

Publication 1078
Issue: 10/17/2003

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 Counsel advice.

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

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Department of the Treasury
Internal Revenue Service

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	• Allocation of Sales Price 200315040	1001.01-00
	• Amount Realized 200244009	1001.02-00
	• Real Property Taxes Paid by the Purchaser 200303023 200303023 200328034 200328034 200328034 200328035 200328035 200328035	1001.02-02
	• Property Differing Materially 200210029 200227020	1001.02-07
Section 1012	Basis of Property--Costs	1012.00-00
	• Liabilities Assumed as Purchase Price 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 200326034	1012.06-00
	• Property Received From Services 200244008	1012.10-00
Section 1014	Basis of Property Acquired From a Decedent	1014.00-00
	200240018 200240018 200240018 200240018 200340019 200311030	
	• Appreciated Property Acquired By Decedent by Gift Within One Year of Death 200210051	1014.06-00
Section 1015	Basis of Property Acquired by Gift or Transfer in Trust	1015.00-00
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	• Transfer in Trust After December 31, 1920 200213014 200324051	1015.03-00
	• <i>Basis in Hands of Trustee or Beneficiaries of an Irrevocable Trust</i> 200313002	1015.03-01
Section 1016	Adjustment v. No Adjustment to Basis	1016.00-00
	• Improvements, Additions, Other Capital Charges 200229014 200229014 200229014 200229014 200229014	1016.07-00
	• <i>Stockholders Contributions</i> 200335034	1016.07-03
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	• Like Kind Property 200224004	1031.02-00
	• Like Kind Real Estate 200219006	1031.03-00
	• Deferred Exchanges 200211016 200236026 200236026 200240049 200240049 200240049 200240049 200241016 200241016 200241016 200338001	1031.05-00
	• Basis 200244010 200342003	1031.08-00
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	200232028 200335034	
Section 1033	Involuntary Conversion	1033.00-00
	200236003 200236003 200246015 200246015 200246015 200315021	
	• General Rule 200322017	1033.01-00
	• Definition of Involuntary Conversion Events 200217001 200219006 200239009 200239009 200239009 200239012 200239012 200239012	1033.02-00
	• Property Similar or Related in Service or Use 200239009 200239009 200239009 200239012 200239012 200239012	1033.03-00
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	200323012 200342003	
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	• <i>One Policy Exchanged for Two or More Policies</i> 200243047	1035.03-01
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	200221042 200233022 200317011	
	• Transfers Incident to Divorce 200221021	1041.01-00
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	• Definitions 200337003 200337003 200337003	1042.03-00

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Section 1082	Basis for Determining Gain or Loss	1082.00-00
	200240006 200240006 200240006 200240006	
Section 1092	Straddles	1092.00-00
	• Mixed Straddles	1092.05-00
	• <i>Mixed Straddle Account</i> 200206048 200206049 200212003	1092.05-02
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	200211042 200215037 200218034 200243002 200335034	
	• Depreciable Property Used In Trade or Business	1221.06-00
	200243002	
	• Securities	1221.12-00
	• <i>Business Hedges</i> 200221008	1221.12-02
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	200209007 200209008 200215037 200335029	
Section 1223	Holding Period of Capital Assets	1223.00-00
	200202033 200202078 200210056 200210061 200221032 200230017 200230017 200234043 200234043 200234043 200234043 200236030 200236030 200303027 200303027 200306010 200306010 200313002 200319004 200319004 200319005 200319005 200333013	
	• Decedent and Estate	1223.01-00
	200213014 200324051	
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	200215037 200335034	
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	200335033	
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	200209007 200209008	
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	200219017 200219019 200219020 200219021 200219026 200249002	
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	200249002	
	• Substantial Rights v. No Substantial Rights	1235.04-00
	200249002	

