

Publication 1078
Issue: 12/04/2015

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.

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CC:PA:LPD:DLS, Room 5201, 1111 Constitution Avenue N.W., Washington, DC 20224; (202) 622-7570.

Department of the Treasury
Internal Revenue Service

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	201219021	

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	• Federal Income 201306018	275.01-00
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	201504011 201531016	
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	• <i>Parachute Payment</i> 201519017	280G.01-01
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	201207002 201247004 201252008 201304002 201306012 201306013 201306014 201312028 201328025 201352007 201426019 201440006 201446013 201447019 201448016 201505035 201516047 201516050 201522001 201523017 201527004 201536016 201537020 201544015	
	• Liquidation v. Reorganization 201350001	301.04-00
	• Constructive Dividend 201350001	301.07-00
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	201202010 201202020 201207002 201328025 201330017 201330018 201330017 201330018 201352007 201405005 201444007	
	• Disproportionate Redemption of stock 201202010 201202020 201236025	302.02-00
	• Complete Termination of Interest 201228012 201405005	302.03-00
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	• Acquisition by Subsidiary	304.01-00
	• <i>Distribution to which Section 301 Applies</i> 201252008 201330004 201330004	304.01-03
	• Acquisition by Related Corporation (Other Than Subsidiary)	304.02-00
	• <i>Section 304 v. Section 351</i> 201228034	304.02-01
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	201247004 201306012 201306013 201306014 201308001 201312028 201308001 201333007 201404005 201426019 201447019 201448016 201505035 201516047 201544015	
	• Stock Dividends 201304002 201404005 201446013 201447019 201516047 201537020	305.01-00
	• Distributions in Lieu of Money 201247004 201252012 201312028 201426019 201440006 201447019 201505035 201516050 201536016 201544015	305.03-00
	• Disproportionate Distributions 201213011 201404005 201446013 201537020	305.04-00
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	201308001 201308001	
	• Section 306 Stock v. Not 306 Stock 201308001 201308001	306.01-00

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	• With Respect to its Stock 201405005	311.01-00
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	• Allocation in Separations 201240017 201249012 201330002 201330002 201527003	312.09-00
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	• Year Liquidation Occurs 201228023	331.04-00
	• Form v. Substance 201252008	331.07-00
Section 332	Complete Liquidation of Subsidiaries 201228030 201228033 201236014 201240017 201249012 201252014 201308002 201328003 201308002 201333007 201350001 201352007 201404002 201406005 201411002 201418039 201418046 201433007 201441010 201443017 201445008 201452016 201504007 201511001 201511001 201512001 201528006 201535007 201537018	332.00-00
	• Nonrecognition of Gain or Loss 201213018 201228030 201236014 201308002 201314001 201315016 201308002 201339001 201412013 201415001	332.01-00
	• Debts of Parent to Subsidiary 201213018	332.07-00
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	• Liquidation in a Reorganization	336.03-00
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	• <i>Disqualified Property</i> 201418025	336.03-02
	• <i>Liquidation to which section 332 Applies</i> 201328003	336.03-05
	• Stock Sales and Distributions Treated as Asset Transfers 201546011	336.05-00
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	• <i>Transfer of Substantially All Assets to Tax Exempt</i> 201404004	337.14-01

	• Loss Disallowance 201310015	337.16-00
	• <i>Basis Reductions on Deconsolidation</i> 201521008 201521008 201521008 201521008 201521008	337.16-01
	• <i>Allowable Worthless Stock Loss</i> 201249005 201250010 201329001 201329007 201329008 201329009 201329010 201329011 201329012 201329013 201329014	337.16-02
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	• Express Election 201214018 201412012	338.01-00
	• <i>Time in which Election must be made</i> 201206010 201246021 201338011 201437005 201438018 201503007 201510037 201530017 201534007	338.01-02
	• Qualified Stock Purchase 201203004 201211009 201213013 201214012 201216026 201228011 201252011 201351004	338.02-00
	• Consistency Rules 201213013 201214012	338.04-00
	• Purchase from Related Corporation 201203004	338.09-00
	• Deemed Asset Sale and Liquidation in 338(h)(10) Election 201203004	338.80-00
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	• Control v. No Control by Transferor 201224006 201242007 201306006 201326014 201333007 201506008	351.01-00
	• Series of Transactions 201212001 201506008 201531014	351.02-00
	• "Property" Defined 201506008	351.05-00
	• Constructive Exchange 201350001	351.11-00
	• Section 351 v. Section 304 (See Also 0304.01-01) 201228034	351.12-00
	• Investment Company Exception 201547003	351.13-00
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	• Exchange v. Liquidation 201423010	354.01-00

