

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.

Each ruling, technical advice memorandum, or Chief Counsel advice contained in this publication is directed only to the taxpayer who requested it or with respect to whom it is issued. Section 6110(k)(3) of the Internal Revenue Code provides that letter rulings, technical advice memorandums, and Chief counsel advice may not be used or cited as precedent.

Any person having questions about this publication or about section 6110 of the Code should contact the Chief, Disclosure and Litigation Support Branch,
CC:PA:LPD:DLS, Room 5201, 1111 Constitution Avenue N.W., Washington, DC 20224; (202) 622-7570.

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Section 317	Other Definitions	317.00-00
	<ul style="list-style-type: none"> • Redemption of Stock v. Not a Redemption 201247010 	317.02-00
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	201211020 201252008 201330004 201330004 201334006 201511020 201511020	
	<ul style="list-style-type: none"> • Year Liquidation Occurs 201228023 	331.04-00
	<ul style="list-style-type: none"> • Form v. Substance 201252008 	331.07-00
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	201228030 201228033 201236014 201240017 201249012 201252014 201308002 201328003 201308002 201333007 201350001 201352007 201404002 201406005 201411002 201418039 201418046 201433007 201441010 201443017 201445008 201452016 201504007 201511001 201511001 201512001 201528006	

	• Nonrecognition of Gain or Loss 201213018 201228030 201236014 201308002 201314001 201315016 201308002 201339001 201412013 201415001	332.01-00
	• Debts of Parent to Subsidiary 201213018	332.07-00
Section 336	Gain or Loss Recognized on Property Distributed in Complete Liquidation 201237017 201418025 201511020 201511020	336.00-00
	• Liquidation in a Reorganization	336.03-00
	• <i>Distribution of Property to a Related Person</i> 201418025	336.03-01
	• <i>Disqualified Property</i> 201418025	336.03-02
	• <i>Liquidation to which section 332 Applies</i> 201328003	336.03-05
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	• Section 332 Liquidations 201404004	337.10-00
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	• <i>Transfer of Substantially All Assets to Tax Exempt</i> 201404004	337.14-01
	• Loss Disallowance 201310015	337.16-00
	• <i>Basis Reductions on Deconsolidation</i> 201521008 201521008 201521008 201521008 201521008	337.16-01
	• <i>Allowable Worthless Stock Loss</i> 201249005 201250010 201329001 201329007 201329008 201329009 201329010 201329011 201329012 201329013 201329014	337.16-02
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	• Express Election 201214018 201412012	338.01-00
	• <i>Time in which Election must be made</i> 201206010 201246021 201338011 201437005 201438018 201503007 201510037 201530017 201534007	338.01-02
	• Qualified Stock Purchase 201203004 201211009 201213013 201214012 201216026 201228011 201252011 201351004	338.02-00
	• Consistency Rules 201213013 201214012	338.04-00
	• Purchase from Related Corporation 201203004	338.09-00
	• Deemed Asset Sale and Liquidation in 338(h)(10) Election 201203004	338.80-00
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	201201012 201212001 201214014 201224006 201228030 201232030 201232033 201240017 201249012 201250004 201252002 201252014 201312017 201314001 201330002 201330002 201333007 201348006 201350001 201350007 201411006 201412013 201415001 201416002 201422004 201424007 201424010 201431002 201436033 201437007 201437013 201438009 201446019 201505012 201506008 201511015 201511015	
	• Control v. No Control by Transferor	351.01-00
	201224006 201242007 201306006 201326014 201333007 201506008	
	• Series of Transactions	351.02-00
	201212001 201506008 201531014	
	• "Property" Defined	351.05-00
	201506008	
	• Constructive Exchange	351.11-00
	201350001	
	• Section 351 v. Section 304 (See Also 0304.01-01)	351.12-00
	201228034	
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	• Exchange v. Liquidation	354.01-00
	201423010	
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	201202007 201208017 201213001 201213005 201216027 201228030 201228033 201229002 201232033 201236014 201238018 201240013 201244006 201245020 201252017 201305003 201306010 201310023 201312017 201323017 201325009 201328024 201330002 201330022 201330002 201330022 201333007 201334009 201334032 201337003 201338040 201339001 201340009 201341026 201347005 201349006 201352007 201402002 201402002 201407005 201411012 201416002 201416005 201418018 201418030 201419005 201419010 201419012 201422018 201423012 201424006 201424009 201424013 201426004 201437006 201441009 201441010 201441016 201503006 201505013 201512001 201524005	
	• Spin-Off	355.01-00
	201202007 201203004 201211008 201213018 201215005 201216023 201216027 201228002 201228030 201232014 201232033 201233016 201236014 201240017 201244006 201244008 201246027 201249012 201251006 201305003 201306006 201308002 201312017 201312020 201312022 201314001 201315009 201315016 201325009 201328024 201329005 201330007 201330022 201308002 201330007 201330022 201334009 201334032 201335001 201336012 201337007 201338040 201340009 201341004 201341013 201341026 201347005 201348005 201349006 201350007 201352007 201404002 201407005 201409002 201409003 201411002 201412013 201415001 201416005 201418030 201418039 201418046 201419005 201419010 201419012 201422004 201422012 201423006 201423010 201424005 201424006 201424008 201424009 201424011 201424013 201426004 201426008 201430002 201433007 201436033 201437006 201437013 201438009 201440014 201441008 201441009 201441016 201443017 201445008 201503006 201504007 201505007 201505013 201511001 201511001 201512001 201516014 201528006	
	• Split-Off	355.01-01
	201208017 201213001 201213002 201213005 201230007 201232033 201234009 201238018 201240016 201245020 201246027 201252017 201306010 201308017 201308018 201310023 201313016 201323017 201327003 201330002 201330007 201308017 201308018 201330002 201330007 201337003 201350007 201352007 201403002 201403002 201404002 201405003 201411002 201411012 201418019 201422017 201426007 201435005 201512001	
	• Split-Up	355.01-02
	201402002 201402002 201418018 201423012	

