

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) 317-6840.

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	• <i>Securities In Affiliated Corporations</i> 201314005 201325007 201347002 201829004	165.06-02
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	<ul style="list-style-type: none"> • Public Utility Property 201718017 201722006 202020011 202303003 	167.22-00
	<ul style="list-style-type: none"> • <i>Normalization Rules</i> 201223013 201223014 201334036 201418024 201436037 201436038 201438003 201519021 201531010 201531011 201531012 201532018 201532024 201532025 201534001 201541010 201544018 201548017 201603017 201619005 201640005 201709008 201717008 201718015 201739001 201743009 201745002 201752002 201817006 201828010 201842001 201921005 201949006 202020011 202142002 202205002 202213001 202239002 	167.22-01
	<ul style="list-style-type: none"> • Computer Software 201549024 	167.28-00
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	<ul style="list-style-type: none"> • Recovery Period 201216029 	168.18-00
	<ul style="list-style-type: none"> • Classification of Property 201216029 201243003 201244015 201310028 201404001 201509029 201543001 	168.20-00
	<ul style="list-style-type: none"> • <i>Assigned</i> 201539024 	168.20-01
	<ul style="list-style-type: none"> • Public Utility Property 202017027 202032002 202042005 202046007 202047004 202130005 202131004 202140014 202208005 	168.24-00
	<ul style="list-style-type: none"> • <i>Normalization Rules</i> 201816005 201824005 201824006 202009014 202010002 202017015 202033002 202124003 202150003 202206010 202211004 202227002 202350001 202402003 	168.24-01
	<ul style="list-style-type: none"> • Property Used Predominantly Outside the United States 201216008 201510038 	168.25-00
	<ul style="list-style-type: none"> • Alternative Depreciation System (ADS) 201316006 201316007 	168.29-00
	<ul style="list-style-type: none"> • <i>Outside the United States</i> 201324005 201324006 201943021 	168.29-01
	<ul style="list-style-type: none"> • <i>Tax-Exempt Use Property</i> 201436048 201606005 201722001 201737002 	168.29-02
	<ul style="list-style-type: none"> • Redeterminations, Changes in Use 201228036 201450001 	168.32-00
	<ul style="list-style-type: none"> • Retirements 201710006 	168.35-00

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	• Ordinary Income and Capital Gain Property 201443019 201443020	170.11-00
	• <i>Inventory and Other Property</i> 201414014	170.11-03
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	• <i>Partial Interests in Property</i> 201249002	170.12-03
	• <i>Substantiation</i> 201608012 201736023 202302012	170.12-09
	• Qualified Conservation Contribution 201212009 201212010 201239008 201334039 202002011 202020002 202141022	170.14-00
	• <i>Conservation Purpose</i> 202130014	170.14-03
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	• <i>Allowance Only to Same Taxpayer (Libson Shops)</i> 201605018	172.01-01
	• Specified Business 201612013 201447006	172.03-00
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	• Certain Elections for Intangible Property 201214014	197.01-00
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	• Medical Care 201933005 202311001	213.05-00
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	• Allocation Methods 201439001	263A.04-00
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	• <i>Matching of Deduction and Payee Income</i> 201228035	267.02-01
	• <i>Payments to Foreign Persons</i> 201228035 201334037	267.02-03
	• Limitation on Gain Where Loss Previously Disallowed 201737011	267.05-00
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	• <i>Controlled Group Defined</i> 201405009	267.07-01
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	<ul style="list-style-type: none"> • Federal Income 201306018 	275.01-00
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	<ul style="list-style-type: none"> • <i>Parachute Payment</i> 201519017 	280G.01-01
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	<ul style="list-style-type: none"> • Dividend in Property 	301.01-00
	<ul style="list-style-type: none"> • <i>Form v. Substance</i> 201552027 201640018 	301.01-07
	<ul style="list-style-type: none"> • Other Than a Dividend 	301.02-00
	<ul style="list-style-type: none"> • <i>Distribution With Respect to Stock v. Not With Respect to Stock</i> 201637010 	301.02-01
	<ul style="list-style-type: none"> • Liquidation v. Reorganization 201350001 	301.04-00
	<ul style="list-style-type: none"> • Constructive Dividend 201350001 	301.07-00
Section 302	Distributions in Redemption of Stock 201202010 201202020 201207002 201328025 201330017 201330018 201330017 201330018 201352007 201405005 201444007 201637010 201805003 201805004 201805005 201805006 201805007 201805008 202219011	302.00-00
	<ul style="list-style-type: none"> • Not Essentially Equivalent to a Dividend 201918009 	302.01-00
	<ul style="list-style-type: none"> • Disproportionate Redemption of stock 201202010 201202020 201236025 	302.02-00
	<ul style="list-style-type: none"> • Complete Termination of Interest 201228012 201405005 	302.03-00
	<ul style="list-style-type: none"> • Redemption from Noncorporate Shareholder in Partial Liquidation 202146006 	302.04-00
	<ul style="list-style-type: none"> • <i>Qualified Trade or Business</i> 202146006 	302.04-02
	<ul style="list-style-type: none"> • <i>Termination of a Business</i> 202146006 202210005 	302.04-03
	<ul style="list-style-type: none"> • Constructive Ownership 202219011 	302.05-00
	<ul style="list-style-type: none"> • <i>Waiver of Family Attribution by Individual</i> 201805011 202219011 	302.05-01
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	• Acquisition by Subsidiary	304.01-00
	• <i>Distribution to which Section 301 Applies</i> 201252008 201330004 201330004	304.01-03
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	• <i>Section 304 v. Section 351</i> 201228034	304.02-01
	• Control Requirement Met 201601001	304.03-00
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	• Distributions in Lieu of Money 201247004 201252012 201312028 201426019 201440006 201447019 201505035 201516050 201536016 201544015 201552011 201607003 201629003 201631005 201637013 201709011 201717005	305.03-00
	• Disproportionate Distributions 201213011 201404005 201446013 201537020 201604008 201717005 202406001 202406002 202406005 202406006 202406007 202406008 202406009 202406010 202406011 202406012 202406013	305.04-00
	• Deemed Distributions 201604008	305.13-00
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	• With Respect to its Stock 201405005 201835001	311.01-00
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	• Computations of Earnings and Profits 201601001	312.01-00
	• Tax Free Distributions 202244008 202246005	312.06-00
	• Allocation in Separations 201240017 201249012 201330002 201330002 201527003 201644018	312.09-00
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	• Source of Distribution	316.09-00
	• <i>Earnings and Profits</i> 201637010	316.09-03
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	201211020 201252008 201330004 201330004 201334006 201511020 202031002	
	<ul style="list-style-type: none"> • Year Liquidation Occurs 201228023 202017023 	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 201731008 202134013 201308002 201333007 201350001 201352007 201404002 201406005 201411002 201418039 201418046 201433007 201441010 201443017 201445008 201452016 201504007 201511001 201512001 201528006 201535007 201537018 201607003 201622012 201626002 201633014 201721002 201802007 201827008 201921002 201923003 202351007	
	<ul style="list-style-type: none"> • Nonrecognition of Gain or Loss 201213018 201228030 201236014 201308002 201314001 201315016 201308002 201339001 201412013 201415001 201603002 201730010 201827006 	332.01-00
	<ul style="list-style-type: none"> • Debts of Parent to Subsidiary 201213018 	332.07-00
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	201237017 201418025 201511020 201942004 202002005 202012006 202016010 202017024 202042006 202043002 202046008 202050012 202053009 202110012 202119006 202120005 202137002 202152015 202239010 202250008 202302008 202310010 202336004 202336005 202336006 202351008 202402006	
	<ul style="list-style-type: none"> • General Rule 202031002 	336.01-00
	<ul style="list-style-type: none"> • Liquidation in a Reorganization 	336.03-00
	<ul style="list-style-type: none"> • <i>Distribution of Property to a Related Person</i> 201418025 	336.03-01
	<ul style="list-style-type: none"> • <i>Disqualified Property</i> 201418025 	336.03-02
	<ul style="list-style-type: none"> • <i>Liquidation to which section 332 Applies</i> 201328003 	336.03-05
	<ul style="list-style-type: none"> • Stock Sales and Distributions Treated as Asset Transfers 201749004 201546011 201611006 201622019 201625006 201633013 201636011 201640009 201652014 201702024 201711007 201714019 201721011 201730004 201730005 201733003 201739005 201740003 201740014 201751009 201802008 201808008 201808011 201824011 201825014 201827001 201836002 201836003 201842002 201848010 201902028 201909008 201910015 201910018 201923024 201928001 201929002 201929018 201930001 201931003 201934005 201940001 201941001 201942004 201943016 202002005 202003002 202005013 202012002 202012006 202016009 202016010 202016012 202017024 202020012 202023003 202042006 202043001 202043002 202046008 202050012 202053009 202101004 202106001 202109004 202119006 202119008 202120012 202130013 202137002 202147010 202149008 202152015 202152016 202208008 202215013 202220005 202239010 202240012 202242005 202244006 202246006 202247009 202250008 202301007 202302008 202302009 202302010 202309011 202309012 202310010 202316007 202317012 202322003 202322016 202330004 202336004 202336005 202336006 202338005 202342011 202342012 202347012 202350008 202351008 202352015 202352016 202402006 202403007 202403010 202414002 	336.05-00
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	202134013 201404004 201536004 201625009 201725017	

	• Adoption of Plan and 12-Month Period	337.01-00
	• <i>Date Plan Adopted</i> 201731008	337.01-01
	• Sale or Exchange 201801006 201801009 201910010 201910011 201910012 201910013 201910016 201910017	337.03-00
	• Liquidation v. Reorganization 201921002	337.07-00
	• Section 332 Liquidations 201404004 201921002	337.10-00
	• Loss on Stock of Subsidiary 201606017 201606025	337.13-00
	• Conversion to Tax Exempt 201725017	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	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 201924014 202114014 202131008 202131009 202133012 202135001 202137001 202226008 202240004 202309010	338.01-00
	• <i>Time in which Election must be made</i> 201206010 201246021 201632019 201338011 201437005 201438018 201503007 201510037 201530017 201534007 201611016 201738002 201826004 201835003 201850019 201924005 202037010 202114014 202131008 202135001 202137001 202210015 202224004 202240004 202309010	338.01-02
	• Qualified Stock Purchase 201203004 201211009 201213013 201214012 201216026 201228011 201252011 201351004 201622012 201702035	338.02-00
	• Consistency Rules 201213013 201214012	338.04-00
	• Elective Recognition of Gain or Loss by Target Corporation - Together with Nonrecognition of Gain or Loss on Stock Sold by Selling Consolidated Group 202334005	338.05-00
	• Purchase from Related Corporation 201203004 201702035	338.09-00
	• Deemed Asset Sale and Liquidation in 338(h)(10) Election 201203004 201702035	338.80-00
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	201201012 201212001 201214014 201224006 201228030 201232030 201232033	
	201240017 201249012 201250004 201252002 201252014 201312017 201314001	
	201330002 201731008 201330002 201333007 201348006 201350001 201350007	
	201411006 201412013 201415001 201416002 201422004 201424007 201424010	
	201431002 201436033 201437007 201437013 201438009 201446019 201505012	
	201506008 201511015 201641011 201746022 201810005 201820016 201822008	
	201835001 202048003 202125001 202309002	
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	201224006 201242007 201306006 201326014 201333007 201506008 201601001	
	201818010	
	• Series of Transactions	351.02-00
	201212001 201506008 201531014	
	• "Property" Defined	351.05-00
	201506008 201552026	
	• Constructive Exchange	351.11-00
	201350001	
	• Section 351 v. Section 304 (See Also 0304.01-01)	351.12-00
	201228034	
	• Investment Company Exception	351.13-00
	201547003 201622001 201622014 201633028 201716016 201716017 201716018	
	201716019 201716020 201810005 202016013	
	• Non-Qualified Preferred Stock	351.14-00
	201716045	
	• Exceptions	351.15-00
	201552026	
Section 354	Exchanges of Stock and Securities in Certain Reorganizations	354.00-00
	202050014 202309002	
	• Exchange v. Liquidation	354.01-00
	201423010	
	• Substantially All of the Assets	354.05-00
	201731008 202050014	

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 201612012 201634010 201731004 201330002
 201330022 201333007 201334009 201334032 201337003 201338040 201339001
 201340009 201341026 201347005 201349006 201352007 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
 201624011 201626017 201633014 201634010 201641011 201643008 201644018
 201651010 201706005 201716002 201721002 201734004 201740015 201801012
 201805012 201817001 201818010 201827008 201848016 201851004 201852015
 201919008 201920009 201921002 201921010 201930011 201931005 201940007
 201944002 201948001 201949013 201949014 202009002 202010003 202019016
 202022004 202026001 202029003 202033003 202035009 202036001 202036005
 202045001 202045003 202047007 202051009 202118004 202123006 202126005
 202132005 202132006 202145020 202150012 202151001 202152010 202201005
 202218001 202218002 202220003 202223004 202224012 202225006 202227008
 202231004 202231013 202235002 202236007 202243003 202244009 202246008
 202248008 202304005 202304007 202305010 202322006 202322015 202328019
 202330002 202332001 202339007 202340015 202343025 202344013 202345008
 202347011 202349009 202350010 202351009 202404005 **202419016**

• 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 201612012 201634010
 201731003 201731004 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
 201512001 201516014 201528006 201535006 201535007 201537018 201538015
 201542004 201603005 201603006 201603020 201605016 201607003 201613008
 201614017 201626017 201634010 201637013 201651010 201706005 201734004
 201740015 201801012 201802007 201820016 201827006 201827008 201833011
 201834006 201835001 201836001 201839006 201845009 201851005 201852015
 201910004 201920009 201923003 201925004 201931007 201935009 201943011
 201944002 201945022 201948001 201949014 202009002 202035009 202045001
 202047007 202051011 202107009 202118004 202126005 202132006 202139001
 202139006 202145020 202145027 202149006 202150009 202151001 202151004
 202152010 202208012 202209002 202210012 202224002 202224012 202225006
 202227008 202231004 202231013 202236007 202244008 202244009 202246005
 202246008 202248008 202249011 202249014 202304005 202304007 202305010
 202310007 202311005 202322006 202328019 202330002 202332001 202339007
 202340015 202343025 202344013 202345008 202347004 202349009 202350010
 202351007 202351009 202404005

