212.21-00 |
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| **Section 216** | **Deduction Of Taxes, Interest, And Business Depreciation By Cooperative Housing Corporation Tenant-Stockholder** | **216.00-00** |
| | • Status As Cooperative Housing Corporation<br>200217042 200232029 200232031 | 216.01-00 |
| | *• Gross Income Requirement*<br>200250030 | *216.01-02* |
| | • Status As Tenant-Stockholder<br>200232029 200232031 | 216.02-00 |
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| | • Transition Rules | 263A.06-00 |
| | *• 3-Year Average Method*<br>200206012 | *263A.06-02* |
| | • Interest Capitalization<br>200252059 200252059 | 263A.08-00 |
| | • Avoided Cost Method<br>200252059 200252059 | 263A.09-00 |
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| | • Substantiation<br>200235006 200235006 | 274.08-00 |
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| | • Not Essentially Equivalent to a Dividend | 302.01-00 |
| | *• Meaningful Reduction of Interest*<br>200218004 | *302.01-04* |

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| | • Redemption from Noncorporate Shareholder in Partial Liquidation<br>200229005 200229005 200229005 200229005 200229005 200230002 200230002 200301029 | 302.04-00 |
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200204020 200204029 200217044

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200201030 200201030 200202046 200202049 200202058 200202066 200202067
200203056 200204033 200204036 200205013 200205015 200205016 200205017
200205018 200205037 200206036 200210057 200210058 200210059 200211020
200211027 200211029 200211031 200213025 200216009 200218020 200220013
200220025 200223023 200223024 200223025 200223026 200223027 200223028
200223029 200223030 200223031 200223032 200223033 200223034 200223035
200223053 200223054 200223055 200223056 200223057 200223058 200223059
200223060 200223061 200223062 200224019 200225028 200227019 200227038
200230031 200230031 200232014 200232023 200232024 200234027 200234027
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200248001 200248022 200249006 ***200304020 200304027 200252003 200252003***
200252004 200252004 200252005 200252005 200252006 200252006 200252007
200252007 200252008 200252008 200252009 200252009 200252010 200252010
200252011 200252011 200252012 200252012 200252013 200252013 200252015
200252015 200252016 200252016 200252017 200252017 200252018 200252018
200252019 200252019 200252020 200252020 200252021 200252021 200252022
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200252026 200252026 200301021 200303040 200303050

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200229005 200229005 200229005 200229005 200229005

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200204002 200206006 200208022 200209029 200211030 200212012 200214025
200217021 200218022 200224011 200224026 200235005 200235005 200237004
200242006 200301035

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200201032 200201032 200204034 200209029 200212012 200215031 200221009
200224009 200227016 200229015 200229015 200229015 200229015 200229015
200229025 200229025 200229025 200229025 200229025 200230006 200230006
200234061 200234061 200234061 200234061 200234064 200234064 200234064
200234064 200236044 200236044 200239005 200239005 200239005 200239006
200239006 200239006 200243049 200245012 200245029 200245043 200248026
200302008 200302022 200252063 200252063 200302008 200302022

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200201006 200201006 200202047 200202059 200205035 200206022 200209029
200209047 200212026 200213016 200214014 200214021 200215049 200216006
200217006 200218021 200219025 200220019 200223002 200225005 200227024
200231003 200231003 200231008 200231008 200234021 200234021 200234021
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200243032 200247003 200247019 200247020 200247021 200247022 200247023
200302044 ***200304023 200251012 200251012 200251012 200252058 200252058***
200301040 200302044 200303004 200303005 200303034 200303036

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200205001 200205034 200206041 200207025 200209018 200211032 200215027
200215034 200217051 200220010 200223007 200226007 200226036 200231006
200231006 200234053 200234053 200234053 200234053 200243028 200243036
200245009 200302008 200302030 200252072 200252072 200301011 200301036
200302008 200302030 200303057

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200202060

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200202059 200209018 200211032 200214025 200221009 200227016 200234025
200234025 200234025 200234025 200250017

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200211019

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200203058 200209029 200212012

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200221046

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| | • *Using Stock of Corporation Controlling Acquiring Corporation*<br>200236005 200236005 200250023 | *368.01-01* |
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| | • Stock for Property (Type "C")<br>200225031 | 368.03-00 |
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| | • Recapitalization (Type "E")<br>200206028 200208017 200211035 200213001 200213002 200213003 200232016 200236008 200236008 ***200304023*** | 368.05-00 |
| | • Change in Identity, etc. (Type "F")<br>200204034 200209049 | 368.06-00 |
| | • Continuity of Interest Rule<br>200213001 200213002 200213003 | 368.08-00 |
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| | • *Equity Structure Shift*<br>200207014 | *382.07-03* |

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| | • Discrimination as to Contributions or Benefits (See Also 401.29-01, 401.20-00, 414.00-00)<br>200230044 200230044 200248029 | 401.04-00 |
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| | • *Employee Dies Before Entire Interest Distributed*<br>200208031 200209062 200221048 200223065 200234074 200234074 200234074 200234074 200235038 200235038 200235039 200235039 200235040 200235040 200235041 200235041 200244023 200248030 200248031 | *401.06-02* |
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| | • *Special Distribution Requirements*<br>200211049 200218039 200236053 200236053 | *401.29-02* |
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| | • Amounts Distributed or Made Available to Beneficiary<br>200231019 200231019 | 402.06-00 |

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| | • Unrealized Appreciation of Employer's Securities<br>200202078 200243052 200302048 200302048 | 402.07-00 |
| | • Rollover Contributions<br>200213032 | 402.08-00 |
| | *• Rollover Lump Sums*<br>200202078 200215032 200302048 200302048 | *402.08-01* |
| | *• By a Surviving Spouse*<br>200204038 200211054 200222033 | *402.08-05* |
| | • Tax on Lump Sum Distributions<br>200215032 | 402.09-00 |
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| | • Qualified Annuities<br>200244023 | 403.01-00 |
| | • Nonqualified Annuities<br>200245060 | 403.02-00 |
| | • Annuities Purchased by Section 501(c)(3) Organizations or Public Schools<br>200202027 200249008 200302032 200301032 200302032 200303041 | 403.04-00 |
| | • Rollover Amounts<br>200249008 | 403.05-00 |
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| | • Qualification | 408.02-00 |
| | *• Benefit Distributions*<br>200204048 200210066 | *408.02-01* |
| | • Rollover Contributions<br>200208031 200221048 200245055 ***200304038*** | 408.03-00 |
| | • Individual Retirement Annuity<br>200222032 200225038 200225039 | 408.05-00 |
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200247059

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200225043

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200242042

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200202073 200210064 200214030 200229049 200229049 200229049 200229049 200229049 200230045 200230045 200235034 200235034 200236055 200236055 200242043 200247053 200248028 200249011 200249012 200251020 200251020 200251020 200251021 200251021 200251021 200251022 200251022 200251022 200251023 200251023 200251023 200252099 200252099 200301042 200301043 200301044

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200230042 200230042

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200207027 200229050 200229050 200229050 200229050 200229050 200230043 200230043 200235032 200235032 200236048 200236048 200239036 200239036 200239036 200243053 200250041 200251015 200251015 200251015 200252095 200252095

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200203076 200204041 200204043 200204049 200204050 200216035 200221058 200221060 200221063 200223070 200224034 200231017 200231017 200236054 200236054 200238052 200238052 200238052 200240054 200240054 200240054 200240054 200241045 200241045 200241045 200241046 200241046 200241046 200241055 200241055 200241055 200241057 200241057 200241057 200245056 200249009 ***200304039 200304040 200301045***

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200219042 200229051 200229051 200229051 200229051 200229051

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200230044 200230044

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200213033

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200203071 200219002

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200203073 200203074 200203075

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| **Section 419A** | **Qualified Asset Account; Limitations on Additions to Account (See Also 419.00-00 et. seq.)**<br>200210025 | **419A.00-00** |
| **Section 420** | **Transfers to Retiree Health**<br>200301047 | **420.00-00** |
| **Section 423** | **Employee Stock Purchase Plans**<br>200241001 200241001 200241001 200244006 | **423.00-00** |
| **Section 424** | **Definitions and Special Rules** | **424.00-00** |
| | • Modification, Extension or Renewal of Options<br>200207005 | 424.01-00 |
| **Section 444** | **Election of Taxable Year Other Than Required Year** | **444.00-00** |
| | • Procedural Requirements for Making Election<br>200222014 | 444.03-00 |
| **Section 446** | **General Rule for Methods of Accounting (Permissible v. Not Permissible)**<br>200225006 200234069 200234069 200234069 200234069 200242001 | **446.00-00** |
| | • Clearly v. Not Clearly Reflecting Income<br>200213004 200242010 | 446.01-00 |
| | • Change of Methods (Permissible v. Not Permissible)<br>200302002 200302002 | 446.04-00 |
| | *• Change in Method of Accounting for Depreciation*<br>200206014 200206015 200206021 200208002 200210053 200214003 200216016 200216018 200222022 200229021 200229021 200229021 200229021 200229021 200245038 200246006 200246006 200246006 200248016 | *446.04-17* |
| | • 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* |
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| **Section 448** | **Limitation on Use of Cash Method of Accounting** | **448.00-00** |
| | • Farming Business Exception | 448.03-00 |
| | *• Farming Business Defined*<br>200242010 | *448.03-01* |
| | • 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>200209015 200222003 200225006 200227012 200251009 200251009 200251009 | **451.00-00** |
| | • Annual Theory<br>200210019 200217052 200234056 200234056 200234056 200234056 | 451.01-00 |
| | • Conditions and Contingencies<br>200236003 200236003 | 451.04-00 |
| | • Tax Refunds<br>200211043 | 451.08-00 |
| | • Prepaid and Advance Income<br>200247035 | 451.13-00 |

