

Publication 1078
Issue: 12/26/2003

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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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
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200302022 200305009 200310005 200310005 200310005 200314018 200339007
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200209047 200212026 200213016 200214014 200214021 200215049 200216006
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200231003 200231003 200231008 200231008 200234021 200234021 200234021
200234021 200234044 200234044 200234044 200234044 200234050 200234050
200234050 200234050 200237022 200239022 200239022 200239022 200243027
200243032 200247003 200247019 200247020 200247021 200247022 200247023
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200302044 200303004 200303004 200303005 200303005 200303034 200303034
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200311024 200312024 200312024 200312024 200312024 200312024 200312024
200315025 200316038 200324039 200326020 200329043 200332011 200333018
200345049 200345050 200347001 200351005

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200215034 200217051 200220010 200223007 200226007 200226036 200231006
200231006 200234053 200234053 200234053 200234053 200243028 200243036
200245009 200302008 200302030 200308004 200308048 200327018 200327027
200344001 200346013 200252072 200252072 200301011 200301036 200302008
200302030 200303057 200303057 200308004 200308048 200310009 200310009
200310009 200312011 200312011 200312011 200312011 200312011 200312011
200312022 200312022 200312022 200312022 200312022 200312022 200313003
200318046 200323041 200337001 200337001 200337001 200339004 200347013
200350002 **200352002**

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200202060 200306014 200306014 200332015

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	200222032 200225038 200225039	
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	200206014 200206015 200206021 200208002 200210053 200214003 200216016 200216018 200222022 200229021 200229021 200229021 200229021 200229021 200245038 200246006 200246006 200246006 200248016 200327041	
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	200303058 200330011 200330033 200337010 200337010 200337010	
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	200302012 200302013 200301009 200301012 200301013 200301014 200301015	
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	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	
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	200302021 200302023 200302027 200302028 200302041 200335026 200302021	
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	200232022 200236034 200236034 200239010 200239010 200239010 200240009	
	200240009 200240009 200240009 200241025 200241025 200241025 200245044	
	200245045 200302021 200302023 200302027 200302028 200302041 200327042	
	200335026 200343016 200343017 200346020 200302021 200302023 200302027	
	200302028 200302041 200323004 200323005 200323008 200326019 200339030	
	200345017 200345018 200345021 200345023 200345024 200345035 200345036	
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	200205003 200206006 200217021 200224011 200237003 200238022 200238022 200238022 200238025 200238025 200238025	
	<ul style="list-style-type: none"> • Services 200230001 200230001 • Transfer or Use of Intangibles 200230001 200230001 • <i>Cost Sharing Agreements</i> 200225009 • Allocation of Net Income 200203053 • Allocation of Deductions 200203053 • Collateral Effects of Allocation • <i>Constructive Dividend</i> 200334001 • <i>Capital Contribution</i> 200334001 • Rev. Proc. 65-17 200229019 200229019 200229019 200229019 200229019 	<ul style="list-style-type: none"> 482.09-00 482.11-00 482.11-08 482.13-00 482.17-00 482.22-00 482.22-02 482.22-03 482.23-00
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	<ul style="list-style-type: none"> • Title-Holding Company 200214035 200214036 • Religious, Charitable, etc., Institutions and Community Chest 200211051 200216037 200222030 200225042 200304036 200321021 200349008 200333034 	<ul style="list-style-type: none"> 501.02-00 501.03-00

<ul style="list-style-type: none"> • <i>Foundations</i> 	501.03-02
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<ul style="list-style-type: none"> • <i>Trusts</i> 	501.03-03
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200203069 200225046 200236051 200236051 200243056 200304036	
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 200350007 200350013 200350014 200351007 200351013 200351023 **200352013**

• Termination of Election
 200215039 200226009

1362.02-00

• Ceases to be Small Business Corporation

200240038 200240038 200240038 200240038 200344005 200250006 200250007
 200250008 200303032 200303032 200316030 200324050 200330004 200330005
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1362.02-02

