

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 312	Effect on Earnings and Profits (Decrease v. No Decrease) 201330002 201330002	312.00-00
	• Computations of Earnings and Profits 201601001	312.01-00
	• Allocation in Separations 201240017 201249012 201330002 201330002 201527003	312.09-00
Section 317	Other Definitions	317.00-00
	• Redemption of Stock v. Not a Redemption 201247010	317.02-00

Section 331	Gain or Loss to Shareholders in Corporate Liquidations 201211020 201252008 201330004 201330004 201334006 201511020 201511020	331.00-00
	• Year Liquidation Occurs 201228023	331.04-00
	• Form v. Substance 201252008	331.07-00
Section 332	Complete Liquidation of Subsidiaries 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 201535007 201537018 201607003	332.00-00
	• Nonrecognition of Gain or Loss 201213018 201228030 201236014 201308002 201314001 201315016 201308002 201339001 201412013 201415001 201603002	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
	• Stock Sales and Distributions Treated as Asset Transfers 201546011 201611006	336.05-00
Section 337	Gain or Loss on Sale or Exchange in Connection With Certain Liquidations (UIL for Transaction Prior to 1986 Act Effective Dates) 201404004 201536004	337.00-00
	• Section 332 Liquidations 201404004	337.10-00
	• Loss on Stock of Subsidiary 201606017 201606025	337.13-00
	• Conversion to Tax Exempt	337.14-00
	• <i>Transfer of Substantially All Assets to Tax Exempt</i> 201404004	337.14-01
	• Loss Disallowance 201310015 201606017 201606025	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
Section 338	Certain Stock Purchases Treated as Asset Acquisitions 201211009 201213013 201214012 201351004 201412012 201429016 201435002	338.00-00

	• 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 201611016	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
Section 341	Collapsible Corporations 201209025	341.00-00
Section 351	Transfer to Corporation Controlled by Transferor 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	351.00-00
	• Control v. No Control by Transferor 201224006 201242007 201306006 201326014 201333007 201506008 201601001	351.01-00
	• Series of Transactions 201212001 201506008 201531014	351.02-00
	• "Property" Defined 201506008 201552026	351.05-00
	• Constructive Exchange 201350001	351.11-00
	• Section 351 v. Section 304 (See Also 0304.01-01) 201228034	351.12-00
	• Investment Company Exception 201547003	351.13-00
	• Exceptions 201552026	351.15-00
Section 354	Exchanges of Stock and Securities in Certain Reorganizations	354.00-00
	• Exchange v. Liquidation 201423010	354.01-00

Section 355**Distribution of Stock and Securities of a Controlled Corporation****355.00-00**

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 201535007
201537018 201601001 201603005 201603006 201603020

• 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
201535006 201535007 201537018 201538015 201542004 201603005 201603006
201603020 201605016 201607003

• 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.**355.02-00**

201233016

• Active Business**355.03-00**

201219003 201251006 201333003 201407005 201418039 201418046 201426007
201429006 201436033 201531014 201535007 201542004 201551009 201605016
201606014 201607003