Section 355

Distribution of Stock and Securities of a Controlled Corporation

355.00-00

201202007 201208017 201213001 201213005 201216027 201228030 201228033
 201229002 201232033 201236014 201238018 201240013 201244006 201245020
 201252017 201305003 201306010 201310023 201312017 201323017 201325009
 201328024 201330002 201330022 201330002 201330022 201333007 201334009
 201334032 201337003 201338040 201339001 201340009 201341026 201347005
 201349006 201352007 201402002 201402002 201407005 201411012 201416002
 201416005 201418018 201418030 201419005 201419010 201419012 201422018
 201423012 201424006 201424009 201424013 201426004 201437006 201441009
 201441010 201441016 201503006 201505013 201512001 201524005 201535007
 201537018

• 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
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 201330022 201334009 201334032 201335001 201336012 201337007 201338040
 201340009 201341004 201341013 201341026 201347005 201348005 201349006
 201350007 201352007 201404002 201407005 201409002 201409003 201411002
 201412013 201415001 201416005 201418030 201418039 201418046 201419005
 201419010 201419012 201422004 201422012 201423006 201423010 201424005
 201424006 201424008 201424009 201424011 201424013 201426004 201426008
 201430002 201433007 201436033 201437006 201437013 201438009 201440014
 201441008 201441009 201441016 201443017 201445008 201503006 201504007
 201505007 201505013 201511001 201511001 201512001 201516014 201528006
 201535006 201535007 201537018 201538015 201542004

• Split-Off

355.01-01

201208017 201213001 201213002 201213005 201230007 201232033 201234009
 201238018 201240016 201245020 201246027 201252017 201306010 201308017
 201308018 201310023 201313016 201323017 201327003 201330002 201330007
 201308017 201308018 201330002 201330007 201337003 201350007 201352007
 201403002 201403002 201404002 201405003 201411002 201411012 201418019
 201422017 201426007 201435005 201512001

• Split-Up

355.01-02

201402002 201402002 201418018 201423012

• Non Pro Rata Distributions, etc.

355.02-00

201233016

• Active Business

355.03-00

201219003 201251006 201333003 201407005 201418039 201418046 201426007
 201429006 201436033 201531014 201535007 201542004

• Five-Year Requirement

355.03-01

201251006 201528016

• Business Purpose

355.04-00

201308017 201308018 201308017 201308018

• Control

355.05-00

201437013 201527003

• Distribution of Control

355.05-01

201437013

• Distributions Within a Consolidated Group

355.09-00

201305003 201352007 201445008

• Gain Recognition on Distributions Pursuant to Acquisitions of Greater than 50% of Distributing or Controlled

355.10-00

201249011 201250021 201324009 201505007

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	• Securities as "Other Property" 201527003	356.02-00
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	• Allocation of Basis 201411006 201437007	358.02-00
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	• Exchanges Not Solely in Kind 201423010 201440014	361.01-00
	• Distributions	361.02-00
	• <i>Certain Transfers to Creditors</i> 201228033 201409003 201511001 201511001 201537004	361.02-02
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	• Property Acquired in Reorganizations and Transfers by Controlling Stockholders 201418013 201418041 201418042 201505028 201521011 201521011 201521011 201521011 201521011 201545013	362.01-00
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	• <i>Reorganizations Described in Section 368(a)(1)(B)</i> 201249011 201250021 201324009	367.03-01
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	• <i>Anti-Abuse Rule</i> 201530020	367.06-07
	• Transfers of Intangible Property to Foreign Corporations Under Section 367(d) 201321018	367.30-00
	• Treatment of Distribution Described in Section 367(e) 201348011 201423006	367.40-00
	• <i>Liquidations Under Section 332</i> 201348011	367.40-02

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201201012 201212001 201213019 201213021 201214013 201216027 201224006
 201228030 201236014 201238018 201239003 201240017 201247009 201249012
 201252017 201308001 201308017 201308018 201310023 201312017 201314003
 201325009 201330022 201308001 201308017 201308018 201330022 201341026
 201349006 201402002 201402002 201404006 201406005 201416002 201419005
 201424005 201424006 201424009 201424011 201426004 201512001

