

Citation Index

CODE SECTIONS

Internal Revenue Code (IRC)

- §1(h)(11)(B) ... B33, C141
- §1(h)(4)(A) ... C92
- §23(b)(2)(A) ... A34
- §23(d)(1) ... A32
- §23(f)(1) ... A33
- §25 ... C166
- §25A(g)(2) ... C18
- §25C ... C175
- §25D ... C175
- §26(a) ... A34
- §32(c)(1)(B) ... A296
- §32(c)(2)(B)(vi) ... C156
- §32(c)(3)(A) ... A296
- §32(k) ... B201
- §36 ... B176, C176
- §36(c)(1) ... B176
- §36(c)(6) ... B176
- §36B ... A174
- §36B(b)(2)(B)(i) ... A113
- §36B(c)(2)(C)(ii) ... A174
- §40A(d)(1) ... B83
- §42 ... B150
- §42(a) ... B150
- §45P ... C153
- §45R ... A36
- §45R(b)(1) ... A169
- §45R(e)(2) ... A169
- §45R(g)(2) ... A168
- §47 ... B150
- §48 ... A52
- §48(a) ... A52
- §48D(f)(3) ... B188
- §56(a)(1) ... C71
- §56(b)(1) ... C71
- §56(d)(2)(A) ... C71
- §56(d)(3) ... C71
- §56(d)(a)(A) ... C71
- §58(a) ... C71
- §61 ... B180, B189–B191
- §61(a) ... B188, B190
- §61(a)(1) ... B181
- §61(a)(12) ... C72
- §61(a)(3) ... A150
- §62 ... A146, B186
- §62(a)(1) ... C127
- §62(a)(2)(E) ... C149–C150
- §62(a)(20) ... B187
- §63 ... A188
- §63(c)(5) ... A96
- §63(c)(6)(A) ... A28
- §63(d) ... A146, A149
- §67(a) ... C127, C133, C150
- §67(b) ... C133
- §68(b) ... A19
- §68(d) ... A19
- §71(b)(1)(A) ... A25
- §72 ... B189, B199, B228, B234, C202, C215
- §72(d)(1) ... C219
- §72(d)(1)(E) ... C220
- §72(m)(7) ... C15–C16
- §72(p) ... B200
- §72(t) ... B200, B226, B228–B233, C10, C12–C13, C20, C153
- §72(t)(1) ... B231
- §72(t)(10)(A) ... C24
- §72(t)(10)(B) ... C24
- §72(t)(2) ... B200, B231–B232
- §72(t)(2)(A)(i) ... C13–C14, C22
- §72(t)(2)(A)(ii) ... C13–C14
- §72(t)(2)(A)(iii) ... C13, C15
- §72(t)(2)(A)(iv) ... C13, C18
- §72(t)(2)(A)(v) ... C13, C23
- §72(t)(2)(A)(vi) ... C13, C25
- §72(t)(2)(A)(vii) ... C13
- §72(t)(2)(A)(viii) ... C13, C28
- §72(t)(2)(B) ... C13, C24
- §72(t)(2)(C) ... C13, C26
- §72(t)(2)(D) ... C24
- §72(t)(2)(D)(ii) ... C24
- §72(t)(2)(D)(iii) ... C24
- §72(t)(2)(E) ... B28, C13, C17–C18, C23
- §72(t)(2)(F) ... C13, C27
- §72(t)(2)(G)(i) ... C153
- §72(t)(2)(G)(iii) ... C28
- §72(t)(2)(G)(iii)(II) ... C13, C28
- §72(t)(3)(A) ... C24, C26
- §72(t)(3)(B) ... C18
- §72(t)(4)(A) ... C21
- §72(t)(4)(B) ... C22
- §72(t)(6) ... C12
- §72(t)(7)(A) ... C17
- §72(t)(7)(B) ... C18
- §72(t)(8)(B) ... C27
- §72(t)(8)(C) ... C27
- §72(t)(8)(D)(i)(I) ... C27
- §86 ... C208
- §86(a) ... C209
- §86(a)(1) ... C208
- §86(b)(2) ... C208
- §101(a) ... B63
- §101(g) ... B63
- §101(g)(2)(A) ... B64
- §101(g)(4)(A) ... B64
- §104 ... B180, B186
- §104(a)(1) ... B187
- §104(a)(2) ... B187
- §104(a)(3) ... B181, C191
- §105 ... A171
- §105(b) ... A171, B180
- §106 ... A171
- §108 ... B189, C73
- §108(a)(1)(A) ... C72
- §108(a)(1)(B) ... C72
- §108(a)(1)(C) ... C72
- §108(a)(1)(D) ... C72
- §108(a)(1)(E) ... C72
- §108(b) ... C73
- §108(b)(5) ... C73
- §108(c) ... C73
- §108(f) ... C72
- §108(g) ... A224
- §112(a) ... C155
- §112(a)(1) ... C155
- §112(a)(2) ... C155
- §112(c)(2) ... C155
- §112(c)(4) ... C155
- §117 ... B188
- §117(a) ... B188
- §117(b)(1) ... B188
- §121 ... A30, A239–A240, B223–B225, C27, C99, C105, C162, C166
- §125(h) ... C154
- §126 ... A223, A231
- §131 ... C199
- §131(c) ... C199
- §132 ... B29–B30, B32
- §132(b) ... B29
- §132(c) ... B29
- §132(d) ... B29
- §132(e) ... B29
- §134(b)(1) ... C156
- §135 ... C179
- §151(b) ... A29
- §151(d)(3) ... A20
- §152 ... A106, B180–B182
- §152(a) ... B180, B182
- §152(c) ... A22
- §152(c)(1) ... A23

- §152(c)(1)(D) ... A296
 §152(c)(4) ... A296
 §152(c)(4)(B) ... A23
 §152(d) ... A22
 §152(e)(2) ... A24
 §152(f)(1)(A)(i) ... A24
 §162 ... A58, A72, A141, A229,
 B30, B32, B132, B205–
 B206, B210, B212, B214,
 B220, B222
 §162(a) ... B32, B207, B210, C127
 §162(a)(2) ... B186
 §162(l) ... B30–B31
 §162(l)(2)(A) ... B30
 §162(l)(2)(B) ... B30
 §163(d) ... C141
 §163(d)(3)(B) ... C141
 §163(d)(4)(A) ... C141
 §163(d)(4)(B) ... C141
 §163(h)(2)(D) ... B202
 §163(h)(3) ... C141, C162
 §163(h)(3)(B) ... B203
 §163(h)(3)(B)(ii) ... C162
 §163(h)(3)(C)(ii) ... C162
 §163(h)(4)(i) ... C162
 §165 ... A61, A69, A146, A150,
 C105
 §165(f) ... A150
 §166 ... B233, C105
 §166(a)(1) ... B234
 §167 ... B170
 §168 ... B170, B177
 §168(f)(4) ... A190
 §168(k) ... B171
 §170 ... A235–A236, B203, B205
 §170(b)(1)(A)(ii) ... B188
 §170(b)(1)(E)(v) ... A222
 §170(h)(5)(A) ... A235
 §172 ... A182, A188, B221
 §172(b)(1)(F) ... C47
 §172(b)(1)(F)(ii)(I) ... C47
 §172(b)(1)(F)(iv) ... C47
 §172(b)(1)(G) ... C48
 §172(b)(3) ... C46, C48
 §172(i)(3) ... C48
 §174 ... B126, B132
 §175 ... A223, B126
 §175(c)(2) ... A223
 §179 ... A53, A64, A219, C140,
 C157
 §179(b)(1)(C) ... C157
 §179(b)(2)(C) ... C157
 §179(b)(3) ... C140
 §179(d)(1)(A) ... C157–C158
 §179A ... B126
 §179B ... B126
 §179C ... B126
 §179D ... B126
 §179E ... B126
 §180 ... A219, B126
 §183 ... A229, A239, B210, B212–
 B214, B220
 §183(d) ... A239
 §190 ... B126
 §193 ... B126
 §194 ... A230
 §194(a) ... A230
 §194(b) ... A230
 §194(c)(1) ... A231
 §197 ... B114
 §197(a) ... B111
 §197(c)(2) ... B114
 §197(d) ... B111
 §197(f)(4)(B) ... B111
 §199 ... A188, A199–A200, B177,
 C36, C71
 §199(a)(1) ... A188
 §199(b) ... A196, A198, B177
 §199(b)(1) ... A188
 §199(c)(1) ... A189, B177
 §199(c)(4) ... A190
 §199(c)(4)(A) ... A190
 §199(c)(4)(A)(i)(I) ... A191
 §199(c)(5) ... A190
 §199(d)(1) ... A199
 §199(d)(1)(A) ... A189, A200
 §199(d)(1)(A)(iii) ... A200
 §199(d)(2) ... A199
 §199(d)(3) ... A202
 §199(d)(3)(A)(ii) ... A201
 §199(d)(3)(F) ... A201
 §199(d)(5) ... A190
 §199(d)(6) ... A189
 §199(d)(9) ... A188
 §212 ... A72, A229, B222, C140
 §213 ... A178, C182, C184, C192,
 C198
 §213(a) ... C182
 §213(b) ... C183
 §213(d) ... C191–C192
 §213(d)(1) ... C182, C192
 §213(d)(1)(A) ... C182
 §213(d)(1)(B) ... C182
 §213(d)(1)(C) ... C182, C198
 §213(d)(1)(D) ... C182, C192
 §213(d)(10) ... C192
 §213(d)(11) ... C198
 §213(d)(9) ... C184
 §213(f) ... C24, C182
 §217(b) ... C157
 §217(g)(1) ... C156
 §219(b)(5)(B) ... C1
 §219(c) ... C1
 §219(f)(6) ... C11
 §219(g)(3)(B) ... A21–A22
 §223 ... A177
 §223(c)(2)(C) ... A179
 §223(d)(2)(C)(iii) ... C193
 §262 ... B206
 §263 ... B126
 §263A ... A45, A68, A224, A229,
 B120–B121, B177–B178
 §263A(c)(5) ... A229
 §263A(e)(4) ... A203
 §266 ... A230
 §267 ... B122
 §269A ... B37
 §269A(a) ... B37
 §269A(a)(1) ... B37
 §269A(b) ... B132
 §269A(b)(1) ... B37
 §269A(b)(2) ... B37
 §274 ... B206, B208
 §274(d) ... B207, C128
 §274(h)(7) ... C140
 §274(n) ... C133, C150
 §280A(b) ... C140
 §280F ... B206
 §280F(d)(4)(A) ... B207
 §318 ... A168, B31, B37, B132
 §318(a)(1) ... B132
 §318(a)(2) ... B132
 §318(a)(2)(C) ... B132
 §351 ... B9
 §357 ... B9
 §401 ... B172, C200
 §401(a) ... A142, A311, C219
 §401(c)(1) ... B30
 §401(k) ... B226–B227
 §403(a) ... A142
 §403(b) ... A142
 §402 ... B226
 §402(c)(11)(A) ... B172
 §403 ... B172
 §403(a) ... A311, C219
 §403(b) ... A311, C219
 §404(k) ... C25
 §404(k)(2)(A)(i) ... C25
 §404(k)(2)(A)(ii) ... C25
 §404(k)(2)(A)(iii) ... C25
 §408 ... A142, B172, B199, B226,
 B228–B229, B231, B233
 §408(d)(1) ... B228, B230, B234
 §408(d)(2) ... C4
 §408(d)(3) ... B200