• Five-Year Requirement**355.03-01**

201251006 201528016

• Business Purpose**355.04-00**

201308017 201308018 201308017 201308018

• Control**355.05-00**

201437013 201527003

• Distribution of Control**355.05-01**

201437013 201605016

• Distributions Within a Consolidated Group**355.09-00**

201305003 201352007 201445008

	<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
Section 356	Receipt of Additional Consideration--Boot (Gain Recognized v. Not Recognized) 201424017 <ul style="list-style-type: none"> • Securities as "Other Property" 201527003	356.00-00 356.02-00
Section 357	Assumption of Liability (Gain Recognized v. Not Recognized) <ul style="list-style-type: none"> • Liabilities in Excess of Basis • <i>Exceptions</i> 201230008 201348006 201431002 201542004	357.00-00 357.02-00 357.02-02
Section 358	Basis to Distributees <ul style="list-style-type: none"> • Allocation of Basis 201411006 201437007	358.00-00 358.02-00
Section 361	Nonrecognition of Gain or Loss to Corporations (Recognized v. Not Recognized) 201228033 201409003 201504007 201511001 201511001 201516014 201542004 <ul style="list-style-type: none"> • Exchanges Not Solely in Kind • Distributions • <i>Certain Transfers to Creditors</i> 201423010 201440014 201607003 201228033 201409003 201511001 201511001 201537004 201601001	361.00-00 361.01-00 361.02-00 361.02-02
Section 362	Basis to Corporations 201411006 201418013 201418034 201418041 201418042 201441014 201502001 201502002 201505028 <ul style="list-style-type: none"> • Property Acquired in Reorganizations and Transfers by Controlling Stockholders 201418013 201418041 201418042 201505028 201521011 201521011 201521011 201521011 201521011 201545013	362.00-00 362.01-00
Section 367	Foreign Corporations 201348011 201432002 <ul style="list-style-type: none"> • Transfer to Foreign Corporations Subject to Section 367(a) • Treatment of Transfers of Stock or Securities to Foreign Corporations • <i>Reorganizations Described in Section 368(a)(1)(B)</i> • <i>Treatment of Subsequent Disposition of Stock of Transferee</i> • Transfer of Foreign Branch with Previously Deducted Losses Under Section 367(a) • <i>Anti-Abuse Rule</i> • Transfers of Intangible Property to Foreign Corporations Under Section 367(d) 201321018 201321018 201249011 201250021 201324009 201321018 201530020 201321018	367.00-00 367.01-00 367.03-00 367.03-01 367.03-13 367.06-00 367.06-07 367.30-00

Section 368	• Treatment of Distribution Described in Section 367(e)	367.40-00
	201348011 201423006	
	• Liquidations Under Section 332	367.40-02
	201348011 201606006	
	Definitions Relating to Corporate Reorganizations	368.00-00
	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")	368.01-00
	201213001 201213019 201213021 201228033 201232033 201252002 201252014	
	201312017 201314008 201314028 201326006 201333007 201350007 201404002	
	201423010 201436034 201438009 201505012 201535007	
	• Stock for Stock (Type "B")	368.02-00
	201249011 201250021 201324009 201603020	
	• Liquidation Distribution	368.02-02
	201418039 201418046	
	• Stock for Property (Type "C")	368.03-00
	201224006 201228030 201247009 201252014 201324003 201340016 201411002	
	201413003 201418039 201418046 201422004 201424007	
	• Substantially All the Property	368.03-01
	201247009	
	• 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 201607003	
	• Recapitalization (Type "E")	368.05-00
	201308001 201315009 201315020 201315021 201308001 201424010	
	• Change in Identity, etc. (Type "F")	368.06-00
	201201004 201201012 201208019 201228030 201236014 201239003 201250004	
	201252011 201252014 201314003 201316017 201322008 201326006 201328003	
	201330022 201330022 201333007 201339001 201404006 201411002 201418039	
	201418046 201445008 201511020 201511020 201611015	
	• Continuity of Interest Rule	368.08-00
	201214013 201224006 201247009	
	• Related party Acquisitions	368.08-03
	201214013	

	• <i>Business Enterprise Continuity</i> 201247009 201314028 201413003	368.08-06
	• <i>Historic Business Assets</i> 201224006	368.08-07
	• <i>Transfers to Controlled Corporations</i> 201214013 201224006 201234009 201240016 201424007	368.08-08
	• Plan of Reorganization 201411002	368.09-00
	• <i>Several Steps</i> 201252014 201411002	368.09-01
	• Liquidation v. Reorganization 201505012	368.12-00
	• Transactions Involving Two or More Investment Companies 201247009	368.13-00
	• Transfer by Corporation in Title 11 Case (Type "G") 201208036 201230020 201523001	368.14-00
Section 381	Carryovers in Certain Corporate Acquisitions (Allowed v. Not Allowed)	381.00-00
	• Method of Accounting 201237012 201343012	381.04-00
Section 382	Limitation on Net Operating Loss Carry-forwards and Built-in Losses Following Ownership Changes 201208002 201215007 201228023 201229004 201251002 201306003 201308026 201308029 201309013 201314035 201322032 201326013 201328027 201308026 201308029 201335012 201345023 201350006 201403007 201403007 201412009 201432015 201443009 201443009 201549010	382.00-00
	• Scope of Section 382 Limitation	382.02-00
	• <i>Closing of the Books</i> 201418038 201545014	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