	• Non Pro Rata Distributions, etc. 201233016	355.02-00
	• Active Business 201219003 201251006 201333003 201407005 201418039 201418046 201426007 201429006 201436033 201531014	355.03-00
	• <i>Five-Year Requirement</i> 201251006 201528016	355.03-01
	• Business Purpose 201308017 201308018 201308017 201308018	355.04-00
	• Control 201437013 201527003	355.05-00
	• <i>Distribution of Control</i> 201437013	355.05-01
	• Distributions Within a Consolidated Group 201305003 201352007 201445008	355.09-00
	• Gain Recognition on Distributions Pursuant to Acquisitions of Greater than 50% of Distributing or Controlled 201249011 201250021 201324009 201505007	355.10-00
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	• Securities as "Other Property" 201527003	356.02-00
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	• <i>Exceptions</i> 201230008 201348006 201431002	357.02-02
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	• Allocation of Basis 201411006 201437007	358.02-00
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	• Exchanges Not Solely in Kind 201423010 201440014	361.01-00
	• Distributions	361.02-00
	• <i>Certain Transfers to Creditors</i> 201228033 201409003 201511001 201511001	361.02-02
Section 362	Basis to Corporations 201411006 201418013 201418034 201418041 201418042 201441014 201502001 201502002 201505028	362.00-00
	• Property Acquired in Reorganizations and Transfers by Controlling Stock- holders 201418013 201418041 201418042 201505028 201521011 201521011 201521011 201521011 201521011	362.01-00
Section 367	Foreign Corporations 201348011 201432002	367.00-00

	• Transfer to Foreign Corporations Subject to Section 367(a) 201321018	367.01-00
	• Treatment of Transfers of Stock or Securities to Foreign Corporations 201321018	367.03-00
	• <i>Reorganizations Described in Section 368(a)(1)(B)</i> 201249011 201250021 201324009	367.03-01
	• <i>Treatment of Subsequent Disposition of Stock of Transferee</i> 201321018	367.03-13
	• Transfer of Foreign Branch with Previously Deducted Losses Under Section 367(a)	367.06-00
	• <i>Anti-Abuse Rule</i> 201530020	367.06-07
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	• <i>Liquidations Under Section 332</i> 201348011	367.40-02
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	201201012 201212001 201213019 201213021 201214013 201216027 201224006 201228030 201236014 201238018 201239003 201240017 201247009 201249012 201252017 201308001 201308017 201308018 201310023 201312017 201314003 201325009 201330022 201308001 201308017 201308018 201330022 201341026 201349006 201402002 201402002 201404006 201406005 201416002 201419005 201424005 201424006 201424009 201424011 201426004 201512001	
	• Statutory Merger or Consolidation (Type "A") 201213001 201213019 201213021 201228033 201232033 201252002 201252014 201312017 201314008 201314028 201326006 201333007 201350007 201404002 201423010 201436034 201438009 201505012	368.01-00
	• Stock for Stock (Type "B") 201249011 201250021 201324009	368.02-00
	• <i>Liquidation Distribution</i> 201418039 201418046	368.02-02
	• Stock for Property (Type "C") 201224006 201228030 201247009 201252014 201324003 201340016 201411002 201413003 201418039 201418046 201422004 201424007	368.03-00
	• <i>Substantially All the Property</i> 201247009	368.03-01

<ul style="list-style-type: none"> • Assets for Control of Transferee (Type "D") 	368.04-00
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<ul style="list-style-type: none"> • Recapitalization (Type "E") 	368.05-00
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<ul style="list-style-type: none"> • Change in Identity, etc. (Type "F") 	368.06-00
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<ul style="list-style-type: none"> • Continuity of Interest Rule 	368.08-00
201214013 201224006 201247009	
<ul style="list-style-type: none"> • <i>Related party Acquisitions</i> 	368.08-03
201214013	
<ul style="list-style-type: none"> • <i>Business Enterprise Continuity</i> 	368.08-06
201247009 201314028 201413003	
<ul style="list-style-type: none"> • <i>Historic Business Assets</i> 	368.08-07
201224006	
<ul style="list-style-type: none"> • <i>Transfers to Controlled Corporations</i> 	368.08-08
201214013 201224006 201234009 201240016 201424007	
<ul style="list-style-type: none"> • Plan of Reorganization 	368.09-00
201411002	
<ul style="list-style-type: none"> • <i>Several Steps</i> 	368.09-01
201252014 201411002	
<ul style="list-style-type: none"> • Liquidation v. Reorganization 	368.12-00
201505012	
<ul style="list-style-type: none"> • Transactions Involving Two or More Investment Companies 	368.13-00
201247009	
<ul style="list-style-type: none"> • Transfer by Corporation in Title 11 Case (Type "G") 	368.14-00
201208036 201230020 201523001	
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Carryovers in Certain Corporate Acquisitions (Allowed v. Not Allowed)	381.00-00
<ul style="list-style-type: none"> • Method of Accounting 	381.04-00
201237012 201343012	