§408(d)(3)(A) ... B230, B234
 §408(d)(3)(B) ... B230
 §408(d)(4) ... C13
 §408(d)(5) ... C13
 §408(e)(2)(A) ... B227
 §408(m) ... C92
 §408(o) ... C2
 §408(o)(2)(B) ... C2
 §408A ... A142, B172
 §414 ... A167–A168, B172
 §414(p)(1)(B) ... C25
 §414(p)(2) ... C25
 §414(p)(3) ... C25
 §446(a) ... A51, B118
 §446(b) ... B118
 §446(c) ... B118
 §446(c)(4) ... B129
 §446(d) ... B118
 §446(e) ... B118
 §446(f) ... A74
 §447 ... B121
 §447(d) ... B121
 §448 ... B37, B118, B120–B121
 §448(c) ... B119
 §448(d)(2) ... B37, B121
 §448(d)(3) ... B121
 §448(d)(5) ... B119
 §448(d)(6) ... B120
 §451(a) ... B118
 §451(e) ... A225
 §457 ... B172
 §457(b) ... A142
 §461 ... B118, B126
 §461(c) ... B126
 §461(h)(3) ... B125
 §461(i)(1) ... B125
 §461(j)(4)(C)(ii) ... A223
 §461(j)(4)(C)(ii)(II) ... A223
 §464 ... A234–A235
 §464(c) ... A234
 §464(c)(1) ... A234
 §464(c)(2)(A) ... A234
 §465(a)(1)(B) ... B132
 §469 ... A141, A144, A180, A183–
 A184, B25, B216–B218,
 B220–B222, C38, C141,
 C144
 §469(a) ... B220, B222
 §469(a)(2) ... B131
 §469(b) ... B149, B222
 §469(c)(1) ... B132, B217
 §469(c)(2) ... A152, B132, B140
 §469(c)(7) ... A155
 §469(c)(7)(A) ... B142
 §469(c)(7)(A)(ii) ... B219

§469(c)(7)(B) ... A155, B141–
 B142
 §469(c)(7)(B)(i) ... B141
 §469(c)(7)(B)(ii) ... B141
 §469(c)(7)(C) ... B141
 §469(c)(7)(D)(ii) ... B141
 §469(d)(1) ... B149
 §469(f) ... B152
 §469(g) ... B151, B222
 §469(g)(1) ... B150
 §469(g)(1)(A) ... A181
 §469(h)(1) ... B133
 §469(h)(3) ... A183
 §469(h)(5) ... A187
 §469(i) ... B140, B143–B144
 §469(i)(1) ... B143, B145
 §469(i)(3) ... B145
 §469(i)(3)(F) ... B145
 §469(i)(4)(A) ... B145
 §469(i)(4)(B) ... B145
 §469(i)(5) ... B145
 §469(i)(6)(A) ... B143
 §469(i)(6)(B) ... B143
 §469(i)(6)(D) ... B143
 §469(j)(1) ... B132
 §469(j)(2) ... B132
 §469(j)(2)(B) ... B132
 §469(j)(9) ... B150
 §475 ... C146
 §475(a)(2) ... C146
 §475(b)(1)(A) ... C146
 §475(b)(1)(B) ... C146
 §475(b)(2) ... C146
 §475(c)(4) ... C146
 §475(e)(1) ... C146
 §475(e)(2) ... A141, A184, C144
 §475(e)(2)(C) ... A184
 §475(f) ... C148–C149
 §475(f)(3) ... C146
 §481 ... A74
 §481(a) ... A58, A68, A73–A74
 §501 ... C200
 §501(a) ... B172, B180, B238–
 B239
 §501(c)(3) ... B238
 §501(c)(9) ... B180–B181
 §529 ... B45–B46
 §529(b)(2) ... B45
 §529(b)(3) ... B45
 §529(b)(4) ... B45
 §529(b)(5) ... B45
 §529(b)(6) ... B45
 §529(c)(2)(A)(i) ... B46
 §529(c)(2)(B) ... B46
 §529(c)(3)(C)(iii) ... B48
 §529(c)(4)(C) ... B46

§529(c)(5)(B) ... B46–B47
 §529(e)(1) ... B46
 §529(e)(2) ... B47
 §529(e)(3) ... B48, C17
 §532(b) ... B35
 §535(b) ... B36
 §535(c) ... B36
 §612 ... A238, B149
 §613 ... C114
 §613A ... A238, C114
 §616 ... B126
 §631 ... A229
 §631(a) ... A228
 §631(b) ... A229
 §641(a) ... A138
 §651 ... A139
 §661 ... A139
 §671 ... A320
 §679 ... A320
 §704(b) ... A200
 §731(a) ... A158
 §736(a)(1) ... A157
 §736(a)(2) ... A157–A158
 §736(b) ... A157
 §751 ... A200, B81
 §754 ... B81
 §761(f)(1) ... B25
 §851(b)(3)(B) ... B81
 §861 ... A193
 §879(a) ... A15
 §911 ... A96, B185–B186, C179
 §936 ... B177, C114
 §1001 ... B221–B222
 §1014 ... A237
 §1014(a)(3) ... A237–A238
 §1017 ... C73
 §1031 ... A232, A235, B151,
 B208–B209, C105
 §1033 ... A231
 §1033(a) ... C176
 §1035 ... C223
 §1038 ... A239–A240, B223–
 B224
 §1038(a) ... B224
 §1038(b) ... A239, B224
 §1038(e) ... B224
 §1041 ... B208
 §1041(b)(1) ... B209
 §1041(b)(2) ... B209
 §1091 ... C140
 §1091(a) ... C140
 §1092(d)(1) ... A184
 §1201 ... B174
 §1201(a) ... B115, B174
 §1202 ... C36, C42, C45, C113,
 C119

2014 Workbook

§1202(e)(3) ... C114	§1411(c)(2)(A) ... A187, B139	§4975(e) ... B227
§121 ... B224	§1411(c)(2)(B) ... A159	§4980D ... A172
§1211 ... B162	§1411(c)(3) ... A185	§4980H(b)(1) ... A168
§1211(a) ... B115	§1411(c)(4) ... A185	§4980H(c)(2)(A) ... A167
§1211(b) ... C86, C140, C147	§1411(c)(5) ... A142	§4980H(c)(2)(B)(i) ... A167
§1211(b)(1) ... C86	§1411(c)(6) ... A142	§4980H(c)(2)(E) ... A167
§1212(b) ... C44, C86	§2010(c) ... A38	§5000A ... A111
§1212(b)(2) ... C86	§2032 ... A228	§5000A(b)(1) ... A91, A107
§1221 ... B114, B174	§2032A ... A39–A40, A220, A237–A238	§5000A(b)(3)(A) ... A106
§1221(a)(1) ... B174, C144	§2032A(b) ... A183	§5000A(b)(3)(B) ... A110
§1221(a)(4) ... B113	§2032A(b)(1)(C)(ii) ... A183, A219	§5000A(c)(2)(B) ... A109
§1221(a)(6) ... C86	§2032A(b)(4) ... A183, A219	§5000A(c)(3)(C) ... A107
§1221(a)(7) ... C86	§2032A(b)(5) ... A183, A219	§5000A(c)(3)(D)(ii) ... A109
§1223(9) ... A228	§2032A(e)(2) ... A40	§5000A(c)(4)(A) ... A96
§1231 ... A68, A228–A229	§2032A(e)(5) ... A222	§5000A(c)(4)(B) ... A108
§1236 ... C144–C145	§2056(a) ... A37	§5000A(e)(1)(A) ... A96
§1236(c) ... C145	§2056(b)(7) ... A39	§5000A(e)(1)(B)(i) ... A97
§1236(d)(2) ... C145	§2513 ... A37	§5000A(e)(4) ... A104–A105
§1245 ... A52–A54, B113–B114, C92	§2523(a) ... A37	§5000A(f)(1)(A) ... A92
§1245(b)(8) ... B114	§3101 ... B179, B181	§5000A(f)(1)(A)(i) ... C177
§1250 ... A54, C92	§3101(b)(1) ... C178	§6001 ... B207
§1253 ... B111	§3101(b)(2) ... A20, A161–A162, A166	§6012(a)(1)(A)(iv) ... A100
§1256 ... A184	§3101(b)(6) ... C178	§6013(a)(1) ... A138
§1301(b)(2) ... A222	§3102 ... B182	§6013(b)(2)(B) ... A7
§1311 ... A74	§3102(f)(1) ... A162	§6015(c)(4)(B) ... A10
§1314 ... A74	§3111 ... B181, B235	§6018 ... B183
§1341 ... B43	§3121 ... B78, B179, B235	§6020(b) ... A271
§1361(a)(1) ... B105	§3121(a) ... A198, B179	§6033 ... B194
§1361(b) ... B11	§3121(a)(13)(A) ... B179	§6041 ... C158
§1361(b)(1) ... B105	§3121(a)(8) ... A226	§6073 ... A220
§1361(b)(1)(B) ... B23	§3121(a)(8)(A) ... A198	§6075 ... B183
§1361(b)(3) ... B23, B106	§3121(a)(8)(B)(i) ... A226	§6103 ... B194–B195
§1361(c)(2) ... B23	§3121(a)(8)(B)(ii) ... A226	§6166 ... A41
§1362(b)(3) ... B106	§3121(b) ... B78, B179	§6211 ... B199
§1362(b)(5) ... B106	§3121(b)(3) ... B26	§6211(a) ... B199
§1366 ... B234–B235	§3121(b)(3)(A) ... A198	§6211(b)(4) ... B199
§1366(b) ... A222	§3121(n) ... C149	§6213 ... B188
§1372(a) ... B31	§3201(a) ... A166	§6213(b)(1) ... C50
§1372(b) ... B31	§3301 ... B181, B235, C197	§6224(c)(1) ... A244
§1401 ... B188	§3306(b) ... C197	§6224(c)(3) ... A244
§1401(b) ... A160	§3306(b)(11) ... A226	§6231(a)(7) ... A244
§1401(b)(2) ... A162, A166	§3306(c)(5) ... B78	§6324 ... B184
§1401(b)(2)(B) ... A166	§3401 ... B179–B180	§6324(a)(2) ... B184
§1402 ... B188	§3401(a) ... A198, B180	§6334(a) ... C26
§1402(a)(13) ... A186	§3401(d) ... B77, B182	§6334(a)(13)(A) ... C26
§1411 ... A20, A152, A179, A182	§3401(d)(1) ... B77, B181–B182	§6334(a)(13)(B)(i) ... C26
§1411(a)(1) ... A135, C144	§3402 ... A228, B179	§6334(a)(2) ... C26
§1411(a)(2) ... A135, A139	§3402(o) ... B180	§6334(e)(1)(A) ... C26
§1411(c) ... A141, A146, A150, C144	§3405(b) ... C12	§6334(e)(2) ... C26
§1411(c)(1) ... A141, A146	§4973 ... C10	§6426(b) ... B83
§1411(c)(1)(A)(iii) ... A141, A160, A184	§4975 ... B226–B227	§6426(b)(4)(A) ... B83
§1411(c)(2) ... A141	§4975(c) ... B227	§6426(c) ... B83
		§6426(d) ... B83
		§6426(e) ... B83

