Internal Revenue Service
DEPARTMENT OF THE TREASURY

LB&I Concept Unit

Unit Name	Installment Method	
Primary UIL Code	453.10-00	Installment Method - Definitions

Library Level	**Title**
Knowledge Base	Corporate/Business Issues & Credits
Shelf	Methods of Accounting and Timing
Book	Installment Methods
Chapter	General Rules

Document Control Number (DCN)	COR-C-005 (formerly MAT/C/214_01-01)
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General Overview

Installment Method

A seller may defer gain recognition under an installment sale. An installment sale occurs when a seller receives at least one payment in a tax year after the disposition. Absent an exception or a seller election, a seller is on the installment method for sales at a gain. The installment method doesn't apply to sales that result in a loss. See Pub. 537, *Installment Sales.*

Installment sale reporting does not affect the character of a gain. For example, if the property sold is a capital asset, the gain reportable each year is capital gain.

Under the installment method, income is recognized over the years in which installment payments are received by multiplying the payments received during the year by the gross profit ratio (or "gross profit percentage"). The gross profit percentage is the gross profit on the sale divided by the total contract price for that sale.

An installment sale is reported on a Form 6252, *Installment Sale Income*. Form 6252 is used:

- to report an installment sale in the year the sale occurred, and
- for each year a payment is received or a payment is considered to have been received.

Relevant Key Factors

Installment Method
Key Factors
A seller can use the installment method for most types of property sales with the following exceptions: 1. Sale at a loss. 2. Sale of publicly traded securities. 3. Sale of inventory. Exceptions are discussed on slides 5 and 6. 4. Dealer of timeshare units, where the dealer sold only the right to use real property for six weeks or less each year. 5. Dealer of residential lots, as long as the seller does not improve the lot. 6. Sale of depreciable property to a related person. Exceptions are discussed on slides 7, 8 and 9. 7. Personal property sold under a revolving credit plan. A seller elects out of the installment method by reporting all the gain as income in the year of the disposition of the property. A seller must make the election no later than the due date of the seller's return, including extensions, for the year the sale occurs. Internal Revenue Code (IRC) 453(d). To make this election, the seller does not report the sale on a Form 6252, but instead reports the sale on a Form 8949, *Sales and Other Dispositions of Capital Assets*, Form 4797, *Sales of Business Property*, or both. A seller who sells depreciable property at a gain must report any depreciation recapture as ordinary income in the year of sale even if no installment payment was received that year. The seller adds the recaptured depreciation to the basis of the property. Typically, each payment received as part of an installment sale consists of three parts: interest income, gain on the sale, and non-taxable recovery of basis under Treas. Reg. 15a.453-1. Allocations of gain versus recovery of basis for each payment are discussed in detail later in this Practice Unit.

Detailed Explanation of the Concept

<table>
<tr><th colspan="2">Installment Method</th></tr>
<tr><td colspan="2">Transactions that are eligible for the installment method report the gain as payments are received. Certain transactions are not eligible for the installment method.</td></tr>
<tr><th>Analysis</th><th>Resources</th></tr>
<tr><td><u>Transactions Not Eligible for Installment Sale Treatment</u>

A seller can use the installment method for most types of property sales with the following exceptions:

1. Sale at a loss.
2. Publicly traded securities: Gain from the disposition of stocks and securities traded on an established securities market does not qualify for the installment method. A cash basis seller must report the gain or loss realized from a sale of stock or securities traded on an established market in the year the trade occurs. Additionally, gain from the disposition of property (other than stock or securities) of a kind regularly traded on an established market, to the extent provided in regulations, do not qualify for the use of the installment method.
3. Inventory: Gain from the disposition of inventories of personal property does not qualify for use of the installment method. The sale of inventory of personal property does not qualify as an installment sale even if a payment is received after the year of sale.