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	201208002 201215007 201228023 201229004 201251002 201306003 201308026 201308029 201309013 201314035 201322032 201326013 201328027 201308026 201308029 201335012 201345023 201350006 201403007 201403007 201412009 201432015 201443009 201443009	
	• Scope of Section 382 Limitation	382.02-00
	• <i>Closing of the Books</i> 201418038	382.02-05
	• Value of Old Loss Corporation 201435003	382.05-00
	• Ownership Change 201350006	382.07-00
	• <i>Segregation Rules</i> 201350006 201451015	382.07-05
	• Definitions and Special Rules 201215007 201403007 201403007	382.11-00
	• <i>5-Percent Shareholder</i> 201215007 201403007 201403007	382.11-09
	• Operating Rules 201322032 201335012 201443009 201443009	382.12-00
	• <i>Contributions to Capital</i> 201350006	382.12-01
	• <i>Title 11 or Similar Case</i> 201306003 201322032 201328027 201435003	382.12-08
	• <i>Election Out</i> 201519004	382.12-13
	• <i>Controlled Groups</i> 201232016 201232017 201335012 201421011 201421012 201421013 201443009 201443009	382.12-16
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	• Debt v. Equity 201230008 201323021	385.01-00
	• New Financial Products 201209006 201226026	385.03-00
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	201205022 201234036 201238031 201242019 201242020 201338028	
	• Impossibility of Diversion	401.01-00
	• <i>Definitely Determinable Benefits Under a Pension Plan</i> 201501025	401.01-03
	• Impossibility of Diversion 201228055	401.03-00
	• Discrimination as to Contributions or Benefits (See Also 401.29-01, 401.20-00, 414.00-00) 201440027	401.04-00
	• Required Distributions 201202042 201208039 201318033 201320021 201424031 201434028 201437025 201437034 201503024	401.06-00

	<ul style="list-style-type: none"> • <i>In General</i> 201203033 201210047 201228045 201228051 201241017 201422028 201422029 201422030 201422031 201424031 201427023 201430022 201431034 201434028 	401.06-01
	<ul style="list-style-type: none"> • <i>Employee Dies Before Entire Interest Distributed</i> 201202042 201208039 201210045 201320021 	401.06-02
	<ul style="list-style-type: none"> • Commencement of Benefits Under Qualified Trusts 201221033 	401.11-00
	<ul style="list-style-type: none"> • Cash or Deferred Arrangements 201417025 201527042 201532036 	401.29-00
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	201201018 201204025 201209015 201211030 201212023 201216047 201224046 201226036 201226037 201228043 201231018 201236035 201240032 201242024 201243016 201243017 201246046 201247020 201301016 201302046 201304013 201308037 201311041 201311042 201313025 201313027 201315035 201318031 201323044 201324025 201308037 201331009 201331010 201343029 201404017 201405030 201405031 201407026 201407027 201410039 201417026 201420025 201428014 201430023 201430030 201434029 201436057 201437026 201440025 201440027 201440032 201447050 201447051 201447052 201511038 201511038 201522012 201524030 201528043 201529016 201531024 201532040 201532042 201533023	
	<ul style="list-style-type: none"> • Exempt Trust 201417025 	402.01-00
	<ul style="list-style-type: none"> • Foreign Situs Trust 201341039 201406022 201419026 201430028 201436055 201452027 201502021 201505046 	402.03-00
	<ul style="list-style-type: none"> • Amounts Distributed or Made Available to Beneficiary 201431037 201527042 	402.06-00
	<ul style="list-style-type: none"> • Unrealized Appreciation of Employer's Securities 201242019 201427024 	402.07-00
	<ul style="list-style-type: none"> • Rollover Contributions 201211031 201215015 201224043 201233021 201233022 201234034 201305015 201323040 201330047 201330047 201341038 201346013 201403020 201403025 201418063 201419020 201419021 201420026 201426032 201442070 201443029 201443030 201445028 201446031 201446032 201446038 201448033 201452022 201452025 201505045 201514020 201521022 201521022 201521022 201521022 201521022 201524027 	402.08-00
	<ul style="list-style-type: none"> • <i>By a Surviving Spouse</i> 201523019 201523020 	402.08-05
	<ul style="list-style-type: none"> • Tax on Lump Sum Distributions 201241019 	402.09-00
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	201230030	
	<ul style="list-style-type: none"> • Non-Forfeitable Rights 201345036 201451062 201501026 	403.03-00
	<ul style="list-style-type: none"> • Rollover Amounts 201212023 201224043 201323040 201419021 201524027 	403.05-00
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	201204010 201206022 201206024 201208043 201218024 201221034 201229012 201233023 201330030 201330030 201511039 201511039	

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	201208039 201405032 201405033 201405034 201423043 201431038 201439006 201451065	
	• Exclusive Benefit of Individual or His Beneficiary	408.01-00
	201225020	

• Rollover Contributions

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	• Distributions 201318033 201426034 201446030	408.06-00
	• Prohibited Transactions 201437023	408.07-00
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201204019 201210044 201216040 201217018 201217019 201218041 201219024
201219025 201221023 201224033 201224036 201229001 201229010 201230025
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201411037 201415008 201415010 201417017 201419015 201424024 201429027
201431032 201433016 201433017 201433020 201434022 201434023 201451030
201451033 201505040 201505041 201505042 201507026 201517008

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201309014

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201218016 201218017 201218019 201218022 201218023 201218041 201219025
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201350042 201350044 201350045 201350046 201351028 201402015 201402015
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201514012 201514014 201514015 201515034 201516066 201517009 201517010
201517012 201517013 201517014 201518021 201519032 201519033 201522006
201524026 201526018 201526019 201526022 **201534014 201534015 201534016**
201534020