• *Passive Investment Income*

1362.02-03

200203017 200205019 200206023 200206030 200206031 200208007 200210041
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200348007 200350008 200351015

• S Termination Year

1362.03-00

200207021 200210043 200219013 200227028 200229039 200229039 200229039
200229039 200229039

• Inadvertent Terminations

1362.04-00

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200352014

Section 1366

Pass-Thru of Items to Shareholders

1366.00-00

200207015 200223052 200230030 200230030 200308033 200335034 200308033

Section 1367	Adjustment to Basis of Stock of, and Indebtedness Owning, Shareholders 200223052	1367.00-00
Section 1374	Tax Imposed On Certain Built-In Gains (for Corporations Electing S Status After 12/31/86) 200205028 200240002 200240002 200240002 200240002 200247002 200320013 200320013 200329011	1374.00-00
	• Net Recognized Built-in Gain 200329011	1374.02-00
	• Recognized Built-in Loss 200329011	1374.04-00
Section 1375	Tax Imposed On Certain Passive Investment Income 200210041 200210042 200210045 200210046 200218033	1375.00-00
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	• Post-termination Transition Period 200207015 200223052 200230030 200230030	1377.02-00
Section 1381	Organizations to Which Part Applies 200209024 200210033 200224017 200239029 200239029 200239029 200314002 200332001 200341017	1381.00-00
Section 1388	Definitions; Special Rules 200206044 200226037 200244013 200252027 200252027	1388.00-00
Section 1396	Empowerment Zone Employment Credit 200214016	1396.00-00
Section 1398	Rules Relating to Individual's Title 11 Cases	1398.00-00
	• Cases Under Chapter 7 or 11 200217003	1398.01-00
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	• Net Earnings From Self-Employment 200305001 200305002	1402.01-00
	• Self-Employment Income 200321018	1402.02-00
	• Ministers, Members of Religious Orders, Christian Science Practitioners (Election) 200318002	1402.05-00
Section 1441	Withholding of Tax on Nonresident Aliens (Required v. Not Required) 200219011 200244017	1441.00-00
	• Who must Withhold	1441.01-00
	• <i>Liability of Withholding Agent</i> 200243003	1441.01-02
	• Income Subject to Withholding v. Not Subject to Withholding 200222001 200316040	1441.02-00
Section 1442	Withholding of Tax on Foreign Corporations (Required v. Not Required) 200243003 200244017	1442.00-00
Section 1443	Foreign Tax-Exempt Organizations (Subject v. Not Subject to Withholding) 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 200223009	1445.07-00
Section 1446	Withholding Tax Paid by Partnerships with Foreign Partners	1446.00-00
	• Partner's Credit For Withholding Taxes 200251013 200251013 200251013	1446.08-00
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	200247002	
	• Intercompany Transactions 200209025 200302002 200302002 200334037 200345049	1502.13-00
	• <i>Stock of Members</i> 200232028	1502.13-01
	• Loss Disallowance Rule 200206050 200209051	1502.20-00
	• Consolidated Net Operating Loss Deduction 200209002 200214023 200305019 200306025 200306025 200307075 200307075 200312018 200312018 200312018 200312018 200312018 200312018	1502.21-00
	• Investment Adjustment 200215002	1502.32-00
	• Earnings and Profits 200225014 200317019	1502.33-00
	• Life and Non-Life 200344002 200252070 200252070 200323002	1502.50-00
	• Filing Requirements 200203059 200220018 200238026 200238026 200238026 200303055 200303055 200312013 200312013 200312013 200312013 200312013 200312013 200333015 200351001	1502.75-00
	• <i>When Group Remains in Existence</i> 200232016 200339008	1502.75-10
	• Taxable Year of Members of Group 200227001 200303056 200303056 200312015 200312015 200312015 200312015 200312015 200312015	1502.76-00
	• Common Parent Agent for Subsidiaries 200203007 200210012 200235011 200235011	1502.77-00
	• <i>Alternative Agents of the Group</i> 200235011 200235011 200307077 200307077	1502.77-01
	• Application of Section 382 with Respect to a Consolidated Group 200203007	1502.98-00
Section 1503	Computation and Payment of Taxes	1503.00-00
	• Dual Consolidated Loss 200221018	1503.04-00