	<ul style="list-style-type: none"> • <i>Split-Off</i> 201208017 201213001 201213002 201213005 201230007 201232033 201234009 201238018 201240016 201245020 201246027 201252017 201306010 201308017 201308018 201310023 201313016 201323017 201327003 201330002 201330007 201731003 201308017 201308018 201330002 201330007 201337003 201350007 201352007 201403002 201404002 201405003 201411002 201411012 201418019 201422017 201426007 201435005 201512001 201625012 201625013 201851004 201920008 201923003 201945016 201949013 202019016 202026001 202031006 202033005 202108010 202132005 202151001 202211009 202218002 202220003 202224002 202231013 202235002 202243003 202244009 202304005 202309013 202332001 202343025 202345008 	355.01-01
	<ul style="list-style-type: none"> • <i>Split-Up</i> 201402002 201418018 201423012 201921010 201931005 201940007 202010003 202033003 202201005 	355.01-02
	<ul style="list-style-type: none"> • Non Pro Rata Distributions, etc. 201233016 201625012 201625013 	355.02-00
	<ul style="list-style-type: none"> • Active Business 201219003 201251006 201634010 201333003 201407005 201418039 201418046 201426007 201429006 201436033 201531014 201535007 201542004 201551009 201605016 201606014 201607003 201624004 201625012 201625013 201626002 201633009 201634010 201637013 201643008 201706005 201730010 201818010 201827008 201834006 201930011 201940007 201948001 201949012 202009002 202029003 202033005 202036001 202045001 202132006 202340015 	355.03-00
	<ul style="list-style-type: none"> • <i>Five-Year Requirement</i> 201251006 201528016 201624004 201633009 201643008 201706005 202009002 202150004 	355.03-01
	<ul style="list-style-type: none"> • Business Purpose 201308017 201308018 201308017 201308018 201730010 	355.04-00
	<ul style="list-style-type: none"> • Control 201437013 201527003 201818010 202218002 	355.05-00
	<ul style="list-style-type: none"> • <i>Distribution of Control</i> 201731004 201437013 201605016 201703012 201945022 202218002 202248008 	355.05-01
	<ul style="list-style-type: none"> • Device 201734004 201743017 202051009 202113007 	355.06-00
	<ul style="list-style-type: none"> • Continuity of Interest 201644018 202033005 	355.07-00
	<ul style="list-style-type: none"> • Distributions Within a Consolidated Group 201305003 201352007 201445008 201730010 	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 201614001 201627001 201740015 201748007 201801005 201801012 201943001 202026001 202114017 202126005 202145020 202224002 	355.10-00
Section 356	Receipt of Additional Consideration--Boot (Gain Recognized v. Not Recognized) 201424017 201721014	356.00-00
	<ul style="list-style-type: none"> • Reorganization Exchange 	356.01-00
	<ul style="list-style-type: none"> • <i>Series of Transactions</i> 201614017 	356.01-02
	<ul style="list-style-type: none"> • Securities as "Other Property" 201527003 	356.02-00

Section 357	Assumption of Liability (Gain Recognized v. Not Recognized) 202244008 202246005	357.00-00
	• Liabilities in Excess of Basis	357.02-00
	• <i>In General</i> 201721002	357.02-01
	• <i>Exceptions</i> 201230008 201348006 201431002 201542004 201627001 201703012	357.02-02
Section 358	Basis to Distributees 202051009 202218002	358.00-00
	• Allocation of Basis 201411006 201437007 202218002 202244008 202246005	358.02-00
	• Assumption of Liabilities 201721002	358.03-00
Section 361	Nonrecognition of Gain or Loss to Corporations (Recognized v. Not Recognized) 201228033 201634010 201409003 201504007 201511001 201516014 201542004 201613008 201634010 201637013 201649012 201651010 201802007 201818010 201833011 201839006 201852015 201925004 201949013 201949014 202019016 202022004 202026001 202036005 202051009 202123006 202132005 202151001 202152010 202220003 202224012 202231004 202231013 202244009 202304005 202322006 202330002 202332001 202339007 202344013 202350010	361.00-00
	• Exchanges Not Solely in Kind 201423010 201440014 201910004	361.01-00
	• Distributions 201607003 201627001 201827006 201839006 201925004 201949014 202019016 202151004 202231004 202244008 202244009 202246005 202332001 202350010	361.02-00
	• <i>Distributions of Appreciated Property</i> 201721014	361.02-01
	• <i>Certain Transfers to Creditors</i> 201228033 201731004 201409003 201511001 201537004 201601001 201627001 201703012 201721002 201802007 201833011 201839006 201851005 201852015 201925004 202019016 202022004 202050014 202051009 202139006 202231004 202244009 202322006 202330002 202332001 202350010	361.02-02
Section 362	Basis to Corporations 201411006 201418013 201418034 201418041 201418042 201441014 201502001 201502002 201505028 201839013 202050010 202051009 202203010	362.00-00
	• Property Acquired in Reorganizations and Transfers by Controlling Stockholders 201701005 201418013 201418041 201418042 201505028 201521011 201545013 201736001 201832011 201832012 202244008 202246005	362.01-00
Section 367	Foreign Corporations 201348011 201432002 201639014 201746022 201935004 201936004 202107010 202107011 202334014 202335001	367.00-00
	• Transfer to Foreign Corporations Subject to Section 367(a) 201321018 201651015 202045007	367.01-00
	• Treatment of Transfers of Stock or Securities to Foreign Corporations 201321018 201651015 201935004 202045007	367.03-00
	• <i>Reorganizations Described in Section 368(a)(1)(B)</i> 201249011 201250021 201324009	367.03-01

• <i>Requirements of Gain Recognition Agreement</i> 202110014	367.03-10
• <i>Treatment of Subsequent Disposition of Stock of Transferee</i> 201321018	367.03-13
• <i>Transfer of Foreign Branch with Previously Deducted Losses Under Section 367(a)</i>	367.06-00
• <i>Anti-Abuse Rule</i> 201530020	367.06-07
• <i>Transfers of Intangible Property to Foreign Corporations Under Section 367(d)</i> 201321018 202335001	367.30-00
• <i>Treatment of Distribution Described in Section 367(e)</i> 201348011 201423006 201639014 201808010	367.40-00
• <i>Liquidations Under Section 332</i> 201348011 201606006 201639014 201808010	367.40-02
Section 368	
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 201404006 201406005 201416002 201419005 201424005 201424006 201424009 201424011 201426004 201512001 201746022 201839006 201931005 201944002 201949013 201949014 202019016 202033003 202035009 202036001 202107010 202107011 202118004 202126005 202132005 202132006 202145020 202150009 202151001 202220003 202225006 202227008 202231004 202235002 202236007 202243003 202244009 202246008 202248008 202304005 202304007 202309002 202322006 202328019 202330002 202330006 202332001 202334014 202340015 202343025 202344013 202345008 202349009 202350010 202351009	
• <i>Statutory Merger or Consolidation (Type "A")</i> 201213001 201213019 201213021 201228033 201232033 201252002 201252014 201312017 201314008 201314028 201326006 201333007 201350007 201404002 201423010 201436034 201438009 201505012 201535007 201625012 201625013 201820002 201918015 202145020	368.01-00
• <i>Using Stock of Corporation Controlling Merged Corporation</i> 201820002	368.01-02
• <i>Stock for Stock (Type "B")</i> 201249011 201250021 201324009 201603020	368.02-00
• <i>Liquidation Distribution</i> 201418039 201418046	368.02-02
• <i>Stock for Property (Type "C")</i> 201224006 201228030 201247009 201252014 201324003 201731008 201340016 201411002 201413003 201418039 201418046 201422004 201424007 202107010 202107011	368.03-00
• <i>Substantially All the Property</i> 201247009 201731008	368.03-01

<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 201612012 201731003 201731008 201308002 201330002 201330007 201330022 201333007 201335001 201336012 201337003 201337007 201338040 201339001 201340009 201341004 201341013 201341026 201347005 201349006 201350007 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 201613008 201637013 201827006 201835001 201836001 201839006 201845009 201851004 201851005 201910004 201920008 201920009 201921002 201921010 201923003 201925004 201930011 201931005 201944002 201945016 201949013 201949014 202010003 202019016 202026001 202033003 202035009 202036001 202036005 202045003 202051011 202108010 202118004 202126005 202127003 202132005 202132006 202139006 202145027 202149006 202151001 202151004 202152010 202201005 202203002 202208012 202211009 202220003 202223004 202224002 202224012 202225006 202227008 202231004 202231013 202235002 202236007 202243003 202244008 202244009 202246008 202249011 202249014 202304005 202304007 202310007 202311005 202322006 202330002 202332001 202339007 202340015 202343025 202344013 202345008 202349009 202350010 202351007 202351009 202404005 202419016	
<ul style="list-style-type: none"> • Recapitalization (Type "E") 	368.05-00
201308001 201315009 201315020 201315021 201308001 201424010 201835001	
<ul style="list-style-type: none"> • 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 201611015 201635001 201638004 201737010 201746022 202031002 202102007 202107010 202107011 202334014 202339009	
<ul style="list-style-type: none"> • Continuity of Interest Rule 	368.08-00
201214013 201224006 201247009	
<ul style="list-style-type: none"> • <i>Proprietary Interest Continuity</i> 	368.08-02
202050014	
<ul style="list-style-type: none"> • <i>Related party Acquisitions</i> 	368.08-03
201214013	
<ul style="list-style-type: none"> • <i>Following a Qualified Stock Purchase Under Section 338</i> 	368.08-05
201918015	
<ul style="list-style-type: none"> • <i>Business Enterprise Continuity</i> 	368.08-06
201247009 201314028 201413003 201644018 201918015 202145025	
<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 201625012 201625013	
<ul style="list-style-type: none"> • Plan of Reorganization 	368.09-00
201411002 201626002 201627001 202128001 202305010	
<ul style="list-style-type: none"> • <i>Several Steps</i> 	368.09-01
201252014 201411002	

	• 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 201644018 201716002 201805012 202050014	368.14-00
Section 381	Carryovers in Certain Corporate Acquisitions (Allowed v. Not Allowed) 201830005	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 202021010 201308026 201308029 201335012 201345023 201350006 201403007 201412009 201432015 201443009 201549010 201750006 201902022 201949017 202017023 202140007 202142007 202142008 202146003 202345009	382.00-00
	• General Rule 201648004	382.01-00
	• Scope of Section 382 Limitation	382.02-00
	• <i>Closing of the Books</i> 201418038 201545014 201734003 201942005	382.02-05
	• Value of Old Loss Corporation 201435003	382.05-00
	• Ownership Change 201350006	382.07-00
	• <i>Segregation Rules</i> 201350006 201451015 202024013	382.07-05
	• Built-in Gains and Losses and Section 338 Gains 201629007	382.08-00
	• <i>Net Unrealized Built-in Gain</i> 201629007	382.08-01
	• Definitions and Special Rules 201215007 201403007 201902022	382.11-00
	• <i>Preferred Stock</i> 202131005	382.11-05
	• <i>Treating Interests As Stock</i> 202131005	382.11-07
	• <i>5-Percent Shareholder</i> 201215007 201403007 201902022	382.11-09
	• Operating Rules 201322032 202021010 201335012 201443009 201949017	382.12-00
	• <i>Contributions to Capital</i> 201350006	382.12-01
	• <i>Title 11 or Similar Case</i> 201306003 201322032 201328027 201435003 201648004 202342007	382.12-08
	• <i>Election Out</i> 201519004 201949017 202235001 202342007	382.12-13

	<ul style="list-style-type: none"> • <i>Controlled Groups</i> 201232016 201232017 202021010 201335012 201421011 201421012 201421013 201443009 	382.12-16
Section 384	Limitation on Use of Preacquisition Losses to Offset Built-in Gains 201806005	384.00-00
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 201205022 201234036 201238031 201242019 201242020 201338028 201650002 201650003 201750004 201837004 201923016 202035010 202042012 202044001 202114010 202114011 202114012 202125007 202202012 202202013 202240018 202305001 202417010	401.00-00
	<ul style="list-style-type: none"> • Impossibility of Diversion 202125007 	401.01-00
	<ul style="list-style-type: none"> • <i>Exclusive Benefit of Employees or Their Beneficiaries</i> 201538022 201847008 	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 201839010 	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"> • <i>Comparability Among Two or More Plans</i> 201810008 	401.04-04
	<ul style="list-style-type: none"> • Required Distributions 201202042 201208039 201318033 201320021 202039002 201424031 201434028 201437025 201437034 201503024 201628004 201628005 201628006 201902023 201923016 201924013 202031007 202035010 202042012 202114010 202114011 202114012 202140011 202143002 	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 201840007 201909003 202035010 202140011 	401.06-01
	<ul style="list-style-type: none"> • <i>Employee Dies Before Entire Interest Distributed</i> 201202042 201208039 201210045 201320021 201628004 201628005 201628006 201633025 201750004 201923016 201924013 202042012 202044001 202114010 202114012 202140011 	401.06-02
	<ul style="list-style-type: none"> • Commencement of Benefits Under Qualified Trusts 201221033 201933006 	401.11-00
	<ul style="list-style-type: none"> • Additional Participation Requirements (See Also 410.00-00) 201810008 	401.20-00
	<ul style="list-style-type: none"> • Medical, Etc. Benefits 201611003 201625005 201639001 201805002 202305001 	401.27-00