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501.03-01

201203032 201313033 201351025 201428019 201428024

<ul style="list-style-type: none"> • <i>Foundations</i> 	501.03-02
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201241010	
<ul style="list-style-type: none"> • <i>Corporations</i> 	501.03-05
201202038 201204019 201204020 201204021 201205011 201210041 201211026 201215011 201218041 201219025 201219028 201224033 201224036 201227006 201228042 201229001 201229010 201230025 201233018 201236033 201241011 201242014 201244021 201245021 201325014 201333014 201338052 201346012 201405023 201410035 201419016 201423026 201426028 201428021 201446025 201451036 201521016 201521016 201521016 201521016 201521016	
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201217021	
<ul style="list-style-type: none"> • <i>Educational Organizations</i> 	501.03-08
201252025 201303018 201304011 201305013 201323025 201327015 201345032 201405024 201415009 201417017 201417018 201424024 201426035 201433020 201435015 201440023 201445014 201503017 201509040 201510059 201516069 201527044	
<ul style="list-style-type: none"> • <i>Hospitals and Health Clinics (See Also 0501.06-03)</i> 	501.03-11
201210041 201317012 201328035 201445015 201451037	
<ul style="list-style-type: none"> • <i>Libraries, Museums, etc.</i> 	501.03-13
201221024 201517011	
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201433020	
<ul style="list-style-type: none"> • <i>Organizations With Charitable Activities Outside U.S. (See Also 0501.28-00)</i> 	501.03-15
201215011 201322041 201335024 201438032	
<ul style="list-style-type: none"> • <i>Prevention of Cruelty Groups</i> 	501.03-18
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<ul style="list-style-type: none"> • <i>Public Recreation Facilities and Athletic Organizations</i> 	501.03-19
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<ul style="list-style-type: none"> • <i>Religious Organizations</i> 	501.03-20
201232034 201236033 201246041 201251018 201310045 201325017 201327018 201350047 201414024 201417017 201420020 201523022	
<ul style="list-style-type: none"> • <i>Scholarships, Endowment Funds and Trusts, Student Loans</i> 	501.03-22
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<ul style="list-style-type: none"> • <i>Scientific Organizations</i> 	501.03-24
201311030 201313032	
<ul style="list-style-type: none"> • <i>Social Welfare Groups (See Also 0501.04-00)</i> 	501.03-25
201304011 201340021 201415007 201451036 201505042	
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<ul style="list-style-type: none"> • <i>Organizational and Operational Tests</i> 	501.03-30
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201218016 201433018	
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<ul style="list-style-type: none"> • <i>Prepaid Medical Care Association (See Also 0501.03-10)</i> 	501.04-02
201406019 201451033	
<ul style="list-style-type: none"> • <i>Political Activities Organizations</i> 	501.04-03
201214035 201221025 201221026 201221027 201221028 201221029 201403019 201403019 201403020 201424028 201449002	
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<ul style="list-style-type: none"> • <i>Agriculture and Horticulture Organizations</i> 	501.05-01
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<ul style="list-style-type: none"> • <i>Business Leagues, Chambers of Commerce, Real Estate Boards, or Boards of Trade</i> 	501.06-00
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<ul style="list-style-type: none"> • <i>Performance of Particular Services for Members</i> 	501.06-01
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<ul style="list-style-type: none"> • <i>Professional Associations (See Also 0501.03-11)</i> 201217022 201347022 	501.06-03
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<ul style="list-style-type: none"> • <i>Fraternal Beneficiary Societies (See Also 0501.03-09)</i> 201425015 	501.08-00
<ul style="list-style-type: none"> • <i>Voluntary Employees' Beneficiary Associations (See Also 0501.03-01)</i> 201221030 201224037 201250023 201250024 201251023 201349020 201410037 201410038 201415008 201422025 201434025 201450028 201450029 201513004 201515036 201532037 	501.09-00
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<ul style="list-style-type: none"> • <i>Inurement</i> 201321040 201351026 	501.09-03
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<ul style="list-style-type: none"> • <i>Mutual or Cooperative Electric Companies</i> 201241012 201340017 201423028 	501.12-03
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	<ul style="list-style-type: none"> • Private v. Public Interest Served 	501.33-00
	201202038 201202039 201203024 201203025 201204019 201204020 201205010 201205011 201205012 201209011 201209012 201209013 201210042 201210043 201211025 201211026 201213031 201215012 201215013 201216040 201217019 201218021 201219028 201219029 201221023 201223020 201224031 201224034 201227006 201228040 201228041 201228042 201229001 201229010 201230024 201232035 201233018 201234029 201234030 201241011 201242015 201244021 201247017 201247018 201250025 201250027 201250028 201250029 201252024 201252025 201252026 201302040 201302041 201303017 201303019 201303020 201304011 201305011 201305012 201305013 201307014 201308032 201309019 201310046 201310048 201310049 201311028 201311029 201311030 201311033 201313032 201313033 201313034 201314045 201314046 201314047 201314048 201314049 201315029 201322053 201323028 201323035 201326019 201330043 201308032 201330043 201331007 201331008 201334043 201334044 201334045 201345032 201349023 201403017 201403017 201404013 201405024 201407019 201407020 201409012 201410035 201411039 201416010 201417017 201419015 201423031 201424024 201424027 201427018 201428023 201428028 201430014 201431032 201433019 201433020 201438030 201440021 201451043 201451045 201452018 201502017 201504017 201510058 201510059 201511026 201511026 201514011 201514013 201516066 201517019 201519033 201519035 201523021 201523022 201526021	
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	<ul style="list-style-type: none"> • "Exclusively" Test 	501.35-00
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	<ul style="list-style-type: none"> • Business Activities 	501.36-00
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	<ul style="list-style-type: none"> • Section 501(c)(3) Organizations 	501.36-01
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	<ul style="list-style-type: none"> • Publishing Activities, Radio, Television, etc. 	501.36-03
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	<ul style="list-style-type: none"> • Fund Raising (See also 0512.06-00) 	501.36-04
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	<ul style="list-style-type: none"> • Legislative and Political Propaganda Activities 	501.38-00
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	<ul style="list-style-type: none"> • "Action" Organizations 	501.38-01
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	• Timeliness of Election 201201007 201201014 201251004 201314013 201341002 201410014 201410019 201410020 201410021 201410022 201410023 201410025 201410026 201426012 201440003 201442003 201443011 201444016 201444017 201448002 201505017 201505018 201505019 201505020 201505021 201505022 201505023 201505024 201505025 201505026 201505027 201508003 201510024 201514002 201519023 201525008 201525008 201525008 201525008 201532014	754.02-00
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	• <i>Rules for Termination, Liquidation, Reorganization or Incorporation</i> 201443003 201443003	884.08-00
	• <i>Complete Termination of a U. S. Business</i> 201405012	884.08-10
	• <i>Reorganization of a Foreign Corporation</i> 201443003 201443003	884.08-30
Section 887	Imposition of Tax On Gross Transportation Income Of Nonresident Aliens and Foreign Corporations 201212012	887.00-00
Section 894	Income Affected by Treaty	894.00-00
	• <i>Teachers, Students, and Trainees</i> 201251015	894.10-00
	• <i>Pensions</i> 201412016	894.11-00
Section 897	Disposition of Investment in United States Real Property 201321007	897.00-00
	• <i>Distributions of U.S. Real Property Interest By Foreign Corporation</i> 201321007	897.05-00
Section 901	Taxes of Foreign Countries and of Possessions of U.S. 201423022	901.00-00
	• <i>Amount Allowed</i> 201349015	901.02-00
	• <i>Denial of Credit with Respect to Certain Abusive Transactions</i> 201312045	901.11-00
Section 902	Deemed Paid Credit Where Domestic Corporation Owns 10 Percent or More of Voting Stock of Foreign Corporation (See Also 960.00-00 et. seq.)	902.00-00
	• <i>Computation of Credit</i>	902.01-00
	• <i>Post-1986 Undistributed Earnings</i> 201441015 201444039	902.01-01
	• <i>Post-1986 Foreign Income Taxes</i> 201441015 201444039	902.01-02
Section 904	Limitation on Credit	904.00-00
	• <i>Carryback and Carryover</i> 201438027	904.02-00
	• <i>Recapture of Overall Foreign Loss</i> 201240017 201249012	904.05-00