• Statutory Merger or Consolidation (Type "A") **368.01-00**
 201213001 201213019 201213021 201228033 201252002 201252014
 201312017 201314008 201314028 201326006 201333007 201350007 201404002
 201423010 201436034 201438009 201505012 201535007

• Stock for Stock (Type "B") **368.02-00**
 201249011 201250021 201324009

• *Liquidation Distribution* **368.02-02**
 201418039 201418046

• Stock for Property (Type "C") **368.03-00**
 201224006 201228030 201247009 201252014 201324003 201340016 201411002
 201413003 201418039 201418046 201422004 201424007

• *Substantially All the Property* **368.03-01**
 201247009

• Assets for Control of Transferee (Type "D") **368.04-00**
 201203004 201208017 201212001 201213001 201213002 201213005 201214013
 201215005 201216023 201216027 201219003 201229002 201230007 201232014
 201232033 201233016 201234009 201236014 201238018 201240013 201240016
 201244006 201244008 201250004 201251006 201252002 201252017 201306006
 201306010 201308002 201310023 201312022 201313016 201314001 201315016
 201325009 201329005 201330002 201330007 201330022 201308002 201330002
 201330007 201330022 201333007 201335001 201336012 201337003 201337007
 201338040 201339001 201340009 201341004 201341013 201341026 201347005
 201349006 201350007 201402002 201402002 201405003 201407005 201409002
 201409003 201411002 201411012 201412013 201415001 201416005 201418018
 201418019 201418030 201418039 201418046 201419005 201419010 201419013
 201422012 201422017 201423012 201424005 201424006 201424008 201424009
 201424011 201424013 201426004 201426007 201426008 201430002 201433007
 201435005 201437006 201438009 201441008 201441016 201443017 201445008
 201512001 201524005 201528006 201531014 201537018

• Recapitalization (Type "E") **368.05-00**
 201308001 201315009 201315020 201315021 201308001 201424010

• Change in Identity, etc. (Type "F") **368.06-00**
 201201004 201201012 201208019 201228030 201236014 201239003 201250004
 201252011 201252014 201314003 201316017 201322008 201326006 201328003
 201330022 201330022 201333007 201339001 201404006 201411002 201418039
 201418046 201445008 201511020 201511020

• Continuity of Interest Rule **368.08-00**
 201214013 201224006 201247009

• *Related party Acquisitions* **368.08-03**
 201214013

• *Business Enterprise Continuity* **368.08-06**
 201247009 201314028 201413003

• *Historic Business Assets* **368.08-07**
 201224006

	• <i>Transfers to Controlled Corporations</i>	368.08-08
	201214013 201224006 201234009 201240016 201424007	
	• Plan of Reorganization	368.09-00
	201411002	
	• <i>Several Steps</i>	368.09-01
	201252014 201411002	
	• Liquidation v. Reorganization	368.12-00
	201505012	
	• Transactions Involving Two or More Investment Companies	368.13-00
	201247009	
	• Transfer by Corporation in Title 11 Case (Type "G")	368.14-00
	201208036 201230020 201523001	
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	• Method of Accounting	381.04-00
	201237012 201343012	
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	201208002 201215007 201228023 201229004 201251002 201306003 201308026	
	201308029 201309013 201314035 201322032 201326013 201328027 201308026	
	201308029 201335012 201345023 201350006 201403007 201403007 201412009	
	201432015 201443009 201443009 201549010	
	• Scope of Section 382 Limitation	382.02-00
	• <i>Closing of the Books</i>	382.02-05
	201418038 201545014	
	• Value of Old Loss Corporation	382.05-00
	201435003	
	• Ownership Change	382.07-00
	201350006	
	• <i>Segregation Rules</i>	382.07-05
	201350006 201451015	
	• Definitions and Special Rules	382.11-00
	201215007 201403007 201403007	
	• <i>5-Percent Shareholder</i>	382.11-09
	201215007 201403007 201403007	
	• Operating Rules	382.12-00
	201322032 201335012 201443009 201443009	
	• <i>Contributions to Capital</i>	382.12-01
	201350006	
	• <i>Title 11 or Similar Case</i>	382.12-08
	201306003 201322032 201328027 201435003	
	• <i>Election Out</i>	382.12-13
	201519004	
	• <i>Controlled Groups</i>	382.12-16
	201232016 201232017 201335012 201421011 201421012 201421013 201443009	
	201443009	
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	• Debt v. Equity	385.01-00
	201230008 201323021	