	<ul style="list-style-type: none"> • Cash or Deferred Arrangements 201417025 201527042 201532036 201601012 201722014 201833012 202023001 202126001 202304001 202408002 	401.29-00
	<ul style="list-style-type: none"> • <i>Special Antidiscrimination Rules</i> 201615013 	401.29-01
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 201618019 201634024 201749007 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 201522012 201524030 201528043 201529016 201531024 201532040 201532042 201533023 201537029 201537030 201537031 201547008 201549031 201549032 201603043 201608021 201610023 201611020 201625021 201627006 201635011 201637018 201644024 201645020 201645025 201649020 201821008 201822033 201826018 201835017 201840007 201936009 202019008 202147015 202218028 202304001	
	<ul style="list-style-type: none"> • Exempt Trust 201417025 201821008 201831006 201936009 	402.01-00
	<ul style="list-style-type: none"> • Non-Exempt Trust 201749007 	402.02-00
	<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 202210004 	402.07-00
	<ul style="list-style-type: none"> • Rollover Contributions 201211031 201215015 201224043 201233021 201233022 201234034 201305015 201323040 201330047 201618014 201330047 201341038 201346013 201403020 201403025 201418063 201419020 201419021 201420026 201426032 201442070 201443029 201443030 201445028 201446031 201446032 201446038 201448033 201452022 201452025 201505045 201514020 201521022 201524027 201535026 201539036 201543022 201622040 201936009 	402.08-00
	<ul style="list-style-type: none"> • <i>Rollover Lump Sums</i> 202019008 	402.08-01
	<ul style="list-style-type: none"> • <i>Reorganization Payments</i> 201535025 	402.08-03
	<ul style="list-style-type: none"> • <i>By a Surviving Spouse</i> 201523019 201523020 201821008 201839005 201936009 	402.08-05
	<ul style="list-style-type: none"> • Tax on Lump Sum Distributions 201241019 202019008 	402.09-00
Section 403	Taxation of Employee Annuities (Taxable v. Not Taxable)	403.00-00
	201230030	
	<ul style="list-style-type: none"> • Non-Forfeitable Rights 201345036 201451062 201501026 	403.03-00

	• Annuities Purchased by Section 501(c)(3) Organizations or Public Schools 201634021 201538020 201634021	403.04-00
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Section 501

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201947020 202004012 202005022 202009025 202009028 202014017 202014022
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202036008 202041007 202041009 202044011 202046010 202047009 202047010
202047012 202047014 202049005 202052040 202102009 202102010 202102011
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202109008 202110044 202113009 202114023 202117014 202117023 202119002
202122011 202122012 202124009 202124010 202124011 202124012 202124013
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202316009 202316011 202321016 202323011 202326008 202327019 202331003
202331004 202332018 202339039 202343037 202346030 202347002 202352021
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202416014 202416015

• Instrumentalities of U.S.

501.01-00

201749019 201503016 201503019 201509039 202340020 202344017 202413013
202419025

• Title-Holding Company

501.02-00

201309014 202001027 201552033 201617011 202101005 202221008

• Religious, Charitable, etc., Institutions and Community Chest

501.03-00

201202039 201202040 201203019 201203020 201203021 201203022 201203023
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 201225014 201225015 201225016 201225017 201226029 201229001 201229010
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 201240028 201240029 201240036 201241009 201241011 201242014 201244021
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 201314049 201314058 201315027 201317020 201318009 201318012 201318017
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 201350045 201350046 201351028 201402015 201402016 201402017 201405017
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 201406012 201406013 201406014 201406015 201406017 201407015 201407018
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 201413012 201414021 201414022 201414023 201414025 201414026 201414032
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201829006 201829007 201829008 201829009 201829010 201829011 201829012
201829013 201829014 201829015 201829016 201829017 201829018 201829019
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202243017 202243019 202244017 202244019 202244021 202245006 202245009
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202334016 202334017 202334018 202336016 202336017 202336018 202336019
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202336027 202336029 202336031 202338007 202338008 202338009 202338010
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 202339016 202339017 202339018 202339019 202339020 202339021 202339022
 202339023 202339024 202339025 202339026 202339027 202339028 202339029
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 202339037 202339040 202339041 202339042 202339043 202339044 202339045
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 202344017 202345011 202345012 202346009 202346029 202346031 202346032
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 202402012 202402014 202403013 202403016 202403018 202403019 202404006
 202404007 202404009 202404010 202405007 202405008 202405009 202405011
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 202411013 202412010 202412011 202414005 202414006 202414010 **202419018**
202419019 202419021 202419022 202419023 202419024 202419025

• *Employee Benefit Organization (See Also 0501.09-00)* 501.03-01
 201203032 201313033 201351025 201428019 201428024 201824014 201908024

• *Foundations* 501.03-02
 201911008 201335014 201335023 201411037 201436051 201513005 201514016
 201541013 201603033 201606030 201609001 201825004 202144028

• *Trusts* 501.03-03
 201219029 201237019 201306023 201317011 201335014 201447049 201451032
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• *Unincorporated Associations* 501.03-04
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• *Corporations* 501.03-05
 201202038 201204019 201204020 201204021 201205011 201210041 201211026
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 201346012 201405023 201410035 201419016 201423026 201426028 201428021
 201446025 201451036 201521016 201550043 201615018 201622035 201643025
 201702042 201712014 201717048 201718038 201721022 201740022 201742028
 201743018 201814010 201824012 201832013 201832015 201835012 201838008
 201841007 201841008 201847011 201904016 201908024 201917008 201922038
 201924018 201929021 201934008 201940010 201941030 201942011 201944017
 202009028 202019028 202022005 202022006 202022007 202033006 202041009
 202046010 202047009 202047012 202047014 202049005 202101006 202102012
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 202131011 202131013 202141028 202145031 202152021 202228015 202237011
 202237019 202240028 202242016 202304014 202310011 202314016 202316009
 202316010 202326022 202335015 202335019 202352021 202403015 202411012
 202413013

• *Civil Rights Groups* 501.03-07
 201217021 201701023 201640019

• *Educational Organizations* 501.03-08
 201252025 201303018 201304011 201305013 201323025 201327015 202134018
 201345032 201405024 201415009 201417017 201417018 201424024 201426035
 201433020 201435015 201440023 201445014 201503017 201509040 201510059
 201516069 201527044 201550043 201608016 201619010 201621016 201644019
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 202235012 202304014 202322019

<ul style="list-style-type: none"> • <i>Fraternal Beneficiary Societies; Secret Societies (See Also 0501.08-00)</i> 201951012 	501.03-09
<ul style="list-style-type: none"> • <i>Hospitals and Health Clinics (See Also 0501.06-03)</i> 201210041 201317012 201328035 201445015 201451037 201702002 201703005 201744019 202004012 	501.03-11
<ul style="list-style-type: none"> • <i>Libraries, Museums, etc.</i> 201221024 201517011 	501.03-13
<ul style="list-style-type: none"> • <i>Literary Organizations</i> 201433020 	501.03-14
<ul style="list-style-type: none"> • <i>Organizations With Charitable Activities Outside U.S. (See Also 0501.28-00)</i> 201215011 201322041 201335024 201438032 	501.03-15
<ul style="list-style-type: none"> • <i>Political Action Organizations</i> 201712015 202005020 	501.03-17
<ul style="list-style-type: none"> • <i>Prevention of Cruelty Groups</i> 201337017 201831013 202404008 	501.03-18
<ul style="list-style-type: none"> • <i>Public Recreation Facilities and Athletic Organizations</i> 201204020 201340021 201343028 201619010 201918018 202131011 202140017 202144030 202152019 202152022 202328021 202349013 202351016 	501.03-19
<ul style="list-style-type: none"> • <i>Religious Organizations</i> 201232034 201236033 201246041 201251018 201310045 201325017 201327018 201632021 201350047 201414024 201417017 201420020 201523022 201904008 202007019 202138010 	501.03-20
<ul style="list-style-type: none"> • <i>Research Organizations</i> 201701022 202129017 	501.03-21
<ul style="list-style-type: none"> • <i>Scholarships, Endowment Funds and Trusts, Student Loans</i> 201237020 201251022 201634025 201415003 201423030 201432037 201652029 202207010 202409019 	501.03-22
<ul style="list-style-type: none"> • <i>Scientific Organizations</i> 201311030 201313032 201701022 201717048 201818018 202126024 	501.03-24
<ul style="list-style-type: none"> • <i>Social Welfare Groups (See Also 0501.04-00)</i> 201304011 201632022 201340021 201415007 201451036 201505042 201716048 202004015 	501.03-25
<ul style="list-style-type: none"> • <i>State Instrumentalities</i> 201411018 	501.03-26

• *Organizational and Operational Tests*

501.03-30

201203024 201205012 201210043 201215011 201216040 201234030 201250027
 201250028 201305013 201306028 201314047 201314049 201317012 201322041
 201323037 201327017 201330037 201632020 201632021 201632023 201731016
 201911016 202021021 202021026 201330037 201331007 201334043 201340021
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 201411038 201411042 201412022 201414024 201414033 201417024 201423030
 201424027 201428031 201430014 201433016 201441017 201446029 201510059
 201511024 201517015 201525011 201525012 201526020 201526021 201526023
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 201832019 201833018 201838008 201838009 201844013 201847010 201852020
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 202413012 202414007 202416015 **202419020 202419025**

• *Limitation of Beneficiaries*

501.03-31

201923026 201931011 202011008 202014015 202014016 202034011 202241007

• *Cooperative Hospital Service Organizations*

501.03-32

201218016 201433018

• *Lessening the Burdens of Government*

501.03-33

201213029 201214034 201413012 201531022 201945029 202118021 202131013
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<ul style="list-style-type: none"> • Civic Leagues and Social Welfare Groups (See Also 0501.03-25) 	501.04-00
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<ul style="list-style-type: none"> • Local Associations of Employees 	501.04-01
201321033 201321035 201321036 201321038 201323027 201323032 201443020 201736026 201810010	
<ul style="list-style-type: none"> • Prepaid Medical Care Association (See Also 0501.03-10) 	501.04-02
201406019 201451033 202101007 202331004	
<ul style="list-style-type: none"> • Political Activities Organizations 	501.04-03
201214035 201221025 201221026 201221027 201221028 201221029 201403019 201403020 201424028 201449002 201552032 201615014 201951013 202022009 202120016	
<ul style="list-style-type: none"> • Community 	501.04-06
201338053 201941028 202023008 202047014 202226014 202227012 202230013 202237011 202323013 202336028 202344018 202414009	
<ul style="list-style-type: none"> • Homeowners Association 	501.04-07
201204017 201224032 201224035 201234028 201325016 201548020 201604019 201623013 201636044 201736027 201803010 201805014 201832014 201832016 201832017 201932016 201933015 201951014 202014018 202015028 202040009 202047015 202124010 202128009 202130015 202145030 202226014 202227012 202230013 202321015 202323013 202414009	
<ul style="list-style-type: none"> • Labor Organizations 	501.05-00
201217022 201311031 201646007 201824014 201951011 202345010 202350014 202350016	
<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
201205014 201205015 201213032 201215014 201218018 201231013 201237021 201246039 201321026 201329023 201329024 201646005 201701019 201731015 201749016 201338047 201347023 201349019 201349021 201405025 201406020 201420021 201425014 201430018 201446026 201451038 201502015 201509041 201514019 201521017 201527045 201540017 201617010 201631015 201633035 201633036 201633037 201639016 201649017 201702044 201715003 201717045 201718040 201721020 201733016 201736028 201750020 201751023 201809007 201811016 201814011 201821013 201832018 201906014 201907007 201931009 201931010 201931013 201940009 201941025 201944014 201945028 201951010 201951011 202007021 202009027 202010004 202013016 202015020 202015022 202015025 202017028 202018008 202034010 202050016 202052025 202052040 202110021 202122015 202149014 202213010 202214015 202221016 202224014 202232020 202232021 202232022 202232023 202237012 202248013 202309016 202319017 202333006 202346030	
<ul style="list-style-type: none"> • <i>Performance of Particular Services for Members</i> 	501.06-01
201203018 201205014 201205015 201213032 201231013 201242016 201321026 201327015 201701019 201731015 201749016 201347022 201411040 201424023 201425014 201432026 201529010 201540017 201605020 201622033 201633037 201639016 201649017 201715003 201726014 201733016 201736028 201746028 201750020 201751023 201810011 201811016 201818017 201820019 201832018 201836009 201907007 201924019 201931010 201931013 201940009 201941025 201944014 201945028 202007021 202009027 202010004 202015020 202015022 202015025 202017028 202018008 202034010 202050016 202110021 202117016 202122015 202122016 202126023 202149014 202213010 202214015 202221016 202224014 202232020 202232021 202232022 202232023 202237012 202346030 202405010	
<ul style="list-style-type: none"> • <i>Conduct of Business for Profit</i> 	501.06-02
201327015 201810011 201814011 202018008 202117016 202122016 202221016	
<ul style="list-style-type: none"> • <i>Professional Associations (See Also 0501.03-11)</i> 	501.06-03
201217022 201347022 201621017 201746028	