	<ul style="list-style-type: none"> • <i>Overall Foreign Loss Accounts</i> 201452002 	904.05-04
Section 905	Applicable Rules 201429026 <ul style="list-style-type: none"> • Adjustments on Payment of Accrued Taxes • <i>Pooling Adjustments</i> 201441015 201444039 • <i>Redetermination of U.S. Liability</i> 201444039 	905.00-00 905.03-00 905.03-02 905.03-03
Section 911	Citizens or Residents of the United States Living Abroad 201313023 <ul style="list-style-type: none"> • Election 201507013 201507016 • <i>Timely filed returns</i> 201507013 201507016 • <i>Reelection</i> 201231006 201308023 201308023 201344007 201347016 201429015 201433002 201444023 201504002 201509027 201511017 201511017 201517004 	911.00-00 911.11-00 911.11-01 911.11-03
Section 932	Coordination of United States and Virgin Islands Income Taxes <ul style="list-style-type: none"> • Bona Fide Residents of the Virgin Islands 201503012 	932.00-00 932.02-00
Section 951	Amounts Included in Gross Income of U.S. Shareholders (Included v. Not Included) 201436047	951.00-00
Section 952	Subpart F Income Defined 201240019	952.00-00
Section 953	Insurance Income 201407010 201503009 201504006 201504008 <ul style="list-style-type: none"> • Election by Foreign Insurance Company to be Treated as Domestic Corporation 201303005 201351010 201451012 	953.00-00 953.06-00
Section 954	Foreign Base Company Income 201235007 <ul style="list-style-type: none"> • Foreign Personal Holding Company Income 201201016 201228020 201407010 201503009 201504006 201504008 • <i>Sale or Exchange of Property</i> 201201016 • <i>Commodities Transactions</i> 201330006 201330006 • <i>Nonfunctional Currency Transactions</i> 201226011 201241002 • Foreign Base Company Sales Income 201206003 201325005 201332007 201340010 201532033 	954.00-00 954.02-00 954.02-05 954.02-06 954.02-07 954.03-00
Section 956	Investment of Earnings in U.S. Property 201420017 201436047 201446020 201521006 201521006 201521006 <ul style="list-style-type: none"> • U.S. Property Defined 201516064 	956.00-00 956.03-00

