

Section 6110 Index

Written
Determinations
Requested After
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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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	<ul style="list-style-type: none"> • Spin-Off 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 201535006 201535007 201537018 201538015 201542004 201603005 201603006 201603020 201605016 	355.01-00
	<ul style="list-style-type: none"> • Split-Off 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 	355.01-01
	<ul style="list-style-type: none"> • Split-Up 201402002 201402002 201418018 201423012 	355.01-02
	<ul style="list-style-type: none"> • Non Pro Rata Distributions, etc. 201233016 	355.02-00
	<ul style="list-style-type: none"> • Active Business 201219003 201251006 201333003 201407005 201418039 201418046 201426007 201429006 201436033 201531014 201535007 201542004 201551009 201605016 201606014 	355.03-00
	<ul style="list-style-type: none"> • Five-Year Requirement 201251006 201528016 	355.03-01
	<ul style="list-style-type: none"> • Business Purpose 201308017 201308018 201308017 201308018 	355.04-00
	<ul style="list-style-type: none"> • Control 201437013 201527003 	355.05-00
	<ul style="list-style-type: none"> • Distribution of Control 201437013 201605016 	355.05-01
	<ul style="list-style-type: none"> • Distributions Within a Consolidated Group 201305003 201352007 201445008 	355.09-00
	<ul style="list-style-type: none"> • Gain Recognition on Distributions Pursuant to Acquisitions of Greater than 50% of Distributing or Controlled 201249011 201250021 201324009 201505007 201601009 201603005 201603006 	355.10-00
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201249011 201250021 201324009 201603020	
<ul style="list-style-type: none"> • <i>Liquidation Distribution</i> 	368.02-02
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<ul style="list-style-type: none"> • Stock for Property (Type "C") 	368.03-00
201224006 201228030 201247009 201252014 201324003 201340016 201411002 201413003 201418039 201418046 201422004 201424007	
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201247009	
<ul style="list-style-type: none"> • Assets for Control of Transferee (Type "D") 	368.04-00
201203004 201208017 201212001 201213001 201213002 201213005 201214013 201215005 201216023 201216027 201219003 201229002 201230007 201232014 201232033 201233016 201234009 201236014 201238018 201240013 201240016 201244006 201244008 201250004 201251006 201252002 201252017 201306006 201306010 201308002 201310023 201312022 201313016 201314001 201315016 201325009 201329005 201330002 201330007 201330022 201308002 201330002 201330007 201330022 201333007 201335001 201336012 201337003 201337007 201338040 201339001 201340009 201341004 201341013 201341026 201347005 201349006 201350007 201402002 201402002 201405003 201407005 201409002 201409003 201411002 201411012 201412013 201415001 201416005 201418018 201418019 201418030 201418039 201418046 201419005 201419010 201419013 201422012 201422017 201423012 201424005 201424006 201424008 201424009 201424011 201424013 201426004 201426007 201426008 201430002 201433007 201435005 201437006 201438009 201441008 201441016 201443017 201445008 201512001 201524005 201528006 201531014 201537018 201603020	
<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
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<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
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<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
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<ul style="list-style-type: none"> • <i>Several Steps</i> 	368.09-01
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201204018 201205014 201213032 201214035 201215014 201219030 201219031 201221025 201221026 201221027 201221028 201221029 201224031 201224034 201234028 201252029 201313031 201317013 201318010 201318011 201318013 201318014 201318015 201318016 201318018 201318019 201318020 201318021 201318022 201318023 201318024 201318025 201318028 201319031 201321032 201321037 201321039 201323026 201323031 201323036 201323038 201323039 201325016 201327016 201329022 201331006 201333017 201333018 201334045 201335017 201338053 201338055 201349018 201351024 201403019 201403019 201403020 201406019 201409013 201411039 201414028 201424028 201425013 201429031 201443021 201449002 201451033 201503020 201505043 201507025 201511025 201511025 201518018 201552032	
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<ul style="list-style-type: none"> • Agriculture and Horticulture Organizations 	501.05-01
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<ul style="list-style-type: none"> • Business Leagues, Chambers of Commerce, Real Estate Boards, or Boards of Trade 	501.06-00
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201217022 201347022	
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201204018 201337018 201342014 201343024 201343025 201344010 201529011 201605021	