	<ul style="list-style-type: none"> • <i>Controlled Groups</i> 201232016 201232017 201335012 201421011 201421012 201421013 201443009 201443009 	382.12-16
Section 385	Treatment of Certain Interests in Corporations as Stock or Indebtedness	385.00-00
	<ul style="list-style-type: none"> • Debt v. Equity 201230008 201323021 	385.01-00
	<ul style="list-style-type: none"> • New Financial Products 201209006 201226026 	385.03-00
Section 401	Qualified Pension, Profit-Sharing, and Stock Bonus Plan	401.00-00
	201205022 201234036 201238031 201242019 201242020 201338028	
	<ul style="list-style-type: none"> • Impossibility of Diversion 	401.01-00
	<ul style="list-style-type: none"> • <i>Exclusive Benefit of Employees or Their Beneficiaries</i> 201538022 	401.01-01
	<ul style="list-style-type: none"> • <i>Definitely Determinable Benefits Under a Pension Plan</i> 201501025 	401.01-03
	<ul style="list-style-type: none"> • Impossibility of Diversion 201228055 	401.03-00
	<ul style="list-style-type: none"> • Discrimination as to Contributions or Benefits (See Also 401.29-01, 401.20-00, 414.00-00) 201440027 201605006 	401.04-00
	<ul style="list-style-type: none"> • <i>Discrimination in Availability of Form of Benefit</i> 201605006 	401.04-03
	<ul style="list-style-type: none"> • 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"> • Medical, Etc. Benefits 201611003 	401.27-00
	<ul style="list-style-type: none"> • Cash or Deferred Arrangements 201417025 201527042 201532036 201601012 	401.29-00
Section 402	Taxability of Beneficiary of Employee's Trust (Time and Manner of Taxation)	402.00-00
	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 201537029 201537030 201537031 201547008 201549031 201549032 201603043 201608021 201610023 201611020	

	• Exempt Trust 201417025	402.01-00
	• Foreign Situs Trust 201341039 201406022 201419026 201430028 201436055 201452027 201502021 201505046	402.03-00
	• Amounts Distributed or Made Available to Beneficiary 201431037 201527042	402.06-00
	• Unrealized Appreciation of Employer's Securities 201242019 201427024	402.07-00
	• 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 201535026 201539036 201543022	402.08-00
	• <i>Reorganization Payments</i> 201535025	402.08-03
	• <i>By a Surviving Spouse</i> 201523019 201523020	402.08-05
	• Tax on Lump Sum Distributions 201241019	402.09-00
Section 403	Taxation of Employee Annuities (Taxable v. Not Taxable) 201230030	403.00-00
	• Non-Forfeitable Rights 201345036 201451062 201501026	403.03-00
	• Annuities Purchased by Section 501(c)(3) Organizations or Public Schools 201538020	403.04-00
	• Rollover Amounts 201212023 201224043 201323040 201419021 201524027	403.05-00
Section 404	Deduction for Contributions of Employer to an Employee's Trust or Annuity Plan and Compensation Under a Deferred-Payment Plan (Deduct. v. Not Deduct.) 201204010 201206022 201206024 201208043 201218024 201221034 201229012 201233023 201330030 201330030 201511039 201511039	404.00-00
Section 404A	Deduction for Certain Foreign Deferred Compensation Plans 201540015	404A.00-00
Section 408	Individual Retirement Accounts 201208039 201405032 201405033 201405034 201423043 201431038 201439006 201451065 201611022	408.00-00
	• Exclusive Benefit of Individual or His Beneficiary 201225020	408.01-00