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| | *• Goods (1.451-5)*<br>200246016 200246016 200246016 | *451.13-04* |
| | • Constructive Receipt<br>200203006 | 451.14-00 |
| | *• Compensation*<br>200202027 | *451.14-04* |
| | • Accrual Method<br>200247035 | 451.19-00 |
| | • Special Rules for Crop Insurance Proceeds<br>200213026 | 451.23-00 |
| **Section 453** | **Installment Method (Available v. Not Available)**<br>200218034 | **453.00-00** |
| | • Revocation of Elections<br>200226039 200230016 200230016 | 453.08-00 |
| | *• Election After Revocation*<br>200250027 | *453.08-01* |
| | • Contingent Payment Sales | 453.09-00 |
| | *• Alternative Basis Recovery*<br>200236036 200236036 | *453.09-01* |
| **Section 457** | **Deferred Compensation Plans of State and Local Governments and Tax Exempt Organizations**<br>200205007 | **457.00-00** |
| | • Year of Inclusion in Gross Income<br>200202027 200302032 200301032 200302032 200303041 200303058 | 457.01-00 |
| | • Eligible Deferred Compensation Plan Defined<br>200303041 | 457.05-00 |
| | *• Plan*<br>200303058 | *457.05-01* |
| | *• Tax Exempt Organization*<br>200302015 200302015 | *457.05-03* |
| | • Special Rules | 457.09-00 |
| | *• Length of Service Award Plans*<br>200224002 | *457.09-08* |
| | • Ineligible Plans<br>200229001 200229001 200229001 200229001 200229001 200302032 200301032 200302032 | 457.10-00 |
| | • Exclusive Benefit Set-Asides | 457.12-00 |
| | *• Custodial Accounts and Contracts*<br>200303058 | *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 |

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200203004 200208004 200209010 200209017 200219014 200225006 200229009 200229009 200229009 200229009 200229009 200229009 200229010 200229010 200229010 200229010 200229010 200243022 200243024 200302009 200302010 200302011 200302012 200302013 200301009 200301012 200301013 200301014 200301015 200301016 200301017 200301018 200301019 200302009 200302010 200302011 200302012 200302013

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200216013

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200235021 200235021

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200207016 200208004 200209010 200218019 200219014 200229009 200229009 200229009 200229009 200229009 200229010 200229010 200229010 200229010 200229010 200238046 200238046 200238046 200243022 200243024 200246012 200246012 200246012 200302009 200302010 200302011 200302012 200302013 200301009 200301012 200301013 200301014 200301015 200301016 200301017 200301018 200301019 200302009 200302010 200302011 200302012 200302013

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200201033 200201033 200202025 200203008 200203038 200203039 200203040 200203062 200203064 200203065 200232021 200232022 200245044 200245045 200302021 200302023 200302027 200302028 200302041 200302021 200302023 200302027 200302028 200302041

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200213015 200222001 200243034

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200243025

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200206016 200234049 200234049 200234049 200234049 200303052

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| | • Items Includible v. Not Includible in Inventory<br>200203001 | 471.09-00 |
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| | • Election<br>200223005 200223017 200234048 200234048 200234048 200234048 200234052 200234052 200234052 200234052 | 472.01-00 |
| | • LIFO Conformity Requirement<br>200239032 200239032 200239032 | 472.05-00 |
| **Section 475** | **Mark to Market Accounting Method for Dealers in Securities** | **475.00-00** |
| | • Securities Traders<br>200209052 200209053 200209054 ***200304006*** | 475.08-00 |
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| **Section 482** | **Allocation of Income and Deductions Among Taxpayers**<br>200205003 200206006 200217021 200224011 200237003 200238022 200238022 200238022 200238025 200238025 200238025 | **482.00-00** |
| | • Services<br>200230001 200230001 | 482.09-00 |
| | • Transfer or Use of Intangibles<br>200230001 200230001 | 482.11-00 |
| | *• Cost Sharing Agreements*<br>200225009 | *482.11-08* |
| | • Allocation of Net Income<br>200203053 | 482.13-00 |
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| **Section 501** | **Exemption From Tax on Corporations, Certain Trusts, etc. (Exempt v. Not Exempt)**<br>200217044 200230018 200230018 200236049 200236049 200244028 200245064 | **501.00-00** |
| | • Title-Holding Company<br>200214035 200214036 | 501.02-00 |
| | • Religious, Charitable, etc., Institutions and Community Chest<br>200211051 200216037 200222030 200225042 ***200304036*** | 501.03-00 |
| | *• Foundations*<br>200204039 200205048 200205049 200206057 200218036 200218041 200218042 200219036 200219039 200221050 200222034 200225042 200232036 200233027 200233028 200233029 200233030 200234065 200234065 200234065 200234065 200234066 200234066 200234066 200234066 200234067 200234067 200234067 200234067 200234068 200234068 200234068 200234068 200234072 200234072 200234072 200234072 200238050 200238050 200238050 200241056 200241056 200241056 | *501.03-02* |
| | *• Educational Organizations*<br>200203069 200225046 200236051 200236051 200243056 ***200304036*** | *501.03-08* |
| | *• Hospitals and Health Clinics (See Also 0501.06-03)*<br>200203070 200206058 200211051 200214035 200214036 200216036 200218037 200233025 200238051 200238051 200238051 200240053 200240053 200240053 200240053 200241050 200241050 200241050 200245057 ***200304041 200304042*** | *501.03-11* |

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| | • *Labor Organizations (See Also 0501.05-00)*<br>200233024 | *501.03-12* |
| | • *Scholarships, Endowment Funds and Trusts, Student Loans*<br>200247056 | *501.03-22* |
| | • *Social Welfare Groups (See Also 0501.04-00)*<br>200211052 200249014 ***200304036*** | *501.03-25* |
| | • *State Instrumentalities*<br>200216037 | *501.03-26* |
| | • *Testing for Public Safety*<br>200215057 200215058 200215059 200215060 | *501.03-28* |
| | • *Organizational and Operational Tests*<br>200218036 200218041 200218042 200219036 200219039 200225046 | *501.03-30* |
| | • Civic Leagues and Social Welfare Groups (See Also 0501.03-25) | 501.04-00 |
| | • *Local Associations of Employees*<br>200219037 | *501.04-01* |
| | • Business Leagues, Chambers of Commerce, Real Estate Boards, or Boards of Trade<br>200223067 | 501.06-00 |
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| | • Voluntary Employees' Beneficiary Associations (See Also 0501.03-01)<br>200204045 200225041 200302052 200301047 200302052 | 501.09-00 |
| | • *Permissible Benefits*<br>200211053 | *501.09-01* |
| | • *Inurement*<br>200203073 200203074 200203075 200211053 200223068 | *501.09-03* |
| | • Income Inures v. does Not Inure to Private Individual<br>200230005 200230005 | 501.32-00 |
| **Section 502** | **Feeder Organizations (Exempt v. Not Exempt)** | **502.00-00** |
| | • Section 501 (c)(3) Organizations<br>200241050 200241050 200241050 | 502.01-00 |
| **Section 507** | **Termination of Private Foundation Status**<br>200201035 200201035 200201036 200201036 200204042 200204053 200205048 200205049 200206057 200215054 200215055 200215056 200216032 200216033 200219043 200219044 200221064 200221065 200221066 200221067 200221068 200221069 200226045 200229052 200229052 200229052 200229052 200229052 200229053 200229053 200229053 200229053 200229053 200233027 200233028 200233029 200233030 200234065 200234065 200234065 200234065 200234066 200234066 200234066 200234066 200234067 200234067 200234067 200234067 200234068 200234068 200234068 200234068 200234072 200234072 200234072 200234072 200238048 200238048 200238048 200238049 200238049 200238049 200238050 200238050 200238050 200241049 200241049 200241049 200241056 200241056 200241056 200242045 200242046 200243051 200243057 200244024 200244026 200244027 200245054 200246035 200246035 200246035 200247057 200247060 200302049 ***200304025 200302049*** | **507.00-00** |
| | • Termination Under Section 507(a)(2)(A)<br>200221050 | 507.02-00 |
| | • Termination Under Section 507(b)(1)(A)<br>200225045 | 507.03-00 |