	• New Financial Products 201209006 201226026	385.03-00
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	• <i>Exclusive Benefit of Employees or Their Beneficiaries</i> 201538022	401.01-01
	• <i>Definitely Determinable Benefits Under a Pension Plan</i> 201501025	401.01-03
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	• Discrimination as to Contributions or Benefits (See Also 401.29-01, 401.20-00, 414.00-00) 201440027	401.04-00
	• Required Distributions 201202042 201208039 201318033 201320021 201424031 201434028 201437025 201437034 201503024	401.06-00
	• <i>In General</i> 201203033 201210047 201228045 201228051 201241017 201422028 201422029 201422030 201422031 201424031 201427023 201430022 201431034 201434028	401.06-01
	• <i>Employee Dies Before Entire Interest Distributed</i> 201202042 201208039 201210045 201320021	401.06-02
	• Commencement of Benefits Under Qualified Trusts 201221033	401.11-00
	• Cash or Deferred Arrangements 201417025 201527042 201532036	401.29-00
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	• Exempt Trust 201417025	402.01-00
	• Foreign Situs Trust 201341039 201406022 201419026 201430028 201436055 201452027 201502021 201505046	402.03-00
	• Amounts Distributed or Made Available to Beneficiary 201431037 201527042	402.06-00
	• Unrealized Appreciation of Employer's Securities 201242019 201427024	402.07-00

	• Rollover Contributions	402.08-00
	201211031 201215015 201224043 201233021 201233022 201234034 201305015 201323040 201330047 201330047 201341038 201346013 201403020 201403025 201418063 201419020 201419021 201420026 201426032 201442070 201443029 201443030 201445028 201446031 201446032 201446038 201448033 201452022 201452025 201505045 201514020 201521022 201521022 201521022 201521022 201521022 201524027 201535026 201539036 201543022	
	• <i>Reorganization Payments</i>	402.08-03
	201535025	
	• <i>By a Surviving Spouse</i>	402.08-05
	201523019 201523020	
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	201241019	
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	201230030	
	• Non-Forfeitable Rights	403.03-00
	201345036 201451062 201501026	
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	201538020	
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	201212023 201224043 201323040 201419021 201524027	
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	201204010 201206022 201206024 201208043 201218024 201221034 201229012 201233023 201330030 201330030 201511039 201511039	
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	201540015	
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	201208039 201405032 201405033 201405034 201423043 201431038 201439006 201451065	
	• Exclusive Benefit of Individual or His Beneficiary	408.01-00
	201225020	

• Rollover Contributions

201203034 201204024 201205021 201206023 201206025 201206026 201207013
201208040 201208041 201209022 201209023 201210046 201211032 201211033
201212021 201212022 201215016 201216049 201216050 201218025 201218026
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<ul style="list-style-type: none"> • Private v. Public Interest Served 	501.33-00
<p>201202038 201202039 201203024 201203025 201204019 201204020 201205010 201205011 201205012 201209011 201209012 201209013 201210042 201210043 201211025 201211026 201213031 201215012 201215013 201216040 201217019 201218021 201219028 201219029 201221023 201223020 201224031 201224034 201227006 201228040 201228041 201228042 201229001 201229010 201230024 201232035 201233018 201234029 201234030 201241011 201242015 201244021 201247017 201247018 201250025 201250027 201250028 201250029 201252024 201252025 201252026 201302040 201302041 201303017 201303019 201303020 201304011 201305011 201305012 201305013 201307014 201308032 201309019 201310046 201310048 201310049 201311028 201311029 201311030 201311033 201313032 201313033 201313034 201314045 201314046 201314047 201314048 201314049 201315029 201322053 201323028 201323035 201326019 201330043 201308032 201330043 201331007 201331008 201334043 201334044 201334045 201345032 201349023 201403017 201403017 201404013 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 201511026 201514011 201514013 201516066 201517019 201519033 201519035 201523021 201523022 201526021 201535019 201538025 201545029 201545030 201548021 201548025</p>	
<ul style="list-style-type: none"> • Trustees Serve Private Interest 	501.33-01
<p>201226029 201228041 201236033 201315028 201350043 201414024 201451043 201451045</p>	
<ul style="list-style-type: none"> • "Exclusively" Test 	501.35-00
<p>201221023 201228040 201237019 201303019 201303020 201306026 201322053 201334045 201340021 201345031 201345032 201405023 201407020 201414024 201415007 201431032 201433019 201452018 201505042 201511024 201511024 201523021 201529013 201538025 201540019 201545030</p>	
<ul style="list-style-type: none"> • Business Activities 	501.36-00
<p>201234029 201250029 201310046 201314047 201329024 201330038 201330038 201334045 201404013 201405022 201405023 201407019 201428028 201431032 201433020 201510058 201514013 201525012 201525012 201525012 201525012 201545030</p>	
<ul style="list-style-type: none"> • Section 501(c)(3) Organizations 	501.36-01
<p>201204021 201205013 201210041 201233017 201234030 201236033 201242017 201247017 201250027 201302041 201305013 201309019 201311029 201314045 201314049 201330037 201330038 201330037 201330038 201403017 201403017 201405023 201414024 201428022 201428023 201510058 201517008 201525011 201525011 201525011 201525011 201535019 201538025 201540016 201545031</p>	
<ul style="list-style-type: none"> • Publishing Activities, Radio, Television, etc. 	501.36-03
<p>201204021 201252025 201433020 201526020</p>	
<ul style="list-style-type: none"> • Fund Raising (See also 0512.06-00) 	501.36-04
<p>201323037 201407020 201416010</p>	
<ul style="list-style-type: none"> • Legislative and Political Propaganda Activities 	501.38-00
<p>201415007 201505042</p>	
<ul style="list-style-type: none"> • "Action" Organizations 	501.38-01
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<ul style="list-style-type: none"> • Electing Expenditure Test 	501.38-02
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<ul style="list-style-type: none"> • Feeder Organizations (Exempt v. Not Exempt) 	502.00-00
<p>201317011 201444043</p>	