<ul style="list-style-type: none"> • Social Clubs 	501.07-00
201204018 201213033 201219032 201225018 201240025 201240027 201240030 201241018 201306027 201315030 201317014 201317015 201317016 201318026 201322044 201323033 201329025 201330041 201612014 201634026 201749011 201330041 201333019 201338044 201338050 201405026 201405027 201406016 201407024 201414029 201418056 201428009 201429028 201434022 201442058 201445027 201448021 201448022 201450023 201451030 201451039 201501015 201511024 201515035 201529011 201551010 201605021 201615019 201615021 201623012 201635007 201635008 201636045 201638028 201640020 201642036 201644021 201702043 201706020 201732035 201745013 201750021 201751022 201806012 201824013 201824014 201835007 201845030 201848017 201928016 201941026 201943026 201948009 201951012 202015018 202015023 202017037 202019027 202022008 202034012 202052013 202052018 202052020 202052021 202052024 202052027 202052035 202052045 202052046 202052047 202052048 202110023 202110025 202110028 202110032 202110033 202110035 202110037 202110039 202110040 202110041 202110043 202110046 202110047 202123009 202124011 202150022 202150024 202150032 202213011 202216021 202216022 202221012 202221015 202226012 202226015 202226019 202227010 202230010 202230012 202230014 202233015 202237013 202237014 202237015 202237018 202238012 202238013 202238015 202238016 202239016 202239019 202240021 202240023 202240024 202240025 202242013 202242019 202242022 202243010 202243012 202243014 202243015 202243016 202243018 202244014 202244015 202244022 202245007 202245008 202246012 202246014 202246016 202248015 202249017 202302016 202303013 202304010 202304011 202304013 202305013 202306014 202310012 202317023 202318022 202318023 202319019 202319024 202321014 202323009 202323012 202323014 202326021 202327016 202327017 202343038 202402013 202403014 202403017	
<ul style="list-style-type: none"> • Profit v. Not for Profit 	501.07-01
201204018 201337018 201342014 201343024 201343025 201344010 201529011 201605021 201615019 201835007 202015023 202319022	
<ul style="list-style-type: none"> • Distribution of Assets 	501.07-02
201204018 201213034 201213035 201515035 202226016	
<ul style="list-style-type: none"> • Leases or Sales of Club Property 	501.07-03
201204018 201302043 201306027 201315030 201629009 202201014 202227010 202343038	
<ul style="list-style-type: none"> • Automobile Clubs 	501.07-04
201430019	
<ul style="list-style-type: none"> • Business with Nonmembers 	501.07-05
201204018 201219032 201634026 201414029 201428009 201428020 201428027 201430019 201515035 201517016 201517017 201605021 201615019 201635008 201706020 201806011 201835007 201845030 201943025 201948009 202011007 202015023 202017037 202227010 202242013 202401018	
<ul style="list-style-type: none"> • Payment of Benefits to Members 	501.07-06
201219032 201306027 201642036 201845030 201941026 201943025 202015018	
<ul style="list-style-type: none"> • Fraternal Beneficiary Societies (See Also 0501.03-09) 	501.08-00
201425015 201717046 201720011 201951012 202003007 202239015 202332017	
<ul style="list-style-type: none"> • Voluntary Employees' Beneficiary Associations (See Also 0501.03-01) 	501.09-00
201221030 201224037 201250023 201250024 201251023 202039003 201349020 201410037 201410038 201415008 201422025 201434025 201450028 201450029 201513004 201515036 201532037 201605015 201625004 201625018 201703014 201817008 201827014 201835011 202125002 202236004	
<ul style="list-style-type: none"> • Permissible Benefits 	501.09-01
202039003 201451040 201605015 201703014 201947010 202034001 202125002	

<ul style="list-style-type: none"> • <i>Geographic Locale</i> 	501.09-02
201221030 201330039 201330039 201415008	
<ul style="list-style-type: none"> • <i>Inurement</i> 	501.09-03
201321040 201634029 201351026 201605015 201625004 201625018 201734009 201833013	
<ul style="list-style-type: none"> • <i>Membership</i> 	501.09-04
201221030 201224037 201250023 201250024 201251023 201415008 201422025 201703014 201835011 202236004	
<ul style="list-style-type: none"> • Domestic Fraternal Societies, Orders, and Associations 	501.10-00
201240026 201340022 201620014 201721021 201805015 202133015 202222006 202316012 202319021	
<ul style="list-style-type: none"> • Local Benevolent Life Insurance Associations, etc. 	501.12-00
201247019 201431031 201814012 202232017	
<ul style="list-style-type: none"> • <i>Mutual Ditch or Irrigation Companies</i> 	501.12-01
201246038	
<ul style="list-style-type: none"> • <i>Mutual or Cooperative Telephone Companies</i> 	501.12-02
201309017 201431031	
<ul style="list-style-type: none"> • <i>Mutual or Cooperative Electric Companies</i> 	501.12-03
201241012 201340017 201423028	
<ul style="list-style-type: none"> • Cemetery Companies 	501.13-00
201409009 201428011 201428029 201605019 202419017	
<ul style="list-style-type: none"> • Credit Unions 	501.14-00
201416009 201447039	
<ul style="list-style-type: none"> • Insurance Companies or Associations With Net Written Premiums of \$350,000Or Less 	501.15-00
201713012 201713013 201338046 201338051 201342012 201342013 201405028 201428025 201445016 201447040 201447041 201447042 201450021 201517018 201525013 201609008 201613016 201645019 201652030 201702037 201702048 201712013 201712016	
<ul style="list-style-type: none"> • Organized to Finance Crop Operations 	501.16-00
201333014	
<ul style="list-style-type: none"> • Supplemental Unemployment Benefit Trusts 	501.17-00
201406018 201411041	
<ul style="list-style-type: none"> • Organization of Past or Present Armed Forces Members 	501.19-00
201218020 201237022 201252027 201338048 201414027 201450020 201451041 201451042 201652028 201752015 202052016 202149011 202221010	
<ul style="list-style-type: none"> • Section 501(c)(25) Organizations 	501.25-00
202226017	
<ul style="list-style-type: none"> • Religious and Apostolic Organizations 	501.26-00
201310047	
<ul style="list-style-type: none"> • Cooperative Hospital Service Organizations 	501.27-00
201218016	
<ul style="list-style-type: none"> • Dedication of Assets to an Exempt Organization 	501.29-00
201706019 201841007 201841008 201904016 201940010 201941030 201942011	
<ul style="list-style-type: none"> • Control of Corporation 	501.30-00
201224031 201224034 201247017 201428029 201433017 201839015 202020024 202101008	
<ul style="list-style-type: none"> • <i>Closely Controlled Organizations</i> 	501.30-01
201306026	

<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"> • <i>Proof of Exemption</i> 201235023 201701020 201649016 201710035 201710036 201835012 202032008 202114023 202313008 202313009 	501.31-00
<ul style="list-style-type: none"> • <i>Domestic Fraternal Societies</i> 201404012 	501.31-01
<ul style="list-style-type: none"> • <i>Income Inures v. does Not Inure to Private Individual</i> 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 201701021 201911008 202039019 201308032 201330037 201330043 201337017 201350047 201403018 201410035 201411038 201411039 201417017 201419019 201424024 201428022 201428026 201428027 201433019 201433020 201443021 201443022 201451043 201451045 201502017 201504017 201511026 201514011 201515037 201519033 201519034 201519035 201529012 201533014 201545028 201545029 201548021 201548025 201604018 201614038 201617011 201620011 201631014 201636046 201637017 201714031 201729023 201740023 201746027 201808019 201831013 201831014 201832019 201843013 201907008 201918020 202016022 202016026 202022005 202044011 202110034 202113008 202113009 202118022 202122017 202309016 202342018 	501.32-00
<ul style="list-style-type: none"> • <i>Distribution of Assets to Private Individuals</i> 201203025 201209011 201209012 201209013 201213031 201215012 201215013 201216040 201218021 201228040 201230024 201232035 201234029 201252024 201252026 201302040 201303019 201303020 201305011 201305012 201308032 201310046 201310049 201311033 201314048 201315029 201323028 201330043 201911008 202039019 201308032 201330043 201403018 201411039 201428026 201440021 201502017 201504017 201511026 201519035 201525012 201545029 201548025 201614038 201636046 201640019 201640022 201740023 201751016 201822032 201831014 201831015 201835009 201907008 202017030 202040008 202044011 202122017 202131011 202141027 202150031 202342018 202414007 	501.32-01

• Private v. Public Interest Served

501.33-00

201202038 201202039 201203024 201203025 201204019 201204020 201205010
 201205011 201205012 201209011 201209012 201209013 201210042 201210043
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 201227006 201228040 201228041 201228042 201229001 201229010 201230024
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 201314049 201315029 201322053 201323028 201323035 201326019 201330043
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 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 201514011 201514013 201516066 201517019 201519033 201519035
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 201936010 201940011 201941027 201941029 201944015 201944016 201947020
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 202036008 202040008 202041007 202044011 202046010 202047009 202047010
 202047012 202052022 202052034 202053020 202101008 202102009 202102010
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 202201015 202207010 202224013 202224015 202228015 202228016 202232018
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 202245009 202247016 202302017 202304014 202305015 202306011 202307007
 202308012 202310013 202311007 202318020 202321016 202327019 202332014
 202332016 202333003 202340020 202342018 202345011 202347019 202349013
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 202406014 202408009 202414007 202416014 202416015 **202419019 202419025**

• Trustees Serve Private Interest

501.33-01

201226029 201228041 201236033 201315028 201350043 201414024 201451043
 201451045 201652029

<ul style="list-style-type: none"> • "Exclusively" Test 	501.35-00
201221023 201228040 201237019 201303019 201303020 201306026 201322053 201632021 201701020 202021021 201334045 201340021 201345031 201345032 201405023 201407020 201414024 201415007 201431032 201433019 201452018 201505042 201511024 201523021 201529013 201538025 201540019 201545030 201617011 201702042 201712015 201718038 201721022 201729022 201733017 201737013 201747009 201801013 201808020 201818018 201833032 201835006 201835012 201839015 201843013 201910021 201918018 201918019 201918020 201931011 201932017 201941027 201944016 201951015 202014017 202015019 202015021 202016029 202031010 202032007 202032008 202033006 202036007 202036008 202041007 202041008 202041009 202046010 202047010 202047013 202047014 202049005 202052022 202053019 202053020 202102012 202129016 202135008 202138007 202138008 202138010 202140017 202141024 202141026 202141028 202144028 202144029 202144030 202145029 202150020 202152019 202152020 202152022 202201015 202202017 202213012 202218025 202218026 202221009 202221011 202221018 202223016 202224015 202226018 202230011 202232018 202236011 202237011 202242010 202242016 202244018 202302017 202305015 202308012 202309017 202313008 202313009 202321016 202324012 202326020 202343037 202349014 202405006 202416014	
<ul style="list-style-type: none"> • Business Activities 	501.36-00
201234029 201250029 201310046 201314047 201329024 201330038 201701020 201911010 201330038 201334045 201404013 201405022 201405023 201407019 201428028 201431032 201433020 201510058 201514013 201525012 201545030 201601014 201617011 201645017 201702041 201702042 201714031 201720010 201734009 201747009 201801014 201808020 201818018 201819011 201830023 201832015 201833032 201835006 201835009 201844013 201918019 201940011 201944015 202019029 202022005 202032007 202131012 202141028 202145029 202213009 202214014 202221018 202222007 202235011 202235012 202242010 202249018 202307007 202311007 202318021 202332014 202339045 202346033 202347018	
<ul style="list-style-type: none"> • <i>Section 501(c)(3) Organizations</i> 	501.36-01
201204021 201205013 201210041 201233017 201234030 201236033 201242017 201247017 201250027 201302041 201305013 201309019 201311029 201314045 201314049 201330037 201330038 201632021 201749017 201911010 202021026 201330037 201330038 201403017 201405023 201414024 201428022 201428023 201510058 201517008 201525011 201535019 201538025 201540016 201545031 201601014 201617012 201641025 201641027 201702041 201710031 201710033 201712017 201717048 201733015 201743018 201803009 201814010 201830023 201925017 201929021 201944016 202004011 202004012 202014017 202015021 202016028 202020024 202036007 202041008 202041009 202101008 202129017 202131012 202214014 202222007 202235012 202307007 202406014	
<ul style="list-style-type: none"> • <i>Fairs, Trade Shows, Exhibitions, etc. (See also 0512.07-00)</i> 	501.36-02
202031011 202047014 202125022 202127040 202237011	
<ul style="list-style-type: none"> • <i>Publishing Activities, Radio, Television, etc.</i> 	501.36-03
201204021 201252025 201433020 201526020 201710031 201710033 201835008 202005021 202144028 202342018	
<ul style="list-style-type: none"> • <i>Fund Raising (See also 0512.06-00)</i> 	501.36-04
201323037 201407020 201416010	
<ul style="list-style-type: none"> • Legislative and Political Propaganda Activities 	501.38-00
201415007 201505042 202206013	
<ul style="list-style-type: none"> • <i>"Action" Organizations</i> 	501.38-01
201415007 201430014 201505042 201908024 201932017 202316011	
<ul style="list-style-type: none"> • <i>Electing Expenditure Test</i> 	501.38-02
201239012 201415007 201804005 202206013	

Section 502	Feeder Organizations (Exempt v. Not Exempt) 201317011 201444043	502.00-00
Section 503	Requirements for Exemption (Exempt v. Not Exempt) 201242014 201242017 201245021 201311028 201325017 201338052 201444043 201507026 201517008 201928015 202414007	503.00-00
	• Organizations to Which Section Applies 202309016	503.01-00
	• Future Status of Organizations Denied Exemption 201209007 201209008 201520013	503.03-00
Section 504	Status After Organization Ceases to Qualify for Exemption Under Section 501(c)(3) Because of Substantial Lobbying or Because of Political Activities	504.00-00
	• Denial of Exemption 201205011 201205013 201217019 201446028 201510059	504.50-00
Section 507	Termination of Private Foundation Status 201216045 201243015 201321024 201418060 201435016 201513005 201514016 201714002 201714003 201825004 201930017 202017026 202231005 202231006 202231007 202231008 202328004 202328005	507.00-00
	• Termination Under Section 507(a)(1) 201230026 201417020 201417021 201427019	507.01-00
	• <i>Special Rules</i> 201345033 201345034	507.01-01
	• Termination Under Section 507(b)(1)(B) 201441018	507.04-00
	• Liability of Transferee Organizations 201243015 201244020 201321024 201321025	507.05-00
	• Imposition of Tax 201244020 201321024 201321025 201325018 201325019 201325020 201325021 201448026 201603033 201603034 201606030	507.06-00
	• Aggregate Tax Benefit 201244020 201321025 201603033 201603034	507.07-00
	• Substantial Contributor 201609001	507.08-00
	• Value of Assets 201321024 201321025	507.09-00
Section 508	Special Rules With Respect to Section 501 (c)(3) Organizations 202119002	508.00-00
	• New Organizations 201446025	508.01-00
	• Governing Instruments 201931011	508.04-00
Section 509	Private Foundation Defined 202023012	509.00-00
	• Definitions 201418067	509.01-00
	• <i>Private Foundation</i> 201306023 201802017 201825004 202047011	509.01-01