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| | • Termination Under Section 507(b)(1)(B)<br>200204039 200220030 200225045 | 507.04-00 |
| | • Liability of Transferee Organizations<br>200204039 200221050 | 507.05-00 |
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| | • Exceptions to Private Foundation Status | 509.02-00 |
| | *• Supporting Organizations*<br>200204040 200208027 200215048 200218037 | *509.02-02* |
| | • Continuation of Private Foundation Status<br>200205048 200205049 200206057 200216032 200216033 200233027 200233028 200233029 200233030 200234065 200234065 200234065 200234065 200234066 200234066 200234066 200234066 200234067 200234067 200234067 200234067 200234068 200234068 200234068 200234068 200234072 200234072 200234072 200234072 200238050 200238050 200238050 200241049 200241049 200241049 200241056 200241056 200241056 | 509.03-00 |
| **Section 511** | **Tax on Unrelated Business Income of Charitable, etc, Organizations (Taxable v. Not Taxable)**<br>200211051 200213021 200214035 200214036 200215057 200215058 200215059 200215060 200216036 200225044 200233031 | **511.00-00** |
| | • Organizations Subject to Tax<br>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>200208027 200211051 200213027 200214035 200214036 200216036 200220028 200223067 200233024 200233031 200236049 200236049 200237027 200242041 200243056 ***200304003 200304004 200304005 200301030 200301047 200303062*** | **512.00-00** |
| | • Exception, Additions, and Limitations on Unrelated Income<br>200225046 200234071 200234071 200234071 200234071 | 512.01-00 |
| | *• Rents and Royalties*<br>200219037 200222030 200225046 200241050 200241050 200241050 | *512.01-01* |
| | • Partnerships<br>200206058 200218037 ***200304041 200304042 200251016 200251016 200251016***<br>200251017 200251017 200251017 200251018 200251018 200251018 | 512.02-00 |
| | • Definitions | 512.09-00 |
| | *• General*<br>200225044 200250042 200252096 200252096 | *512.09-01* |
| | *• Section 501(c)(7), (9), (17), or (20) Organizations (See Also 419.00-00 et. seq.)*<br>200223068 | *512.09-03* |
| | • Modifications<br>200246032 200246032 200246032 | 512.10-00 |

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| **Section 513** | **Unrelated v. Not Unrelated Trade or Business**<br>200203069 200204051 200206058 200211051 200213027 200214035 200214036 200216037 200218037 200222031 200222032 200225038 200225039 200225044 200230005 200230005 200236049 200236049 200236051 200236051 ***200304036 200304041 200304042 200301048*** | **513.00-00** |
| | • Advertising, etc., Activities<br>200225046 200303062 | 513.02-00 |
| | • Cooperatives<br>200223067 | 513.03-00 |
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| **Section 514** | **Unrelated Debt-Financed Income**<br>200213027 200214035 200214036 200216036 200233031 200233032 200235042 200235042 200237027 | **514.00-00** |
| | • Definitions--Debt-Financed Property<br>200211052 | 514.06-00 |
| | • Acquisition Indebtedness<br>200224014 200233023 | 514.07-00 |
| **Section 528** | **Certain Homeowners Associations**<br>200203027 | **528.00-00** |
| **Section 529** | **Qualified State Tuition Programs**<br>200214032 200231020 200231020 200232035 | **529.00-00** |
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| | • Date of Payment<br>200213017 | 561.02-00 |
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| | • Preferential Dividends<br>200213017 | 562.03-00 |
| **Section 565** | **Consent Dividends** | **565.00-00** |
| | • General Rule | 565.01-00 |
| | *• Making and Filing Consents*<br>200240022 200240022 200240022 200240022 200302034 200302034 | *565.01-02* |
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| | *• Fair Market Value of Timber (See Also 611.07-02 et seq.)*<br>200229007 200229007 200229007 200229007 200229007 | *631.01-01* |
| **Section 636** | **Income Tax Treatment of Mineral Production Payments**<br>200240036 200240036 200240036 200240036 | **636.00-00** |
| **Section 641** | **Imposition of Tax**<br>200229018 200229018 200229018 200229018 200229018 200240010 200240010 200240010 200240010 | **641.00-00** |
| | • Termination of Estates and Trusts<br>200226031 | 641.03-00 |

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| **Section 642** | **Special Rules for Credits and Deductions**<br>200240027 200240027 200240027 200240027 | **642.00-00** |
| | • Charitable Deduction<br>200252032 200252032 | 642.03-00 |
| | *• Paid or Permanently Set Aside*<br>200221011 | *642.03-03* |
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| | • Multiple Trusts<br>200209007 200209008 200210056 200210061 | 643.06-00 |
| **Section 651** | **Deductions for Trusts Distributing Current Income Only**<br>200240010 200240010 200240010 200240010 200242037 | **651.00-00** |
| **Section 661** | **Deduction for Estates and Trusts Accumulating Income or Distributing Corpus**<br>200207018 200240010 200240010 200240010 200240010 200242037 | **661.00-00** |
| | • Amounts Paid, Credited, or Required to Be Distributed<br>200210002 200226031 | 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** |
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| **Section 664** | **Charitable Remainder Trusts**<br>200202078 200203034 200205008 200207026 200219012 200221042 200229046 200229046 200229046 200229046 200229046 200230004 200230004 200240012 200240012 200240012 200240012 200245058 ***200304025 200250042 200251010*** 200251010 200251010 200252096 200252096 200301020 | **664.00-00** |
| | • Character of Distribution<br>200215032 | 664.01-00 |
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| | *• Charitable Remainder Unitrust*<br>200232015 200233005 200233006 200233007 200233008 200234038 200234038 200234038 200234038 200240012 200240012 200240012 200240012 200244011 200251016 200251016 200251016 200251017 200251017 200251017 200251018 200251018 200251018 | *664.03-02* |
| | *• Unitrust With Income Exception*<br>200215042 | *664.03-03* |
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| | • Persons Treated as Grantors<br>200209015 200227020 200239035 200239035 200239035 | 671.02-00 |

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| | • Method of Reporting<br>200207007 | 671.04-00 |
| **Section 672** | **Definitions and Rules**<br>200243031 | **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>200222003 | **677.00-00** |
| **Section 678** | **Person Other Than Grantor Treated as Substantial Owner**<br>200235007 200235007 200235008 200235008 200235009 200235009 200238004 200238004 200238004 200238005 200238005 200238005 200238006 200238006 200238006 200238007 200238007 200238007 200238008 200238008 200238008 200238009 200238009 200238009 200238010 200238010 200238010 200238011 200238011 200238011 200238012 200238012 200238012 | **678.00-00** |
| **Section 691** | **Recipients of Income in Respect of Decedents**<br>200209026 200221011 200230018 200230018 200234019 200234019 200234019 200234019 | **691.00-00** |
| | • Deduction for Estate Tax<br>200247001 200303010 | 691.03-00 |
| **Section 701** | **Partners, Not Partnerships, Subject to Tax**<br>200246014 200246014 200246014 | **701.00-00** |
| | • Partnership ISP - Subchapter K Anti-Abuse Rule Regulation Section 1.701-2<br>200205021 200242004 200250013 | 701.01-00 |
| **Section 702** | **Income and Credits of Partner**<br>200214016 | **702.00-00** |
| | • Partner's Distributive Share | 702.01-00 |
| | *• Credits*<br>200215005 200215017 200216003 200216004 200216011 200216015 | *702.01-09* |
| **Section 704** | **Partner's Distributive Share**<br>200203043 200203044 200203046 200203047 200203048 200203049 200203050 200203051 200203052 200204013 200204015 200204016 200204017 200204018 200204023 200214016 | **704.00-00** |
| | • Partnership Agreement<br>200210047 | 704.01-00 |
| **Section 707** | **Transactions Between Partner and Partnership**<br>200246014 200246014 200246014 | **707.00-00** |
| | • Not in Capacity as Partner<br>200250013 200301004 | 707.01-00 |
| **Section 708** | **Continuation of Partnership**<br>200219008 | **708.00-00** |
| | • Termination<br>200214016 | 708.01-00 |
| **Section 721** | **Nonrecognition of Gain or Loss on Contributions**<br>200210047 200211017 200214016 200252014 200252014 | **721.00-00** |
| **Section 722** | **Basis of Contributing Partner's Interest**<br>200214016 | **722.00-00** |

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| **Section 723** | **Basis of Property Contributed to Partnership**<br>200214016 | **723.00-00** |
| **Section 731** | **Extent of Recognition of Gain or Loss on Distribution**<br>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>200233018 200242004 200246014 200246014 200246014 | **752.00-00** |
| **Section 754** | **Manner of Electing Optional Adjustment to Basis of Partnership Property**<br>200202022 | **754.00-00** |
| | • Timeliness of Election<br>200202053 200202055 200205025 200209046 200215011 200229028 200229028 200229028 200229028 200229028 200234031 200234031 200234031 200234031 200234032 200234032 200234032 200234032 200234033 200234033 200234033 200234033 200234034 200234034 200234034 200234034 200234035 200234035 200234035 200234035 200248015 200249005 200252079 200252079 200252082 200252082 | 754.02-00 |
| **Section 761** | **Terms Defined**<br>200214016 | **761.00-00** |
| | • Partnership | 761.01-00 |
| | *• Organizations Treated as a Partnership*<br>200202022 | *761.01-01* |
| | *• Organizations Not Treated as a Partnership*<br>200216005 | *761.01-02* |
| **Section 775** | **Electing Large Partnership Defined**<br>200221020 | **775.00-00** |
| **Section 817** | **Treatment of Variable Contracts**<br>200221036 200223012 200244001 | **817.00-00** |
| | • Variable Contract Defined<br>200206047 200246022 200246022 200246022 200248021 | 817.04-00 |
| | • Treatment Nondiversified Contracts | 817.08-00 |
| | *• Look-Through Diversification*<br>200244016 | *817.08-04* |
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| | • Alternative Tax Small Companies<br>200223015 | 831.02-00 |
| | • Whether Company Qualifies as Insurance Company<br>200237010 200242027 | 831.03-00 |
| **Section 832** | **Insurance Company Taxable Income**<br>200234001 200234001 200234001 200234001 200234002 200234002 200234002 200234002 200237010 | **832.00-00** |
| | • Premiums Earned<br>200203016 | 832.05-00 |
| | • Reduction of Deduction<br>200234013 200234013 200234013 200234013 | 832.07-00 |