• Rollover Contributions

408.03-00

201203034 201204024 201205021 201206023 201206025 201206026 201207013
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	<ul style="list-style-type: none"> • Prohibited Transactions 408.07-00 	201437023
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<ul style="list-style-type: none"> • <i>Scientific Organizations</i> 	501.03-24
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• <i>Permissible Benefits</i> 201451040 201605015	501.09-01
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<ul style="list-style-type: none"> • Cooperative Hospital Service Organizations 201218016 	501.27-00
<ul style="list-style-type: none"> • Control of Corporation 201224031 201224034 201247017 201428029 201433017 	501.30-00
<ul style="list-style-type: none"> • <i>Closely Controlled Organizations</i> 201306026 	501.30-01
<ul style="list-style-type: none"> • <i>Dealings With Controlling Interests</i> 201237019 201307009 201345032 201350047 	501.30-02
<ul style="list-style-type: none"> • Proof of Exemption 201235023 	501.31-00
<ul style="list-style-type: none"> • <i>Domestic Fraternal Societies</i> 201404012 	501.31-01
<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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<ul style="list-style-type: none"> • Private v. Public Interest Served 	501.33-00
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201226029 201228041 201236033 201315028 201350043 201414024 201451043 201451045	
<ul style="list-style-type: none"> • "Exclusively" Test 	501.35-00
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201204021 201205013 201210041 201233017 201234030 201236033 201242017 201247017 201250027 201302041 201305013 201309019 201311029 201314045 201314049 201330037 201330038 201330037 201330038 201403017 201403017 201405023 201414024 201428022 201428023 201510058 201517008 201525011 201525011 201525011 201525011 201535019 201538025 201540016 201545031 201601014	
<ul style="list-style-type: none"> • Publishing Activities, Radio, Television, etc. 	501.36-03
201204021 201252025 201433020 201526020	
<ul style="list-style-type: none"> • Fund Raising (See also 0512.06-00) 	501.36-04
201323037 201407020 201416010	
<ul style="list-style-type: none"> • Legislative and Political Propaganda Activities 	501.38-00
201415007 201505042	
<ul style="list-style-type: none"> • "Action" Organizations 	501.38-01
201415007 201430014 201505042	
<ul style="list-style-type: none"> • Electing Expenditure Test 	501.38-02
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<ul style="list-style-type: none"> • Feeder Organizations (Exempt v. Not Exempt) 	502.00-00
201317011 201444043	

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	<ul style="list-style-type: none"> Investment Requirements 	856.02-00
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	<ul style="list-style-type: none"> Other Requirements 	856.03-00
	201225008 201225009 201530014	
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	201206001 201225008 201225009 201250003 201250008 201301007 201320001 201320002 201334033 201341015 201450017 201549013	
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	<ul style="list-style-type: none"> • 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 201527037 201528002 201532005 201533003 201535001 201535014 201536001 201536008 201540002 201543009 201544010 201544011 201548014 201552003 201552005 201601003 201604007	992.02-00
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	<ul style="list-style-type: none"> • Like Kind Property 201216007 201238027 201531009 201532021	1031.02-00
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 201237015 201238019 201238020 201238021 201238022 201238023 201238024
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Section 1362

Election by Small Business Corporation

1362.00-00

201201006 201205002 201205006 201206009 201206011 201211002 201211004
 201211005 201211006 201211007 201214010 201215004 201216027 201217006
 201217009 201217013 201218008 201218009 201219014 201226001 201226013
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• Eligible v. Ineligible 1362.01-00
 201205002 201206009 201217009 201226017 201227003 201233001 201233004
 201234011 201238006 201238007 201252001 201301008 201301011 201310019
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 201451016 201451019 201515013 201516003 201516009 201519016 201528017
 201537001 201608007 **201611010**

• Shareholder Consent 1362.01-01
 201516009 201528017 201539019 201610005

• Election After Termination 1362.01-02
 201206009 201217009 201312023 201320012 201550022

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1362.01-03

201201006 201202016 201203009 201203011 201204007 201207004 201208015
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 201523010 201524019 201524023 201528019 201541007 201541007 201550002
 201550022 201603001 201604006 **201611010**

• Termination of Election

1362.02-00

201201006 201205002 201206009 201217009 201226013 201232023 201237001
 201238017 201243009 201252001 201306004 201306005 201320008 201337001
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 201434013 201434014 201443014 201443014 201444007 201450014 201508002
 201523008 201526006 201538010