The installment method is not allowed for dealer dispositions such as:
▪ any disposition of personal property by a person who regularly sells or otherwise disposes of personal property of the same type on the installment plan, or
▪ any disposition of real property held by the seller for sale to customers in the ordinary course of the seller's trade or business.</td><td>▪ IRC 453(b)(1) - Installment Sale Defined
▪ IRC 453(a) - General Rule
▪ Treas. Reg. 15a.453-1(b)(2)
▪ Rev. Rul. 70-430 - Section 165 Losses
▪ IRC 453(b)(2)(A) - Installment Sale Exceptions
▪ Rev. Rul. 93-84 - Installment Method of Accounting; Year-end Sale of Stock or Securities
▪ PLR 201315004 - Taxation of Real Estate Investment Trusts
▪ IRC 453(l)(2) - Dealer Disposition Exceptions
▪ IRC 453(l)(3) - Payment of interest on Timeshares and Residential Lots
▪ IRC 2032A(e)(4) & (5) - Valuation of Certain Farm, etc. Real Property
▪ IRC 453(b)(2)(B) - Inventories of Personal Property</td></tr>
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<u>Transactions Not Eligible for Installment Sale Treatment (cont'd)</u>

To determine whether a seller holds property "primarily for sale to customers in the ordinary course of its trade or business," the Tax Court uses a factor-based approach that looks to the purpose for which the seller holds the property. Most relevant to this determination is the seller's purpose at the time it sells the property although courts may consider events that occurred before that to identify the purpose.

! CAUTION: Exception: Dealers who meet one of the following exceptions may use the installment method:
▪ Disposition of property used or produced in the farming trade (within the meaning of IRC 2032A(e)(4) or (5)). This exception, however, doesn't allow farm equipment dealers or manufacturers to use the installment method.
▪ Dealer dispositions of timeshares to an individual in the ordinary course of the seller's trade or business. A timeshare disposition includes:
– the "right to use" a timeshare, that is, without ownership or deeding of the property,
– a deeded timeshare ownership interest of six weeks or less per year in residential real property; deeded means there is a signed legal document that confers an interest in a small portion of the property, or
– a right to recreationally use specified campgrounds.
▪ The disposition of an unimproved residential lot to an individual in the ordinary course of business. Neither the seller nor any related party may make improvements to the lot.
</td><td>
▪ Raymond v. Commissioner - T.C. Memo 2001-96
▪ Cottle v. Commissioner - 89 T.C. 467 (1987)
▪ SI BOO, LLC v. Commissioner - T.C. Memo 2015-19

▪ IRC 453(l) - Dealer Dispositions
▪ Thom v. U.S. - 283 F. 3d 939 (8th Cir. 2002)
▪ PLR 9616012 - Farm Property Exception
▪ TAM 199908040 - Farm Property Exception
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<u>Transactions Not Eligible for Installment Sale Treatment (cont'd)</u>

4. A dealer who sells a "right to use" timeshare or a timeshare ownership interest in residential real property for not more than six weeks per year, a right to use a specific campground for recreational purposes, or a residential lot with respect to which the seller or a related party will not make improvements may use the installment method to report the gain but must pay interest on the tax that it is deferring under IRC 453(l).
5. Dealer of residential lots, as long as the seller does not improve the lot. A residential lot is a parcel of unimproved land which the purchaser intends to construct (or intends to contract to have another person construct) a dwelling unit for use as a residence by the purchaser.
6. Sale of depreciable property to a related person is generally ineligible for the installment method and, as a result, all payments are deemed received in the year of the disposition.
   - The term "related person" is defined by IRC 1239(b) with the modification that two partnerships may be related persons as described under IRC 707(b)(1)(B).
   - IRC 453(f)(7) clarifies that the term "depreciable property" is based on whether the property is depreciable in the hands of the buyer/transferee (as opposed to the seller/transferor) under IRC 167.

   The installment method may be used for related party sales, however, if the seller establishes that federal tax avoidance is not one of the primary purposes of adopting the method.

</td><td>

- IRC 453(g) - Sale of Depreciable Property to a Controlled Entity
- *Wang v. Commissioner* - 75 T.C. Memo 1998-27
- *Vest v. C.I.R.* - T.C. Memo 2016-187, *aff'g* 690 Fed. Appx. 210 (5th Cir. 2017)

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<u>Transactions Not Eligible for Installment Sale Treatment (cont'd)</u>

IRC 453(e) functions to accelerate the recognition of income on certain installment sales. If the seller disposes of property on the installment method (first disposition) to a related person who then disposes of the property (second disposition):
▪ Before making all payments on the first disposition, and
▪ Within two years of the first disposition (except in the case of marketable securities, for which there is no time limit).

The general consequence is for the seller to realize a taxable amount at the time of the second disposition. The amount realized is the lesser of the amount realized with respect to the second disposition or the total contract price for the first disposition over the aggregate amounts already treated as received with respect to the first disposition.