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| | • Interinsurers or Reciprocal Underwriters<br>200242005 | 832.15-00 |
| **Section 833** | **Treatment of Blue Cross Blue Shield Organizations**<br>200201004 200201004 | **833.00-00** |
| **Section 847** | **Special Estimated Tax Payments**<br>200222039 | **847.00-00** |
| **Section 855** | **Dividends Paid by Regulated Investment Company After Close of Taxable Year**<br>200206027 200302006 200302006 | **855.00-00** |
| **Section 856** | **Definition of Real Estate Investment Trust**<br>200225033 200226013 200234054 200234054 200234054 200234054 | **856.00-00** |
| | • Income Requirements<br>200236037 200236037 | 856.01-00 |
| | • Rents From Real Property<br>200234054 200234054 200234054 200234054 | 856.04-00 |
| | • Treatment of Wholly Owned Subsidiaries<br>***200304011*** | 856.07-00 |
| **Section 857** | **Taxation of Real Estate Investment Trusts and Their Beneficiaries** | **857.00-00** |
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| **Section 861** | **Income From Sources Within the U.S.** | **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 200241014 200241014 200241014 | *861.08-01* |
| | *• Apportionment*<br>200203020 200241014 200241014 200241014 | *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) | 861.09-00 |
| | *• Asset Method of Apportionment*<br>200201009 200201009 200207003 200212001 200220012 200221043 200221044 | *861.09-06* |
| | • Allocation Apportionment of Research and Experimental Expenditures (In General)<br>200207012 200243020 | 861.15-00 |

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| **Section 862** | **Income From Sources Without U.S.**<br>200222011 | **862.00-00** |
| **Section 864** | **Definitions**<br>200224003 | **864.00-00** |
| | • Rules for Allocating Interest, etc. (See Also 861.08 through 861.14)<br>200201009 200201009 | 864.04-00 |
| **Section 871** | **Tax on Nonresident Alien Individuals** | **871.00-00** |
| | • Tax on Nonresident Aliens | 871.02-00 |
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| **Section 877** | **Expatriation to Avoid Tax**<br>200211015 200221037 ***200304007*** | **877.00-00** |
| | • Principal Purpose--the Avoidance of Tax<br>200201029 200201029 200206029 200207001 200208001 200208015 200209027 200209030 200210005 200211033 200212018 200212019 200212020 200214013 200214022 200214024 200215044 200216019 200217043 200218002 200218024 200218028 200218032 200219031 200219033 200220017 200222027 200224015 200224024 200225011 200225035 200227030 200229012 200229012 200229012 200229012 200229012 200230021 200230021 200234046 200234046 200234046 200234046 200234060 200234060 200234060 200234060 200235003 200235003 200235014 200235014 200236029 200236029 200236033 200236033 200238013 200238013 200238013 200238014 200238014 200238014 200238015 200238015 200238015 200239027 200239027 200239027 200240041 200240041 200240041 200240041 200241010 200241010 200241010 200242011 200242012 200245033 200246025 200246025 200246025 200247041 ***200304008 200250025 200250032*** 200250034 200250035 200252080 200252080 200303059 | 877.01-00 |
| | • Ruling Submission by Expatriating Long-Term Resident<br>200210049 200210050 200216020 200216021 200221039 200234036 200234036 200234036 200234036 | 877.08-00 |
| **Section 881** | **Tax on Income of Foreign Corporations Not Connected with United States Business**<br>200206008 200227006 | **881.00-00** |
| | • Repeal of Tax On Interest of Foreign Corporations Received From Certain Portfolio Debt Investments | 881.02-00 |
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| **Section 882** | **Tax on Income of Foreign Corporations Connected with United States Business** | **882.00-00** |
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| **Section 894** | **Income Affected by Treaty**<br>200209026 | **894.00-00** |

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| **Section 897** | **Disposition of Investment in United States Real Property** | **897.00-00** |
| | • U.S. Real Property Interest<br>200201023 200201023 ***200304021 200304022*** | 897.02-00 |
| **Section 901** | **Taxes of Foreign Countries and of Possessions of U.S.**<br>200225032 200302042 200302042 | **901.00-00** |
| | • Foreign Taxes on Mineral Income<br>200302042 200302042 | 901.04-00 |
| **Section 904** | **Limitation on Credit** | **904.00-00** |
| | • Separate Application of Section With Respect to Certain Categories - Income | 904.03-00 |
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| | *• Look-Through Rules*<br>200206010 | *904.03-20* |
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| **Section 911** | **Citizens or Residents of the United States Living Abroad** | **911.00-00** |
| | • Election<br>200202072 200226010 | 911.11-00 |
| | *• Reelection*<br>200230012 200230012 200248025 | *911.11-03* |
| **Section 921** | **Exempt Foreign Trade Income Excluded from Gross Income**<br>200241014 200241014 200241014 | **921.00-00** |
| **Section 925** | **Transfer Pricing Rules**<br>200215003 | **925.00-00** |
| | • Computation of Transfer Pricing<br>200237024 | 925.01-00 |
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| **Section 927** | **Other Definitions and Special Rules** | **927.00-00** |
| | • Definition of Export Property<br>200231014 200231014 | 927.01-00 |
| | • Election and Termination of Election<br>200221040 | 927.04-00 |
| **Section 933** | **Income From Sources Within Puerto Rico**<br>200215019 | **933.00-00** |
| **Section 953** | **Insurance Income** | **953.00-00** |
| | • Election by Foreign Insurance Company to be Treated as Domestic Corporation<br>200201021 200201021 200242023 200246022 200246022 200246022 | 953.06-00 |
| **Section 954** | **Foreign Base Company Income** | **954.00-00** |
| | • Foreign Personal Holding Company Income<br>200206010 200224007 | 954.02-00 |
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| **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>200216022 | **956.00-00** |
| | • U.S. Property Defined<br>200229030 200229030 200229030 200229030 200229030 | 956.03-00 |
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| **Section 962** | **Election by Individuals to be Subject to Tax at Corporate Rates**<br>200247033 200247034 | **962.00-00** |
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| **Section 988** | **Treatment of Certain Foreign Currency Transactions**<br>200206006 200237003 | **988.00-00** |
| **Section 1001** | **Determination of Amount of and Recognition of Gain or Loss**<br>200202033 200207018 200209007 200209008 200210018 200210056 200210061 200213011 200213014 200215032 200217024 200217036 200217037 200221032 200223019 200224001 200226042 200229018 200229018 200229018 200229018 200229018 200229046 200229046 200229046 200229046 200229046 200231011 200231011 200234043 200234043 200234043 200234043 200236030 200236030 200238034 200238034 200238034 200238041 200238041 200238041 200240014 200240014 200240014 200240014 200240016 200240016 200240016 200240016 200242008 200244008 200301020 200303027 | **1001.00-00** |
| | • Amount Realized<br>200244009 | 1001.02-00 |
| | *• Real Property Taxes Paid by the Purchaser*<br>200303023 | *1001.02-02* |
| | *• Property Differing Materially*<br>200210029 200227020 | *1001.02-07* |
| **Section 1012** | **Basis of Property--Costs** | **1012.00-00** |
| | • Liabilities Assumed as Purchase Price<br>200208004 200209010 200219014 200229009 200229009 200229009 200229009 200229009 200229010 200229010 200229010 200229010 200229010 200243022 200243024 200302009 200302010 200302011 200302012 200302013 200301009 200301012 200301013 200301014 200301015 200301016 200301017 200301018 200301019 200302009 200302010 200302011 200302012 200302013 | 1012.06-00 |
| | • Property Received From Services<br>200244008 | 1012.10-00 |
| **Section 1014** | **Basis of Property Acquired From a Decedent**<br>200240018 200240018 200240018 200240018 | **1014.00-00** |
| | • Appreciated Property Acquired By Decedent by Gift Within One Year of Death<br>200210051 | 1014.06-00 |

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| **Section 1015** | **Basis of Property Acquired by Gift or Transfer in Trust**<br>200202033 200221032 200234043 200234043 200234043 200234043 200236030 200236030 200303027 | **1015.00-00** |
| | • Transfer in Trust After December 31, 1920<br>200213014 | 1015.03-00 |
| **Section 1016** | **Adjustment v. No Adjustment to Basis** | **1016.00-00** |
| | • 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>200201007 200201007 200203033 200203042 200208004 200209010 200241013 200241013 200241013 200242009 200251008 200251008 200251008 200251014 200251014 200251014 | **1031.00-00** |
| | • Like Kind Property<br>200224004 | 1031.02-00 |
| | • Like Kind Real Estate<br>200219006 | 1031.03-00 |
| | • Deferred Exchanges<br>200211016 200236026 200236026 200240049 200240049 200240049 200240049 200241016 200241016 200241016 | 1031.05-00 |
| | • Basis<br>200244010 | 1031.08-00 |
| **Section 1032** | **Exchange of Stock for Property (Recognition v. Nonrecognition)**<br>200232028 | **1032.00-00** |
| **Section 1033** | **Involuntary Conversion**<br>200236003 200236003 200246015 200246015 200246015 | **1033.00-00** |
| | • Definition of Involuntary Conversion Events<br>200217001 200219006 200239009 200239009 200239009 200239012 200239012 200239012 | 1033.02-00 |
| | • Property Similar or Related in Service or Use<br>200239009 200239009 200239009 200239012 200239012 200239012 | 1033.03-00 |
| **Section 1035** | **Exchanges of Insurance Policies** | **1035.00-00** |
| | • Exchange of Policies With Different Insurers | 1035.03-00 |
| | *• One Policy Exchanged for Two or More Policies*<br>200243047 | *1035.03-01* |
| **Section 1041** | **Transfers of Property Between Spouses or Incident to Divorce**<br>200221042 200233022 | **1041.00-00** |
| | • Transfers Incident to Divorce<br>200221021 | 1041.01-00 |
| **Section 1042** | **Sales of Stock to Employee Stock Ownership Plans or Certain Cooperatives**<br>200234003 200234003 200234003 200234003 200239035 200239035 200239035 200243001 200246027 200246027 200246027 | **1042.00-00** |
| **Section 1059** | **Corporate Shareholder's Basis in Stock Reduced by Non-taxed Portion of Extraordinary Dividends** | **1059.00-00** |
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| | *• Reduction in Basis Rule*<br>200218004 | *1059.01-01* |