	• Pledges and Guarantees 201203010 201436047	956.05-00
Section 982	Admissibility of Documentation Maintained in Foreign Countries 201333013	982.00-00
Section 987	Branch Transactions	987.00-00
	• Remittances (Definition) 201321007	987.03-00
Section 992	Requirements of a Domestic International Sales Corporation 201433003	992.00-00
	• Definition of DISC	992.01-00
	• <i>Capitalization</i> 201444018	992.01-03
	• Election 201216006 201221003 201224025 201237006 201242001 201304001 201305002 201310018 201327001 201327004 201327005 201335002 201336013 201341023 201343011 201343015 201346003 201347006 201347018 201349003 201351012 201351015 201404008 201411008 201418040 201421010 201429020 201433004 201434002 201436002 201436041 201440019 201441012 201444018 201451026 201502005 201506006 201516013 201516052 201519020 201521010 201521010 201521010 201521010 201521010 201527037 201528002 201532005 201533003	992.02-00
Section 1001	Determination of Amount of and Recognition of Gain or Loss 201204001 201204002 201204003 201204004 201204005 201205001 201207001 201208003 201208004 201211009 201214021 201216010 201218003 201223012 201238004 201243004 201243006 201245007 201308016 201319018 201320009 201326014 201308016 201334006 201342001 201418007 201418017 201418031 201418032 201419001 201419011 201436043 201443004 201443004 201516008 201516020 201516022 201516023 201525001 201525001 201525001 201525001 201527032 201528024 201530008 201530009 201530010 201530011 201530012 201530013 201531003 201531004 201531005 201531006 201531007 201532008 201532009 201532010 201532011 201532012 201532013	1001.00-00
	• Amount Realized 201221004 201525010 201525010 201525010 201525010	1001.02-00
	• <i>Property Differing Materially</i> 201443004 201443004 201516022 201516023	1001.02-07
Section 1011	Adjusted Basis for Determining Gain or Loss 201418007	1011.00-00
Section 1014	Basis of Property Acquired From a Decedent 201245006	1014.00-00
Section 1015	Basis of Property Acquired by Gift or Transfer in Trust 201204001 201204002 201204003 201204004 201204005 201216010 201218003 201238004 201303003 201418007 201419001 201426016 201436043 201525001 201525001 201525001 201525001	1015.00-00
Section 1031	Exchange of Property Held for Productive Use or Investment 201234018 201242003 201302009 201313024 201411036 201416006	1031.00-00
	• Like Kind Property 201216007 201238027 201531009 201532021	1031.02-00
	• Deferred Exchanges 201238027 201242003 201252018 201308020 201308020 201332010 201416006 201437012	1031.05-00

	• Multi-Party Exchanges 201252018 201332010	1031.06-00
	• Exchanges Not Solely In Kind 201325011	1031.07-00
Section 1032	Exchange of Stock for Property (Recognition v. Nonrecognition) 201249011 201250021 201324009	1032.00-00
Section 1033	Involuntary Conversion 201333010 201333011	1033.00-00
	• Definition of Involuntary Conversion Events 201252010	1033.02-00
	• Special Rule for Outdoor Advertising Displays 201450004	1033.07-00
	• Special Rule for Principal Residences Destroyed in Presidentially Declared Disasters 201240006	1033.10-00
Section 1035	Exchanges of Insurance Policies 201304003 201330016 201330016	1035.00-00
Section 1041	Transfers of Property Between Spouses or Incident to Divorce 201206005	1041.00-00
Section 1042	Sales of Stock to Employee Stock Ownership Plans or Certain Cooper- atives	1042.00-00
	• Nonrecognition of Gain 201435014	1042.01-00
Section 1060	Special Allocation Rules for Certain Asset Acquisitions 201501011	1060.00-00
Section 1092	Straddles 201515001	1092.00-00
	• Special Rule for Identified Straddles 201241005 201515001	1092.02-00
	• <i>Defined</i> 201515001	1092.02-01
	• Mixed Straddles	1092.05-00
	• <i>Mixed Straddle Account</i> 201327007 201516010	1092.05-02
	• Straddle Defined 201310027	1092.06-00
	• Qualified Covered Call Options 201317009	1092.07-00
	• Definitions and Special Rules 201241005	1092.08-00
Section 1202	50-Percent Exclusion for Gain from Certain Small Business Stocks 201436001	1202.00-00
Section 1221	Capital Asset v. Not a Capital Asset 201203003 201208038 201209014	1221.00-00
Section 1223	Holding Period of Capital Assets 201204001 201204002 201204003 201204004 201204005 201216010 201418007 201436043 201443004 201516022 201516023 201525001 201525001 201525001 201525001	1223.00-00

Section 1234	Option to Buy or Sell	1234.00-00
	• Gain or Loss of Purchaser 201214021	1234.01-00
Section 1248	Gain From Certain Sales or Exchanges of Stock in Certain Foreign Corporations 201423006 201426008	1248.00-00
Section 1250	Gain From Dispositions of Certain Depreciable Realty	1250.00-00
	• Section 1250 Property 201243003	1250.01-00
	• Exceptions and Limitations	1250.04-00
	• <i>Gifts</i> 201318003	1250.04-01
Section 1253	Transfers of Franchises, Trademarks, and Trade Names 201322020	1253.00-00
Section 1256	Section 1256 Contracts Marked to Market	1256.00-00
	• Definitions	1256.07-00
	• <i>Qualified Board or Exchange</i> 201322033	1256.07-05
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	• OID Election 201435004	1272.05-00
Section 1286	Tax Treatment of Stripped Bonds 201229003 201502006 201502007	1286.00-00
Section 1295	Qualified Electing Fund	1295.00-00
	• Time For Making Election 201228021 201249014	1295.02-00
	• <i>Retroactive Elections</i> 201201013 201210017 201248009 201248010 201302010 201302011 201302019 201302020 201314026 201319006 201319007 201321010 201322017 201322018 201330019 201330020 201330021 201330019 201330020 201330021 201333004 201334007 201334034 201340008 201344008 201349002 201349010 201349011 201349012 201350011 201350012 201350013 201350014 201350015 201350016 201350017 201350018 201350019 201350020 201350021 201350022 201350023 201350024 201350025 201411001 201412006 201412010 201417009 201417010 201417011 201417012 201417013 201417014 201417015 201417016 201422002 201422003 201422019 201422021 201423002 201423004 201423008 201423015 201427002 201427003 201427004 201427005 201427006 201429002 201429002 201429003 201429004 201429011 201429021 201431021 201431022 201431023 201431024 201431025 201431026 201431027 201431028 201431029 201442004 201442005 201442006 201445006 201447022 201447024 201448004 201451020 201451021 201451022 201508008 201508009 201508010 201509028 201510040 201510041 201510042 201516062 201516063 201519022 201528008 201528009 201528036	1295.02-02
Section 1296	Passive Foreign Investment Company 201244003 201311014 201447003	1296.00-00
	• Characterization of Income	1296.02-00