§6501 ... B237
 §6501(a) ... B237
 §6501(c)(9) ... A41
 §6501(e) ... B237
 §6502 ... A10
 §6511 ... A10, A41
 §6511(a) ... A7
 §6651 ... B174, B183, B212,
 B214, B226, B235–B236
 §6651(a)(1) ... B174–B175, B183,
 B212–B213, B215–B216,
 B236
 §6654 ... A185
 §6654(i) ... A221
 §6654(i)(2) ... A220
 §6654(i)(2)(A) ... A221
 §6654(i)(2)(B) ... A221
 §6656 ... B235–B236
 §6662 ... A74, B170, B196, B198–
 B199, B203, B205, B210,
 B212, B214, B216, B221,
 B224, B226, B228–B229,
 B231
 §6662(a) ... B171, B189–B190,
 B197–B198, B200, B202,
 B204, B209–B213, B215–
 B217, B225, B229–B232
 §6662(a)(1)(A) ... B199
 §6662(d) ... B189–B190
 §6662(d)(2)(c) ... A250
 §6662A ... B201
 §6663 ... A74, B170, B201
 §6663(a) ... B171
 §6664 ... B196, B198–B199, B229
 §6664(a) ... B199
 §6664(a)(1)(A) ... B199
 §6664(c)(1) ... B197
 §6672 ... B101, B103, B105
 §6672(a) ... B102
 §6676 ... B201
 §6676(a) ... B201
 §6677 ... A320
 §6693(b)(1) ... C7
 §6693(b)(2) ... C7
 §6694 ... A74, A248, A250, B192
 §6694(a) ... A250, A254
 §6694(a)(2) ... A248
 §6694(b) ... A250, A252, A254
 §6695 ... B192
 §6695(g) ... A292
 §6707A(c) ... A248
 §6713 ... B192
 §7201 ... B239
 §7216 ... A244, A255
 §7216(a) ... A254

§7422 ... B218, B224
 §7428 ... B238
 §7431 ... B194
 §7431(c) ... B195
 §7436 ... B235
 §7491 ... B237
 §7491(a) ... B139
 §7525 ... A255–A256
 §7525(a)(3)(A) ... A255
 §7701 ... B192
 §7701(a)(31)(B) ... A140
 §7701(b)(1)(B) ... A138
 §7702B ... C182, C191–C192
 §7702B(a) ... C191
 §7702B(a)(1) ... C191
 §7702B(a)(2) ... C191
 §7702B(b) ... C192
 §7702B(b)(1) ... C192
 §7702B(b)(2)(B)(i) ... C192
 §7702B(c) ... C192
 §7702B(c)(1) ... C182, C184,
 C192
 §7702B(C)(2) ... B67
 §7702B(c)(2) ... C182
 §7702B(c)(2)(B) ... C182
 §7702B(c)(3) ... C198
 §7702B(d)(1) ... C193
 §7702B(d)(2) ... C193
 §7703 ... A4, B228
 §7704 ... B80, B83
 §7704(a) ... B83
 §7704(b) ... B83
 §7704(c)(3) ... B83
 §7704(d)(1) ... B83
 §9831(a)(2) ... A172
 §9831(b) ... A172

§1.62-2(d)(2) ... C127
 §1.62-2(e) ... C127–C128
 §1.62-2(f) ... C127
 §1.62-2(g)(2) ... C130
 §1.62-2(h)(2)(i)(A) ... C131
 §1.72-11(f) ... C217
 §1.72-17A(f) ... C16
 §1.72-17A(f)(1) ... C15
 §1.72-17A(f)(2) ... C15–C16
 §1.83-6(a)(2) ... A228
 §1.106-1 ... A31
 §1.112-1(a)(2) ... C155
 §1.112-1(b)(4) ... C155
 §1.121-1(c)(2) ... C106
 §1.121-1(e)(1) ... C110
 §1.121-3 ... C107–C108
 §1.121-3(e) ... C108
 §1.121-3(f) ... C108
 §1.121-3(g)(1) ... C109
 §1.132-1 ... B30
 §1.132-1(b) ... B30
 §1.152-4(d)(1) ... A24
 §1.162-1 ... A65, A72
 §1.162-11 ... A44
 §1.162-3 ... A44–A45
 §1.162-3(a)(1) ... A45, A49
 §1.162-3(a)(3) ... A49
 §1.162-3(c)(1) ... A45
 §1.162-3(c)(1)(i) ... A46, A49
 §1.162-3(c)(2) ... A46
 §1.162-3(c)(3) ... A46, A49, A66
 §1.162-3(c)(4) ... A45
 §1.162-3(c)(4)(i) ... A45
 §1.162-3(d) ... A48, A67
 §1.162-3(d)(2) ... A49
 §1.162-3(d)(3) ... A49
 §1.162-3(e) ... A59, A67
 §1.162-3(e)(1)-(2) ... A50
 §1.162-3(h) ... A46
 §1.162-3(i) ... A51, A73
 §1.162-3(j)(2) ... A51
 §1.162-3(j)(2)(i) ... A76
 §1.162-3(j)(2)(ii) ... A76
 §1.162-3(j)(3) ... A51, A77
 §1.162-4 ... A44, A58
 §1.162-4(b) ... A58
 §1.162-4(c)(3) ... A77
 §1.162-5 ... B206
 §1.162-7(a) ... B35
 §1.162-7(b)(3) ... B35
 §1.163(d)-1(a) ... C141
 §1.163(d)-1(b) ... C141
 §1.165-2 ... A44
 §1.165-7 ... A61, A68
 §1.165-8(a)(2) ... C54

REGULATIONS

Treasury Regulations

§1.36B-4(a)(1)(i) ... A116
 §1.36B-5 ... A112
 §1.48-1(e)(1) ... A52
 §1.48-1(e)(2) ... A52
 §1.61-21(a)(3) ... B181
 §1.61-21(a)(4) ... B181
 §1.61-21(b)(1) ... B181
 §1.61-6(a) ... B61–B62
 §1.61-8(c) ... A56
 §1.62-1(a) ... C133
 §1.62-2(c)(1) ... C127
 §1.62-2(c)(4) ... C127
 §1.62-2(c)(5) ... C132
 §1.62-2(d) ... C127

§1.167-4 ... A44
 §1.167(a)-1(b) ... A45
 §1.167(a)-11(e)(1)(1) ... B171
 §1.167(a)-7 ... A44
 §1.167(a)-8 ... A44
 §1.168(i)-7 ... A44
 §1.170A-14(a) ... A235
 §1.175-3 ... A218
 §1.178-1(b)(1) ... B111
 §1.178-1(b)(5) ... B112
 §1.179-1(f)(2) ... A207
 §1.179-2(c)(6) ... C158
 §1.183-2(b) ... B211, B213, B215
 §1.199-1(a) ... A201
 §1.199-1(b) ... A201
 §1.199-1(d)(3) ... A192
 §1.199-1(d)(3)(i) ... A192, A203
 §1.199-1(e) ... A189
 §1.199-2(a)(3) ... A198
 §1.199-3(a)(1) ... A190
 §1.199-3(c) ... A193
 §1.199-3(e)(2) ... A190
 §1.199-3(f)(1) ... A191
 §1.199-3(g)(2) ... A191
 §1.199-3(g)(3) ... A191
 §1.199-3(h)(9) ... A192
 §1.199-3(i)(1)(iii) ... A191
 §1.199-3(i)(3) ... A192
 §1.199-4(d) ... A193
 §1.199-4(e) ... A193
 §1.199-4(f) ... A193
 §1.199-4(g) ... A193
 §1.199-5(b) ... A199
 §1.199-5(c) ... A200
 §1.199-5(d) ... A199
 §1.199-6(a) ... A201
 §1.199-6(g) ... A201
 §1.199-6(h) ... A201
 §1.199-6(i) ... A202
 §1.199-6(j) ... A202
 §1.199-6(l) ... A202–A203
 §1.199-8(c)(2) ... A193
 §1.213-1(a) ... B117
 §1.213-1(e)(1)(iii) ... C183
 §1.217-2(b)(1) ... C156
 §1.217-2(b)(2) ... C156
 §1.217-2(b)(3) ... C156
 §1.217-2(g)(3) ... C156
 §1.217-2(g)(4) ... C156
 §1.262-1(b)(8) ... C152
 §1.263-3(e)(3)(ii) ... A54
 §1.263(a)-1 ... A44
 §1.263(a)-1(c)(1) ... A75
 §1.263(a)-1(f) ... A65, A67, A75, A77

§1.263(a)-1(f)(2) ... A67
 §1.263(a)-1(f)(3) ... A67
 §1.263(a)-1(f)(3)(iii) ... A68
 §1.263(a)-1(f)(3)(vi) ... A66
 §1.263(a)-1(f)(3)(vii) ... A66
 §1.263(a)-1(f)(4) ... A65
 §1.263(a)-1(f)(5) ... A67, A76
 §1.263(a)-1(f)(6) ... A67–A68
 §1.263(a)-1(f)(7) ... A66
 §1.263(a)-1(g) ... A67
 §1.263(a)-1(h)(2) ... A76
 §1.263(a)-1(h)(2)(ii) ... A76
 §1.263(a)-2 ... A44, A64
 §1.263(a)-3 ... A44
 §1.263(a)-3(b)(1) ... A58
 §1.263(a)-3(d) ... A53, A57, A59, A70, A72
 §1.263(a)-3(d)(1) ... A60
 §1.263(a)-3(e)(2) ... A52
 §1.263(a)-3(e)(2)(i) ... A52
 §1.263(a)-3(e)(2)(ii) ... A53
 §1.263(a)-3(e)(2)(ii)(B) ... A53
 §1.263(a)-3(e)(2)(iii) ... A54
 §1.263(a)-3(e)(2)(iv) ... A55
 §1.263(a)-3(e)(2)(v) ... A55
 §1.263(a)-3(e)(2)(v)(B) ... A55
 §1.263(a)-3(e)(3)(ii)(A) ... A56
 §1.263(a)-3(e)(3)(ii)(B) ... A56
 §1.263(a)-3(e)(3)(iii) ... A56
 §1.263(a)-3(e)(3)(iv) ... A56
 §1.263(a)-3(e)(4) ... A57
 §1.263(a)-3(e)(5)(i) ... A56–A57
 §1.263(a)-3(e)(5)(ii) ... A57
 §1.263(a)-3(e)(6) ... A54
 §1.263(a)-3(f) ... A70
 §1.263(a)-3(f)(2) ... A56
 §1.263(a)-3(g)(3) ... A57
 §1.263(a)-3(h) ... A70
 §1.263(a)-3(h)(10) ... A72
 §1.263(a)-3(h)(3) ... A71
 §1.263(a)-3(h)(3)(iv) ... A71
 §1.263(a)-3(h)(5) ... A71
 §1.263(a)-3(h)(5)(ii) ... A71
 §1.263(a)-3(h)(6) ... A72, A76
 §1.263(a)-3(h)(7) ... A72
 §1.263(a)-3(h)(8) ... A71
 §1.263(a)-3(i) ... A68
 §1.263(a)-3(i)(1) ... A68
 §1.263(a)-3(i)(1)(i) ... A69
 §1.263(a)-3(i)(1)(ii) ... A69
 §1.263(a)-3(i)(2) ... A70
 §1.263(a)-3(i)(3) ... A68
 §1.263(a)-3(i)(4) ... A61
 §1.263(a)-3(i)(6) ... A70
 §1.263(a)-3(j) ... A53, A59–A60