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| **Section 1060** | **Special Allocation Rules for Certain Asset Acquisitions**<br>200208004 200209010 200219014 200229009 200229009 200229009 200229009 200229009 200229010 200229010 200229010 200229010 200229010 200243022 200243024 200302009 200302010 200302011 200302012 200302013 200301009 200301012 200301013 200301014 200301015 200301016 200301017 200301018 200301019 200302009 200302010 200302011 200302012 200302013 | **1060.00-00** |
| **Section 1082** | **Basis for Determining Gain or Loss**<br>200240006 200240006 200240006 200240006 | **1082.00-00** |
| **Section 1092** | **Straddles** | **1092.00-00** |
| | • Mixed Straddles | 1092.05-00 |
| | *• Mixed Straddle Account*<br>200206048 200206049 200212003 | *1092.05-02* |
| **Section 1221** | **Capital Asset v. Not a Capital Asset**<br>200211042 200215037 200218034 200243002 | **1221.00-00** |
| | • Depreciable Property Used In Trade or Business<br>200243002 | 1221.06-00 |
| | • Securities | 1221.12-00 |
| | *• Business Hedges*<br>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>200202033 200202078 200210056 200210061 200221032 200230017 200230017 200234043 200234043 200234043 200234043 200236030 200236030 200303027 | **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 200249002 | **1235.00-00** |
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| | • Substantial Rights v. No Substantial Rights<br>200249002 | 1235.04-00 |
| **Section 1241** | **Cancellation of Lease or Distributor's Agreement (Sale or Exchange v. Not a Sale or Exchange)**<br>200218034 | **1241.00-00** |
| **Section 1259** | **Constructive Sales of Appreciated Financial Positions**<br>200217039 200236045 200236045 | **1259.00-00** |
| **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*<br>200303024 | *1291.06-02* |
| **Section 1295** | **Qualified Electing Fund** | **1295.00-00** |

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| | • Time For Making Election | 1295.02-00 |
| | *• Retroactive Elections*<br>200212014 200245034 200303024 | *1295.02-02* |
| **Section 1301** | **Averaging of Farm Income**<br>200213026 | **1301.00-00** |
| **Section 1311** | **Correction of Error**<br>200232001 200242037 | **1311.00-00** |
| **Section 1313** | **Definitions** | **1313.00-00** |
| | • Determination v. No Determination<br>200251001 200251001 200251001 | 1313.01-00 |
| **Section 1341** | **Computation of Tax Where Taxpayer Restores Substantial Amount Held Under Claim of Right**<br>200235030 200235030 | **1341.00-00** |
| **Section 1361** | **Definitions**<br>200211032 200215006 200229037 200229037 200229037 200229037 200229037 200229038 200229038 200229038 200229038 200229038 200234062 200234062 200234062 200234062 200235007 200235007 200235008 200235008 200235009 200235009 200238004 200238004 200238004 200238005 200238005 200238005 200238006 200238006 200238006 200238007 200238007 200238007 200238008 200238008 200238008 200238009 200238009 200238009 200238010 200238010 200238010 200238011 200238011 200238011 200238012 200238012 200238012 200247030 | **1361.00-00** |
| | • Small Business Corporation v. Not a Small Business Corporation<br>200201005 200201005 200205044 200248023 | 1361.01-00 |
| | *• Non-Resident Alien as Shareholder*<br>200226031 | *1361.01-03* |
| | *• More than One Class of Stock*<br>200221035 200226032 | *1361.01-04* |
| | • Certain Trusts Permitted as Shareholders | 1361.03-00 |
| | *• Qualified Subchapter S Trusts*<br>200217011 200218031 200227022 200227027 200233020 200238023 200238023 200238023 200246018 200246018 200246018 | *1361.03-02* |
| | *• Electing Small Business Trusts*<br>200227021 | *1361.03-03* |
| | • Qualified Subchapter S Subsidiary<br>200204011 200205036 200206026 200208006 200208012 200217053 200218007 200219032 200222009 200223004 200223050 200229039 200229039 200229039 200229039 200229039 200241003 200241003 200241003 200245016 200245017 200245022 200245023 200245024 200245025 200245026 200245027 200248006 200252075 200252075 200252085 200252085 200303031 | 1361.05-00 |
| **Section 1362** | **Election by Small Business Corporation**<br>200202023 200210048 200215035 200217014 200217026 200219023 200220021 200220022 200220023 200221003 200221005 200221007 200221024 200226021 200227021 200227025 200236012 200236012 200246010 200246010 200246010 200250002 200252056 200252056 | **1362.00-00** |
| | • Eligible v. Ineligible<br>200217048 200222009 | 1362.01-00 |
| | *• Election After Termination*<br>200218017 200239007 200239007 200239007 200245021 | *1362.01-02* |

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200239025 200239031 200239031 200239031 200240007 200240007 200240007
200240007 200240008 200240008 200240008 200240008 200240011 200240011
200240011 200240011 200240013 200240013 200240013 200240013 200240025
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200240050 200241004 200241004 200241004 200241005 200241005 200241005
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200241036 200241036 200241036 200241037 200241037 200241037 200242014
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200245004 200245005 200245011 200245013 200245014 200245015 200245021
200245028 200245030 200245031 200245032 200245039 200245040 200245041
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200246007 200246007 200246007 200246008 200246008 200246008 200246011
200246011 200246011 200246020 200246020 200246020 200247011 200247031
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200302026 200302036 200302039 ***200304010 200304012 200304013 200304014 200304016 200304017 200250010 200251011 200251011 200251011 200252030*** 200252030 200252031 200252031 200252034 200252034 200252057 200252057 200252062 200252062 200252068 200252068 200252075 200252075 200252089 200252089 200252090 200252090 200301031 200301034 200302020 200302025 200302026 200302036 200302039 200303002 200303026 200303035 200303039 200303042 200303044 200303045 200303048 200303049

• Termination of Election 1362.02-00
200215039 200226009

*• Ceases to be Small Business Corporation* *1362.02-02*
200240038 200240038 200240038 200240038 200250006 200250007 200250008 200303032

*• Passive Investment Income* *1362.02-03*
200203017 200205019 200206023 200206030 200206031 200208007 200210041 200210042 200210045 200210046 200211001 200215045 200217008 200217012 200217023 200217034 200217045 200218033 200220024 200221027 200224021 200226024 200226025 200227004 200229003 200229003 200229003 200229003 200229003 200229027 200229027 200229027 200229027 200229027 200229036 200229036 200229036 200229036 200229036 200237005 200237015 200239008 200239008 200239008 200239033 200239033 200239033 200240003 200240003 200240003 200240003 200240005 200240005 200240005 200240005 200240017 200240017 200240017 200240017 200240026 200240026 200240026 200240026 200240032 200240032 200240032 200240032 200240033 200240033 200240033 200240033 200240034 200240034 200240034 200240034 200240039 200240039 200240039 200240039 200240043 200240043 200240043 200240043 200241002 200241002 200241002 200241006 200241006 200241006 200241007 200241007 200241007 200241023 200241023 200241023 200245007 200247024 200247026 200247027 200247028 200247029 200302024 ***200304026 200252036 200252036*** 200252037 200252037 200302024 200303046

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

• Inadvertent Terminations 1362.04-00
200201027 200201027 200203057 200204027 200205004 200205024 200206011 200207017 200209019 200212010 200212011 200215043 200216008 200217010 200217011 200218007 200221014 200222016 200223003 200226006 200226027 200227004 200227026 200227027 200227031 200227033 200227034 200227035 200229024 200229024 200229024 200229024 200229024 200233019 200233020 200234022 200234022 200234022 200234022 200235015 200235015 200235016 200235016 200236013 200236013 200237009 200237011 200237012 200237014 200237023 200238021 200238021 200238021 200238023 200238023 200238023 200240040 200240040 200240040 200240040 200240044 200240044 200240044 200240044 200242013 200242024 200245008 200245019 200245020 200246009 200246009 200246009 200246017 200246017 200246017 200246026 200246026 200246026 200247005 200247027 200248017 200248018 200248019 200250009 200250016 200251005 200251005 200251005 200252033 200252033 200252038 200252038 200252039 200252039 200252040 200252040 200252041 200252041 200252042 200252042 200252043 200252043 200252044 200252044 200252045 200252045 200252046 200252046 200252047 200252047 200252048 200252048 200252049 200252049 200252050 200252050 200252051 200252051 200252052 200252052 200252053 200252053 200252054 200252054 200252078 200252078 200301038 200303033 200303054