• <i>Distribution of Assets</i> 201204018 201213034 201213035 201515035	501.07-02
• <i>Leases or Sales of Club Property</i> 201204018 201302043 201306027 201315030	501.07-03
• <i>Automobile Clubs</i> 201430019	501.07-04
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• <i>Geographic Locale</i> 201221030 201330039 201330039 201415008	501.09-02
• <i>Inurement</i> 201321040 201351026 201605015	501.09-03
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• <i>Mutual Ditch or Irrigation Companies</i> 201246038	501.12-01
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• Credit Unions 201416009 201447039	501.14-00
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<ul style="list-style-type: none"> • <i>Closely Controlled Organizations</i> 201306026 	501.30-01
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<ul style="list-style-type: none"> • Income Inures v. does Not Inure to Private Individual 201202038 201202039 201203024 201203025 201204019 201204021 201205010 201205012 201209011 201209012 201209013 201210042 201211025 201211026 201213030 201213031 201215012 201215013 201217019 201218021 201219028 201219032 201226029 201227006 201228040 201228041 201228042 201229001 201229010 201230024 201232035 201233018 201234030 201241011 201242015 201244021 201247018 201250025 201250027 201250029 201252024 201252026 201302040 201302041 201303017 201303019 201303020 201305011 201305012 201305013 201307014 201308032 201310046 201310049 201311029 201311030 201311033 201313032 201314045 201314048 201314049 201315029 201323028 201323035 201326019 201330037 201330043 201308032 201330037 201330043 201337017 201350047 201403018 201403018 201410035 201411038 201411039 201417017 201419019 201424024 201428022 201428026 201428027 201433019 201433020 201443021 201443022 201451043 201451045 201502017 201504017 201511026 201511026 201514011 201515037 201519033 201519034 201519035 201529012 201533014 201545028 201545029 201548021 201548025 201604018 	501.32-00
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201221023 201228040 201237019 201303019 201303020 201306026 201322053 201334045 201340021 201345031 201345032 201405023 201407020 201414024 201415007 201431032 201433019 201452018 201505042 201511024 201511024 201523021 201529013 201538025 201540019 201545030	
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<ul style="list-style-type: none"> • Publishing Activities, Radio, Television, etc. 	501.36-03
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201323037 201407020 201416010	
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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 201543002 201605007	754.02-00

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	• Income Requirements 201225008 201225009 201246013 201407011 201418022 201428002 201433005 201518010 201522002 201524017 201527012 201527013 201546006 201602003 201605005	856.01-00
	• Investment Requirements 201236006 201315007 201406009 201428002 201450017 201503010 201515009 201518010 201521006 201521006 201521006 201521006 201521006 201524017 201551007 201602003	856.02-00

	<ul style="list-style-type: none"> • Other Requirements 201225008 201225009 201530014 	856.03-00
	<ul style="list-style-type: none"> • Rents From Real Property 201206001 201225008 201225009 201250003 201250008 201301007 201320001 201320002 201334033 201341015 201450017 201549013 	856.04-00
	<ul style="list-style-type: none"> • Treatment of Wholly Owned Subsidiaries 201210021 201214002 201232011 201311009 201345021 201424016 201426017 201432011 201433001 201452013 201511019 201511019 201516018 201521015 201521015 201521015 201521015 201521015 201527016 201530005 201532006 201533005 201533006 201539007 201539008 201550025 201552009 	856.07-00
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	<ul style="list-style-type: none"> • Adjustments 201239006 	860.03-00
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	<ul style="list-style-type: none"> • Compensation for Labor or Services 201438027 	861.04-00
	<ul style="list-style-type: none"> • Allocation and Apportionment of Deductions (In General) 201446018 	861.08-00
	<ul style="list-style-type: none"> • <i>Net Operating Losses</i> 201228013 	861.08-12
	<ul style="list-style-type: none"> • Allocation and Apportionment of Interest Expense (In General) 201320017 201335008 201423001 201505036 	861.09-00
	<ul style="list-style-type: none"> • <i>Apportionment Rules -- Corporations</i> 201423001 	861.09-05
	<ul style="list-style-type: none"> • <i>Asset Method of Apportionment</i> 201210019 201210020 201223001 201320017 201335008 201505036 	861.09-06
	<ul style="list-style-type: none"> • <i>Fair Market Value Method</i> 201320017 201335008 201423001 201505036 	861.09-07
	<ul style="list-style-type: none"> • Characterization Rules and Adjustments for Certain Assets (In General) 201336018 	861.12-00
	<ul style="list-style-type: none"> • <i>Miscellaneous</i> 201336018 	861.12-04