	• <i>Support</i>	509.01-02
	201239011 201240036 201342011 201711014	
	• <i>Exceptions to Private Foundation Status</i>	509.02-00
	201335018 201417018 202023012	
	• <i>Publicly Supported Organizations</i>	509.02-01
	202039020 201445015 201507024 201620016 201729025 201733019 201850023	
	201909015 201923027 202023012 202031009 202034007 202034008 202126029	
	202144032 202228019 202235013 202245012 202248017 202305020 202309021	
	202313009 202313010 202344020 202349019	
	• <i>Supporting Organizations</i>	509.02-02
	201314044	
	• <i>Churches</i>	509.02-04
	201310045	
	• <i>Continuation of Private Foundation Status</i>	509.03-00
	201424025	
Section 511	Tax on Unrelated Business Income of Charitable, etc., Organizations (Taxable v. Not Taxable)	511.00-00
	201206018 201219024 201251019 201701002 201405029 201406020 201410037	
	201424025 201425016 201426029 201429029 201440022 201441019 201451044	
	201501014 201503018 201545027 201626004 202415003	
	• <i>Organizations Subject to Tax</i>	511.01-00
	201406019	
	• <i>Section 501(c)(2) Corporations</i>	511.02-00
	201241018	
Section 512	Unrelated Business Taxable Income (Taxable v. Not Taxable)	512.00-00
	201208038 201209014 201218014 201218015 201223021 201250025 201251019	
	201306023 201311032 201311036 201321024 201321025 201323029 201328035	
	201701002 201406020 201407022 201409009 201413012 201422027 201423027	
	201423030 201425016 201426029 201430017 201434025 201440022 201441019	
	201451044 201501014 201503018 201613014 201613015 201630009 201636042	
	201636043 201710005 201729013 201729014 201730022 201837014 202133014	
	• <i>Exception, Additions, and Limitations on Unrelated Income</i>	512.01-00
	201206018 201425016 201430017 201503018 201644019 202002010	
	• <i>Rents and Royalties</i>	512.01-01
	202039018 201444043 201644019 201740002	
	• <i>Rent v. Ordinary Business Profits</i>	512.01-02
	201422027 201849009	
	• <i>Investments and Other Speculative Activities--Foundation (See Also 0501.26-06)</i>	512.04-00
	201329028 201333020 201413012 201613014 201613015 201636042 201636043	
	201729013 201729014 201730022	
	• <i>Advertising (See Also 0501.26-02)</i>	512.05-00
	201405029 201837014	
	• <i>Fund-Raising Activities (See Also 0501.26-06)</i>	512.06-00
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	201545027 201833013 201844005	

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	<ul style="list-style-type: none"> • Games of Chance 	513.05-00
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	201740002	
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	<ul style="list-style-type: none"> • Taxation of Trusts 	857.02-00
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	<ul style="list-style-type: none"> • <i>Income from Prohibited Transactions</i> 	857.02-03
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	<ul style="list-style-type: none"> • Earnings and Profits 	857.05-00
	201652012 202024003	
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	<ul style="list-style-type: none"> • Receipt by Shareholders 	858.01-00
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	<ul style="list-style-type: none"> • Interest and Addition to Tax 	860.02-00
	201727004	
	<ul style="list-style-type: none"> • Adjustments 	860.03-00
	201239006	
	<ul style="list-style-type: none"> • Determination 	860.04-00
	201727004	
	<ul style="list-style-type: none"> • Claim Required for Dividend Deduction 	860.06-00
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	<ul style="list-style-type: none"> • Suspension of Statute of Limitations 	860.07-00
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	<ul style="list-style-type: none"> • Election 202323007 202341006 	860D.01-00
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	<ul style="list-style-type: none"> • Allocation and Apportionment of Deductions (In General) 201446018 	861.08-00
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	<ul style="list-style-type: none"> • <i>Fair Market Value Method</i> 201320017 201701018 201335008 201423001 201505036 201638012 201702036 201718034 201718035 201744014 201744015 201744016 	861.09-07
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	<ul style="list-style-type: none"> • Characterization Rules and Adjustments for Certain Assets (In General) 201336018 	861.12-00
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	<ul style="list-style-type: none"> • Partly From Sources Within and Partly From Sources Without U.S. 	863.02-00
	<ul style="list-style-type: none"> • <i>Transportation</i> 201311024 	863.02-04
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	<ul style="list-style-type: none"> • Foreign Personal Holding Company Income 201201016 201228020 201407010 201503009 201504006 201504008 201637005 201644008 201644009 201644010 201648015 201648016 201718020 201739009	954.02-00
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	<ul style="list-style-type: none"> • U.S. Property Defined 201516064	956.03-00
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Section 1295	Qualified Electing Fund 202344015	1295.00-00
	• <i>Time For Making Election</i> 201228021 201249014 202038002 202111001 202111002 202229008 202319001 202344015 202350015 202412001 202412002 202412003 202413001 202413002 202419001	1295.02-00
	• <i>Retroactive Elections</i> 201201013 201210017 201248009 201248010 201302010 201302011 201302019 201302020 201314026 201319006 201319007 201321010 201322017 201322018 201330019 201330020 201330021 201911001 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 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 201622028 201622029 201622030 201629005 201630006 201642025 201651004 201702001 201729003 201739006 201744004 201808012 201809006 201812006 201814006 201837001 201925002 202023004 202023005 202038002 202111001 202111002 202128002 202128007 202201011 202203001 202207001 202220014 202229008 202229034 202252006 202252007 202319001 202330005 202334006 202350015 202412001 202412002 202412003 202413001 202413002 202419001	1295.02-02
Section 1296	Passive Foreign Investment Company 201244003 201311014 201447003 201806001 201806002 201806003 201806004 201845015 201845016 201845018 201930005 201930006 201930007 201930008 202041006 202110016 202226006 202235007	1296.00-00
	• <i>Characterization of Income</i>	1296.02-00
	• <i>Application of Income Look-Through Rules</i> 201445005	1296.02-02
Section 1297	Special Rules 201322009 201515006	1297.00-00
Section 1301	Averaging of Farm Income	1301.00-00
	• <i>Engaged in Farm Business</i> 201435006	1301.01-00
Section 1311	Correction of Error 201208027 201313027	1311.00-00

	• Inconsistent Position v. No Inconsistent Position 201710029	1311.01-00
	• Correction Not Barred v. Barred at Time of Error 201823004	1311.02-00
Section 1313	Definitions	1313.00-00
	• Determination v. No Determination 201247001 201247011 201622032	1313.01-00
Section 1341	Computation of Tax Where Taxpayer Restores Substantial Amount Held Under Claim of Right 201224029 201328031	1341.00-00
Section 1361	Definitions	1361.00-00
	201203006 201216027 201232003 201233014 201237015 201238018 201238019 201238020 201238021 201238022 201238023 201238024 201243007 201243008 201301004 201302004 201302005 201302006 201310022 201314003 201322016 201322036 201325008 201618003 201634019 202021002 202021006 202021007 202039004 201341009 201414006 201419009 201426004 201436039 201442016 201447007 201450012 201604009 201604010 201608007 201610012 201614002 201614003 201614019 201634019 201650007 201735019 201740006 201810003 201815003 201819002 201820001 201820009 201825018 201831001 201849005 201849006 201852011 201918013 201923025 201926008 201929007 201933001 201938003 201940006 201943015 201947011 201949009 201952001 202009022 202010001 202019025 202020005 202101001 202110001 202126006 202126007 202126008 202126009 202126010 202126011 202126012 202126013 202126014 202126015 202126016 202126017 202126018 202126019 202126020 202127004 202127005 202127006 202127007 202127008 202127009 202127010 202127011 202127012 202127013 202127014 202127015 202127016 202127017 202127018 202127019 202127020 202127021 202127022 202127023 202127024 202127025 202127026 202127027 202127028 202127029 202127030 202127031 202127032 202127033 202127034 202127035 202127036 202127037 202128003 202131009 202139005 202140015 202141002 202142003 202147001 202152016 202207007 202210014 202211006 202220002 202231011 202233004 202233005 202233006 202302004 202303002 202305004 202310001 202315004 202340002 202340005 202343022 202344002 202345001 202352017 202405003 202407005 202410003 202413006 202418008 202419011	
	• Small Business Corporation v. Not a Small Business Corporation 201201006 201218005 201237014 201250018 201314003 201314008 201322036 201338039 201433014 201523012 201523013 201604011 201608007 201735019 201747006 201750002 201825018 201831001 201837012 201845013 201902005 201918002 201918013 201926008 201949009 202019010 202141002 202142003 202210014 202220002 202233004 202233005 202233006 202302004 202310001 202345001 202405003	1361.01-00
	• <i>Number of Shareholders</i> 201926008 202343022	1361.01-01
	• <i>Shareholder Not an Individual or Permitted Trust or Estate</i> 201205002 201208013 201218005 201237014 201250013 201250018 202021007 201338039 201424021 201426001 201523012 201523013 201525009 201528037 201544006 201546003 201546004 201604011 201735019 201743006 201815003 201831001 201845003 201845004 201845005 201918002 201933004 201936005 202009022 202010001 202019010 202105005 202345006 202405003	1361.01-02
	• <i>Non-Resident Alien as Shareholder</i> 201312023 201545015 202004001 202344002 202419011	1361.01-03

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<ul style="list-style-type: none"> • <i>Ineligible Corporation</i> 	1361.01-05
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<ul style="list-style-type: none"> • <i>Certain Trusts Permitted as Shareholders</i> 	1361.03-00
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<ul style="list-style-type: none"> • <i>Electing Small Business Trusts</i> 	1361.03-03
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• Qualified Subchapter S Subsidiary

1361.05-00

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Section 1362**Election by Small Business Corporation****1362.00-00**

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202419011

• Eligible v. Ineligible	1362.01-00
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• Shareholder Consent	1362.01-01
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• Election After Termination	1362.01-02
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• *Late Elections*

1362.01-03

201201006 201202016 201203009 201203011 201204007 201207004 201208015
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• *Termination of Election*

1362.02-00

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<ul style="list-style-type: none"> • <i>Ceases to be Small Business Corporation</i> 	1362.02-02
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1362.04-00

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 202340009 202340011 202342001 202343022 202344002 202344004 202344005
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 202349005 202349006 202352017 202401004 202403001 202403002 202407005
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 202416005 202418003 202418008 **202419011 202419012**

Section 1366	Pass-Thru of Items to Shareholders	1366.00-00
	201327009 201333008 201429025 202335014	
Section 1367	Adjustment to Basis of Stock of, and Indebtedness Owing, Shareholders	1367.00-00
	201237017 201421015 201440013	
Section 1368	Distributions	1368.00-00
	201207002 201216027 201328025 202345005	
	• Accumulated Adjustments Account	1368.01-00
	201421015 201440013 201446021	
Section 1374	Tax Imposed On Certain Built-In Gains (for Corporations Electing S Status After 12/31/86)	1374.00-00
	201202014 201219003 201314008 201348007 201722008	

Section 1443	Foreign Tax-Exempt Organizations (Subject v. Not Subject to Withholding)	1443.00-00	
	• Income Subject to Withholding 201808010	1443.02-00	
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 201726015 202035012 202111013 202130016 202234012	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 201749002 201341018 201342004 201402001 201414009 201418033 201418043 201930012 201936004 201949008 202008002 202013008 202035012 202111013 202121004 202229030 202231014 202236007 202248009 202249009 202310014 202317019 202334014 202340016 202348015 202352022 202406004 202417006 202417018	1502.00-00	
	• Computation of Tax Liability 202412009	1502.02-00	
	• Consolidated Investment Credit 202347009	1502.03-00	
	• Consolidated Foreign Tax Credit 202348014	1502.04-00	
	• Liability for Tax 201644018	1502.06-00	
	• Overall Foreign Loss Recapture Rules 201452002	1502.08-00	
	• Intercompany Transactions 201208034 201243013 201312027 201612006 201336018 201339001 201402001 201411007 201507006 201524016 201528007 201540001 201603002 201605014 201610004 201722012 201723008 201723009 201726012 201828006 201830005 201936004 202126003 202219002 202236007 202240017 202248009 202305010 202334014 202417006 202417018	1502.13-00	
	• <i>Stock of Members</i> 201210018 201228011 201312027 201322002 201341022 201605013 201722012 201810001 201810002 202203009 202219002 202248009	1502.13-01	
	• <i>Obligations of Members</i> 201707006	1502.13-02	
	• <i>Anti-Avoidance</i> 201640018	1502.13-03	
	• Stock, Bonds, and Other Obligations of Members 201208034	1502.14-00	R
	• Limitation on Built-in Losses 201232011	1502.15-00	
	• Excess Losses 201749002 201350007 201441010 201930012 202305010	1502.19-00	