**Section 1366** **Pass-Thru of Items to Shareholders** **1366.00-00**
200207015 200223052 200230030 200230030

**Section 1367** **Adjustment to Basis of Stock of, and Indebtedness Owing, Shareholders** **1367.00-00**
200223052

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|---|---|---|
| **Section 1374** | **Tax Imposed On Certain Built-In Gains (for Corporations Electing S Status After 12/31/86)**<br>200205028 200240002 200240002 200240002 200240002 200247002 | **1374.00-00** |
| **Section 1375** | **Tax Imposed On Certain Passive Investment Income**<br>200210041 200210042 200210045 200210046 200218033 | **1375.00-00** |
| **Section 1377** | **Definitions and Special Rules** | **1377.00-00** |
| | • Post-termination Transition Period<br>200207015 200223052 200230030 200230030 | 1377.02-00 |
| **Section 1381** | **Organizations to Which Part Applies**<br>200209024 200210033 200224017 200239029 200239029 200239029 | **1381.00-00** |
| **Section 1388** | **Definitions; Special Rules**<br>200206044 200226037 200244013 200252027 200252027 | **1388.00-00** |
| **Section 1396** | **Empowerment Zone Employment Credit**<br>200214016 | **1396.00-00** |
| **Section 1398** | **Rules Relating to Individual's Title 11 Cases** | **1398.00-00** |
| | • Cases Under Chapter 7 or 11<br>200217003 | 1398.01-00 |
| **Section 1401** | **Rate and Applicability of Self-Employment Tax**<br>200222008 | **1401.00-00** |
| **Section 1402** | **Definitions**<br>200212027 | **1402.00-00** |
| **Section 1441** | **Withholding of Tax on Nonresident Aliens (Required v. Not Required)**<br>200219011 200244017 | **1441.00-00** |
| | • Who must Withhold | 1441.01-00 |
| | *• Liability of Withholding Agent*<br>200243003 | *1441.01-02* |
| | • Income Subject to Withholding v. Not Subject to Withholding<br>200222001 | 1441.02-00 |
| **Section 1442** | **Withholding of Tax on Foreign Corporations (Required v. Not Required)**<br>200243003 200244017 | **1442.00-00** |
| **Section 1443** | **Foreign Tax-Exempt Organizations (Subject v. Not Subject to Withholding)**<br>200244017 | **1443.00-00** |
| **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** | **1446.00-00** |
| | • Partner's Credit For Withholding Taxes<br>200251013 200251013 200251013 | 1446.08-00 |
| **Section 1502** | **Regulations Governing Consolidated Returns (May v. May Not File Consolidated Returns)**<br>200247002 | **1502.00-00** |
| | • Intercompany Transactions<br>200209025 200302002 200302002 | 1502.13-00 |

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|---|---|---|
| | *• Stock of Members*<br>200232028 | *1502.13-01* |
| | • Loss Disallowance Rule<br>200206050 200209051 | 1502.20-00 |
| | • Consolidated Net Operating Loss Deduction<br>200209002 200214023 | 1502.21-00 |
| | • Investment Adjustment<br>200215002 | 1502.32-00 |
| | • Earnings and Profits<br>200225014 | 1502.33-00 |
| | • Life and Non-Life<br>200252070 200252070 | 1502.50-00 |
| | • Filing Requirements<br>200203059 200220018 200238026 200238026 200238026 200303055 | 1502.75-00 |
| | *• When Group Remains in Existence*<br>200232016 | *1502.75-10* |
| | • Taxable Year of Members of Group<br>200227001 200303056 | 1502.76-00 |
| | • Common Parent Agent for Subsidiaries<br>200203007 200210012 200235011 200235011 | 1502.77-00 |
| | *• Alternative Agents of the Group*<br>200235011 200235011 | *1502.77-01* |
| | • Application of Section 382 with Respect to a Consolidated Group<br>200203007 | 1502.98-00 |
| **Section 1503** | **Computation and Payment of Taxes** | **1503.00-00** |
| | • Dual Consolidated Loss<br>200221018 | 1503.04-00 |
| | *• Dual Resident Corporation*<br>200201028 200201028 200201031 200201031 200203068 200205043 200208023 200210062 200213022 200213023 200213024 200214004 200216014 200216023 200216024 200219027 200227032 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 200240045 200240045 200240045 200240045 200240046 200240046 200240046 200240046 200243043 200245036 200245037 200247043 ***200304001 200304028 200250011*** | *1503.04-04* |
| **Section 1504** | **Definitions**<br>200201014 200201014 200238029 200238029 200238029 200302014 200251009 200251009 200251009 200302014 | **1504.00-00** |
| | • Affiliated Group v. Not an Affiliated Group<br>200252060 200252060 | 1504.01-00 |
| | • Includible Corporation v. Not an Includible Corporation | 1504.02-00 |
| | *• Foreign Subsidiary Formed to Comply With Foreign Law May Be An Includible Corporation*<br>200213018 | *1504.02-01* |
| | • Options, Warrants, Convertible Obligations<br>200302040 200302040 | 1504.03-00 |
| **Section 2001** | **Imposition and Rate of Tax** | **2001.00-00** |

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|---|---|---|
| | • Determination of Amount of Adjusted Taxable Gifts<br>200252032 200252032 | 2001.02-00 |
| **Section 2013** | **Credit for tax on Prior transfers**<br>200218003 | **2013.00-00** |
| **Section 2031** | **Definition**<br>200202032 200205002 200240014 200240014 200240014 200240014 200240016 200240016 200240016 200240016 200247001 200303010 | **2031.00-00** |
| **Section 2032** | **Alternate Valuation**<br>200203031 200236041 200236041 200247007 200302007 200302007 | **2032.00-00** |
| | • Exercise of Election<br>200227029 200234037 200234037 200234037 200234037 | 2032.01-00 |
| **Section 2032A** | **Valuation of Farm Real Property** | **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>200210051 200223013 200223014 200231011 200231011 200240027 200240027 200240027 200240027 200241044 200241044 200241044 | **2033.00-00** |
| | • 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>200303016 | 2035.01-00 |
| **Section 2036** | **Transfers With Retained Life Estate (Included v. Not Included in Gross Estate)**<br>200203045 200205002 200210018 200213013 200240018 200240018 200240018 200240018 200241044 200241044 200241044 200247037 200303016 | **2036.00-00** |
| | • 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>200213014 | **2037.00-00** |
| **Section 2038** | **Revocable Transfers (Included v. Not Included in Gross Estate)**<br>200205002 200210051 200213013 200213014 200241044 200241044 200241044 200247037 200303016 | **2038.00-00** |
| **Section 2039** | **Annuities (Included v. Not Included in Gross Estate)** | **2039.00-00** |
| | • Amount to Be Included<br>200210009 | 2039.02-00 |
| **Section 2041** | **Powers of Appointment (Included v. Not Included in Gross Estate)**<br>200206045 200210038 200210051 200210056 200210061 200219028 200219029 200219034 200225015 200229013 200229013 200229013 200229013 200229013 200240027 200240027 200240027 200240027 200243048 200244002 | **2041.00-00** |
| | • Pre-1942 Powers<br>200205033 | 2041.01-00 |

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|---|---|---|
| | • General Power v. Not a General Power<br>200227020 200234047 200234047 200234047 200234047 200241035 200241035 200241035 | 2041.03-00 |
| **Section 2042** | **Proceeds of Life Insurance (Included v. Not Included in Gross Estate)**<br>200303016 | **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* |
| **Section 2044** | **Certain Property for which Marital Deduction was Previously Allowed**<br>200203045 200205002 200219003 200223020 200223047 200236021 200236021 200243030 200250033 | **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>200241044 200241044 200241044 | **2053.00-00** |
| | • Claims Against the Estate | 2053.09-00 |
| | *• Claim Extinguished - Effect of Post Death Events*<br>200217022 | *2053.09-13* |
| **Section 2055** | **Transfers for Public, Charitable, and Religious Uses(Deductible v. Not Deductible)**<br>200204022 200223013 200223014 200229046 200229046 200229046 200229046 200229046 200230018 200230018 200232015 200234038 200234038 200234038 200234038 200241044 200241044 200241044 200252032 200252032 | **2055.00-00** |
| | • To Corporation or Association Organized for Exclusively Charitable Purposes<br>200302005 200302005 | 2055.02-00 |
| | • To Trustee or Fraternal Society for Charitable Purposes | 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* |
| | • Modification of Will | 2055.09-00 |
| | *• Contest*<br>200252077 200252077 | *2055.09-02* |
| | • Charitable and Noncharitable Interest (Tax Reform Act of 1969)<br>200232015 200302029 200302029 | 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>200201026 200201026 200224006 200230022 200230022 200232015 200302029 200302029 | *2055.12-10* |