	• <i>Dual Resident Corporation</i>	1503.04-04
	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 200321008 200327036 200340016 200344023 200346003 200346004 200250011 200313018 200316039 200318068 200320012 200320012 200323032 200330038 200330040 200333010 200336025 200336027 200339051 200348003	
Section 1504	Definitions	1504.00-00
	200201014 200201014 200238029 200238029 200238029 200302014 200251009 200251009 200251009 200302014	
	• <i>Affiliated Group v. Not an Affiliated Group</i>	1504.01-00
	200252060 200252060 200329028	
	• <i>Includible Corporation v. Not an Includible Corporation</i>	1504.02-00
	• <i>Foreign Subsidiary Formed to Comply With Foreign Law May Be An Includible Corporation</i>	1504.02-01
	200213018	
	• <i>Options, Warrants, Convertible Obligations</i>	1504.03-00
	200302040 200302040	
Section 2001	Imposition and Rate of Tax	2001.00-00
	• <i>Determination of Amount of Adjusted Taxable Gifts</i>	2001.02-00
	200252032 200252032 200341002	
Section 2013	Credit for tax on Prior transfers	2013.00-00
	200218003	
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	200202032 200205002 200240014 200240014 200240014 200240014 200240016 200240016 200240016 200240016 200247001 200303010 200303010	
Section 2032	Alternate Valuation	2032.00-00
	200203031 200236041 200236041 200247007 200302007 200302007 200348010	
	• <i>Exercise of Election</i>	2032.01-00
	200227029 200234037 200234037 200234037 200234037 200327043 200318053 200324048	
	• <i>Included Property</i>	2032.05-00
	200343002	
Section 2032A	Valuation of Farm Real Property	2032A.00-00
	• <i>Method of Election</i>	2032A.08-00
	• <i>Perfecting Elections and Agreements</i>	2032A.08-04
	200234055 200234055 200234055 200234055	
Section 2033	Property in Which Decedent Had an Interest	2033.00-00
	200210051 200223013 200223014 200231011 200231011 200240027 200240027 200240027 200240027 200241044 200241044 200241044 200315015 200320015 200320015	
	• <i>Life Estate</i>	2033.09-00
	200213014	
Section 2035	Adjustments for Certain Gifts Made Within 3 Years of Decedent's Death	2035.00-00