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	• <i>Deemed Dividend Election by Shareholder of Controlled Foreign Corporation</i> 200303024 200303024	1291.06-02
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	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 200306013 200306013 200316005 200334027 200334029	
	• Small Business Corporation v. Not a Small Business Corporation 200201005 200201005 200205044 200248023 200313004 200320008 200320008	1361.01-00
	• <i>Non-Resident Alien as Shareholder</i> 200226031	1361.01-03
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	• Certain Trusts Permitted as Shareholders 200311019	1361.03-00

	• <i>Grantor Trusts</i>	1361.03-01
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	• <i>Qualified Subchapter S Trusts</i>	1361.03-02
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	• <i>Electing Small Business Trusts</i>	1361.03-03
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Section 1362	Election by Small Business Corporation	1362.00-00
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	• <i>Eligible v. Ineligible</i>	1362.01-00
	200217048 200222009 200306026 200306026	
	• <i>Election After Termination</i>	1362.01-02
	200218017 200239007 200239007 200239007 200245021	

• Late Elections

1362.01-03

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• Termination of Election
200215039 200226009

1362.02-00

• *Ceases to be Small Business Corporation*

1362.02-02

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• *Passive Investment Income*

1362.02-03

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• S Termination Year

1362.03-00

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• Inadvertent Terminations

1362.04-00

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Section 1366

Pass-Thru of Items to Shareholders

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200223052

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<ul style="list-style-type: none"> • Section 442; Accounting Periods 	9100.09-00
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<ul style="list-style-type: none"> • Section 472; LIFO Election 	9100.11-00
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<ul style="list-style-type: none"> • Section 754; Manner of Electing Optional Adjustment to Basis of Partnership Property 	9100.15-00
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- Other 9100.22-00
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- Regulation Section 1.1502-20; Loss Disallowance Rule 9100.28-00
 - 200206050

- Reg. 301.7701-3 Classification of Certain Business Entities 9100.31-00
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 - 200252068 200252068 200252081 200252081 200301002 200301003 200301005
 - 200301006 200301007 200302019 200302026 200303043 200303043 200306007
 - 200306007 200307005 200307005 200307007 200307007 200307064 200307064
 - 200307065 200307065 200307066 200307066 200307067 200307067 200307068
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 - 200308025 200308026 200308027 200308028 200308029 200308040 200310010
 - 200310010 200310010 200312020 200312020 200312020 200312020 200312020
 - 200312020 200312021 200312021 200312021 200312021 200312021 200312021
 - 200314020 200316024 200316025 200316029 200318036 200320014 200320014
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 - 200330006 200330007 200330008 200333009 200333012 200333021 200334009
 - 200334012 200339023 **200342002**

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- Res Judicata 9111.14-00
 - 200221002

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	• <i>Related Civil Action</i> 200206008 200221002	9111.19-02
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	• U.S. Model Income Tax Treaty	9114.01-00
	• <i>Students and Trainees</i> 200251003 200251003 200251003	9114.01-20
	• U.S. Income Tax Treaties	9114.03-00
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	• <i>Germany</i> 200327047	9114.03-13
	• <i>Ireland</i> 200216010 200236023 200236023 200238031 200238031 200238031 200239030 200239030 200239030 200243029 200321013 200252071 200252071 200301039 200323016 200330031 200330035 200330039	9114.03-19
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	• <i>Switzerland</i> 200201025 200201025 200224025 200332008	9114.03-38
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	• <i>Czech Republic</i> 200251003 200251003 200251003	9114.03-43
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	• Railroad Car Leasing 200338009	9214.03-00
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	• Substance v. Form Issues Not Contained in Present List 200226014 200334001	9999.97-00

• Not Able to Identify Under Present List

9999.98-00

200202063 200202070 200205045 200205046 200205047 200206001 200206002
200208025 200208026 200210001 200210032 200210063 200211007 200211045
200212031 200212032 200212033 200213007 200215050 200215052 200216026
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200336029 200336035 200338012 200339047