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	• <i>Trade or Business Conducted Through Partnership</i> 201501013	864.01-02
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	• <i>Reelection</i> 201231006 201308023 201308023 201344007 201347016 201429015 201433002 201444023 201504002 201509027 201511017 201511017 201517004 201538016	911.11-03
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	• Election by Foreign Insurance Company to be Treated as Domestic Corporation 201303005 201351010 201451012 201537009 201539006	953.06-00
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	• Foreign Personal Holding Company Income 201201016 201228020 201407010 201503009 201504006 201504008	954.02-00
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	• <i>Commodities Transactions</i> 201330006 201330006	954.02-06
	• <i>Nonfunctional Currency Transactions</i> 201226011 201241002	954.02-07
	• Foreign Base Company Sales Income 201206003 201325005 201332007 201340010 201532033	954.03-00
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	• 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 201535001 201535014 201536001 201536008 201540002 201543009 201544010 201544011 201548014 201552003 201552005 201601003 201604007	992.02-00

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	• <i>Defined</i> 201515001	1092.02-01
	• Mixed Straddles 201543008	1092.05-00
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	• Qualified Covered Call Options 201317009	1092.07-00
	• Definitions and Special Rules 201241005	1092.08-00
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	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 201546010 201548018 201604002	
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	• Engaged in Farm Business 201435006	1301.01-00
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	• Determination v. No Determination 201247001 201247011	1313.01-00
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201203006 201216027 201232003 201233014 201237015 201238018 201238019
201238020 201238021 201238022 201238023 201238024 201243007 201243008
201301004 201302004 201302005 201302006 201310022 201314003 201322016
201322036 201325008 201341009 201414006 201419009 201426004 201436039
201442016 201447007 201450012 201604009 201604010

• **Small Business Corporation v. Not a Small Business Corporation** 1361.01-00
201201006 201218005 201237014 201250018 201314003 201314008 201322036
201338039 201433014 201523012 201523013 201604011

• *Shareholder Not an Individual or Permitted Trust or Estate* 1361.01-02
201205002 201208013 201218005 201237014 201250013 201250018 201338039
201424021 201426001 201523012 201523013 201525009 201525009 201525009
201525009 201528037 201544006 201546003 201546004 201604011

• *Non-Resident Alien as Shareholder* 1361.01-03
201312023 201545015

• *More than One Class of Stock* 1361.01-04
201207002 201214001 201218004 201234001 201236003 201309003 201314014
201314031 201322036 201326012 201328025 201341014 201444020 201444021
201506003 201518008 201528025 201538009

• **Certain Trusts Permitted as Shareholders** 1361.03-00
201216034 201224013 201226019 201232003 201238017 201419009 201604009
201604010

• *Grantor Trusts* 1361.03-01
201216025 201216034 201252007

• *Qualified Subchapter S Trusts* 1361.03-02
201203011 201225005 201232003 201232027 201233014 201235008 201238017
201301004 201302004 201302005 201302006 201313002 201322016 201327009
201330012 201330012 201341003 201341009 201347014 201414006 201419009
201436039 201447007 201528020 201545015 201549001

• *Electing Small Business Trusts* 1361.03-03
201201006 201224013 201238017 201341003 201422006 201436006 201436007
201511014 201511014 201545003 201545015 201545015 201546001 201549001
201549002 201549003

• **Qualified Subchapter S Subsidiary** 1361.05-00
201208011 201208022 201211009 201216015 201216027 201225006 201233003
201237015 201238019 201238020 201238021 201238022 201238023 201238024
201242006 201243007 201243008 201247007 201301003 201306009 201306020
201310022 201314003 201320011 201325008 201326014 201328019 201337004
201426004 201442016 201442041 201444033 201444034 201444035 201444036
201444037 201450012 201516042 201516043 201516044 201516045 201516046
201527006 201531001 201536015 201540005 201544022 201549001 201550003
201550004 201604011

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201201006 201205002 201205006 201206009 201206011 201211002 201211004
201211005 201211006 201211007 201214010 201215004 201216027 201217006
201217009 201217013 201218008 201218009 201219014 201226001 201226013
201226017 201227003 201228003 201232005 201238006 201238014 201238015
201239001 201242009 201243009 201246008 201247012 201248013 201250011
201251007 201252001 201301008 201301011 201306009 201308008 201310019
201310035 201311005 201311017 201314030 201316012 201320008 201322006
201322016 201322036 201324011 201328004 201328026 201328029 201330017
201330018 201308008 201330017 201330018 201334030 201334031 201338012
201340002 201343016 201345018 201346004 201405007 201414010 201416004
201418008 201418044 201418045 201420002 201425003 201425008 201426011
201429001 201431006 201437009 201442038 201442047 201443006 201443006
201443014 201443014 201444007 201447009 201503004 201507011 201516029
201516054 201519016 201527019 201537001 201538010 201539019 201544020
201549017 201550001 201603015 201604005 201604006