§1.263(a)-3(j)(2)(ii) ... A59
 §1.263(a)-3(j)(2)(iii) ... A60
 §1.263(a)-3(j)(2)(iv) ... A60
 §1.263(a)-3(j)(3) ... A60
 §1.263(a)-3(k) ... A53, A61
 §1.263(a)-3(k)(1)(iii) ... A61
 §1.263(a)-3(k)(1)(v) ... A61
 §1.263(a)-3(k)(4) ... A61
 §1.263(a)-3(k)(5) ... A61
 §1.263(a)-3(k)(6) ... A62
 §1.263(a)-3(k)(6)(A) ... A59
 §1.263(a)-3(k)(6)(i)(A) ... A62
 §1.263(a)-3(k)(6)(i)(B) ... A62
 §1.263(a)-3(k)(6)(ii) ... A62
 §1.263(a)-3(k)(7) ... A61–A63
 §1.263(a)-3(l) ... A53, A63
 §1.263(a)-3(l)(3) ... A64–A65
 §1.263(a)-3(m) ... A58
 §1.263(a)-3(n) ... A59
 §1.263(a)-3(n)(2) ... A59
 §1.263(a)-3(n)(3) ... A59
 §1.263(a)-3(q) ... A68, A73
 §1.263(a)-3(r)(2) ... A76
 §1.263(a)-4(f)(5)(ii) ... A71
 §1.263(a)-6 ... A44
 §1.263A-4(a)(4)(i) ... A224
 §1.274-5(c)(2)(iii) ... C128
 §1.274-5(f)(4) ... C128
 §1.274-5(g)(2)(ii) ... C130
 §1.274-5(j)(2) ... B207
 §1.411-4(f)(3) ... C144
 §1.446-1(c)(1)(iv) ... B120
 §1.446-1(c)(2)(i) ... B120
 §1.461-1 ... B126
 §1.461-1(g) ... B126
 §1.461-2 ... B126
 §1.461-4 ... B126
 §1.461-5 ... B125–B126
 §1.461-5(c) ... B125
 §1.461-6 ... B126
 §1.469-0 ... A152
 §1.469-1(e)(4)(iv) ... B148
 §1.469-11 ... A152
 §1.469-11(b)(3)(iv) ... A144–A145, A181, B155–B156, B158
 §1.469-2(e)(2)(iii) ... A157–A158
 §1.469-2(f)(5) ... A154
 §1.469-2(f)(6) ... A156
 §1.469-4 ... B154, B156
 §1.469-4(b)(1) ... B132
 §1.469-4(c) ... A144, A180
 §1.469-4(c)(1) ... B154
 §1.469-4(c)(2) ... B154

§1.469-4(d)(1) ... A153, A180–A181
 §1.469-4(d)(5) ... B159
 §1.469-4(e) ... A144
 §1.469-4(e)(1) ... B156
 §1.469-4(e)(2) ... B156–B157
 §1.469-4(f) ... B156
 §1.469-4(g) ... B152, B156
 §1.469-6 ... B151
 §1.469-7 ... A182
 §1.469-9 ... B152
 §1.469-9(b)(3) ... B141
 §1.469-9(b)(4) ... B141, B147
 §1.469-9(b)(6) ... B141
 §1.469-9(c)(4) ... B142
 §1.469-9(c)(5) ... B141
 §1.469-9(e)(1) ... A153
 §1.469-9(e)(3)(i) ... B142
 §1.469-9(g) ... B142, B158
 §1.469-9(g)(3) ... B158
 §1.469-9(j) ... B145
 §1.471-5 ... C145
 §1.471-2(c) ... B122
 §1.612-4(a) ... B149
 §1.1017-1 ... C73
 §1.1031(k)-1(g)(4) ... B208
 §1.1031(k)-1(g)(4)(iii) ... B209
 §1.1031(k)-1(k)(3) ... B209
 §1.1091-1 ... C140
 §1.1275-4(b) ... A146
 §1.1275-7(f)(1) ... A146
 §1.1301-1(b)(1)(iv) ... A222
 §1.1301-1(b)(2) ... A219
 §1.1301-1(d)(1) ... A205
 §1.1301-1(d)(2) ... A204
 §1.1301-1(e)(1)(i) ... A221
 §1.1301-1(e)(2)(i) ... A205
 §1.1301-1(e)(ii) ... A205
 §1.1361-1(b)(1)(iii) ... B23
 §1.1361-1(e) ... B235
 §1.1361-1(j) ... B23
 §1.1401-1(d)(2) ... A164, A166
 §1.1402-5(a)-(2)(g) ... A186
 §1.1402(a)-(1)(b) ... A186
 §1.1402(a)-13(c) ... A221
 §1.1402(a)-13(d) ... A221
 §1.1402(a)-4(b) ... A221
 §1.1402(c)-3(c) ... A221
 §1.1411-0 ... A152
 §1.1411-1(a) ... A146
 §1.1411-1(d)(5) ... A135
 §1.1411-10 ... A152
 §1.1411-2(a)(1) ... A138
 §1.1411-2(a)(2)(v) ... A140
 §1.1411-2(d) ... C144
 §1.1411-2(d)(1)(ii) ... A140

§1.1411-3(b)(2)(ii) ... A140
 §1.1411-3(b)(ix) ... A140
 §1.1411-3(b)(viii) ... A140
 §1.1411-3(c) ... A140
 §1.1411-3(d) ... A140
 §1.1411-3(e) ... A139
 §1.1411-4(2)(b)(2)(ii) ... A184
 §1.1411-4(b)(3) ... A141
 §1.1411-4(d)(2) ... A182
 §1.1411-4(f) ... A146
 §1.1411-4(f)(2) ... A146
 §1.1411-4(f)(2)(v) ... A148
 §1.1411-4(f)(3) ... A149
 §1.1411-4(f)(4) ... A150, A182
 §1.1411-4(f)(4)(ii) ... A151
 §1.1411-4(g)(6) ... A152–A153, A156
 §1.1411-4(g)(6)(ii) ... A153
 §1.1411-4(g)(7) ... A152, A155
 §1.1411-4(h) ... A146
 §1.1411-5(a)(2) ... A184
 §1.1411-5(b) ... A153
 §1.1411-5(b)(2) ... A144, A155, A157
 §1.1411-5(b)(3) ... A153
 §1.1411-5(b)(ii) ... A143
 §1.1411-6(a) ... A143
 §1.1411-6(b) ... A143
 §1.1411-9 ... A160
 §1.1411-9(b) ... A159
 §1.5000A-1(b)(1) ... A91, A104
 §1.5000A-1(c) ... A106
 §1.5000A-1(c)(2)(ii) ... A107
 §1.5000A-1(d)(10)(i)(B) ... A96
 §1.5000A-1(d)(10)(i)(B)(2) ... A99
 §1.5000A-1(d)(4) ... A96
 §1.5000A-2 ... A92–A93
 §1.5000A-2(b) ... A92
 §1.5000A-2(d) ... A93
 §1.5000A-3 ... A93
 §1.5000A-3(e)(1) ... A96
 §1.5000A-3(e)(3) ... A97
 §1.5000A-3(e)(3)(i)(B) ... A99
 §1.5000A-3(e)(3)(ii)(C) ... A100
 §1.5000A-3(e)(4) ... A99
 §1.5000A-3(e)(4)(ii)(B)(2) ... A100
 §1.5000A-3(e)(4)(ii)(B)(2)(ii) ... A100
 §1.5000A-3(e)(ii)(A) ... A97
 §1.5000A-3(f) ... A100
 §1.5000A-3(f)(3) ... A102
 §1.5000A-3(h)(3) ... A104
 §1.5000A-3(ii)(B) ... A98
 §1.5000A-3(j) ... A104

§1.5000A-3(j)(2)(ii) ... A105
 §1.5000A-3(j)(2)(iii) ... A105
 §1.5000A-3(j)(3)(ii) ... A105
 §1.6013-4(d) ... A13
 §1.6013-6(a)(1) ... A138
 §1.6015-1(b) ... A13
 §1.6015-2(d) ... A14
 §1.6050W-1(b)(5) ... A276
 §1.6050W-1(c) ... A275
 §1.6050W-1(g) ... A276
 §1.6050W-1(h)(1) ... A276
 §1.6073-1(B)(2) ... A217
 §1.6662-3(b)(3) ... A250
 §1.6662-4(d) ... A249
 §1.6662-4(d)(3)(i) ... A249
 §1.6662-4(d)(3)(iii) ... A249, B166
 §1.6662-4(f) ... A249
 §1.6662-4(f)(1) ... A249
 §1.6664-2(c) ... B198
 §1.6694-1(e)(1) ... A250
 §1.6694-1(f) ... A252
 §1.6694-2(d)(3) ... A249
 §1.6694-2(e)(1) ... A250
 §1.6694-2(e)(2) ... A250
 §1.6694-2(e)(3) ... A251
 §1.6694-2(e)(4) ... A251
 §1.6694-2(e)(6) ... A251
 §1.6694-3(b) ... A252
 §1.6694-3(f) ... A254
 §1.6695-2 ... A292
 §1.6695-2(b) ... A291
 §1.6695-2(c) ... A293
 §1.6695-2(d) ... A293
 §20.2032A-8 ... A40
 §20.2056(b)-7 ... A39
 §31.3102-4(a) ... A162
 §31.3102-4(b) ... A163
 §31.3102-4(c) ... A163
 §31.3202-1(g)(3) ... A163
 §31.3401(c)-1(b) ... B77
 §31.3401(c)-1(d) ... B77
 §31.3401(d)-1(h) ... B77
 §31.3402(g)-1(a)(1) ... B182
 §31.3402(g)-1(a)(7) ... B182
 §31.6205-1(b)(4) ... A163
 §31.6205-1(d)(1) ... A163
 §31.6413(a)-1(a)(2) ... A163
 §31.6413(a)-1(a)(2)(iv) ... A164
 §31.6413(a)-2(b) ... A163
 §36B-3(f) ... A113
 §46.4376-1 ... A175
 §46.4376-1(c)(2) ... A176
 §54.4980H-2 ... A119
 §54.4980H-4(a) ... A120
 §301.6334-1(a)(13)(i) ... C26