• Qualified Subchapter S Subsidiary	1361.05-00
201208011 201208022 201211009 201216015 201216027 201225006 201233003	
201237015 201238019 201238020 201238021 201238022 201238023 201238024	
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201426004 201442016 201442041 201444033 201444034 201444035 201444036	
201444037 201450012 201516042 201516043 201516044 201516045 201516046	
201527006 201531001	

Section 1362	Election by Small Business Corporation	1362.00-00
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201201006 201205002 201205006 201206009 201206011 201211002 201211004
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• Eligible v. Ineligible	1362.01-00
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• <i>Shareholder Consent</i>	1362.01-01
201516009 201528017	

• <i>Election After Termination</i>	1362.01-02
201206009 201217009 201312023 201320012	

• *Late Elections*

1362.01-03

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• Termination of Election

1362.02-00

201201006 201205002 201206009 201217009 201226013 201232023 201237001
 201238017 201243009 201252001 201306004 201306005 201320008 201337001
 201345021 201418008 201420002 201432006 201434010 201434011 201434012
 201434013 201434014 201443014 201443014 201444007 201450014 201508002
 201523008 201526006

• *Ceases to be Small Business Corporation*

1362.02-02

201206009 201217009 201252001 201324004 201330017 201330018 201330017
 201330018 201426018 201432006 201443014 201443014 201444007 201508002
 201516001 201516002

• *Passive Investment Income*

1362.02-03

201223007 201226013 201229007 201232023 201244002 201248001 201306004
 201306005 201310008 201320008 201328006 201328007 201328008 201328009
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 201328017 201330010 201330010 201350005 201351013 201420002 201426010
 201441013 201450014 201515011 201516015 201519008 201519018 201523004
 201523005 201523008 201528028

• S Termination Year

1362.03-00

201507011

	<ul style="list-style-type: none"> • Inadvertent Terminations 	1362.04-00
	201201005 201201006 201201009 201202002 201202003 201203002 201203007 201203008 201203011 201203012 201205002 201205006 201206009 201208013 201208023 201209005 201211002 201211004 201211005 201211006 201211007 201214001 201216025 201216032 201217006 201217008 201217009 201217010 201221006 201221008 201221009 201221010 201223007 201224007 201224013 201224014 201225003 201225005 201226013 201227003 201228009 201228010 201228018 201228024 201228025 201232004 201232007 201232009 201232026 201232027 201232029 201234002 201234007 201234008 201235008 201236003 201238007 201238008 201238014 201238015 201238017 201239001 201240012 201240014 201242009 201243009 201244002 201245001 201245002 201245014 201246002 201246008 201247008 201247012 201248001 201250013 201252001 201252007 201301003 201301011 201303009 201306009 201306015 201306016 201308008 201308009 201308022 201310008 201312016 201313002 201314006 201314012 201314014 201315003 201315012 201317004 201320006 201320008 201322006 201322016 201323012 201323013 201323014 201324011 201325003 201325006 201328004 201328006 201328007 201328008 201328009 201328010 201328011 201328012 201328013 201328014 201328015 201328016 201328017 201329004 201330010 201330012 201308008 201308009 201308022 201330010 201330012 201333002 201334030 201334031 201338016 201338024 201340001 201341003 201341006 201341014 201341027 201343016 201345018 201345024 201346001 201347003 201347014 201348001 201348009 201350004 201350005 201351003 201351013 201351014 201351017 201404003 201405004 201405007 201407004 201409001 201412003 201414007 201414010 201414013 201416004 201418004 201418008 201418015 201418036 201418044 201418045 201420001 201420002 201420005 201420013 201421003 201421004 201421005 201422006 201423013 201424003 201424021 201425003 201426001 201426009 201426010 201426011 201426021 201427007 201427017 201429008 201430011 201432001 201432006 201434016 201434018 201436035 201436042 201437009 201438015 201440018 201441013 201442014 201442047 201444008 201444009 201444010 201444011 201444012 201445001 201445003 201445004 201448005 201450014 201451001 201451016 201451017 201451019 201452014 201501007 201503004 201505008 201505016 201505034 201506009 201508002 201511014 201511014 201511016 201511016 201515010 201515011 201515013 201516001 201516002 201516003 201516009 201516015 201516016 201516017 201516029 201519002 201519005 201519008 201519010 201519016 201519018 201523004 201523005 201523016 201524006 201524009 201525004 201525004 201525004 201525004 201525005 201525005 201525005 201525005 201525006 201525006 201525006 201525006 201525009 201525009 201525009 201525009 201527005 201527006 201527007 201527008 201527009 201527019 201528017 201528020 201528025 201528028 201528037 201530002 201530003 201530016 201531008 201532015 201533010	
Section 1366	Pass-Thru of Items to Shareholders 201327009 201333008 201429025	1366.00-00
Section 1367	Adjustment to Basis of Stock of, and Indebtedness Owning, Shareholders 201237017 201421015 201440013	1367.00-00
Section 1368	Distributions 201207002 201216027 201328025	1368.00-00
	<ul style="list-style-type: none"> • Accumulated Adjustments Account 201421015 201440013 201446021	1368.01-00
Section 1374	Tax Imposed On Certain Built-In Gains (for Corporations Electing S Status After 12/31/86) 201202014 201219003 201314008 201348007	1374.00-00
Section 1381	Organizations to Which Part Applies 201507004 201515012 201524002 201524003 201524004 201529004	1381.00-00