If IRC 453(e) applies to deemed payments received by the seller upon the second disposition, then receipt of payments in subsequent taxable years shall not be treated as the receipt of payments with respect to the first disposition to the extent such payments do not exceed the amounts treated as already received. See Related Party "Second Disposition" example on slides 21, 22 and 23.

Under IRC 453(e)(7), if it is established to the satisfaction of the Secretary that neither the first disposition nor the second disposition had as one of its principal purposes the avoidance of federal income tax, then IRC 453(e) does not accelerate the recognition of income.
</td><td>
▪ IRC 453(e) - Second Disposition by Related Persons
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Detailed Explanation of the Concept (cont'd)

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<u>Transactions Not Eligible for Installment Sale Treatment (cont'd)</u>

Depreciable property: The portion of any gain attributable to depreciation recapture does not qualify for the installment method, rather, the installment method applies only to the gain in excess of the depreciation recapture income. The seller must report any depreciation recapture as ordinary income in the year of sale, whether receiving an installment payment or not during that year. The seller adds the recaptured depreciation to the basis of the property. This will affect the gross profit on the sale and the gross profit percentage.
7. Personal property sold under a revolving credit plan: Any disposition of personal property under a revolving credit plan after 1986 does not qualify for use of the installment method. All payments are treated as received in the year of sale.

<u>Installment Method Payment</u>

Typically, each payment with respect to an installment sale consists of the following three parts:
1. Return of the adjusted basis in the property,
2. Gain on the sale, and
3. Interest income.
</td><td>
▪ IRC 453(i) - Recognition of Recapture Income in the Year of Disposition

▪ IRC 453(k)(1) - Current Inclusion in Case of Revolving Credit Plans
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Detailed Explanation of the Concept (cont'd)

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<tr><td><u>Installment Method Payment (cont'd)</u>

<u>Return of the Adjusted Basis in the Property</u>

Upon receiving a payment each year, a seller reports interest income and the gain on the sale on a Form 6252. The adjusted basis represents the seller's investment in the property and is not included in income.

The portion of the payment that does not include interest is effectively comprised of two parts:
1. A tax-free return of adjusted basis and
2. Gain on the sale.

<u>Gain on the Sale</u>

The gain on an installment sale is generally computed as selling price minus adjusted basis.

The selling price includes the following:
▪ Money, plus
▪ Fair market value of any property received, plus
▪ Selling expenses paid by the buyer, plus
▪ Existing debt the buyer pays or assumes under contract. This includes debt the buyer assumes even if it remains in the sellers' name.</td><td>▪ Treas. Reg. 15a.453-1(b)(2)(ii)</td></tr>
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Detailed Explanation of the Concept (cont'd)

Installment Method	
Analysis	**Resources**
Installment Method Payment (cont'd) Gain on the Sale (cont'd) The adjusted basis for installment sale purposes includes the following: ▪ Adjusted basis for the property, plus ▪ Selling expenses, plus ▪ Depreciation recapture. The gain portion of the payment is taxable to the seller. To determine the allocation of gain versus recovery of basis, the seller multiplies each installment payment, excluding the interest income portion, by the gross profit percentage determined for the sale. The payment multiplied by the gross profit percentage equals the reportable gain. The payment less the reportable gain is the non-taxable recovery of basis. The gross profit percentage is equal to the gross profit (that is, selling price less the adjusted basis) divided by the total contract price.	▪ IRC 453(c) - Installment Method Defined

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Detailed Explanation of the Concept (cont'd)

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<tr><td><u>Installment Method Payment (cont'd)</u>

<u>Gain on the Sale (cont'd)</u>

Contract price equals:
▪ The selling price, minus
▪ The mortgages, debts, and other liabilities assumed or taken by the buyer, plus
▪ The amount by which the mortgages, debts, and other liabilities assumed or taken by the buyer exceed the adjusted basis for installment sale purposes.