§301.6334-1(e) ... C26
 §301.6343-1(b)(4) ... A12
 §301.7216-2 ... A254
 §301.7216-3 ... A254
 §301.7216-3(a)(1) ... A254
 §301.7216-3(a)(3) ... A254
 §301.7701-1 ... B3
 §301.7701-1(a)(1) ... B3
 §301.7701-2 ... B3
 §301.7701-2(b)(2) ... B4
 §301.7701-2(c)(2)(iv) ... B26
 §301.7701-3 ... B3, B9, B24, B146
 §301.7701-3(a) ... B4
 §301.7701-3(b) ... B4, B11–B12
 §301.7701-3(b)(1) ... B11
 §301.7701-3(c)(1) ... B11–B12
 §301.7701-3(c)(1)(iii) ... B5, B8
 §301.7701-3(c)(1)(iv) ... B8
 §301.7701-3(c)(1)(v)(C) ... B11
 §301.7701-3(g)(1) ... B8
 §301.7701-3(g)(2)(i) ... B8
 §301.7701-3(g)(3)(i) ... B8
 §301.7701-4(a) ... A139
 §301.9100-3 ... A39

Temporary Treasury Regulations

§1.62-1T(e)(3) ... C150
 §1.67-1T(a)(1)(i) ... C133
 §1.162-3T ... A49, A51
 §1.274-5T(c)(1) ... C134
 §1.274-6T ... C128
 §1.448-1T ... B37
 §1.448-1T(e)(5)(i) ... B37
 §1.469-1T(e)(3)(i) ... A152, B140
 §1.469-1T(e)(3)(ii) ... A152, B140
 §1.469-1T(e)(3)(ii)(A) ... B144
 §1.469-1T(e)(4)(i) ... B148
 §1.469-1T(e)(4)(v)(A) ... B148
 §1.469-1T(e)(4)(v)(B) ... B148
 §1.469-1T(f)(2)(i) ... B152
 §1.469-1T(f)(2)(i)(C) ... B152
 §1.469-1T(f)(2)(iii) ... B152
 §1.469-2T(b)(1) ... B162
 §1.469-2T(c)(2) ... B162
 §1.469-2T(c)(3)(ii) ... A141
 §1.469-2T(c)(3)(iii)(B) ... A143
 §1.469-2T(d)(1) ... B162
 §1.469-2T(d)(5) ... B162
 §1.469-5T ... A144
 §1.469-5T(a)(1) ... B146
 §1.469-5T(a)(4) ... A156
 §1.469-5T(a)(5) ... B137, B146
 §1.469-5T(a)(6) ... B138, B146

§1.469-5T(a)(7) ... B139
 §1.469-5T(b)(2)(ii) ... B139
 §1.469-5T(b)(2)(iii) ... B139
 §1.469-5T(c) ... A156
 §1.469-5T(f)(4) ... B139
 §1.469-5T(g) ... B147
 §1.163-10T(o)(1) ... B203
 §1.171-2T(a)(4)(i)(C) ... A149
 §1.469-2T(c)(3)(ii) ... A143
 §1.469-2T(c)(3)(ii)(E) ... A143
 §1.469-2T(f) ... B137
 §1.469-5T ... B25
 §1.469-5T(a) ... B134, B217
 §1.469-5T(a)(1) ... B217
 §1.469-5T(a)(3) ... B135, B217
 §1.469-5T(a)(4) ... B136
 §1.469-5T(a)(7) ... B217
 §1.469-5T(b)(2)(ii) ... B133
 §1.469-5T(c)(1)(i) ... B136
 §1.469-5T(c)(1)(ii) ... B136
 §1.469-5T(c)(2) ... B136
 §1.469-5T(e)(1) ... B146
 §1.469-5T(e)(2) ... B146
 §1.469-5T(e)(3) ... B146
 §1.469-5T(e)(3)(ii) ... B147
 §1.469-5T(f)(2)(i) ... B133
 §1.469-5T(f)(2)(ii) ... B133
 §1.469-5T(f)(3) ... B134
 §1.1502-
 21T(b)(3)(v)(A)(2) ... C46
 §31.3121(b)(3)-1(T) ... B26
 §31.3121(b)(3)-1(T)(f) ... B26

Proposed Treasury Regulations

§1.125-1(e)(1) ... C154
 §1.280A-2 ... C166
 §1.469-5(e) ... B146
 §1.469-5(e)(3)(i) ... B146
 §1.529-1(c) ... B46
 §1.529-2(i)(1) ... B45
 §1.529-5(b)(3)(ii) ... B47
 §1.1301-1(b) ... A203
 §1.1402(a)-2(g) ... A186
 §1.1402(a)-2(h)(2) ... A186
 §1.1402(a)-2(h)(3) ... A187
 §1.1402(a)-2(h)(4) ... A187
 §1.1411-3(c)(1)(ii) ... A185
 §1.1411-3(c)(2) ... A185
 §1.1411-4(g)(10) ... A158
 §1.1411-4(g)(11) ... A157
 §1.1411-4(g)(11)(i) ... A157
 §1.1411-4(g)(11)(ii) ... A157
 §1.1411-4(g)(11)(ii)(B) ... A157

§1.1411-4(g)(11)(iii)(A) ... A158
 §1.1411-4(g)(11)(iv) ... A158
 §1.5000A-2(b)(2)(vii) ... A92

COURT CASES

ADVO, Inc. et al. v. Comm'r ... A190–A191, B177
Alexander v. Comm'r ... B199
Allen v. Comm'r ... C54
ALT Hotel LLC v. DiamondRock Allerton Owner ... B18
Amazon.com LLC v. New York State Department of Taxation and Finance, et al. ... C161
Andersen v. Comm'r ... B196
Anderson v. Comm'r ... B235
Arberg v. Comm'r ... C140–C141
Aris Valdis Jende and Marilyn Jane Jende v. Comm'r ... A153, B140
ASARCO LLC v. Americas Mining Corp. ... B18
Assaderaghi v. Comm'r ... C147
Austin v. Comm'r ... B175
B. Theodore and Wendy Chapin v. Comm'r ... B135
Bartlett v. Comm'r ... B216
Benz v. Comm'r ... C23
Blangiardo v. Comm'r ... B208
Bobrow v. Comm'r ... B229
Brach v. Comm'r ... B189
Brett Van Alen v. Comm'r ... A237
Brown v. Comm'r ... B170
Burnett Ranches, Limited v. U.S. ... A234–A235
C. H. Laing v. Comm'r ... A159
C.F. Trust, Inc., et al. v. First Flight Limited Partnership, et al. ... B17
Canter v. Lakewood of Voorhees, et al. ... B16
Capital Gymnastics Booster Club Inc. v. Comm'r ... B238
Castleberry v. Branscum ... B13
Charles M. Akers, Jr. v. Comm'r ... B145
Charles Sophy et al. v. Comm'r ... C162
Charlotte and Charles T. Gee v. Comm'r ... C14
Churchman v. Comm'r ... B211
Clark v. Rameker ... B172
Cohan v. Comm'r ... B207

- Cohen v. U.S.* ... B224
Coleman-Stephens v. Comm'r ... C17
Colton v. U.S. ... A256
Comm'r v. Groetzinger ... B210
Commonwealth National Bank of Dallas, et al. v. U.S. ... B103
Continental Casualty Co. v. Cuda ... A242
Couch v. U.S. ... A256
Dabney v. Comm'r ... B231
Davee v. U.S. ... B114
Dean v. IRS ... C74
DeBough v. Comm'r ... B223
DeFrancis and Gross v. Comm'r ... B202
Delbert L. and Margaret J. Baker v. Comm'r ... B139
Dorrance v. U.S. ... B61
Dwyer v. Comm'r ... C16
Edwin E. Healy et al. v. Comm'r ... B43
Ellis v. Comm'r ... B226
Endicott v. Comm'r ... C148
Eram v. Comm'r ... B185
Erwin v. U.S. ... B103
Esgar Corp. et al. v. Comm'r ... A236
Esgar Corp. v. Comm'r ... A236
Estate of John F. Chow et al. v. Comm'r ... B212
Estate of Yaeger v. Comm'r ... C139
FDA v. Brown & Williamson Tobacco Corp. ... B193
Federal Trade Commission v. Olmstead et al. ... B22
Fisher, et al. v. U.S. ... B61
Frank Aragona Trust v. Comm'r ... A184, B147
Frank Chen v. Comm'r ... C147
Fred Misko et ux. v. Comm'r ... B135
Frontier Custom Builders Inc. v. Comm'r ... B178
Gestrich v. Comm'r ... B211
Glaze v. U.S. ... A7, A41
Glick v. U.S. ... B155
Graff Chevrolet Co. v. Campbell ... A74
Gragg v. U.S. ... B218
Great Plains Gasification Assocs. v. Comm'r ... B222
Gullion v. Comm'r ... B210
H.G. Hatt v. Comm'r ... B26
Hart v. Comm'r ... B206
Haurly v. Comm'r ... B233
Herman v. Comm'r ... B71
Herwig v. Comm'r ... B221
Hessing v. Comm'r ... B237
Higgins v. Comm'r ... C147
Hightower v. Comm'r ... B235
Holsinger v. Comm'r ... C147
Howard v. U.S. ... B103
Hradesky v. Comm'r ... B207
In re Adelphia Communications Corp. ... B16
In re Ashley Albright ... B22
In re Brandon Clark and Heidi Heffron-Clark ... B172
In re Chilton ... B172
In re Clark ... B172
In re KZH Livestock, Inc. ... B13
In re Modonlo ... B22
In re Nessa ... B172
In re: Debtor: Phillip Eugene Phillips v. Englewood Post No. 322 Veterans of Foreign Wars of the United States, Inc. ... B17
James F. and Lynn M. Moss v. Comm'r ... B141
James R. and Anita Madler v. Comm'r ... B143
James R. Thompson v. U.S. ... B147
Johnson v. U.S. ... B102
Jones v. Comm'r ... C54
Jordan v. U.S. ... C54
Jorg v. Comm'r ... C54
Julie A. Oderio v. Comm'r ... B142
Kadir v. Comm'r ... B190
Kay v. Comm'r ... C146
Kaycee Land and Livestock v. Roger Flahive ... B13, B17
Keeley v. Comm'r ... C16
Keller v. Comm'r ... B38
King v. Comm'r ... C146
Kowsh v. Comm'r ... C16
Kraatz & Craig Surveying, Inc. v. Comm'r ... B38
Kriti Ripley, LLC v. Emerald Investments, LLC ... B19
Kumar v. Comm'r ... B234
Lee E. and Kathy H. Newell v. Comm'r ... B147
Lifitin et al. v. U.S. ... B183
Litwin v. U.S. ... B234
Longino v. Comm'r ... A190
Loving v. IRS ... A260, A302, A304, B192
Lum v. Comm'r ... B218
Marlowe King v. Comm'r ... A159
Martin v. Comm'r ... B230
Marvin Debough v. Comm'r ... A239–A240
Mattie Carter Trust v. U.S. ... A184
Mayer v. Comm'r ... C140, C147
Merrill Roberts v. Comm'r ... A239
Meyers v. Comm'r ... C54
Michael and Brenda Dudek v. Comm'r ... A238
Miller v. U.S. ... B195
Minnesota Tea Co. v. Helvering ... B191
Muskat v. U.S. ... B114
Netjets Aviation Inc. v. LHC Communications LLC ... B17
North American Oil Consolidated v. Comm'r ... B43
Olmstead, et al. v. Federal Trade Commission ... B22
Oregon Lumber Co. v. Comm'r ... A233
Otte v. U.S. ... B182
Packard v. Comm'r ... B176
Patrick and Louise Wachter v. Comm'r ... A235
Paul D. and Alicia Garnett v. Comm'r ... B147
Payne v. Comm'r ... B203
Plett v. U.S. ... B102
Pool et al. v. Comm'r ... B174
Quill Corp. v. North Dakota ... C161
R. E. Purvis v. Comm'r ... A159
R.C. Arnold v. Comm'r ... C21
Rand and Klugman v. Comm'r ... B198
Reuben v. U.S. ... B61
Rideaux v. Comm'r ... C16
Ridgely v. Lew ... B193
Robert A. Hall, et al. v. Comm'r ... C13
Robert Serenbetz and Karen J. Serenbetz v. Comm'r ... B136
Roberts v. Comm'r ... B214, B228
Ryan, LLC et al. v. Lew et al. ... A259
Sean McAlary Ltd. Inc. v. Comm'r ... B235
Sears v. Comm'r ... C14
Serenbetz v. Comm'r ... B136
Serio v. Baystate Properties, LLC ... B17
Simpson v. Comm'r ... B186
Slodov v. U.S. ... B102
Smalley v. Comm'r ... A233
Smarthealth Inc. v. Comm'r ... B43
Snellman v. Comm'r ... B206
Stephen A. and Kristina K. Gregg v. U.S. ... B147
Stipe v. Comm'r ... C16
Taproot Administrative Services, Inc. v. Comm'r ... B71
Tempel v. Comm'r ... A236