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	201216045 201243015 201321024 201418060 201435016 201513005 201514016	
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	201230026 201417020 201417021 201427019	
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	201345033 201345034	
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	201244020 201321025	
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	201335018 201417018	
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	201206018 201219024 201251019 201405029 201406020 201410037 201424025 201425016 201426029 201429029 201440022 201441019 201451044 201501014 201503018 201545027	
	• Organizations Subject to Tax	511.01-00
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	201241018	
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	201213034 201213035 201235024 201302043 201344011 201425016 201434025 201545027	
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	201409009 201435017 201441018 201503018	
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	201221024 201418061 201434024 201434026	
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	201244004 201245006 201310002 201310003 201310004 201310005 201310006 201343021 201349001 201410001 201410002 201410003 201410004 201410005 201410006 201410007 201410008 201410009 201410010 201426014 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 201440008 201440009 201440010 201440011 201440012 201507008 201532023	
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	201226019 201326011 201430003 201430004 201430005 201430006 201430007 201510001 201510002 201510003 201510004 201510005 201510006 201510007 201510008 201523017 201527004	
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201314031 201322036 201326012 201328025 201341014 201444020 201444021
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201203011 201225005 201232003 201232027 201233014 201235008 201238017
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201201006 201224013 201238017 201341003 201422006 201436006 201436007
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201527006 201531001 201536015 201540005 201544022 **201549001**

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201211005 201211006 201211007 201214010 201215004 201216027 201217006
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201251007 201252001 201301008 201301011 201306009 201308008 201310019
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201322016 201322036 201324011 201328004 201328026 201328029 201330017
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201549017

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<ul style="list-style-type: none"> • S Termination Year 	1362.03-00
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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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- Section 146; Volume Cap 9100.03-00
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<ul style="list-style-type: none"> • Section 663; Special Rules Applicable to Sections 661 and 662 	9100.12-00
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<ul style="list-style-type: none"> • Section 754; Manner of Electing Optional Adjustment to Basis of Partnership Property 	9100.15-00
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<ul style="list-style-type: none"> • Section 911; Citizens or Residents of the United States Living Abroad 	9100.17-00
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<ul style="list-style-type: none"> • Section 1502; Election to File Consolidated Return 	9100.20-00
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• Section 6(c)(3) of PL 97-354; Qualified Oil Corporation 9100.21-00
201431011

• Other 9100.22-00

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• Section 642(c); Election for Estate Trust to Deduct Charitable Payments in the 9100.26-00
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• Regulation Section 1.337(d); Loss on Stock of Subsidiary 9100.29-00
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• Reg. 301.7701-3 Classification of Certain Business Entities

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

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