The gross profit percentage generally remains the same for each payment received. However, the profit is recomputed by the seller in any year in which the buyer and seller agree to a reduction in the original sales price using the adjusted sales price, subtracting the profit already reported and spreading the remaining profit evenly over the remaining installment payments.</td><td>▪ Rev. Rul. 72-570 - Recomputing Total Gross Profit</td></tr>
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Detailed Explanation of the Concept (cont'd)

Installment Method	
Analysis	**Resources**
Interest Income A seller must include interest income in each installment payment as ordinary income. Even if not referenced as interest in the agreement with the buyer, a seller may have to treat part of each payment as interest. The term for interest that is part of an installment sale contract is "stated interest." If an installment sale contract does not provide for adequate stated interest, application of IRC 483 may result in recharacterizing part of the stated principal amount of the contract as interest. The term for the interest resulting from contracts subject to IRC 483 is "unstated interest." If IRC 1274 applies to the contract, this interest is called original issue discount (OID). Generally, IRC 1274 applies to a debt instrument issued for the sale or exchange of property if any payment under the instrument is due more than six months after the date of sale or exchange and the instrument does not provide for adequate interest.	

Detailed Explanation of the Concept (cont'd)

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<tr><td><u>Calculating Gain on the Sale</u>

Example:
▪ Seller S sells property with a basis of $400 to Buyer B for $1,000, payable to Seller S in five annual installments of $200, together with adequate stated interest.
▪ Seller S's gross profit on the sale is $600 ($1,000 selling price less $400 adjusted basis).
▪ The gross profit percentage is 60% ($600 gross profit divided by $1,000 total contract price).
▪ Thus, the amount of each installment payment received by Seller S that must be reported as gain is $120 (60% x $200 payment).
▪ The remaining $80 of each installment payment is a non-taxable recovery of basis.</td><td></td></tr>
</table>

Detailed Explanation of the Concept (cont'd)

Installment Method	
Analysis	**Resources**
Calculating Gain on the Sale (cont'd)	

Gross Profit Percentage = $\frac{\$1{,}000 \text{ Selling Price} - \$400 \text{ Basis}}{\$1{,}000 \text{ Selling Price}} = 60\%$

Year	Payment Received	Gross Profit	Gain Reported
20X1	$200	60%	$120
20X2	$200	60%	$120
20X3	$200	60%	$120
20X4	$200	60%	$120
20X5	$200	60%	$120
Totals	$1,000		$600

Detailed Explanation of the Concept (cont'd)

Installment Method	
Analysis	**Resources**
<u>Change in Accounting Method</u> For tax purposes, income recognition under IRC 453 is a method of accounting. If a seller improperly applied IRC 453, generally, this would require a change in accounting method to a proper method. <u>IRC 453A(c) Interest on Deferred Tax</u> IRC 453A(c) imposes an interest charge on nondealer installment obligations where the property's value exceeds $150,000 and the total amount of all installment sales obligations that arose during and were outstanding at the end of the tax year exceed $5 million.	▪ IRC 453A(a)(1) - Interest on Deferred Tax Liability

Detailed Explanation of the Concept (cont'd)

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<tr><th>Analysis</th><th>Resources</th></tr>
<tr><td><u>IRC 453A(c) Interest on Deferred Tax (cont'd)</u>

A seller must pay interest in subsequent years if installment obligations that originally required interest to be paid are still outstanding at the close of a tax year. The seller should report the interest as additional tax on its tax return.

The deferred tax is equal to the balance of the unrecognized gain at the end of the tax year multiplied by the maximum tax rate (ordinary or capital gain, as appropriate) in effect for the tax year. The underpayment rate in effect for the month with or within the end of the tax year sets the basis for the interest on deferred tax. The underpayment rate is published quarterly in the Internal Revenue Bulletin, available at www.IRS.gov. The underpayment rate multiplied by the deferred tax is the interest (additional tax) due.

For example, a calendar-year seller sold intellectual property to an unrelated party on 11/15/2017, for $15 million on the installment method. The seller received a payment of $1 million in 2017, $5 million in 2018, and a final payment of $9 million in 2019. The seller is liable for IRC 453A(c) interest in 2017 and 2018.

<u>IRC 453A(d) Pledges, Etc. of an Installment Obligation</u>

If any indebtedness is secured by an installment obligation to which IRC 453 applies, the net proceeds of the installment obligation shall be treated as a payment received as of the later of the time the indebtedness becomes secured or the time the proceeds are received by the seller.</td><td>▪ IRC 453A(c) - Interest on Deferred Tax Liability

▪ IRC 453A(d) - Pledges, etc., of Installment Obligations</td></tr>
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Detailed Explanation of the Concept (cont'd)

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<tr><td>
<u>IRC 453B Gain or Loss on Disposition of Installment Obligations</u>

If an installment obligation is satisfied at less than its face value or distributed, transmitted sold or otherwise disposed of, gain or loss shall result.