The Mattie K. Carter Trust v. U.S. ... B147
The National Organization for Marriage Inc. v. U.S. ... B194
Thomas H. Welch v. Comm'r ... B139
Timothy D. Reuben v. U.S. ... B61
Tolin v. Comm'r ... B220
Tom and Nancy Miller v. Comm'r ... B135
Trustees of the National Elevator Industry Pension, Health Benefit and Education Funds v. Andrew Lutyk ... B14
U.S. v. Abrahams ... A256
U.S. v. Cote ... A256
U.S. v. Generes ... B233
U.S. v. Gurtner ... A256
U.S. v. H. Ty Warner ... B239
U.S. v. Quality Stores Inc. et al ... B179
U.S. v. Whisenhunt et al. ... B184
U.S. v. Windsor ... A1, A36
U.S. v. Zabka ... B23
Vitol, S.A. v. Primerose Shipping Company Ltd., et al. ... B13
Wachovia Securities, LLC v. Banco Panamericano, Inc. ... B14
Wang v. Comm'r ... B188
Ward AG Products, Inc. v. Comm'r ... A218
Wells Fargo Bank, N.A. v. Continuous Control Solutions, Inc. ... B19
Williams v. Comm'r ... C24
Wilson v. Comm'r ... C54
Wood v. Comm'r ... B200
Zahra Spiritual Trust v. U.S. ... B17
Zavadil v. Comm'r ... B205

REVENUE RULINGS

54-97 ... A237–A238
 54-194 ... A218
 57-588 ... A217
 59-12 ... A220
 69-606 ... A218
 72-515 ... A232
 74-29 ... B114
 74-175 ... C71
 76-253 ... A232
 76-255 ... A6
 76-453 ... C152
 77-137 ... B21–B22
 78-163 ... A232
 79-207 ... A227

79-229 ... A234
 80-7 ... C68
 80-366 ... A220
 83-183 ... A7
 86-57 ... C70
 87-41 ... B69, C195
 87-44 ... C46
 87-121 ... A221
 91-26 ... B30–B31
 99-5 ... B9
 99-6 ... B9
 99-56 ... A231
 2002-62 ... C19, C22
 2004-71 ... C70
 2004-72 ... C70
 2004-73 ... C70
 2004-74 ... C70
 2004-90 ... A220
 2009-13 ... B58
 2013-17 ... A1, A5, A7, A37, A40

REVENUE PROCEDURES

81-48 ... B181–B182
 2000-34 ... A42
 2001-10 ... B121
 2002-28 ... A193, B121
 2002-69 ... B24
 2003-43 ... B11
 2004-48 ... B11
 2007-34 ... A200
 2007-62 ... B11
 2009-26 ... C74
 2009-41 ... B9–B10
 2009-50 ... A33
 2010-13 ... A144, B156–B157
 2010-32 ... B10
 2010-40 ... A33
 2011-14 ... A74–A75, B130, C149
 2011-34 ... B142
 2011-47 ... C129
 2011-52 ... A33
 2012-1 ... B130
 2012-41 ... B66, C192
 2013-1 ... B10
 2013-13 ... C172
 2013-15 ... A33
 2013-25 ... A178
 2013-30 ... B11, B106–B109
 2013-34 ... A9, A11–A13
 2013-35 ... A19–A20, A25, A33–A34, A38, B46, B66, C26, C192, C232
 2014-1 ... B108

2014-16 ... A73–A74, A90
 2014-17 ... A73
 2014-18 ... A38–A39
 2014-30 ... A178
 2014-42 ... A302–A303

OTHER IRS RELEASES

Chief Counsel Advice

201427016 ... B142, B158

IRS Letter Rulings

8020143 ... A219
 8133015 ... A219
 8244003 ... A219
 8252018 ... A227
 8621012 ... A232
 8738005 ... A227
 8923053 ... C18
 8928050 ... A225
 9136001 ... A227
 9322003 ... A227
 9403001 ... A227
 9428003 ... A227
 9615001 ... A220
 199943050 ... C22
 200243002 ... B114
 200030159 ... C22
 200450057 ... C14
 200541037 ... A232
 200631025 ... C22
 200716032 ... C22
 200816002 ... B23
 200816003 ... B23
 200816004 ... B23
 200929021 ... C22
 201030038 ... C22
 201051025 ... C21
 201020104 ... B147
 201415011 ... B180

IRS Announcements

85-113 ... B182

IRS News Releases

IR-2013-86 ... C1

IRS Notices

87-13 ... C23–C24
 87-16 ... C3
 88-74 ... C163

89-25 ... C19
 90-21 ... B150
 2002-2 ... C25
 2008-1 ... B31
 2008-82 ... C154
 2013-45 ... A119
 2013-54 ... A172–A174
 2013-57 ... A177, A179
 2013-70 ... C175
 2013-71 ... B55–B57, C154
 2013-73 ... C2
 2013-80 ... C150
 2014-7 ... C199
 2014-10 ... A92

Treasury Decisions

8972 ... A222
 9496 ... A275
 9554 ... B26
 9564 ... A44, A77
 9632 ... A97, A100–A101, A107
 9636 ... A43–A44, A52, A67, A73, A75–A76
 9644 ... A134, A143, A152, A154–A155, A179, A181, C144
 9645 ... A161
 9655 ... A118–A120
 9663 ... A112

IRS Publications

3, Armed Forces' Tax Guide ... C149, C152–C153, C155
 15, Employer's Tax Guide ... A36
 15-A, Employer's Supplemental Tax Guide ... C195
 15-B, Employer's Tax Guide to Fringe Benefits ... B29
 17, Your Federal Income Tax ... B58, C86–C87, C231
 51, Agricultural Employer's Tax Guide ... A225
 225, Farmer's Tax Guide ... A204
 334, Tax Guide for Small Business ... B24, C160
 463, Travel, Entertainment, Gift, and Car Expenses ... C130, C132, C134, C150
 501, Exemptions, Standard Deduction, and Filing Information ... A3, A24, A28–A29, A33
 502, Medical and Dental Expenses ... C24, C183

503, Child and Dependent Care Expenses ... A3
 504, Divorced or Separated Individuals ... A6
 521, Moving Expenses ... C157
 523, Selling Your Home ... C107–C108, C110
 525, Taxable and Nontaxable Income ... B29, B43, B66
 530, Tax Information for Homeowners ... C164
 535, Business Expenses ... B30–B31, B112
 536, Net Operating Losses (NOLs) for Individuals, Estates, and Trusts ... C35, C46, C65, C67
 538, Accounting Periods and Methods ... B115–B116, B119–B125
 541, Partnerships ... B24–B25
 550, Investment Income and Expenses ... C96, C105, C111–C112, C114, C143, C147, C149
 551, Basis of Assets ... C85, C96
 554, Tax Guide for Seniors ... C182, C184, C198, C231
 556, Examination of Returns, Appeal Rights, and Claims for Refund ... A271, A274
 575, Pension and Annuity Income ... C202, C215
 590, Individual Retirement Arrangements (IRAs) ... A35, C1–C2, C5–C6, C10–C11, C19, C154
 596, Earned Income Credit (EIC) ... A291, A295
 915, Social Security and Equivalent Railroad Retirement Benefits ... A30, C208
 925, Passive Activity and At-Risk Rules ... B132, B143, B151
 926, Household Employer's Tax Guide ... B72, C195–C197
 936, Home Mortgage Interest Deduction ... C164
 946, How To Depreciate Property ... B130, C174
 947, Practice Before the IRS and Power of Attorney ... A242
 969, Health Savings Accounts and Other Tax-Favored Health Plans ... A178, B55, C193

970, Tax Benefits for Education ... B52, C133
 3598, What You Should Know about the Audit Reconsideration Process ... A271–A272
 4832, Return Preparer Review ... A286

IRS Forms

706, United States Estate (and Generation-Skipping Transfer) Tax Return ... A37–A39, A41–A42
 709, United States Gift (and Generation-Skipping Transfer) Tax Return ... A39, A41–A42
 720, Quarterly Federal Excise Tax Return ... A176, B101
 843, Claim for Refund and Request for Abatement ... A31, A42, A275
 870-AD, Offer to Waive Restrictions on Assessment and Collection of Tax Deficiency and to Accept Overassessment ... A272
 906, Closing Agreement on Final Determination Covering Specific Matters ... A272
 941, Employer's Quarterly Federal Tax Return ... A198, B73, B101
 941-X, Adjusted Employer's Quarterly Federal Tax Return or Claim for Refund ... A163
 943, Employer's Annual Federal Tax Return for Agricultural Employees ... A198, B73, B101
 944, Employer's Annual Federal Tax Return ... B73, B101
 945, Annual Return of Withheld Federal Income Tax ... B101
 982, Reduction of Tax Attributes Due to Discharge of Indebtedness (and Section 1082 Basis Adjustment) ... C72–C73
 1040, U.S. Individual Income Tax Return ... B45, B59, B77, C5, C13, C31, C52, C54, C74, C152