	• Inclusion of Certain Property in Gross Estate 200303016 200303016 200314009 200328030 200328030 200328030	2035.01-00
Section 2036	Transfers With Retained Life Estate (Included v. Not Included in Gross Estate) 200203045 200205002 200210018 200213013 200240018 200240018 200240018 200240018 200241044 200241044 200241044 200247037 200303016 200303016 200345006 200350009 200350010	2036.00-00
	• Retention of Possession or Enjoyment of Right to Income From Property 200311020	2036.01-00
	• Retention of Right to Designate Who Shall Enjoy Property or Income 200328030 200328030 200328030	2036.02-00
	• Life Insurance Trusts 200314009	2036.07-00
	• Transfer v. Not a Transfer 200213014	2036.11-00
	• Amount Included 200210009	2036.23-00
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Section 2038	Revocable Transfers (Included v. Not Included in Gross Estate) 200205002 200210051 200213013 200213014 200241044 200241044 200241044 200247037 200303016 200303016 200345006 200350009 200350010	2038.00-00
	• Power to Alter or Amend	2038.01-00
	• <i>Power to Change Beneficiaries or Their Shares</i> 200328030 200328030 200328030	<i>2038.01-01</i>
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	• Amount to Be Included 200210009	2039.02-00
Section 2041	Powers of Appointment (Included v. Not Included in Gross Estate) 200206045 200210038 200210051 200210056 200210061 200219028 200219029 200219034 200225015 200229013 200229013 200229013 200229013 200229013 200240027 200240027 200240027 200240027 200243048 200244002 200311020 200324018 200345006	2041.00-00
	• Pre-1942 Powers 200205033	2041.01-00
	• General Power v. Not a General Power 200227020 200234047 200234047 200234047 200234047 200241035 200241035 200241035	2041.03-00
Section 2042	Proceeds of Life Insurance (Included v. Not Included in Gross Estate) 200303016 200303016 200314009	2042.00-00
	• Insurance Receivable by Other Beneficiaries	2042.04-00
	• <i>Insurance or Purchase of Decedent's Interest in Business</i> 200214028	<i>2042.04-03</i>
Section 2044	Certain Property for which Marital Deduction was Previously Allowed 200203045 200205002 200219003 200223020 200223047 200236021 200236021 200243030 200250033 200324023	2044.00-00
	• Inclusion of Property in which Decedent had Qualifying Income Interest for Life	2044.01-00

	• <i>Deduction Allowed with Respect to Transfer of Property to Decedent under Section 2056 or 2523</i> 200224016 200319002 200319002	2044.01-01
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	• <i>Claims Against the Estate</i>	2053.09-00
	• <i>Claim Extinguished - Effect of Post Death Events</i> 200217022	2053.09-13
Section 2055	Transfers for Public, Charitable, and Religious Uses(Deductible v. Not Deductible) 200204022 200223013 200223014 200229046 200229046 200229046 200229046 200229046 200230018 200230018 200232015 200234038 200234038 200234038 200234038 200241044 200241044 200241044 200252032 200252032 200306008 200306008 200306009 200306009	2055.00-00
	• <i>To Corporation or Association Organized for Exclusively Charitable Purposes</i> 200302005 200302005	2055.02-00
	• <i>To Trustee or Fraternal Society for Charitable Purposes</i> 200322013	2055.03-00
	• <i>Presently Ascertainable Charitable Remainder</i> 200227015	2055.03-03
	• <i>Transfers Not Exclusively for Charitable Purposes</i> 200340001	2055.07-00
	• <i>Transfers Subject to Condition</i> 200202032	2055.07-02
	• <i>Modification of Will</i>	2055.09-00
	• <i>Contest</i> 200252077 200252077 200306002 200306002	2055.09-02
	• <i>Charitable and Noncharitable Interest (Tax Reform Act of 1969)</i> 200232015 200302029 200302029 200306008 200306008 200306009 200306009	2055.12-00
	• <i>Unitrusts</i> 200330028	2055.12-05
	• <i>Unitrust Lead Interest</i> 200218029	2055.12-06
	• <i>Guaranteed Annuity Lead Interest</i> 200230022 200230022	2055.12-07
	• <i>Reformations of Nonqualifying Interests</i> 200201026 200201026 200224006 200230022 200230022 200232015 200302029 200302029 200305023 200306008 200306008 200306009 200306009 200330028 200350012	2055.12-10
Section 2056	Bequests, etc., to Surviving Spouse (Marital Deduction v. No Marital De- duction) 200211028 200219003 200223013 200223014 200234017 200234017 200234017 200234017 200236021 200236021 200240020 200240020 200240020 200240020 200241032 200241032 200241032 200243030 200324023	2056.00-00
	• <i>Terminable Interests</i>	2056.01-00
	• <i>Life Estate</i> 200222024 200224016 200319002 200319002	2056.01-01
	• <i>Qualified Terminable Interest Property</i> 200218003 200226020 200241012 200241012 200241012 200318039 200339003	2056.07-00