• *Ceases to be Small Business Corporation*

1362.02-02

201206009 201217009 201252001 201324004 201330017 201330018 201330017
 201330018 201426018 201432006 201443014 201443014 201444007 201508002
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• *Passive Investment Income*

1362.02-03

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 201306005 201310008 201320008 201328006 201328007 201328008 201328009
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 201441013 201450014 201515011 201516015 201519008 201519018 201523004
 201523005 201523008 201528028 201538010 201541003 201541003

• S Termination Year

1362.03-00

201507011

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	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 201607017 201610003 201610005 201610007	
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	• Overall Foreign Loss Recapture Rules 201452002	1502.08-00

• Intercompany Transactions	1502.13-00	
201208034 201243013 201312027 201336018 201339001 201402001 201402001 201411007 201507006 201524016 201528007 201540001 201603002 201605014 201610004		
• <i>Stock of Members</i>	1502.13-01	
201210018 201228011 201312027 201322002 201341022 201605013		
• Stock, Bonds, and Other Obligations of Members	1502.14-00	R
201208034		
• Limitation on Built-in Losses	1502.15-00	
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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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 201240011 201403011 201403011

• Section 146; Volume Cap 201528005	9100.03-00
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• Section 266; Carrying Charges 201319008 201607005	9100.05-00
• Section 338(g); Election Under Section 1.338-1T(c)(1) 201206005 201206010 201214018 201246021 201317008 201338011 201412012 201438018 201503007 201510037 201534007 201611016	9100.06-00
• Section 338(h)(1); Election Under Section 1.338(h)(10)-1T 201429016 201435002 201437005 201530017	9100.07-00
• Section 442; Accounting Periods 201224024 201305009 201311019 201311020 201312026 201347017 201436044 201438007 201447021 201452004 201524001 201535005 201537013 201552021 201604012 201606007 201606008	9100.09-00
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• Section 472; LIFO Election 201208033 201232012 201232013 201233005 201317006 201333001 201342009 201405006 201448017 201610014	9100.11-00
• Section 663; Special Rules Applicable to Sections 661 and 662 201245008 201348008	9100.12-00
• Section 754; Manner of Electing Optional Adjustment to Basis of Partnership Property 201201007 201201014 201213006 201213024 201214006 201240008 201250012 201251004 201311016 201314013 201337010 201341002 201352008 201410014 201410019 201410020 201410021 201410022 201410023 201410024 201410025 201410026 201426012 201433010 201436045 201438008 201440003 201442003 201443011 201448002 201505003 201506001 201506002 201508003 201510024 201514002 201519023 201523007 201525008 201525008 201525008 201525008 201528027 201530004 201532001 201532014 201532019 201532020 201543002 201544007 201544008 201544009 201548012 201603018 201605007 201610002	9100.15-00
• Section 911; Citizens or Residents of the United States Living Abroad 201420015 201433009 201507016 201539018	9100.17-00
• Extension of Time For Filing Return 201442018	9100.19-00

<ul style="list-style-type: none"> • Section 1502; Election to File Consolidated Return 	9100.20-00
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<ul style="list-style-type: none"> • Other 	9100.22-00
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• Reg. 301.7701-3 Classification of Certain Business Entities

9100.31-00

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	• <i>China</i> 201438020	9114.03-07
	• <i>Cyprus</i> 201343019	9114.03-08
	• <i>Italy</i> 201212008	9114.03-20
	• <i>United Kingdom</i> 201231010	9114.03-42
	• <i>Israel</i> 201247013	9114.03-44
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	• Chapter XII (Family Farmer)	9115.11-00
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	201213025 201310032 201319019 201333009 201421021 201432018 201504016	

• Issues Related to Statutes Other Than Contained in Internal Revenue Code 201320020	9999.92-00
• <i>Freedom of Information Act</i> 201515028	9999.92-01
• Substance v. Form Issues Not Contained in Present List 201311023 201501012	9999.97-00

• Not Able to Identify Under Present List

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