Any such gain or loss shall be considered as resulting from the sale or exchange of the property with respect to which the installment obligation was received.

<u>Election Out of Installment Method</u>

A seller can "elect out" of the installment method on or before the due date of its tax return (including extensions) for the year of the sale. If a seller elects out of the installment method, the total gain from the sale of property is reported in the year of sale.

If an installment obligation is satisfied at less than its face value or distributed, transmitted sold or otherwise disposed of, gain or loss will result. Any such gain or loss shall be considered as resulting from the sale or exchange of the property with respect to which the installment obligation was received.

To elect out of the installment method, the seller should report the total gain as income in the year of sale on a Form 4797 or on a Schedule D, Capital Gains and Losses. The seller should not report the sale on a Form 6252. The election can only be revoked with IRS approval. To request approval, the seller would follow the letter ruling procedures and pay a user fee. The IRS publishes the letter ruling procedures annually in the first revenue procedure of each calendar year. For example, the letter ruling procedures for 2019 are found in Rev. Proc. 2019-1.
</td><td>
▪ IRC 453B - Gain or Loss on Disposition of Installment Obligations

▪ IRC 453(d)(2) - Election out of the Installment Method

▪ IRC 453(d)(3) - Revocation of Election out of the Installment Method

▪ Treas. Reg. 15a.453-1(d)(3)(ii)
</td></tr>
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Detailed Explanation of the Concept (cont'd)

Installment Method	
Analysis	**Resources**
Election Out of Installment Method (cont'd) For partnerships and S corporations, elections out of the installment method must be made at the partnership and S corporation level. Late elections are permitted only in rare circumstances when the IRS concludes that the seller had good cause for failing to make a timely election.	

Examples of the Concept

Installment Method
Examples
<u>Deprecation Recapture Example</u> ▪ Seller A sells Falcon, a capital asset, to Buyer B for $100,000. ▪ Buyer B pays $10,000 down and pays the remainder in equal annual installments over the next nine years, together with adequate stated interest. ▪ Seller A's adjusted basis in Falcon is $38,000. ▪ Seller A paid selling expenses of $2,000 and depreciation recapture is $15,000. ▪ The gross profit is $45,000 ($100,000 selling price minus $55,000 adjusted basis inclusive of selling expenses and depreciation recapture). ▪ The gross profit percentage is 45% (gross profit of $45,000 divided by $100,000 total contract price). ▪ Accordingly, $4,500 (45% of $10,000) of each $10,000 payment received is gain attributable to the sale and $5,500 ($10,000 minus $4,500) is recovery of basis.

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Examples of the Concept (cont'd)

Installment Method

Examples

Deprecation Recapture Example (cont'd)

Calculating the Gross Profit Percentage:

Line	Description	Amount	
1.	Selling price of the property		$100,000
2.	Adjusted basis of the property	$38,000	
3.	Selling expense	$2,000	
4.	Depreciation recapture	$15,000	
5.	Add lines 2, 3, and 4. Adjusted basis for the installment sale		$55,000
6.	Subtract line 5 from line 1. Gross profit		$45,000
7.	If the amount on line 6 is zero, stop here. The installment method cannot be used.		
8.	Total contract price for the property		$100,000
9.	Divide line 6 by line 7. Gross profit percentage		45%

Examples of the Concept (cont'd)

Installment Method
Examples
<u>Related Party "Second Disposition Rule" Example</u> The IRC 453(e) "second disposition" rule provides that if the original seller disposes of property to a related person who then disposes of it within a two-year period, the second disposition triggers gain to the original seller. The amount realized by the original seller in the year of the second disposition is the lesser of: (i) the amount realized with respect to the second disposition; or (ii) the original total contract price, reduced by payments received by the original seller. <u>Year 1</u> ▪ Seller S sells land to Buyer R, a related party, on the installment method for $200,000 payable in ten equal annual installments of $20,000 plus adequate stated interest on the amount due. ▪ Seller S's adjusted basis of the property is $125,000 which results in a $75,000 gain ($200,000 minus $125,000). ▪ The gross profit percentage of this sale is 37.5% ($75,000 gross profit divided by $200,000 selling price). ▪ Only 37.5% of each payment is taxable in the year(s) of receipt. ▪ Seller S receives a payment of $20,000. ▪ The taxable portion (gain) of this payment is $7,500 (37.5% of $20,000).