	• <i>Effective Election</i>	2056.07-01	
	200229043 200229043 200229043 200229043 200229043 200232030 200236017 200236017 200248007 200323010 200336014		
	• Special Rule for Charitable Remainder Trusts	2056.08-00	
	200204022 200232015		
Section 2056A	Qualified Domestic Trusts (Deductible v. Not Deductible)	2056A.00-00	
	• Qualifying Interest	2056A.02-00	
	200241012 200241012 200241012		
	• Imposition of Estate Tax	2056A.03-00	
	• <i>Distributions Before Death of the Spouse</i>	2056A.03-01	
	200309006		
	• Effective Election	2056A.04-00	
	200211021 200352005		
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	200246024 200246024 200246024 200252084 200252084 200302031 200302031 200352003 200352008		
Section 2057	Sales of Certain Employer Securities (Repealed 1989)	2057.00-00	R
	200313001 200317008 200328012 200328012 200328012 200339025		
Section 2104	Property Within U.S.	2104.00-00	
	200243031		
Section 2107	Expatriation to Avoid Tax	2107.00-00	
	200303037 200303037		
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	• Apportionment of Tax According to State Law	2205.01-00	
	200206024		
Section 2207A	Right of Recovery in the Case of Certain Marital Deduction Property	2207A.00-00	
	200223047		
	• Recovery With Respect to Gift Tax	2207A.02-00	
	200224016 200230017 200230017 200319002 200319002		
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	200303015 200303015		
Section 2501	Imposition of Gift Tax (Imposed v. Not Imposed)	2501.00-00	
	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 200303015 200303027 200303027 200303037 200303037 200313002 200314007 200315015 200319004 200319004 200319004 200319004 200319005 200319005 200320015 200320015 200328030 200328030 200328030 200328030 200334020 200334025 200352004		
	• Gift v. Not a Gift	2501.01-00	
	200203045 200210029 200229013 200229013 200229013 200229013 200229013 200306010 200306010 200310021 200310021 200310021		
	• Certain Residents of Possessions Considered Nonresidents Not Citizens of U.S.	2501.06-00	
	200303015 200303015		
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	200334020		
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	• Present v. Future Interests 200341002	2503.03-00
Section 2504	Taxable Gifts for Preceding Years 200334020	2504.00-00
Section 2505	Unified Credit Against Gift Tax 200334020	2505.00-00
Section 2511	Transfers in General (Gift v. Not a Gift) 200202033 200202036 200212006 200213011 200240014 200240014 200240014 200240014 200240016 200240016 200240016 200240016 200241044 200241044 200241044 200245053 200247013 200308046 200308046 200311020 200318064 200328026 200328026 200328026 200337012 200337012 200337012	2511.00-00
	• Consideration 200209007 200209008	2511.02-00
	• Retention of Powers	2511.07-00
	• <i>Relinquishment of Power</i> 200324018	2511.07-05
	• Transfer of Life Estate or Other Right Over Income 200339021	2511.10-00
	• Gift of Remainder 200220014 200220015 200238039 200238039 200238039 200240015 200240015 200240015 200240015 200248020 200348011	2511.11-00
Section 2512	Valuation of Gifts 200212006 200223013 200223014 200233022 200245053	2512.00-00
	• Valuation of Property in General 200337012 200337012 200337012	2512.01-00
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200352008 200352010 200352022

- Section 42; Low-Income Housing Credit 9100.01-00
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 200348018
- Section 59(e) 9100.02-00
- *R and D Expenditures* 9100.02-03
 200210055
- Section 168; MACRS 9100.04-00
200352009