- 1040X, Amended U.S. Individual Income Tax Return ... A275, C49–C51, C67
- 1040-ES, Estimated Tax for Individuals ... A96, A101, B28
- 1041, U.S. Income Tax Return for Estates and Trusts ... A138, A207
- 1041-ES, Estimated Income Tax for Estates and Trusts ... A139
- 1042, Annual Withholding Tax Return for U.S. Source Income of Foreign Persons ... B101
- 1045, Application for Tentative Refund ... C37, C41, C49–C52, C54, C61
- 1065, U.S. Return of Partnership Income ... A207, B24, C95
- 1065-B, U.S. Return of Income for Electing Large Partnerships ... C95
- 1094-C, Transmittal of Employer-Provided Health Insurance Offer and Coverage Information Return ... A127
- 1095-A, Health Insurance Marketplace Statement ... A127
- 1095-B, Health Coverage ... A127
- 1095-C, Employer-Provided Health Insurance Offer and Coverage ... A127
- 1098, Mortgage Interest Statement ... C230
- 1099-B, Proceeds From Broker and Barter Exchange Transactions ... C93–C96, C104, C115
- 1099-DIV, Dividends and Distributions ... B82, C118, C123
- 1099-K, Payment Card and Third Party Network Transactions ... A275–A276, A279–A280, A286, C160–C161
- 1099-LTC, Long-Term Care and Accelerated Death Benefits ... B63–B64, B66–B67, C192–C193
- 1099-MISC, Miscellaneous Income ... C158
- 1099-PATR, Taxable Distributions Received From Cooperatives ... A201–A202
- 1099-Q, Payments From Qualified Education Programs (Under Sections 529 and 530) ... B49–B50
- 1099-R, Distributions From Pensions, Annuities, Retirement or Profit Sharing Plans, IRAs, Insurance Contracts, etc. ... B58–B59, C1, C8–C9, C12, C14, C30, C216, C218
- 1099-S, Proceeds From Real Estate Transactions ... C93–C96, C104, C106–C107
- 1120, U.S. Corporation Income Tax Return ... A189, A207–A208
- 1120S, U.S. Income Tax Return for an S Corporation ... A207–A208, B107–B108, C95
- 1120-REIT, U.S. Income Tax Return for Real Estate Investment Trusts ... C47
- 1125-A, Cost of Goods Sold ... B122
- 2106, Employee Business Expenses ... C35, C132, C136, C150
- 2106-EZ, Unreimbursed Employee Business Expenses ... C132, C150
- 2439, Notice to Shareholder of Undistributed Long-Term Capital Gains ... C79, C118, C123
- 2553, Election by a Small Business Corporation ... B2, B11, B106–B108
- 2848, Power of Attorney and Declaration of Representative ... A242, A272–A273, A325, C50
- 3115, Application for Change in Accounting Method ... A51, A67–A68, A72–A76, A90, B125, B130, C149
- 3520, Annual Return To Report Transactions With Foreign Trusts and Receipt of Certain Foreign Gifts ... A320
- 3903, Moving Expenses ... C156
- 4136, Credit for Federal Tax Paid on Fuels ... A225
- 4180, Report of Interview with Individual Relative to Trust Fund Recovery Penalty or Personal Liability for Excise Taxes ... B103
- 4562, Depreciation and Amortization ... C158
- 4669, Statement of Payments Received ... A163
- 4670, Request for Relief from Payment of Income Tax Withholding ... A163
- 4684, Casualties and Thefts ... A231, C35, C37, C54, C79, C118
- 4797, Sales of Business Property ... A159, A193–A194, A196, A229, A231, B84, B114, C35, C37, C79, C92, C104, C107, C110–C112, C118, C144, C146, C148
- 4835, Farm Rental Income and Expenses ... A223, C35
- 4852, Substitute for Form W-2, Wage and Tax Statement, or Form 1099-R, Distributions From Pensions, Annuities, Retirement or Profit-Sharing Plans, IRAs, Insurance Contracts, etc. ... C8–C9
- 4952, Investment Interest Expense Deduction ... C141–C143
- 5329, Additional Taxes on Qualified Plans (Including IRAs) and Other Tax-Favored Accounts ... B51–B52, C10–C11, C29, C31, C220
- 5500, Annual Return/Report of Employee Benefit Plan ... A176
- 6252, Installment Sale Income ... C79, C118
- 6781, Gains and Losses From Section 1256 Contracts and Straddles ... C79, C118
- 8275, Disclosure Statement ... A249
- 8275-R, Regulation Disclosure Statement ... A41, A249
- 8288, U.S. Withholding Tax Return for Dispositions by Foreign Persons of U.S. Real Property Interests ... B101

- 8332, Release/Revocation of Release of Claim to Exemption for Child by Custodial Parent ... A23, A106–A107
- 8379, Injured Spouse Allocation ... A15–A16
- 8396, Mortgage Interest Credit ... C166
- 8582, Passive Activity Loss Limitations ... B84, B132, B149
- 8582-CR, Passive Activity Credit Limitations ... B132
- 8594, Asset Acquisition Statement ... A256, B110, B115
- 8606, Nondeductible IRAs ... C5, C7, C52, C154
- 8804, Annual Return for Partnership Withholding Tax (Section 1446) ... B101
- 8824, Like-Kind Exchanges ... C79, C118
- 8829, Expenses for Business Use of Your Home ... A252, C167–C169
- 8832, Entity Classification Election ... B5, B8–B11
- 8849, Claim for Refund of Excise Taxes ... A225
- 8853, Archer MSAs and Long-Term Care Insurance Contracts ... B64, B67, C192
- 8857, Request for Innocent Spouse Relief ... A8
- 8863, Education Credits (American Opportunity and Lifetime Learning Credits) ... A308
- 8867, Paid Preparer's EIC Checklist ... A291–A292, A297
- 8889, Health Savings Accounts (HSAs) ... C193
- 8903, Domestic Production Activities Deduction ... A189, A194, A201
- 8938, Statement of Specified Foreign Financial Assets ... A320–A321
- 8941, Credit for Small Employer Health Insurance Premiums ... A168
- 8949, Sales and Other Dispositions of Capital Assets ... A159, A227, C79, C82, C93, C96, C99, C103–C104, C115, C118–C119, C139, C148
- 8959, Additional Medicare Tax ... A164, A166
- 8960, Net Investment Income Tax — Individuals, Estates, and Trusts ... A136, A147–A148, A159
- 8962, Premium Tax Credit ... A114
- 8965, Health Coverage Exemptions ... A94
- 12203, Request for Appeals Review ... A274
- 14420, Verification of Reported Income ... A280
- CT-1, Employer's Annual Railroad Retirement Tax Return ... B101
- SS-4, Application for Employer Identification Number ... B72, C197
- SSA-1099, Social Security Benefit Statement ... C208
- T, Forest Activities Schedule ... A230
- W-2, Wage and Tax Statement ... C30, C127, C131–C133, C153, C155–C156, C198
- W-2c, Corrected Wage and Tax Statement ... A31
- W-3, Transmittal of Wage and Tax Statements ... A198
- W-4, Employee's Withholding Certificate ... C196
- W-4P, Withholding Certificate for Pension or Annuity Payments ... C12, C221
- 1040, Schedule C, Profit or Loss From Business ... A9, A71, A146, A217, A252, A286, A288, B24–B25, B113, B115, B120, C35, C37, C146, C148, C158, C160, C168–C169, C172, C174
- 1040, Schedule C-EZ, Net Profit From Business ... A217
- 1040, Schedule D, Capital Gains and Losses ... A159, A227, C79, C82, C85–C86, C93–C95, C103, C107, C110, C113, C115, C119, C139, C148–C149
- 1040, Schedule E, Supplemental Income and Loss ... A148, A223, A257, B25, B84, C35, C37–C38
- 1040, Schedule F, Profit or Loss From Farming ... A176, A181, A193–A194, A202–A203, A223, B115, C35, C37
- 1040, Schedule H, Household Employment Taxes ... B73–B74, B76, B78, C196–C197
- 1040, Schedule J, Income Averaging for Farmers and Fishermen ... A203
- 1040, Schedule SE, Self-Employment Tax ... A162, B24–B25
- 1041, Schedule K-1, Beneficiary's Share of Income, Deductions, Credits, etc. ... A237, C74, C118
- 1045, Schedule A — NOL ... C37, C41, C43–C45, C51, C61, C67, C75
- 1045, Schedule B — NOL Carryover ... C52, C64, C67
- 1065, Schedule K-1, Partner's Share of Income, Deductions, Credits, etc. ... A148, B21–B22, B24–B25, B29, B81–B83, B85, B87, C118
- 1120S, Schedule K-1, Shareholder's Share of Income, Deductions, Credits, etc. ... A186, A201, A207, C118

IRS Schedules

- 1040, Schedule A, Itemized Deductions ... A228–A229, A231, B43, B54, B115, C35, C37–C38, C54, C74, C127, C132–C133, C140–C143, C149–C150, C167, C184
- 1040, Schedule B, Interest and Ordinary Dividends ... A320