	<ul style="list-style-type: none"> • Certain Other Cooperatives 201228014 	1381.02-00	
Section 1382	Taxable Income of Cooperatives 201208008 201216011 201219001 201234018 201250009 201413002	1382.00-00	
	<ul style="list-style-type: none"> • Patronage Dividends 201228035 	1382.02-00	
	<ul style="list-style-type: none"> • Exceptions 201407003 	1382.04-00	
Section 1388	Definitions; Special Rules 201234018	1388.00-00	
Section 1402	Definitions 201402004 201402004	1402.00-00	
	<ul style="list-style-type: none"> • Net Earnings From Self-Employment 	1402.01-00	
	<ul style="list-style-type: none"> • <i>Limited Partners</i> 201436049 	1402.01-03	
	<ul style="list-style-type: none"> • Ministers, Members of Religious Orders, Christian Science Practitioners (Election) 201340015 	1402.05-00	
Section 1441	Withholding of Tax on Nonresident Aliens (Required v. Not Required) 201202001 201311006	1441.00-00	
	<ul style="list-style-type: none"> • Who must Withhold 	1441.01-00	
	<ul style="list-style-type: none"> • <i>Liability of Withholding Agent</i> 201428007 	1441.01-02	
	<ul style="list-style-type: none"> • Income Subject to Withholding v. Not Subject to Withholding 	1441.02-00	
	<ul style="list-style-type: none"> • <i>Sale or Exchange of Capital Assets</i> 201343020 	1441.02-03	
	<ul style="list-style-type: none"> • Exemptions from Withholding 	1441.03-00	
	<ul style="list-style-type: none"> • <i>Effectively Connected Income</i> 201428007 	1441.03-01	
Section 1461	Liability for Withheld Tax 201503013	1461.00-00	
Section 1501	Privilege to File Consolidated Returns (May v. May Not File Consolidated Return) 201213012 201306007	1501.00-00	
Section 1502	Regulations Governing Consolidated Returns (May v. May Not File Consolidated Returns) 201201010 201213012 201213013 201214012 201214015 201217014 201243014 201250017 201307001 201311010 201312027 201341018 201342004 201402001 201402001 201414009 201418033 201418043	1502.00-00	
	<ul style="list-style-type: none"> • Overall Foreign Loss Recapture Rules 201452002 	1502.08-00	
	<ul style="list-style-type: none"> • Intercompany Transactions 201208034 201243013 201312027 201336018 201339001 201402001 201402001 201411007 201507006 201524016 201528007 	1502.13-00	
	<ul style="list-style-type: none"> • <i>Stock of Members</i> 201210018 201228011 201312027 201322002 201341022 	1502.13-01	
	<ul style="list-style-type: none"> • Stock, Bonds, and Other Obligations of Members 201208034 	1502.14-00	R

• Limitation on Built-in Losses 201232011	1502.15-00
• Excess Losses 201350007 201441010	1502.19-00
• Consolidated Net Operating Loss Deduction 201206006 201208001 201208032 201214019 201223003 201223004 201224003 201226006 201226008 201226020 201228004 201228007 201228008 201230003 201230004 201230005 201233006 201234012 201234023 201235005 201236015 201237010 201242008 201242010 201245009 201247005 201248012 201249004 201249010 201250002 201301009 201305005 201305010 201306001 201310024 201310025 201312025 201315002 201322034 201323011 201328028 201330001 201330001 201332003 201335007 201336002 201336004 201336008 201338019 201340003 201342005 201342008 201344005 201349008 201349009 201351016 201352005 201411011 201412004 201418016 201418020 201418033 201418043 201423003 201424001 201424015 201426024 201431005 201431008 201431009 201431010 201431012 201431013 201431014 201431015 201431016 201434001 201438004 201438019 201442013 201444015 201448001 201503008 201521007 201521007 201521007 201521007 201521007 201523011 201527038 201530015 201532004 201532030	1502.21-00
• Investment Adjustment 201213013 201214012 201339001 201411007 201430002	1502.32-00
• Earnings and Profits 201411007	1502.33-00
• Accumulated Earnings Tax on Separate Basis 201316008	1502.47-00
• Life and Non-Life 201210015 201213012	1502.50-00
• Filing Requirements 201202008 201202009 201214015 201217014 201225010 201232015 201249007 201250017 201251008 201307001 201310009 201311010 201313019 201317005 201319005 201323010 201324010 201329006 201332002 201336007 201338017 201338025 201341008 201347011 201407012 201411016 201442018 201507003 201514007 201524008 201527036 201529001 201533004	1502.75-00
• <i>When Group Remains in Existence</i> 201228002 201314028 201350007 201424010 201505006	1502.75-10
• <i>Common Parent No Longer in Existence</i> 201250017 201326006	1502.75-11
• Taxable Year of Members of Group 201520001 201520001 201414015 201520001	1502.76-00
• <i>Income Allocation</i> 201235003	1502.76-01
• Common Parent Agent for Subsidiaries 201522005	1502.77-00
• Separate Return Years 201251003 201324004	1502.79-00
• Consolidated Returns for Subsequent Years 201324004	1502.89-00
• Election to File Separate Returns	1502.90-00
• <i>Changes in Affiliated Groups</i> 201251003	1502.90-01

	• Carryover and Carryback 201228005 201312019	1502.92-00
	• Intercompany Transactions 201208034 201402001 201402001	1502.93-00
	• Stock Transactions 201208034	1502.94-00
	• Application of Section 382 with Respect to a Consolidated Group 201414009 201511012 201511012	1502.98-00
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• Section 266; Carrying Charges	9100.05-00
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<ul style="list-style-type: none"> • Section 663; Special Rules Applicable to Sections 661 and 662 201245008 201348008 	9100.12-00
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