<ul style="list-style-type: none"> • Section 338(g); Election Under Section 1.338-1T(c)(1) 	9100.06-00
<p>200201030 200201030 200202046 200202049 200202058 200202067 200204033 200205013 200205015 200205016 200205017 200205018 200205037 200206036 200209021 200210057 200210058 200210059 200211020 200211029 200211031 200218020 200220025 200223023 200223025 200223026 200223027 200223028 200223029 200223030 200223031 200223032 200223033 200223034 200223035 200223053 200223054 200223055 200223056 200223057 200223058 200223059 200223060 200223061 200223062 200225028 200230031 200230031 200232014 200237018 200245049 200247044 200249006 200308047 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 200252022 200252023 200252023 200252024 200252024 200252025 200252025 200252026 200252026 200301021 200303050 200303050 200308047 200311022 200314023 200315018 200315019 200316013 200316014 200324040 200332013 200337002 200337002 200337002</p>	
<ul style="list-style-type: none"> • Section 338(h)(1); Election Under Section 1.338(h)(10)-1T 	9100.07-00
<p>200202066 200203056 200204036 200211027 200213025 200216009 200220013 200224019 200227019 200227038 200232023 200232024 200234027 200234027 200234027 200234027 200234028 200234028 200234028 200234028 200235017 200235017 200235019 200235019 200237025 200238033 200238033 200238033 200238037 200238037 200238037 200241029 200241029 200241029 200241030 200241030 200241030 200247017 200248001 200248022 200304020 200304027 200308031 200327001 200327034 200327035 200327038 200327050 200343007 200346011 200303040 200303040 200308031 200311016 200312017 200312017 200312017 200312017 200312017 200312017 200314022 200318047 200318048 200318067 200322003 200322004 200324020 200348025 200352012</p>	
<ul style="list-style-type: none"> • Section 442; Accounting Periods 	9100.09-00
<p>200201013 200201013 200203060 200209016 200217047 200218013 200218016 200222014 200227010 200230025 200230025 200233009 200235012 200235012 200236039 200236039 200238038 200238038 200238038 200240021 200240021 200240021 200240021 200245035 200245046 200246028 200246028 200246028 200335025 200250028 200301001 200303006 200303006 200303007 200303007 200303008 200303008 200303014 200303014 200309001 200309014 200310004 200310004 200310004 200313006 200318025 200318062 200326022 200330034 200332003 200334036 200351016 200351017 200351018 200351019 200351020 200351021 200351022</p>	
<ul style="list-style-type: none"> • Section 472; LIFO Election 	9100.11-00
<p>200223005 200223017 200234048 200234048 200234048 200234048 200234052 200234052 200234052 200234052 200327017 200326013 200329042</p>	
<ul style="list-style-type: none"> • Section 663; Special Rules Applicable to Sections 661 and 662 	9100.12-00
<p>200250003</p>	
<ul style="list-style-type: none"> • Section 754; Manner of Electing Optional Adjustment to Basis of Partnership Property 	9100.15-00
<p>200229028 200229028 200229028 200229028 200229028 200343022 200303038 200303038 200307063 200307063 200318059 200328014 200328014 200328014 200336006 200336007 200336008 200336009 200336010 200336011 200336012 200336013 200348016</p>	
<ul style="list-style-type: none"> • Section 911; Citizens or Residents of the United States Living Abroad 	9100.17-00
<p>200321007</p>	
<ul style="list-style-type: none"> • Section 927; FSC Election 	9100.18-00
<p>200210062 200221040 200245036 200247043 200304001 200321008 200321009 200327036 200313018 200316039 200320012 200320012 200323032 200330038 200333010</p>	