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| **Section 2056** | **Bequests, etc., to Surviving Spouse (Marital Deduction v. No Marital Deduction)**<br>200211028 200219003 200223013 200223014 200234017 200234017 200234017 200234017 200236021 200236021 200240020 200240020 200240020 200240020 200241032 200241032 200241032 200243030 | **2056.00-00** | |
| | • Terminable Interests | 2056.01-00 | |
| | • *Life Estate*<br>200222024 200224016 | *2056.01-01* | |
| | • Qualified Terminable Interest Property<br>200218003 200226020 200241012 200241012 200241012 | 2056.07-00 | |
| | • *Effective Election*<br>200229043 200229043 200229043 200229043 200229043 200232030 200236017 200236017 200248007 | *2056.07-01* | |
| | • Special Rule for Charitable Remainder Trusts<br>200204022 200232015 | 2056.08-00 | |
| **Section 2056A** | **Qualified Domestic Trusts (Deductible v. Not Deductible)** | **2056A.00-00** | |
| | • Qualifying Interest<br>200241012 200241012 200241012 | 2056A.02-00 | |
| | • Effective Election<br>200211021 | 2056A.04-00 | |
| **Section 2057** | **Bequests, Etc. to Certain Minor Children (Repealed 1981)**<br>200246024 200246024 200246024 200252084 200252084 200302031 200302031 | **2057.00-00** | **R** |
| **Section 2104** | **Property Within U.S.**<br>200243031 | **2104.00-00** | |
| **Section 2107** | **Expatriation to Avoid Tax**<br>200303037 | **2107.00-00** | |
| **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 Gift Tax<br>200224016 200230017 200230017 | 2207A.02-00 | |
| **Section 2209** | **Certain Residents of Possessions Considered NonresidentD Not Citizens of the United States**<br>200303015 | **2209.00-00** | |
| **Section 2501** | **Imposition of Gift Tax (Imposed v. Not Imposed)**<br>200202033 200203045 200210018 200210051 200210056 200212006 200213011 200213013 200221032 200223019 200224001 200227020 200229018 200229018 200229018 200229018 200229018 200231011 200231011 200234043 200234043 200234043 200234043 200236030 200236030 200247013 200303015 200303027 200303037 | **2501.00-00** | |
| | • Gift v. Not a Gift<br>200203045 200210029 200229013 200229013 200229013 200229013 200229013 | 2501.01-00 | |
| | • Certain Residents of Possessions Considered Nonresidents Not Citizens of U.S.<br>200303015 | 2501.06-00 | |

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| **Section 2511** | **Transfers in General (Gift v. Not a Gift)**<br>200202033 200202036 200212006 200213011 200240014 200240014 200240014 200240014 200240016 200240016 200240016 200240016 200241044 200241044 200241044 200245053 200247013 | **2511.00-00** |
| | • Consideration<br>200209007 200209008 | 2511.02-00 |
| | • Gift of Remainder<br>200220014 200220015 200238039 200238039 200238039 200240015 200240015 200240015 200240015 200248020 | 2511.11-00 |
| **Section 2512** | **Valuation of Gifts**<br>200212006 200223013 200223014 200233022 200245053 | **2512.00-00** |
| **Section 2513** | **Gifts by Husband or Wife to Third Party (Gift Splitting) (Allowed v. Not Allowed)**<br>200205027 200213013 | **2513.00-00** |
| | • Joint and Several Liability<br>200205027 | 2513.03-00 |
| **Section 2514** | **Powers of Appointment (Transfer v. Not a Transfer)**<br>200247013 200303016 | **2514.00-00** |
| | • Power Created on or Before October 21, 1942<br>200205033 | 2514.01-00 |
| | • Definition of General Power of Appointment<br>200234047 200234047 200234047 200234047 200241035 200241035 200241035 | 2514.03-00 |
| **Section 2516** | **Certain Property Settlements (Exempt v. Not Exempt >From Gift Tax)**<br>200221021 200221042 | **2516.00-00** |
| **Section 2518** | **Disclaimers**<br>200204022 200208028 200208029 200208030 200208033 200225015 200232015 | **2518.00-00** |
| | • Requirements for a Qualified Disclaimer<br>200302029 200302029 | 2518.01-00 |
| | • Disclaimer of Less than an Entire Interest<br>200230022 200230022 200302029 200302029 200303020 | 2518.02-00 |
| **Section 2519** | **Disposition of Certain Life Estates**<br>200223047 200224016 200230017 200230017 200236021 200236021 200243030 200250033 | **2519.00-00** |
| **Section 2522** | **Charitable and Similar Gifts (Deductible v. Not Deductible)**<br>200223013 200223014 200226012 200240027 200240027 200240027 200240027 200241044 200241044 200241044 | **2522.00-00** |
| | • Transfer Not Exclusively for Charitable etc. Purposes | 2522.02-00 |
| | *• Charitable Remainder Trusts*<br>200205008 200207026 200215032 | *2522.02-03* |
| **Section 2523** | **Gift to Spouse (Marital Deduction Allowed v. Not Allowed)**<br>200210051 200223013 200223014 | **2523.00-00** |

**Section 2601** **Tax On Generation Skipping Transfers** **2601.00-00**
200202033 200203029 200203030 200206045 200209022 200209033 200209034 200209037 200209038 200210029 200210054 200210056 200211008 200213011 200213013 200213014 200214002 200214012 200214019 200214020 200215001 200218023 200218035 200219028 200219029 200221032 200223019 200224001 200225029 200226042 200229013 200229013 200229013 200229013 200229013 200229018 200229018 200229018 200229018 200229018 200229034 200229034 200229034 200229034 200229034 200230038 200230038 200231011 200231011 200234043 200234043 200234043 200234043 200236030 200236030 200238034 200238034 200238034 200240014 200240014 200240014 200240014 200240016 200240016 200240016 200240016 200241038 200241038 200241038 200241041 200241041 200241041 200242022 200242031 200242032 200242033 200242034 200243004 200243005 200243006 200243007 200243008 200243009 200243010 200243011 200243012 200243013 200243014 200243015 200243016 200243017 200243018 200243026 200243033 200243048 200247037 200302004 200252064 200252064 200302004 200303027 200303030

• Exceptions 2601.03-00
200203029 200241041 200241041 200241041

*• Irrevocable Trusts* *2601.03-01*
200201017 200201017 200201020 200201020 200203029 200207018 200211034 200217035 200222012 200229041 200229041 200229041 200229041 200229041 200229042 200229042 200229042 200229042 200229042 200234062 200234062 200234062 200234062 200241041 200241041 200241041 200252061 200252061 200252067 200252067 200252069 200252069 200252083 200252083

• Transitional Rules 2601.04-00

*• Wills or Revocable Trusts Executed Before October 22, 1986* *2601.04-01*
200217036 200217037 200227020

*• Amendments to Wills or Revocable Trusts* *2601.04-03*
200209007 200209008 200234047 200234047 200234047 200234047 200241035 200241035 200241035

*• Cases of Mental Incompetency* *2601.04-05*
200209032 200209035 200209036 200209039 200209042 200209043 200209045 200230019 200230019

**Section 2613** **Skip Person and Non-Skip Person** **2613.00-00**
200215001

**Section 2631** **GST Exemption** **2631.00-00**
200227022

**Section 2632** **Special Rules for Allocation of GST Exemption** **2632.00-00**
200218001 200224018 200242002

• Time and Manner of Allocation 2632.01-00
200212024 200212025 200218010 200218011 200218012 200218015 200223016 200227017 200235013 200235013 200240019 200240019 200240019 200240019 200245018 200247038 200247039 200248012 200302017 ***200304024 200301027*** 200301028 200302017 200303022

• Deemed Allocation to Certain Lifetime Direct Skips 2632.02-00
200201002 200201002 200201003 200201003

**Section 2642** **Inclusion Ratio** **2642.00-00**
200213014 200229032 200229032 200229032 200229032 200229032 200229033 200229033 200229033 200229033 200229033 200233021 200236016 200236016 200236019 200236019 200236020 200236020 200237021 200238003 200238003 200238003 200238018 200238018 200238018 200238028 200238028 200238028 200238035 200238035 200238035 200240029 200240029 200240029 200240029 200240030 200240030 200240030 200240030 200241043 200241043 200241043 200242016 200242017 200242020 200242029 200242030 200243037 200243038 200243039 200247008 200247009 200247042 200302033 200302035 200302037 200302038 200252065 200252065 200252076 200252076 200252086 200252086 200301037 200302033 200302035 200302037 200302038 200303053

• Inclusion Ratio Defined 2642.01-00
200234026 200234026 200234026 200234026 200236004 200236004 200241021 200241021 200241021 200241022 200241022 200241022 200241040 200241040 200241040 200243042 200248009 200248010

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200215001 200236021 200236021 200243030

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200218001

*• Special Election for QTIP* *2652.01-02*
200205040 200208018 200214011 200215026 200226026 200226041 200229043 200229043 200229043 200229043 200229043 200230024 200230024 200231010 200231010 200232027 200232030 200241032 200241032 200241032 200242002

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200232027

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200242002

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200223047 200224016 200229018 200229018 200229018 200229018 200229018 200230003 200230003 200230017 200230017 200250033

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200211036 200220014 200220015 200241039 200241039 200241039

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200222029 200235029 200235029

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200214001 200244004 200303003

*• Payment Under Employers' Plans for Retirement, Disability, Death, etc.* *3121.01-12*
200247040

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200210014 200234009 200234009 200234009 200234009

*• Standby Employee Wages* *3121.01-17*
200206053

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200211005

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| | • *Voluntary Coverage of State, etc., Employees*<br>200206053 | *3121.02-06* |
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| | • *Student Employee of School, etc.*<br>200212029 200215048 | *3121.02-10* |
| | • Employees<br>200215053 200222005 | 3121.04-00 |
| | • *Common Law Tests*<br>200206053 200234007 200234007 200234007 200234007 | *3121.04-01* |
| | • *Insurance Salesmen*<br>200203005 | *3121.04-18* |
| | • Not Employees Under Section 530 of 1978 Revenue Act | 3121.10-00 |
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| | • Application of Hospital Insurance Tax to Federal, State, and Local Government<br>200206053 200247014 200303029 | 3121.15-00 |
| | • Treatment of Certain Deferred Compensation and Salary Reduction Arrangements | 3121.16-00 |
| | • *Employer Contributions*<br>200229017 200229017 200229017 200229017 200229017 | *3121.16-01* |
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| | • Employers v. Not Employers<br>200202050 200203023 200203024 200203025 200203028 200205030 200206020 200210016 200211038 200211039 200214006 200214008 200214009 200214010 200217019 | 3231.01-00 |
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| | • Employment | 3306.03-00 |
| | • *Services for U.S. or an Instrumentality Excepted*<br>200238001 200238001 200238001 | *3306.03-01* |
| | • Employees<br>200222005 200234007 200234007 200234007 200234007 | 3306.05-00 |
| **Section 3401** | **Definitions** | **3401.00-00** |
| | • Employer-Employee Relationship<br>200222005 | 3401.04-00 |
| | • *Employer v. Not an Employer*<br>200214001 200233004 | *3401.04-01* |
| | • *Employee v. Not an Employee*<br>200234007 200234007 200234007 200234007 | *3401.04-02* |
| | • Number of Withholding Exemptions Claimed<br>200206053 | 3401.05-00 |
| **Section 3402** | **Income Tax Collected at Source**<br>200303041 | **3402.00-00** |
| | • Employee Incurring No Income Tax Liability<br>200206053 | 3402.10-00 |

