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From:

Sent: Friday, May 15, 2009 2:03:07 PM

To:

Cc:

Subject: RE: TMP Bankruptcy question

1. See Triangle Investors v. Commissioner, 95 T.C. 610 (1990); Western reserve, 95 T.C. 51, September Partners, T.C. memo. 1990-33

2. Treat them as converted but issue an FPAA to them as a notice partner. This procedure was blessed on Third Dividend Dardanos, before the 9th Circuit.

3. Correct.

You can send it to just
regulation under section 6223(c)(2).

since we have to addresses updated in accordance with the

4. This is covered above

5. Correct

6. The FPAA's should be the same for everyone. Only the primary taxpayer needs the reports with a generic one to the partnership.