<ul style="list-style-type: none"> • Consolidated Net Operating Loss Deduction 	1502.21-00
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 201632002 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 201523011 201527038 201530015 201532004 201532030 201544021 201601010 201605018 201610010 201610011 201611005 201613013 201616006 201620009 201628003 201630003 201630004 201636016 201637002 201637003 201644005 201651011 201703010 201717039 201717040 201738005 201752007 201817017 201825002 201825015 201837003 201901006 201901007 201903016 201904014 201905004 202053006 202117010 202117011 202228001 202229006 202249009 202314014 202319014 202340017 202349011	
<ul style="list-style-type: none"> • Basis of Property 	1502.31-00
201828006	
<ul style="list-style-type: none"> • Investment Adjustment 	1502.32-00
201213013 201214012 201339001 201411007 201430002 201550028 201641019 201921003 201936004 202410011	
<ul style="list-style-type: none"> • Earnings and Profits 	1502.33-00
201411007 201936004	
<ul style="list-style-type: none"> • Accumulated Earnings Tax on Separate Basis 	1502.47-00
201316008	
<ul style="list-style-type: none"> • Life and Non-Life 	1502.50-00
201210015 201213012 202045003	
<ul style="list-style-type: none"> • Filing Requirements 	1502.75-00
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 201541006 201542005 201548016 201550033 201601007 201606019 201631004 201648012 201648014 201702019 201711008 201716007 201717018 201717023 201728002 201730008 201732025 201738006 201744011 201751012 201802009 201813006 201819008 201825016 201827007 201833009 201839009 201902029 201921011 201929001 201933009 201949008 201951004 202008002 202011006 202013008 202031004 202031005 202045005 202101003 202111013 202121004 202130016 202234012 202249010 202309002 202317019 202318016 202406004	
<ul style="list-style-type: none"> • When Group Remains in Existence 	1502.75-10
201228002 201314028 201350007 201424010 201505006 201933009 202218001 202309002	
<ul style="list-style-type: none"> • Common Parent No Longer in Existence 	1502.75-11
201250017 201326006	
<ul style="list-style-type: none"> • Taxable Year of Members of Group 	1502.76-00
201520001 201414015 201520001 201843002 201933009 202032004	
<ul style="list-style-type: none"> • Income Allocation 	1502.76-01
201235003 201542007	

	• Common Parent Agent for Subsidiaries 201522005 201552025 202231014	1502.77-00
	• Separate Return Years 201251003 201324004	1502.79-00
	• Applicability of Other Provisions of Law 201650013	1502.80-00
	• 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 202145025 202335001	1502.93-00
	• Stock Transactions 201208034	1502.94-00
	• Application of Section 382 with Respect to a Consolidated Group 201414009 201511012 202229030	1502.98-00
	• <i>Rules Upon Becoming a Member</i> 202035012	1502.98-03
	• <i>Apportionment</i> 201207003 201414009 202229005 202229030	1502.98-05
	• <i>Limitation on Use of Credits and Net Capital Losses</i> 201435012	1502.98-08
	• Regulations Governing Consolidated Returns--Issue Not Contained in Present List 201216018 201249005 201250010 201252006 201323008 201329001 201329007 201329008 201329009 201329010 201329011 201329012 201329013 201329014 202334014 202335001	1502.99-00
Section 1503	Computation and Payment of Taxes	1503.00-00
	• Dual Consolidated Loss 202110015 202304008	1503.04-00
Section 1504	Definitions 201213012 201214020 201251003 201306007 201306008 201310016 201429010 201451009 201504007 201641012 201815008 201927002 202417008	1504.00-00
	• Affiliated Group v. Not an Affiliated Group 201306007 201306008 201310016 201315019 201325010 201328027 201430002 201435005 201505006 201538015 201649012 201709004 202049002	1504.01-00
	• Includible Corporation v. Not an Includible Corporation 201213012 201214020 201251003 201429007 201433013 201815008 202045003 202417008	1504.02-00
	• <i>Foreign Subsidiary Formed to Comply With Foreign Law May Be An Includible Corporation</i> 201248002	1504.02-01
	• <i>Maquiladora ISP - IRC Section 1504(d) Election</i> 201248002	1504.02-02

Section 2036	Transfers With Retained Life Estate (Included v. Not Included in Gross Estate)	2036.00-00
	201210008 201218003 201233008 201235006 201238004 201245007 201322025 201342001 201345026 201345027 201345028 201417001 201417002 201418007 201429009 201432005 201433006 201434004 201434005 201436003 201436043 201442042 201442043 201442044 201442045 201442046 201443004 201509002 201509003 201509004 201509005 201509006 201509007 201509008 201509009 201509010 201509011 201509012 201509013 201509014 201509015 201509016 201509017 201509018 201510009 201510010 201510011 201510012 201510013 201510014 201510015 201510016 201510017 201510018 201510019 201510020 201510021 201510022 201510023 201511002 201511003 201511004 201511005 201511006 201511007 201511008 201511009 201511010 201515002 201515003 201515004 201515005 201516022 201516023 201525001 201544005 201604001 201647001 201702005 201702006 201709020 201722007 201723002 201723003 201837005 201837006 201837007 201837008 201837009 201843005 201843006 201843007 201843008 201845029 202216001 202216002 202216003 202216004 202216005 202216006 202228003 202228004 202228005 202228006 202228007 202228008 202228009 202228010 202228011 202228012 202229010 202229011 202229012 202229013 202229014 202229015 202229016 202229017 202229018 202229019 202229020 202229021 202229022 202229023 202303004 202303005 202303006 202303007 202303008 202303009 202303012	
	• Retention of Possession or Enjoyment of Right to Income From Property	2036.01-00
	201735005 201947001 201947002 201947003 201947004 201947005 201947006 202303004 202303005 202303006 202303007 202303008 202303009 202303012	
	• Retention of Right to Designate Who Shall Enjoy Property or Income	2036.02-00
	201323007	
Section 2037	Transfers Taking Effect at Death (Included v. Not Included in Gross Estate)	2037.00-00
	201323007 201342001 201345004 201345026 201345027 201345028 201418007 201432005 201433006 201434004 201434005 201436003 201509002 201509003 201509004 201509005 201509006 201509007 201509008 201509009 201509010 201509011 201509012 201509013 201509014 201509015 201509016 201509017 201509018 201510009 201510010 201510011 201510012 201510013 201510014 201510015 201510016 201510017 201510018 201510019 201510020 201510021 201510022 201510023 201511002 201511003 201511004 201511005 201511006 201511007 201511008 201511009 201511010 201515002 201515003 201515004 201515005 201525001 201647001 201702005 201702006 201709020 201722007 201947001 201947002 201947003 201947004 201947005 201947006 202228003 202228004 202228005 202228006 202228007 202228008 202228009 202228010 202228011 202228012 202229010 202229011 202229012 202229013 202229014 202229015 202229016 202229017 202229018 202229019 202229020 202229021 202229022 202229023	

Section 2038	Revocable Transfers (Included v. Not Included in Gross Estate)	2038.00-00
	201218003 201223012 201233008 201235006 201322025 201330033 201330033 201345004 201345026 201345027 201345028 201417001 201417002 201429009 201432005 201433006 201434004 201434005 201436003 201442042 201442043 201442044 201442045 201442046 201443004 201509002 201509003 201509004 201509005 201509006 201509007 201509009 201509010 201509011 201509012 201509013 201509014 201509015 201509016 201509017 201509018 201510009 201510010 201510011 201510012 201510013 201510014 201510015 201510016 201510017 201510018 201510019 201510020 201510021 201510022 201510023 201511002 201511003 201511004 201511005 201511006 201511007 201511008 201511009 201511010 201515002 201515003 201515004 201515005 201516022 201516023 201525001 201544005 201604001 201647001 201702005 201709020 201722007 201723002 201723003 201837005 201837006 201837007 201837008 201837009 201843005 201843006 201843007 201843008 201845029 201947001 201947002 201947003 201947004 201947005 201947006 202009012 202216001 202216002 202216003 202216004 202216005 202216006 202228003 202228004 202228005 202228006 202228007 202228008 202228009 202228010 202228011 202228012 202229010 202229011 202229012 202229013 202229014 202229015 202229016 202229017 202229018 202229019 202229020 202229021 202229022 202229023 202303004 202303005 202303006 202303007 202303008 202303009 202303012	
	• Power to Alter or Amend 201342001	2038.01-00
	• <i>Power to Change Beneficiaries or Their Shares</i> 201323007 201928004	2038.01-01
Section 2040	Joint Interests (Included v. Not Included in Gross Estate)	2040.00-00
	201216005	
Section 2041	Powers of Appointment (Included v. Not Included in Gross Estate)	2041.00-00
	201209003 201210008 201214022 201218003 201229005 201231007 201243001 201634015 201427008 201427010 201427011 201427012 201427013 201427014 201427015 201429009 201436036 201444002 201444003 201444004 201444005 201444006 201446001 201446002 201446003 201446004 201446005 201446006 201446007 201446008 201446009 201446010 201446011 201613007 201614006 201614007 201614008 201634015 201636027 201636028 201636029 201636030 201636031 201636032 201641020 201650005 201653001 201653002 201653003 201653004 201653005 201653006 201718003 201718004 201718005 201718006 201718007 201718008 201718009 201718010 201718012 201737001 201737008 201742006 201744006 201744007 201744008 201751001 201751002 201751003 201803003 201817002 201817003 201836006 201837005 201837006 201837007 201837008 201837009 201843005 201843006 201843007 201843008 201845006 201845029 201852009 201852014 201908003 201908004 201908005 201908006 201908007 201908008 201925005 201925006 201925007 201925008 201925009 201925010 201941008 201941009 201941010 201941011 201941012 201941013 201941014 201941015 201941016 201941017 201941018 201941019 201941020 201941021 201941022 201941023 202009012 202014001 202014002 202014003 202014004 202014005 202020008 202020009 202020010 202108001 202108002 202108003 202108004 202108005 202108006 202120003 202152006 202217005 202228003 202228004 202228005 202228006 202228007 202228008 202228009 202228010 202228011 202228012 202229010 202229011 202229012 202229013 202229014 202229015 202229016 202229017 202229018 202229019 202229020 202229021 202229022 202229023	
	• Pre-1942 Powers 201707003 201707004 201707005 201735009	2041.01-00
	• Post-1942 Powers 201427008 201427010 201427011 201427012 201427013 201427014 201427015 201615004 202206008	2041.02-00

	• General Power v. Not a General Power	2041.03-00
	201207001 201208003 201208004 201634016 201634017 201345004 201345026 201345027 201345028 201407008 201427008 201427010 201427011 201427012 201427013 201427014 201427015 201432005 201433006 201434004 201434005 201436003 201444002 201444003 201444004 201444005 201444006 201446001 201446002 201446003 201446004 201446005 201446006 201446007 201446008 201446009 201446010 201446011 201634016 201634017 201642027 201642028 201642029 201642030 201702016 201702017 201702018 201707007 201707008 201729009 201838002 201838003 201838004 201838005 201838006 201838007 201850001 201850002 201850003 201850004 201850005 201850006 202006002 202006003 202006004 202006005 202006006 202007010 202017018	
	• Special Powers	2041.04-00
	202120003	
	• Exercise of Powers	2041.05-00
	201425007 202120003	
	• Effect of State Laws	2041.12-00
	201920001 201920002 201920003	
Section 2042	Proceeds of Life Insurance (Included v. Not Included in Gross Estate)	2042.00-00
	201235006 201328030 201919002 201919003	
	• Transfer of Policy Within 3 Years of Death	2042.07-00
	• <i>Incidents of Ownership Held by Insured</i>	2042.07-09
	201327010	
Section 2043	Transfers for Insufficient Consideration (Included v. Not Included in Gross Estate)	2043.00-00
	201206005	
Section 2044	Certain Property for which Marital Deduction was Previously Allowed	2044.00-00
	201528014 201536010 201603004 201615004 201721006 201834011 201946009 202016001 202016002 202016003 202016004 202016005 202016006 202146001 202339008	
Section 2053	Expenses, Indebtedness, and Taxes (Deductible v. Not Deductible)	2053.00-00
	201206005	
	• Claims Against the Estate	2053.09-00
	• <i>Consideration v. No Adequate Consideration</i>	2053.09-09
	201745012	
Section 2055	Transfers for Public, Charitable, and Religious Uses(Deductible v. Not Deductible)	2055.00-00
	201216045 201236022 201316004 201450003 201702004 201803003 201845014 201850009 201930017 201933007	
	• Transfers Not Exclusively for Charitable Purposes	2055.07-00
	201947007	
	• Charitable and Noncharitable Interest (Tax Reform Act of 1969)	2055.12-00
	202145026	
	• <i>Unitrust Lead Interest</i>	2055.12-06
	202233014	
	• <i>Guaranteed Annuity Lead Interest</i>	2055.12-07
	201933007	
	• <i>Reformations of Nonqualifying Interests</i>	2055.12-10
	201333006	

Section 2056	Bequests, etc., to Surviving Spouse (Marital Deduction v. No Marital Deduction)	2056.00-00
	201243004 201634018 201731006 201338003 201431004 201431019 201447008 201528014 201603004 201634018 201641018 201830001 201845014 201850008 201923004 201937011 201943010 201946009 202233014 202249006 202339008 202352016 202403011	
	• Terminable Interests	2056.01-00
	201731006 201450002 201624015 201717001 201751005 201850010 201937011 202230007 202341004	
	• Interest of Spouse Conditional on Survival for Limited Period (Six-Month Rule)	2056.03-00
	202133010	
	• Qualified Terminable Interest Property	2056.07-00
	201303003 202001012 202021003 202134010 201410011 201426016 201447008 201528014 201536002 201536010 201603004 201608001 201615004 201636019 201721006 201832003 201903014 201907002 201923004 201942008 201943007 201943010 201946009 202005016 202009012 202016001 202016002 202016003 202016004 202016005 202016006 202115002 202133010 202146001 202229028 202234002 202242002 202244007 202247005 202249006 202339008 202403011 202407004	
	• <i>Effective Election</i>	2056.07-01
	201345006 201636026 201714020 201923004 202238008 202418012	
	• <i>Partial Election</i>	2056.07-02
	201447008	
	• <i>Qualifying Interest</i>	2056.07-03
	201410011	
	• Special Rule for Charitable Remainder Trusts	2056.08-00
	202233014	
	• Passed From Decedent v. Not Passed From Decedent	2056.13-00
	201410011 201416007	
	• Disallowance of Deduction Where Surviving Spouse Not U.S. Citizen	2056.19-00
	201634018 201634018 201830001	
	• <i>Exception For Property Transferred to Qualified Domestic Trust</i>	2056.19-02
	201634018 201634018 201830001	
Section 2056A	Qualified Domestic Trusts (Deductible v. Not Deductible)	2056A.00-00
	201243012 201634018 201406003 201429012 201516055 201622021 201622025 201628011 201634018 201640006 201647002 201830001 201903012 201928009 202120004 202146008 202202006 202244005 202332013 202338006	
Section 2203	Definition of Executor	2203.00-00
	201405016	
Section 2207	Liability of Recipient of Property Over Which Decedent Had Power of Appointment	2207.00-00
	202339008	
Section 2207A	Right of Recovery in the Case of Certain Marital Deduction Property	2207A.00-00
	201243004 201303003 201426016 201536010 202009012	
Section 2209	Certain Residents of Possessions Considered NonresidentD Not Citizens of the United States	2209.00-00
	201924009	