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| | • Withholding on Payments of Indian Casino Profits<br>200222003 | 3402.20-00 |
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| | • Producer<br>200244007 | 4093.02-00 |
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| | • Sport Fishing Equipment<br>200244005 | 4161.01-00 |
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| **Section 4940** | **Excise Tax on Net Investment Income (Applicable v. Not Applicable)**<br>200204042 200204053 200205048 200205049 200206057 200216033 200224035 200233027 200233028 200233029 200233030 200234065 200234065 200234065 200234065 200234066 200234066 200234066 200234066 200234067 200234067 200234067 200234067 200234068 200234068 200234068 200234068 200234072 200234072 200234072 200234072 200238050 200238050 200238050 200241056 200241056 200241056 | **4940.00-00** |
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| | • Computation of Net Investment Income | 4940.02-00 |
| | *• Gross Investment Income--Items Included*<br>200204039 200221050 | *4940.02-01* |
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| | • Special Rules as to Liability<br>200218036 200218041 200218042 200219036 200219039 200221050 200232033 | 4941.03-00 |

• Definition of Self-Dealing 4941.04-00
200204042 200204044 200204046 200204047 200204053 200205048 200205049 200206057 200208039 200213028 200216032 200216033 200217056 200218041 200218042 200219036 200219038 200219039 200221050 200222034 200222037 200222038 200224033 200225037 200225042 200225045 200227044 200232033 200232036 200233027 200233028 200233029 200233030 200233031 200234065 200234065 200234065 200234065 200234066 200234066 200234066 200234066 200234067 200234067 200234067 200234067 200234068 200234068 200234068 200234068 200234072 200234072 200234072 200234072 200238050 200238050 200238050 200238053 200238053 200238053 200241044 200241044 200241044 200241047 200241047 200241047 200241048 200241048 200241048 200241049 200241049 200241049 200241056 200241056 200241056 200244011 200252092 200252092

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200209061 200216032 200224035 200241049 200241049 200241049 200241052 200241052 200241052

• Definitions of Principal Terms 4942.03-00

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200204039 200204044 200204046 200204047 200246031 200246031 200246031

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200205049 200207031

• *Qualifying Distribution* *4942.03-05*
200204039 200204042 200204053 200205049 200207031 200209055 200212034 200233027 200233028 200233029 200233030 200234065 200234065 200234065 200234065 200234066 200234066 200234066 200234066 200234067 200234067 200234067 200234067 200234068 200234068 200234068 200234068 200234072 200234072 200234072 200234072 200238050 200238050 200238050 200241056 200241056 200241056 200246036 200246036 200246036 200251019 200251019 200251019

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200204037 200207030 200212034 200224031 200224032 200225036 200230040 200230040 200235036 200235036 200245059 200247054 200302051 200302051 200303063

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200232036

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200204042 200204044 200204046 200204047 200204053 200233027 200233028 200233029 200234065 200234065 200234065 200234065 200234066 200234066 200234066 200234066 200245058

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200204039

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200204039 200204042 200204044 200204046 200204047 200204053 200205048 200205049 200206057 200218038 200232036 200233027 200233028 200233029 200233030 200234065 200234065 200234065 200234065 200234066 200234066 200234066 200234066 200234072 200234072 200234072 200234072 200245058

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200218038 200222034 200246036 200246036 200246036

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200204042 200204053 200217057 200218036 200218041 200218042 200219036 200219039 200224030 200227039 200230041 200230041 200233026 200235037 200235037 200238054 200238054 200238054 200244020 200244022 200247061 200249010 200302047 ***200304035 200250038 200250044 200252098 200252098*** 200302047

• Definition of Taxable Expenditure 4945.04-00
200204039 200218036 200218041 200218042 200219036 200219039 200222037 200222038 200225045 200227044 200232036 200251019 200251019 200251019

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200221052 200249015

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200222034

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200204044 200204046 200204047 200205048 200205049 200206057 200209055 200216032 200216033 200222034 200233027 200233028 200233029 200233030 200234065 200234065 200234065 200234065 200234066 200234066 200234066 200234066 200234067 200234067 200234067 200234067 200234068 200234068 200234068 200234068 200234072 200234072 200234072 200234072 200238050 200238050 200238050 200241049 200241049 200241049 200241056 200241056 200241056

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200204039 200213028 200241047 200241047 200241047

• Foundation Manager 4946.02-00
200204044 200204046 200204047 200213028

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200223008 200302005 200302005

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200235035 200235035

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200226012

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200244028 200247055

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200204052 200219041 200246033 200246033 200246033

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200236050 200236050 200246034 200246034 200246034

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200230044 200230044

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200211050

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200204038 200222033

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| | *• IRA's*<br>200215061 | *4975.03-03* |
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| | *• ESOP Loans*<br>200210065 200213033 200243055 | *4975.04-02* |
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| | • Disqualified Benefits<br>200203073 200203074 200203075 200204045 200206056 200208003 200210025 200219002 200223068 200245062 200245063 ***200304003 200304004 200304005*** 200301022 200301030 | 4976.01-00 |
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| | • Amount of Reversion<br>200221049 200227040 200227041 | 4980.01-00 |
| **Section 4982** | **Excise Tax on Undistributed Income of Regulated Investment Companies**<br>200202065 200205042 200207020 200216031 | **4982.00-00** |
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| **Section 6012** | **Persons Required to Make Returns of Income (Required v. Not Required)**<br>200217055 200219018 200236043 200236043 | **6012.00-00** |
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| | • Receivers<br>200219018 | 6012.04-00 |
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| | • Return Prepared by IRS Personnel<br>***200304031*** | 6020.02-00 |

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| | • Required Information | 6033.02-00 |
| | *• Private Foundation*<br>200234065 200234065 200234065 200234065 200234066 200234066 200234066 200234066 200234072 200234072 200234072 200234072 200241056 200241056 200241056 | *6033.02-01* |
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| **Section 6061** | **Signing of Returns and Other Documents**<br>200236043 200236043 200247046 | **6061.00-00** |
| **Section 6062** | **Signing of Corporation Returns**<br>200247046 | **6062.00-00** |
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| **Section 6091** | **Place for Filing Returns or Other Documents**<br>200236002 200236002 | **6091.00-00** |
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| | • Disclosure for Tax Administration Purpose<br>200240024 200240024 200240024 200240024 | 6103.11-00 |
| **Section 6109** | **Identifying Numbers**<br>200231013 200231013 200233003 200235027 200235027 | **6109.00-00** |
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| **Section 6201** | **Assessment Authority**<br>200242036 | **6201.00-00** |
| **Section 6203** | **Method of Assessment**<br>200239028 200239028 200239028 | **6203.00-00** |
| **Section 6211** | **Definition of a Deficiency**<br>200202069 200235031 200235031 | **6211.00-00** |
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| | • Name and Address | 6212.02-00 |
| | *• Last Known Address*<br>200230033 200230033 | *6212.02-04* |
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| | *• Mathematical or Clerical Errors*<br>200225004 200245001 200250019 | *6213.07-01* |
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| | • Partner<br>200217031 | 6231.02-00 |
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| | • Affected Item<br>200217031 | 6231.05-00 |
| | • Tax Matters Partner<br>200245002 | 6231.07-00 |

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| **Section 6402** | **Authority to Make Credits or Refunds**<br>200202056 200204014 200213012 200224020 200236025 200236025 200242037 200251013 200251013 200251013 | **6402.00-00** |
| | • Credit of Overpayment Against Any Tax Liability<br>200202056 200204014 200225002 | 6402.01-00 |
| | *• Credits Against Estimated Tax*<br>200202056 | *6402.01-02* |
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| | • Refund Subject to Off-Set<br>200230035 200230035 | 6402.02-00 |
| | • Access to Refund<br>200210012 | 6402.03-00 |
| | • Requirement That a Claim Be Filed<br>200209004 200211006 | 6402.04-00 |
| | *• Grounds*<br>200209004 | *6402.04-02* |
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| **Section 6416** | **Certain Taxes on Sales and Services**<br>200215004 200234040 200234040 200234040 200234040 | **6416.00-00** |
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| **Section 6501** | **Limitations on Assessment and Collection (Barred v. Not Barred)**<br>200204001 200216007 200218009 200221004 200221006 200221010 200243019 | **6501.00-00** |
| | • Adequacy of Return to Start Limitations Running (Sufficient v Insufficient)<br>***200304031 200304032 200251013 200251013 200251013*** | 6501.04-00 |
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| | *• Withholding Agents on U.S. Source Income*<br>200223021 | *6501.07-12* |
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