Examples of the Concept (cont'd)

Installment Method

Examples

<u>Related Party "Second Disposition Rule" Example (cont'd)</u>

<u>Year 2</u>

- Buyer R sold the land for $210,000, all of which Buyer R received in Year 2. Buyer R made no improvements to the land.
- Buyer R's gain of $10,000 ($210,000 minus $200,000) on the resale of the property is an amount in excess of the total contract price for the sale from Seller S to Buyer R, therefore, this amount will not be treated as realized by Seller S as a result of the second disposition rule.
- However, because Buyer R disposed of the land within two years of the original sale, Seller S is required to report the original total contract price, reduced by payments received by the original seller in Year 2, which is equal to $67,500 ($75,000 minus $7,500).

<u>Years 3 to 10</u>

- In these years, Seller S will not include in its installment sale income any principal payments it receives on the installment obligation because Seller S has already reported the total payments as income, and recognized the gain, in Years 1 and 2.
- In Year 1, the taxable portion (gain) of the payment was $7,500 (37.5% of $20,000).
- In Year 2, the taxable portion (gain) of the payment was $67,500 ($75,000 minus $7,500).

Examples of the Concept (cont'd)

Installment Method
Examples
<u>Related Party "Second Disposition Rule" Example (cont'd)</u> If Buyer R had sold the land two years or more after acquiring it, the second disposition rule would no longer have been applicable. The two-year limitation period does not apply to marketable securities. Therefore, with respect to sales of securities the original seller will recognize gain on any subsequent disposition by a related party purchaser to the extent the original seller has not received all payments due on the sale. The non-tax avoidance exception applies to a second disposition that is also an installment sale if the terms of payment under the second installment resale are substantially equal to or longer than those for the first installment sale.

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Index of Referenced Resources

Installment Method
IRC 453 - Installment Method
IRC 453A - Interest on Deferred Tax Liability
IRC 453B - Gain or Loss on Disposition of Installment Obligations
IRC 2032A - Valuation of Certain Farms, Etc., Real Property
Treas. Reg. 15a.453-1 - Installment Method Reporting for Sales of Real Property and Casual Sales of Personal Property
Rev. Rul. 70-430 - Installment Method of Accounting; Losses
Rev. Rul. 72-570 - Installment Method of Accounting; Recomputing Total Gross Profit
Rev. Rul. 93-84 - Installment Method of Accounting; Year-end Sale of Stock or Securities
PLR 9616012 - Installment Method of Accounting; Available Versus Not Available
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TAM 199908040 - Installment Method of Accounting; Available Versus Not Available
Raymond v. Commissioner - T.C. Memo 2001-96
Cottle v. Commissioner - 89 T.C. 467, 487 (1987)
SI BOO, LLC v. Commissioner - T.C. Memo 2015-19
Vest v. C.I.R. - T.C. Memo 2016-187, *aff'g* 690 Fed. Appx. 210 (5th Cir. 2017)
Thom v. U.S. - 283 F. 3d 939 (8th Cir. 2002)
Wang v. Commissioner - 75 T.C. Memo 1998-27

Index of Referenced Resources (cont'd)

Installment Method
Form 4797 - *Sales of Business Property*
Form 6252 - *Installment Sale Income*
Form 8949 - *Sales and Other Dispositions of Capital Assets*
Pub. 537 - *Installment Sales*

Glossary of Terms and Acronyms

Term/Acronym	Definition
Commissioner	Commissioner of the Internal Revenue Service
IRC	Internal Revenue Code
LLC	Limited Liability Company
OID	Original Issue Discount
PLR	Private Letter Ruling
Rev. Proc.	Revenue Procedure
Rev. Rul.	Revenue Ruling
TAM	Technical Advice Memorandum
T.C.	United States Tax Court Opinion - Generally, a Tax Court Opinion is issued in a regular case when the Tax Court believes it involves a sufficiently important legal issue or principle.
T.C. Memo	United States Tax Court Memorandum Opinion - Generally, a Memorandum Opinion is issued in a regular case that does not involve a novel legal issue.
Treas. Reg.	Treasury Regulation

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Index of Related Practice Units

Associated UIL(s)	Related Practice Unit
	None at this time.