Section 2501**Imposition of Gift Tax (Imposed v. Not Imposed)****2501.00-00**

201216010 201218003 201223012 201233008 201243001 201245007 201310002
201310003 201310004 201310005 201310006 201320009 201322025 20134004
201410001 201410002 201410003 201410004 201410005 201410006 201410007
201410008 201410009 201410010 201412015 201417001 201417002 201418007
201419001 201422005 201426014 201430003 201430004 201430005 201430006
201430007 201432029 201435007 201436008 201436009 201436010 201436011
201436012 201436013 201436014 201436015 201436016 201436017 201436018
201436019 201436020 201436021 201436022 201436023 201436024 201436025
201436026 201436027 201436028 201436029 201436030 201436031 201436032
201438010 201438011 201438012 201438013 201438016 201440008 201440009
201440010 201440011 201440012 201442042 201442043 201442044 201442045
201442046 201443004 201451005 201509002 201509003 201509004 201509005
201509006 201509007 201509008 201509009 201509010 201509011 201509012
201509013 201509014 201509015 201509016 201509017 201509018 201510001
201510002 201510003 201510004 201510005 201510006 201510007 201510008
201510009 201510010 201510011 201510012 201510013 201510014 201510015
201510016 201510017 201510018 201510019 201510020 201510021 201510022
201510023 201511002 201511003 201511004 201511005 201511006 201511007
201511008 201511009 201511010 201515002 201515003 201515004 201515005
201516008 201516020 201516022 201516023 201519012 201525001 201528024
201530008 201530009 201530010 201530011 201530012 201530013 201531003
201531004 201531005 201531006 201531007 201532008 201532009 201532010
201532011 201532012 201532013 201543006 201550005 201550006 201550007
201550008 201550009 201550010 201550011 201550012 201604001 201613007
201614006 201614007 201614008 201628008 201628010 201636027 201636028
201636029 201636030 201636031 201636032 201647001 201650005 201653001
201653002 201653003 201653004 201653005 201653006 201653007 201653008
201653009 201702006 201709020 201718003 201718004 201718005 201718006
201718007 201718008 201718009 201718010 201718012 201722007 201723002
201723003 201729009 201732029 201735005 201742006 201744006 201744007
201744008 201751001 201751002 201751003 201808001 201808002 201808003
201812001 201812002 201812005 201814001 201814002 201814005 201817012
201817013 201817014 201817016 201818005 201825003 201832005 201832006
201832008 201832009 201833015 201836006 201837005 201837006 201837007
201837008 201837009 201838002 201838003 201838004 201838005 201838006
201838007 201843005 201843006 201843007 201843008 201845006 201845029
201848002 201848009 201850001 201850002 201850003 201850004 201850005
201850006 201852009 201852014 201908003 201908004 201908005 201908006
201908007 201908008 201925005 201925006 201925007 201925008 201925009
201925010 201941008 201941009 201941010 201941011 201941012 201941013
201941014 201941015 201941016 201941017 201941018 201941019 201941020
201941021 201941022 201941023 202014006 202014008 202014009 202014010
202015004 202015005 202015006 202015007 202015008 202015009 202015010
202015011 202015012 202015013 202017001 202017002 202017003 202017004
202017005 202017006 202017011 202017012 202017013 202017014 202017018
202045011 202108001 202108002 202108003 202108004 202108005 202108006
202146001 202216001 202216002 202216003 202216004 202216005 202216006
202228003 202228004 202228005 202228006 202228007 202228008 202228009
202228010 202228011 202228012 202229010 202229011 202229012 202229013
202229014 202229015 202229016 202229017 202229018 202229019 202229020
202229021 202229022 202229023 202313006 202317001 202317010 202317011
202318010 202318011 202318012 202318013 202318014 202343005 202343006
202343007 202343008 202343009 202343010 202343011 202343012 202343013
202343014 202343015 202343016 202343017 202343018 202343019 202343020
202343021 202406001 202406002 202406005 202406006 202406007 202406008
202406009 202406010 202406011 202406012 202406013

	<ul style="list-style-type: none"> • Gift v. Not a Gift 	2501.01-00
	201205001 201207001 201208003 201208004 201208006 201208031 201209001 201209002 201210001 201210002 201243006 201342001 201345004 201345026 201345027 201345028 201407008 201418017 201418031 201418032 201432005 201433006 201434004 201434005 201436003 201521002 201521003 201521004 201527032 201544005 201642027 201642028 201642029 201642030 201707003 201707004 201707005 201928004 201932002 201932005 201932009 201932010 201947001 201947002 201947003 201947004 201947005 201947006 202116002 202116003 202116004	
	<ul style="list-style-type: none"> • Transfers of Intangible Property By Non-Resident Not Citizens 	2501.03-00
	201250001	
Section 2503	Taxable Gifts (Annual Exclusion Allowed v. Not Allowed)	2503.00-00
	<ul style="list-style-type: none"> • Present v. Future Interests 	2503.03-00
	201208026	
Section 2504	Taxable Gifts for Preceding Years	2504.00-00
	<ul style="list-style-type: none"> • Valuation of Certain Gifts for Preceding Periods 	2504.02-00
	201811002 201811003	
Section 2511	Transfers in General (Gift v. Not a Gift)	2511.00-00
	201206005 201243004 201244014 201334001 201422005 201440007 201507008 201525002 201525003 201528014 201536010 201721006 201834011 201837005 201837006 201837007 201837008 201837009 201843005 201843006 201843007 201843008 201845002 201845029 201946009 202006002 202006003 202006004 202006005 202006006 202007010 202016001 202016002 202016003 202016004 202016005 202016006 202118008 202146001 202339008 202406001 202406002 202406005 202406006 202406007 202406008 202406009 202406010 202406011 202406012 202406013	
	<ul style="list-style-type: none"> • Gifts Indirectly Made 	2511.04-00
	201208026 201442053	
	<ul style="list-style-type: none"> • Gift of Remainder 	2511.11-00
	201407009 201440007 201845002	
	<ul style="list-style-type: none"> • Renunciation of Testate or Intestate Share 	2511.18-00
	201228017 201334001 201403005 201540006 201831003 201921004 201921012	
Section 2512	Valuation of Gifts	2512.00-00
	201206005 201330033 201330033 201928003 202152018	
	<ul style="list-style-type: none"> • Listed Stock 	2512.07-00
	201939002	
	<ul style="list-style-type: none"> • Transfers for Insufficient Consideration 	2512.13-00
	<ul style="list-style-type: none"> • <i>Sufficient v. Insufficient Consideration</i> 	2512.13-01
	201745012	
Section 2513	Gifts by Husband or Wife to Third Party (Gift Splitting) (Allowed v. Not Allowed)	2513.00-00
	201240003 201240004 201523003 201644002 201724007 201811002 201811003	

Section 2514	Powers of Appointment (Transfer v. Not a Transfer)	2514.00-00
	201210008 201310002 201310003 201310004 201310005 201310006 201634015 201345004 201345026 201345027 201345028 201410001 201410002 201410003 201410004 201410005 201410006 201410007 201410008 201410009 201410010 201426014 201430003 201430004 201430005 201430006 201430007 201432005 201433006 201434004 201434005 201436003 201436008 201436009 201436010 201436011 201436012 201436013 201436014 201436015 201436016 201436017 201436018 201436019 201436020 201436021 201436022 201436023 201436024 201436025 201436026 201436027 201436028 201436029 201436030 201436031 201436032 201436036 201438010 201438011 201438012 201438013 201440008 201440009 201440010 201440011 201440012 201510001 201510002 201510003 201510004 201510005 201510006 201510007 201510008 201550005 201550006 201550007 201550008 201550009 201550010 201550011 201550012 201613007 201614006 201614007 201614008 201628010 201634015 201636027 201636028 201636029 201636030 201636031 201636032 201641020 201650005 201653001 201653002 201653003 201653004 201653005 201653006 201653007 201653008 201653009 201702016 201702017 201702018 201707007 201707008 201718003 201718004 201718005 201718006 201718008 201718009 201718010 201718012 201737001 201737008 201742006 201744006 201744007 201744008 201751001 201751002 201751003 201817002 201817003 201832005 201832006 201832007 201832008 201832009 201836006 201837005 201837006 201837007 201837008 201837009 201843005 201843006 201843007 201843008 201845029 201848002 201848009 201852009 201852014 201908003 201908004 201908005 201908006 201908007 201920001 201920002 201920003 201925005 201925006 201925007 201925008 201925009 201925010 201941008 201941009 201941010 201941011 201941012 201941013 201941014 201941015 201941016 201941017 201941018 201941019 201941020 201941021 201941022 201941023 202014001 202014002 202014003 202014004 202014005 202017018 202020008 202020009 202020010 202152006 202217005	
	• Power Created on or Before October 21, 1942	2514.01-00
	201707003 201707004 201707005	
	• Power Created After October 21, 1942	2514.02-00
	201435007 201615004 201729009 201838002 201838003 201838004 201838005 201838006 201838007 201850001 201850002 201850003 201850004 201850005 201850006	
	• Definition of General Power of Appointment	2514.03-00
	201634016 201634017 201634016 201634017 202006002 202006003 202006004 202006005 202006006 202007010 202020008 202020009 202020010	
Section 2516	Certain Property Settlements (Exempt v. Not Exempt >From Gift Tax)	2516.00-00
	201206005 201901003	
Section 2518	Disclaimers	2518.00-00
	201208005 201245004 201516056 201803003 202045011 202228003 202228004 202228005 202228006 202228007 202228008 202228009 202228010 202228011 202228012 202229010 202229011 202229012 202229013 202229014 202229015 202229016 202229017 202229018 202229019 202229020 202229021 202229022 202229023	
	• Requirements for a Qualified Disclaimer	2518.01-00
	201516056	
	• <i>Time Limit</i>	2518.01-01
	201707003 201707004 201707005	
	• <i>Acceptance of Benefits</i>	2518.01-02
	201516056	
	• <i>Joint Property</i>	2518.01-03
	201516056	

	• <i>Passage Without Direction by Disclaimant</i> 201516056	2518.01-04
	• Disclaimer of Less than an Entire Interest	2518.02-00
	• <i>Severable Property</i> 201516056	2518.02-02
	• Disclaimer by Surviving Spouse 201516056	2518.04-00
Section 2519	Disposition of Certain Life Estates 201243004 201303003 201419001 201426016 201528014 201536010 201615004 201721006 201834011 201946009 202016001 202016002 202016003 202016004 202016005 202016006 202116001 202118008 202146001 202339008	2519.00-00
Section 2522	Charitable and Similar Gifts (Deductible v. Not Deductible) 201321012 201323007 201845014 202016001 202016002 202016003 202016004 202016005 202016006 202047005	2522.00-00
	• Charitable Gifts 201908008	2522.01-00
	• Transfer Not Exclusively for Charitable etc. Purposes	2522.02-00
	• <i>Charitable Remainder Trusts</i> 201249002	2522.02-03
Section 2523	Gift to Spouse (Marital Deduction Allowed v. Not Allowed)	2523.00-00
	• Election With Respect to Life Estate for Donee Spouse	2523.06-00
	• <i>Qualified Terminable Interest Property</i> 201233011 202016001 202016002 202016004 202016005 202016006	2523.06-01
	• <i>Treatment of Joint and Survivor Annuities</i> 202016003	2523.06-04
Section 2524	Extent of Deductions 201718007	2524.00-00

Section 2601**Tax On Generation Skipping Transfers****2601.00-00**

201204001 201204002 201204003 201204004 201204005 201208005 201209003
201216010 201218001 201218002 201218003 201223012 201233008 201234016
201243001 201245007 201246004 201314017 201320009 201634016 201634017
202134003 202134004 201341005 201345005 201406008 201418001 201434019
201434020 201438016 201442042 201442043 201442044 201442045 201442046
201443004 201448018 201451005 201509002 201509003 201509004 201509005
201509006 201509007 201509008 201509009 201509010 201509011 201509012
201509013 201509014 201509015 201509016 201509017 201509018 201510009
201510010 201510011 201510012 201510013 201510014 201510015 201510016
201510017 201510018 201510019 201510020 201510021 201510022 201510023
201511002 201511003 201511004 201511005 201511006 201511007 201511008
201511009 201511010 201515002 201515003 201515004 201515005 201516008
201516019 201516020 201516022 201516023 201516036 201521002 201521003
201521004 201525001 201527011 201528029 201530008 201530009 201530010
201530011 201530012 201530013 201531003 201531004 201531005 201531006
201532008 201532009 201532010 201532011 201532012 201532013 201543006
201604001 201606002 201628008 201633022 201633023 201634016 201634017
201647001 201706002 201711002 201712003 201712004 201712005 201718014
201719008 201723002 201723003 201735005 201735009 201803003 201812001
201812002 201812005 201814001 201814002 201814005 201817002 201817003
201817012 201817013 201817014 201817016 201818005 201820007 201820008
201825007 201832007 201833015 201845006 201932001 201932002 201932003
201932004 201932005 201932006 201932007 201932008 201932009 201932010
201938004 201938005 201938006 201947001 201947002 201947003 201947004
201947005 201947006 202009012 202011001 202011002 202011003 202011004
202011005 202013001 202013002 202013003 202013004 202013005 202014006
202014007 202014008 202014009 202014010 202015004 202015005 202015006
202015007 202015008 202015009 202015010 202015011 202015012 202015013
202017001 202017002 202017003 202017004 202017005 202017006 202017011
202017012 202017013 202017014 202020008 202020009 202020010 202108001
202108002 202108003 202108004 202108005 202108006 202120003 202206008
202215015 202216001 202216002 202216003 202216004 202216005 202216006
202217005 202224008 202228003 202228004 202228005 202228006 202228007
202228008 202228009 202228010 202228011 202228012 202229010 202229011
202229012 202229013 202229014 202229015 202229016 202229017 202229018
202229019 202229020 202229021 202229022 202229023 202239004 202301001
202313006 202317001 202317010 202317011 202318010 202318011 202318012
202318013 202318014 202343005 202343006 202343007 202343008 202343009
202343010 202343011 202343012 202343013 202343014 202343015 202343016
202343017 202343018 202343019 202343020 202343021