• Eligible v. Ineligible**1362.01-00**

201205002 201206009 201217009 201226017 201227003 201233001 201233004
201234011 201238006 201238007 201252001 201301008 201301011 201310019
201311017 201314030 201322036 201328004 201338012 201346004 201348001
201418044 201418045 201425008 201443006 201443006 201443014 201443014
201451016 201451019 201515013 201516003 201516009 201519016 201528017
201537001

• Shareholder Consent**1362.01-01**

201516009 201528017 201539019

• Election After Termination**1362.01-02**

201206009 201217009 201312023 201320012 201550022

• Late Elections**1362.01-03**

201201006 201202016 201203009 201203011 201204007 201207004 201208015
201208016 201208018 201208024 201210010 201210016 201210024 201210025
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201216016 201216028 201216030 201217007 201217016 201219008 201219014
201221007 201223008 201224004 201224026 201225001 201226001 201226016
201226017 201227003 201227004 201228001 201228003 201228006 201228022
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201249006 201249009 201250011 201251010 201252013 201301002 201301008
201301012 201302013 201307002 201310017 201310019 201310021 201310035
201311015 201311017 201314030 201314031 201314034 201314036 201314040
201314041 201315010 201320010 201321008 201321009 201321016 201322028
201324001 201324007 201324012 201325001 201328001 201335006 201335009
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201523010 201524019 201524023 201528019 201541007 201541007 201550002
201550022 201603001 201604006

<ul style="list-style-type: none"> • 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 201538010	
<ul style="list-style-type: none"> • <i>Ceases to be Small Business Corporation</i> 	1362.02-02
201206009 201217009 201252001 201324004 201330017 201330018 201330017 201330018 201426018 201432006 201443014 201443014 201444007 201508002 201516001 201516002	
<ul style="list-style-type: none"> • <i>Passive Investment Income</i> 	1362.02-03
201223007 201226013 201229007 201232023 201244002 201248001 201306004 201306005 201310008 201320008 201328006 201328007 201328008 201328009 201328010 201328011 201328012 201328013 201328014 201328015 201328016 201328017 201330010 201330010 201350005 201351013 201420002 201426010 201441013 201450014 201515011 201516015 201519008 201519018 201523004 201523005 201523008 201528028 201538010 201541003 201541003	
<ul style="list-style-type: none"> • 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 201536014 201537001 201538009 201538010 201539019 201541003 201541003 201542001 201544006 201544016 201545003 201545012 201545015 201546001 201546003 201546004 201548015 201549001 201549002 201549003 201549017 201549019 201550001 201550014 201601002 201603001 201603016 201604004 201604005 201605003	
Section 1366	Pass-Thru of Items to Shareholders 201327009 201333008 201429025	1366.00-00
Section 1367	Adjustment to Basis of Stock of, and Indebtedness Owing, Shareholders 201237017 201421015 201440013	1367.00-00
Section 1368	Distributions 201207002 201216027 201328025 <ul style="list-style-type: none"> • Accumulated Adjustments Account 201421015 201440013 201446021	1368.00-00
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	• Certain Other Cooperatives 201228014	1381.02-00
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	• Patronage Dividends 201228035	1382.02-00
	• Exceptions 201407003	1382.04-00
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	• <i>Limited Partners</i> 201436049	1402.01-03
	• Ministers, Members of Religious Orders, Christian Science Practitioners (Election) 201340015	1402.05-00
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- Section 59(e) 9100.02-00
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- *R and D Expenditures* 9100.02-03
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- *ITC Expenditures* 9100.02-04
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- *Development Expenditures* 9100.02-05
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- Section 146; Volume Cap 9100.03-00
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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 663; Special Rules Applicable to Sections 661 and 662 	9100.12-00
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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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<ul style="list-style-type: none"> • Regulation Section 1.337(d); Loss on Stock of Subsidiary 	9100.29-00
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• Reg. 301.7701-3 Classification of Certain Business Entities

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