<ul style="list-style-type: none"> • Extension of Time For Filing Return 200324049 	9100.19-00
<ul style="list-style-type: none"> • Section 1502; Election to File Consolidated Return 200203059 200220018 200238026 200238026 200238026 200303055 200303055 200312013 200312013 200312013 200312013 200312013 200312013 200333015 200351001 	9100.20-00
<ul style="list-style-type: none"> • Other 200201021 200201021 200201023 200201023 200201028 200201028 200201031 200201031 200203068 200205043 200208018 200208023 200210062 200213022 200213023 200213024 200214004 200214011 200216014 200216023 200216024 200219027 200223009 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 200232027 200234036 200234036 200234036 200234036 200236035 200236035 200238029 200238029 200238029 200240045 200240045 200240045 200240045 200240046 200240046 200240046 200240046 200242023 200243043 200245036 200245037 200304001 200304021 200304022 200304028 200321008 200327036 200340016 200344023 200346003 200346004 200252076 200252076 200305027 200312015 200312015 200312015 200312015 200312015 200312015 200312018 200312018 200312018 200312018 200312018 200312018 200313018 200315016 200316039 200318068 200320012 200320012 200323032 200323033 200324044 200324048 200326031 200328012 200328012 200328012 200329020 200329038 200330038 200330040 200333010 200336025 200336027 200339025 200339051 200341001 200345011 200348003 200350005 200352005 	9100.22-00
<ul style="list-style-type: none"> • Section 642(c); Election for Estate Trust to Deduct Charitable Payments in the Tax Year Even Though Not Paid Until Subsequent Year 200344021 	9100.26-00
<ul style="list-style-type: none"> • Regulation Section 1.1502-20; Loss Disallowance Rule 200206050 	9100.28-00

• Reg. 301.7701-3 Classification of Certain Business Entities	9100.31-00
200202003 200202004 200202005 200202006 200202007 200202008 200202009	
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200351023	

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	• Res Judicata	9111.14-00
	200221002	
	• Collateral Estoppel	9111.19-00
	200221002	
	• <i>Related Civil Action</i>	9111.19-02
	200206008 200221002	
Section 9114	Tax Conventions (See Also 894.01-00 through 894.12-00)	9114.00-00
	• U.S. Model Income Tax Treaty	9114.01-00
	• <i>Students and Trainees</i>	9114.01-20
	200251003 200251003 200251003	
	• U.S. Income Tax Treaties	9114.03-00
	• <i>Canada</i>	9114.03-06
	200329038	
	• <i>Germany</i>	9114.03-13
	200327047	

	• <i>Ireland</i>	9114.03-19
	200216010 200236023 200236023 200238031 200238031 200238031 200239030 200239030 200239030 200243029 200321013 200344012 200252071 200252071 200301039 200323016 200330031 200330035 200330039	
	• <i>Japan</i>	9114.03-22
	200222011	
	• <i>Switzerland</i>	9114.03-38
	200201025 200201025 200224025 200332008	
	• <i>United Kingdom</i>	9114.03-42
	200225016	
	• <i>Czech Republic</i>	9114.03-43
	200251003 200251003 200251003	
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	200251003 200251003 200251003	
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	200218022 200224011 200227018	
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	200338009	
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Section 9999	Miscellaneous Issues	9999.00-00
	200220001 200220002	
	• <i>Substance v. Form Issues Not Contained in Present List</i>	9999.97-00
	200226014 200334001	
	• <i>Not Able to Identify Under Present List</i>	9999.98-00
	200202063 200202070 200205045 200205046 200205047 200206001 200206002 200208025 200208026 200210001 200210032 200210063 200211007 200211045 200212031 200212032 200212033 200213007 200215050 200215052 200216026 200216028 200217005 200217017 200218014 200219035 200220006 200220026 200220027 200221001 200221045 200223018 200223051 200225003 200225034 200233002 200234004 200234004 200234004 200234004 200234055 200234055 200234055 200234055 200235024 200235024 200238002 200238002 200238002 200238043 200238043 200238043 200240023 200240023 200240023 200240023 200240037 200240037 200240037 200240037 200241017 200241017 200241017 200241020 200241020 200241020 200242003 200242006 200245052 200246002 200246002 200246002 200246030 200246030 200246030 200247025 200249001 200302018 200304009 200304029 200304030 200346006 200250001 200302018 200303009 200303009 200303047 200303047 200305003 200312002 200312002 200312002 200312002 200312002 200316001 200322001 200328029 200334004 200336029 200336035 200338012 200339047	