• Effective Dates**2601.01-00**

201928004 201932001 202116002 202116003 202116004

• Exceptions**2601.03-00**

201735009

• Irrevocable Trusts**2601.03-01**

201205001 201207001 201208003 201208004 201208006 201208031 201209001
201209002 201210001 201210002 201243006 201320009 201345004 201345026
201345027 201345028 201407008 201417001 201417002 201418017 201418031
201418032 201432005 201433006 201434004 201434005 201436003 201528024
201642027 201642028 201642029 201642030 201702016 201702017 201702018
201706002 201707007 201707008 201735009

• Additions to Irrevocable Trusts**2601.03-05**

201342001 202120003

• Terminations of Interest in and Distributions From Trusts**2601.03-06**

201518002 201518003 201518004 201518005 201519012 201626016

	• <i>Constructive Additions</i>	2601.03-08
	201250001 201418005 201425007 201735009	
	• <i>Transitional Rules</i>	2601.04-00
	201216010 201314017 201320009 201345005 201406008 201422011 201550013	
	201614015 201706002 201711002 201818005 201833015	
	• <i>Wills or Revocable Trusts Executed Before October 22, 1986</i>	2601.04-01
	201322010 201322011 201322012 201322013 201322014 201322015 201345005	
	201416001 201516028 201516036 201527032 201707003 201707004 201707005	
	201818005 201833015	
	• <i>Amendments to Wills or Revocable Trusts</i>	2601.04-03
	201316004 201947001 201947002 201947003 201947004 201947005 201947006	
	• <i>Cases of Mental Incompetency</i>	2601.04-05
	201314017 201316004 201406008 201550013 201614015	
Section 2602	Amount of Tax	2602.00-00
	201516036	
Section 2612	Taxable Termination; Taxable Distribution; Direct Skip	2612.00-00
	201422005	
Section 2613	Skip Person and Non-Skip Person	2613.00-00
	201352001 201352002 201352003	
Section 2623	Taxable Amount in Case of Direct Skip	2623.00-00
	201352001 201352002 201352003	
Section 2624	Valuation	2624.00-00
	201352001 201352002 201352003	
Section 2631	GST Exemption	2631.00-00
	201250005	
Section 2632	Special Rules for Allocation of GST Exemption	2632.00-00
	201210008 201231002 201232028 201242002 201302001 201306002 201307004	
	201310011 201310012 201312018 201314032 201315014 201316011 201731005	
	201731006 201731010 202001002 202001003 202134005 202134006 202134007	
	201338013 201338042 201351007 201417003 201418003 201422014 201423014	
	201426015 201428003 201432008 201442017 201443002 201443013 201510029	
	201519014 201523003 201529002 201529003 201532017 201536007 201536012	
	201536013 201539001 201549025 201552006 201602001 201613009 201614016	
	201622005 201622006 201622013 201626020 201628007 201628018 201635005	
	201636020 201636022 201638017 201638020 201639002 201639003 201640013	
	201644001 201644002 201653013 201718026 201718031 201724007 201724008	
	201724015 201729007 201729018 201736017 201737006 201737007 201738008	
	201738009 201743004 201743005 201803001 201803002 201811003 201820015	
	201826001 201826006 201834005 201836004 201836007 201839003 201839012	
	201839014 201850008 201850009 201852005 201852006 201852007 201852008	
	201903001 201903002 201903003 201903004 201903005 201903006 201920001	
	201920002 201920003 201921001 201923022 201924001 201924002 201924015	
	201924016 201925001 201925013 201927013 201927014 201927015 201929003	
	201929004 201929005 201929006 201929010 201929011 201936001 201937009	
	201937010 201937011 201941008 201941009 201941010 201941011 201941012	
	201941013 201941014 201941015 201941016 201941017 201941018 201941019	
	201941020 201941021 201941022 201941023 201944008 202007011 202007012	
	202007013 202017009 202017010 202019011 202107001 202107002 202117002	
	202117003 202120001 202133006 202133007 202133008 202145014 202148002	
	202148003 202205019 202210011 202220009 202233002 202244003 202247007	
	202248006 202309006 202313004 202313008 202316006 202326005 202326011	
	202326012 202326016 202337003 202337006 202342008 202403008 202403009	
	202419002	

• Time and Manner of Allocation	2632.01-00
201252003 201252004 201314018 201316001 201316002 201320004 201633006 201633015 201929003 201929004 201929005 201929006 202209006	
• Deemed Allocation to Certain Lifetime Direct Skips	2632.02-00
201242005 201321005 201321006 201330015 202001002 202001003 201330015 201407001 201418026 201419004 201433008 201438001 201444019 201517001 201532031 201548001 201548002 201714008 201743004 201743005 201834005 202210010	
• Allocation of Unused GST Exemption	2632.03-00
201731006 201340014 201447013 201624015 201937011 202116006 202202007 202229028 202242002 202343029 202346006 202351004 202351005	

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Inclusion Ratio	2642.00-00
201217011 201217012 201232002 201233013 201240003 201240004 201240010 201242005 201243001 201251001 201302002 201302003 201303006 201306002 201307004 201312018 201313003 201314018 201315005 201321002 201322025 201330015 201634016 201634017 201731005 201731010 202001002 202001003 202134005 202134006 201330015 201338002 201340013 201341021 201345017 201345029 201407001 201414005 201417003 201418001 201418003 201418026 201419004 201432004 201437001 201437003 201438001 201444019 201447026 201450018 201517001 201519014 201526004 201526005 201527001 201527002 201529002 201529003 201532031 201536007 201536012 201536013 201537011 201548001 201548002 201549025 201606001 201607022 201607023 201608009 201611009 201611014 201615005 201615006 201622005 201622006 201628013 201634016 201634017 201636020 201638017 201640013 201644001 201644002 201648010 201653013 201705002 201711001 201724008 201724018 201724022 201724023 201725004 201725005 201725006 201725007 201725010 201729007 201729018 201732029 201736017 201737006 201737007 201738008 201738009 201743004 201743005 201747002 201801001 201802001 201802002 201806006 201811003 201815012 201817005 201825023 201826001 201826006 201834002 201839001 201839003 201839012 201839014 201840001 201840002 201843005 201843006 201843007 201843008 201845007 201847002 201847003 201849007 201849008 201852005 201852006 201852007 201852008 201903001 201903002 201903003 201903004 201903005 201903006 201903013 201923022 201927013 201927014 201927015 201929003 201929004 201929005 201929006 201929010 201929011 201937009 201937010 201942001 201944008 202005003 202007011 202007012 202007013 202017009 202017010 202019011 202107001 202107002 202116006 202117001 202117002 202117003 202120001 202133006 202133007 202133008 202145014 202148002 202148003 202210011 202220009 202233002 202247007 202248001 202248006 202309006 202313004 202313008 202316006 202326011 202326012 202326016 202337003 202337006 202342008 202343030 202346006 202351004 202351005 202403008 202403009	
• Inclusion Ratio Defined	2642.01-00
201210008 201803001 201803002	
• Treatment of Certain Direct Skips Which Are Nontaxable Gifts	2642.03-00
201422007	
• Special Rules for Certain Inter Vivos Transfers	2642.06-00
201315006 202326005	

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Other Definitions	2652.00-00
201243001 201731006 201523003 201526004 201526005 201636022 201642004 201724007 201829005 201937011 202152006	
• Transferor Defined	2652.01-00
201210008 201320005 201731006 201352001 201352002 201352003 201447008 201636022 201937011 202116006 202202007 202343029 202351004 202351005	

	<ul style="list-style-type: none"> • <i>Special Election for QTIP</i> 201217011 201232019 201242002 201246020 201316011 201320005 201322031 201731006 201447008 201447014 201532017 201608001 201615004 201622013 201624015 201642004 201717001 201750014 201820015 201840001 201845010 201850010 201907002 201942008 201943007 202009012 202202007 202230007 202341004 202343029 202419002	2652.01-02
Section 2653	Taxation of Multiple Skips 201352001 201352002 201352003	2653.00-00
Section 2654	Special Rules 201243004 201246020 201322031 201731006 201447008 201447014 201624015 201750014 201907002 201937011 201943007 202202007 202343029 202419002 <ul style="list-style-type: none"> • Separate Shares 201516036 201825023 201845007	2654.00-00 2654.03-00
Section 2663	Regulations 201311004	2663.00-00
Section 2701	Special Valuation Rules for Transfers of Interests in Corporations or Partnerships <ul style="list-style-type: none"> • Valuation Rules • <i>Subtraction Method of Valuation</i> • Other Definitions and Rules • <i>Certain Changes Treated as Transfers</i> 201442053	 2701.01-00 2701.01-01 2701.11-00 2701.11-05
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• Domestic, Foreign Persons	7701.04-00
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• Fiduciary v. Agent	7701.05-00
201302026	
• Indian Tribal Government	7701.20-00
201739011	
• Definition of Resident Alien	7701.21-00
• <i>Coordination with Income Tax Treaties</i>	7701.21-20
201247013	
• Treatment of Certain Contracts For Services, etc.	7701.22-00
• <i>Factors: Lease vs. Service Contract</i>	7701.22-01
201525007	
• Motor Vehicle Operating Leases	7701.25-00
• <i>In General</i>	7701.25-01
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Section 7702A	Modified Endowment Contracts 201443015 201617004 202018003	7702A.00-00
Section 7702B	Treatment of Qualified Long-Term Care Insurance 201845020 202235004	7702B.00-00
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Section 7703	Determination of Marital Status	7703.00-00
	<ul style="list-style-type: none"> • Married Individuals Living Apart 201334041 	7703.02-00
Section 7704	Certain Publicly Traded Partnerships Treated as Corporations 201213004 201232020 201233009 201236023 201250014 201313014 201316005 201322024 201330026 201330027 201330026 201330027 201336016 201338035 201340011 201411004 201414004 201417005 201418021 201514003 201523017 201523018 201527039 201541009 201549013 201614004 201636039 201651008 201710019 201722023 201818001 201819001 201822002 201840006 201927007 202005011 202017008 202305003 202339002	7704.00-00
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Section 7803	Other Personnel 201902031	7803.00-00
Section 7805	Rules and Regulations 201517026 201517027 201716001 201716025 201716026 201716029 201716030 201716033 201716036 201716038 201716041 201716042 201717020 201717022 201717024 201717025 201717031 201717032 201717034 201717035 201718030 201718032 201719021 201927012 202022004	7805.00-00
	• Prospective Application of Changes in Regulations	7805.01-00
	• <i>Prospective Application of Rulings</i> 201537023 202022004	7805.01-01
	• Reversals of Regulations or Rulings With Retroactive Effect 201413013	7805.03-00
	• Retroactive Effect of Regulation	7805.04-00
	• <i>Retroactive Application of Rulings</i> 201216051 201233011 201245017 201927012	7805.04-01
	• Effect of Private Rulings 201927012	7805.05-00
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Section 7871	Indian Tribal Governments Treated As States For Certain Purposes 201445002	7871.00-00
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	• Tax Exempt Bonds 201630002 201937016	7871.03-00
Section 7872	Treatment of Loans with Below Market Interest Rates 201426002	7872.00-00
	• Types of Below Market Loans Subject to Section 7872 202334009 202335006 202335007 202335008 202335009 202336007 202336008 202336009 202336010 202336011 202336012 202336013	7872.05-00
Section 7873	Federal Tax Treatment of Income Derived By Indians >From Exercise of Fishing Rights Secured by Treaty, Etc. 202053014	7873.00-00

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• Section 42; Low-Income Housing Credit 9100.01-00

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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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• Exploration Expenditures 9100.02-06

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• Section 146; Volume Cap 9100.03-00

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<ul style="list-style-type: none"> • Section 168; MACRS 	9100.04-00
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<ul style="list-style-type: none"> • Section 338(h)(1); Election Under Section 1.338(h)(10)-1T 	9100.07-00
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<ul style="list-style-type: none"> • <i>Accounting Methods</i> 	9100.10-01
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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"> • Extension of Time For Filing Return 	9100.19-00
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- Section 1502; Election to File Consolidated Return

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9100.20-00
- Section 6(c)(3) of PL 97-354; Qualified Oil Corporation

201431011

9100.21-00

• Other

9100.22-00

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• Section 709; Election to Amortize Organizational Expenses Provided in Section 709(b)
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• Section 642(c); Election for Estate Trust to Deduct Charitable Payments in the Tax Year Even Though Not Paid Until Subsequent Year 9100.26-00
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• Regulation Section 1.337(d); Loss on Stock of Subsidiary 9100.29-00
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• Section 195; Start-Up Expenditures 9100.30-00
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