Alphabetical Index

NUMBERS

§401(k) plans. *See* Retirement plans, employment-based

A

ACA. *See* Affordable Care Act

Accountant-client privilege ... A256

Accounting method

accrual ... B115

advantages ... B119

balance sheet

technique ... B127

expenses ... B123

income ... B123

related parties ... B122

required use ... B120

vs. cash method ... B116

automatic changes ... B130

cash

accrual adjustments ... B123

advantages ... B119

vs. accrual method ... B116

change of ... A51, A58, A67–A68, A73, A76, B130

applying for ... A73–A74

automatic changes ... A51, A58, A68, A73–A74

correcting depreciation schedules ... A74

designated change

numbers ... A73, A90

choice of ... B118

farming syndicates ... A234

hybrid methods ... B129

optional method for spare parts ... A49

Accrual accounting. *See* Accounting method, accrual

Accumulated earnings tax ... B35

ACEP. *See* Agricultural Conservation Easement Program

Acquisition indebtedness ... C162

ACRE program ... A212, A214

Adaptations ... A63

ADB. *See* Insurance

Additional Medicare tax

entity planning issues ... A185

limited liability

companies ... A186

partnerships ... A185

pass-through entities ... A185

S corporations ... A186

trusts ... A185

Adjunct faculty ... A123

Adjusted gross income ... C37

calculation by FSA ... A207

Adjusted qualified education

expenses ... B48–B49

Adoption

credit ... A3, A32

employee benefits ... C51

minimum health

coverage ... A107, A120–A121

second-parent adoptions ... A24, A32

ADS. *See* Alternative depreciation system

Advertising

by tax practitioners ... A304

cooperative fees ... B112

franchisee expenses ... B113

Advice

reliance on advice of another

preparer ... A251

unauthorized legal advice by tax

practitioners ... A242–A243

written advice from tax

practitioners ... A263

AET. *See* Accumulated earnings tax

Affordable Care Act ... B31, C177

additional Medicare tax. *See*

Additional Medicare tax

agricultural producers ... A167

delayed implementation ... A119

employer mandate ... A118, A167

adjunct faculty ... A123

applicable large

employer ... A119, A126

dependent coverage ... A120–A121

first year employer

relief ... A122

layover hours ... A124

new employers ... A120

on-call hours ... A124

related entities ... A168

religious order

members ... A123

seasonal worker

exception ... A122, A167

small business health options

program (SHOP) ... A125

special employee

groups ... A123

student employees ... A123

transition relief ... A120, A122, A167

volunteer employees ... A123

fees for self-insured health

plans ... A175

hardship

CMS circumstances that constitute ... A102

health reimbursement

plans ... A171, A175

HRAs ... A125

income threshold ... A100

individual mandate ... A91, A262

advance credit

payments ... A116

cost subsidization

premium assistance

credit ... A113

dependents ... A96, A101, A106

exemptions from ... A93

hardship defined ... A102

penalties ... A106–A107, A109

reports to IRS ... A112

short coverage gap

period ... A104

information reporting ... A126

minimum essential

coverage ... A91–A92, A118, C177

net investment income tax. *See* Net investment income tax

AFR. *See* Applicable federal rates

AFS. *See* Applicable financial statements

AFSP. *See* Annual Filing Season Program

AGI. *See* Adjusted gross income

Agricultural Act of 2014 ... A207

Agricultural Conservation Easement Program ... A217

Agriculture. *See* Farming

AICPA Code of Professional Conduct ... A263

ALE. *See* Affordable Care Act

Aliens. *See* Immigrants

Alimony
 as nonbusiness expense ... C37
 as nonbusiness income ... C37
 reporting gap ... A308
 Alternative depreciation
 system ... A61
 Alternative minimum tax
 and NOLs ... C38, C71
 Alternative tax NOL ... C71
 Ambulance services
 volunteer employees ... A123
 Amended tax returns
 in lieu of appeals ... A275
 in response to IRS letter ... A276,
 A279, A286
 regrouping elections ... A145
 same-sex couples. *See* Same-sex
 marriage, amended returns
 statute of limitations ... A7, C46,
 C67
 American Jobs Creation Act ... A188
 American opportunity and lifetime
 learning credit ... B53
 American opportunity credit ... A308
 American Recovery and Reinvestment
 Act of 2009 ... C113
 American Taxpayer Relief
 Act ... B28, B35, C191
 AMT. *See* Alternative minimum tax
 Annual Filing Season
 Program ... A302
 ineligible individuals ... A304
 record of completion ... A303
 transition relief ... A303
 Annuity ... C215
 §1035 exchange ... C223
 distributions
 10% penalty ... C220
 before 59½ ... C220
 exceptions to penalty ... C220
 nonperiodic ... C217
 periodic ... C215
 federal withholding ... C221
 general rule ... C215
 ideal buyer characteristics ... C223
 ownership changes ... C222
 surrendering ... C222
 switching from one contract to
 another ... C223
 taxable portion ... C215
 withdrawals
 simplified method ... C219
 Annulment ... A6
 AOC. *See* American opportunity credit

Apartment
 sale of ... B224
 Applicable federal rates ... C19
 Applicable financial
 statements ... A45, A65–A66
 AQEE. *See* Adjusted qualified
 education expenses
 ARC. *See* Farm Service Agency,
 agricultural risk coverage
 Architectural services
 domestic production gross
 receipts ... A190
 Armed Forces. *See* Military service
 ATNOL. *See* Alternative tax NOL
 ATRA. *See* American Taxpayer Relief
 Act
 Attorney-client privilege ... A255
 Audio recordings
 as qualifying production
 property ... A190
 Audits. *See* Internal Revenue Service,
 audits/examinations
 Authority
 substantial ... B171
 Automobiles
 clean fuel vehicles and refueling
 property ... B126
 Average Crop Revenue Election
 program ... A212, A214

B

Bank Secrecy Act ... A310
 Bankruptcy ... B173
 Chapter 11 ... B179
 Chapter 7 ... B173
 separate filings rule ... B173
 Bankruptcy Code
 Sections 522 (b)(3)(C) and
 (d)(12) ... B172
 Basis
 defined ... C85
 for building safe harbor ... A71
 master limited partnerships ... B82
 spare parts ... A50
 Beneficiary
 designated ... B172
 tax liability ... B184
 Betterments ... A59
 appropriate comparison ... A60
 unavailability of replacement
 parts ... A60
 BSA. *See* Bank Secrecy Act

C

C corporations
 accounting method ... B120
 double taxation issue ... B33
 employee benefits ... B32
 formation issues ... B2
 passive activity ... B132
 qualified dividends ... B33
 sale of a franchise ... B115
 Capital assets ... B174, C85
 basis ... C85
 defined ... C85
 disposition of. *See* Capital gains
 Capital gains
 §1202 stock ... C93
 assets held for personal
 use ... C104
 business vs. nonbusiness
 activity ... C38
 collectibles ... C92
 defined ... C86
 demutualization of life insurance
 companies ... C113
 from passive activity ... B162
 from rental activity ... C38
 in NOL calculation ... C44
 offset with loss ... C86
 Qualified Dividends and Capital
 Gain Tax Worksheet ... C90
 qualified small business
 stock ... C113
 reporting on Form 9949 ... C82,
 C93
 line 1 ... C94
 line 2 ... C103
 long-term gains ... C94
 short-term gains ... C93
 types of transactions ... C103
 reporting on Schedule D ... C79,
 C115
 part III ... C119
 parts I and II ... C115
 sale of a franchise ... B113, B115
 sale of farmland ... A183
 sale of principal
 residence ... A252, C105
 sale of timber ... A228
 security traders ... C112
 short sales ... C113
 tax rates ... C87
 unrecaptured §1250 gain ... C92
 Capital losses
 allowed for NIIT purposes ... A150

- business vs. nonbusiness ... C38, C44–C45
- carryovers ... C86
- defined ... C86
- demutualization of life insurance companies ... C113
- from passive activity ... B162
- in NOL calculation ... C44
- limitations on ... A4, B162
- nonbusiness bad debts ... C105
- related parties ... C103
- reporting on Form 8949 ... C82, C93
 - line 1 ... C94
 - line 2 ... C103
 - long-term losses ... C94
 - short-term losses ... C93
 - types of transactions ... C103
- reporting on Schedule D ... C79, C115
 - part III ... C119
 - parts I and II ... C115
- sale of timber ... A228
- security traders ... C112
- short sales ... C113
- wash sales ... C111
- worthless stocks and securities ... C105
- Capitalization vs. expensing applicable financial statements ... A45, A65–A66
- change of accounting method. *See* Accounting method
- conservation expenditures ... A223
- materials and supplies ... A44
 - criteria ... A45
 - spare parts. *See* Spare parts
- new regulations ... A43
 - applicability dates ... A75
 - change of accounting method ... A51, A58, A68, A73, A76
 - scope of ... A44
 - transitional provisions ... A51, A76
- repairs and improvements ... A58
 - adaptations ... A63
 - betterments ... A59
 - restorations ... A61
- safe harbors ... A65
 - change of accounting method ... A67
 - electing ... A67
- recurring routine maintenance ... A68
- small taxpayers ... A70
- timber producers ... A229–A230
- units of property. *See* Units of property
- Cash method. *See* Accounting method
- Casualties
 - adjustment in NOL
 - carryback ... C51
 - as disposition of passive activity ... B150
 - business vs. nonbusiness ... C37
 - deduction ... A19
 - Form 4684 ... C54
 - NOL carryback period ... C47
 - timber businesses ... A231
- Casualty losses
 - allowed for NIIT purposes ... A150
- CCC. *See* Commodity Credit Corporation
- CE. *See* Education, continuing education for tax practitioners
- Charging orders ... B18
 - foreclosure on transferable interest ... B19
 - rights of creditor ... B19
- Charitable contributions
 - as nonbusiness expense ... C38
 - conservation easements ... A235
 - perpetuity requirement ... A235
 - valuation ... A236
- Children
 - abuse of ... A13
 - adoption of. *See* Adoption
 - as employees in family business ... A198, B26, B28, B78
 - child and dependent care credit ... A23
 - child support ... A15
 - child tax credit ... A4, A23, A288
 - FICA tax exemption ... B78
 - kiddie tax. *See* Kiddie tax
 - minimum health coverage. *See* Insurance, health
 - of same-sex couples ... A24, A32
 - qualifying child ... A23, A295–A296
 - stepchildren ... A23–A24
 - stock attribution rules ... B132
- Children's Health Insurance Program ... A92
- CHIP. *See* Children's Health Insurance Program
- Circular flow of funds ... B205
- Civil Service Retirement System ... C29
- Civil unions. *See* Unrecognized relationships
- COBRA. *See* Consolidated Omnibus Budget Reconciliation Act of 1985
- Collectibles
 - capital gains ... C87, C92
 - examples ... C92
- Collection statute expiration date ... A10
- Combat pay ... C155
- Commodities
 - hedging of ... A184
 - processing of ... A223–A225
 - trading in ... A184
- Commodity Credit Corporation ... A207
- Common law marriage ... A3, A6
- Community property law
 - joint and several liability ... A8, A11, A15
- Conflicts of interest. *See* Tax practitioners, conflicts of interest
- Conservation Reserve Program ... A217
- Conservation Stewardship Program ... A217
- Conservation. *See* Farming
- Consolidated Omnibus Budget Reconciliation Act of 1985 ... A97
- Construction
 - domestic production gross receipts ... A190
- COOL. *See* Country-of-origin labeling
- Cooperatives
 - agricultural. *See* Farming
- Country-of-origin labeling ... A217
- Coverdell ESA. *See* Education savings accounts
- Credit
 - premium assistance ... A113
 - premium tax ... A113
 - small employer health insurance premiums ... A125
- Credit cards
 - ATM withdrawals ... A276
 - checks issued in connection with ... A276
 - payees related to the card issuer ... A276

reporting transactions ... A275, C160
 shared card terminals ... A279
Credits
 additional child tax ... B201
 adoption ... B201
 first-time homebuyer ... B176
 premium assistance ... A113
 calculation ... A113–A114
 excess advanced credit recovery ... A116
 premium assistance credit ... A99, A113, A168
 premium tax credit ... A168–A169
 refundable ... B198–B199
 refundable education ... B201
Criminal investigations
 by the IRS. *See* Internal Revenue Service
 by TIGTA. *See* Treasury Inspector General for Tax Administration
 of tax practitioners. *See* Tax practitioners
CRP. See Conservation Reserve Program
CSED. See Collection statute expiration date
CSP. See Conservation Stewardship Program
CSRS. See Civil Service Retirement System
 Custodial IRAs ... B28

D

Dairy Donation Program ... A217
 Dairy Forward Pricing program ... A217
 Dairy Indemnity program ... A217
 Dairy Margin Protection Program ... A216
 Dairy Promotion and Research program ... A217
 Dairy. *See* Farming
 Day traders. *See* Stocks and securities, securities traders
 DCP. *See* Direct and Counter-Cyclical Program
Death
 and NOLs ... C71
 as qualifying event for COBRA coverage ... A97
 deeming a decedent a farmer ... A219

effect on first-time homebuyer credit ... C176
 effect on MAGI for Medicare purposes ... C179
 estate tax. *See* Estates
 gratuities to survivors of an Armed Forces member ... C156
 inheritance of IRAs ... A35
 inheritance of MLP units ... B81
 inherited timber ... A228
 insurance benefits
 accelerated death benefits ... B64
 joint liability relief for widow/widower ... A12
 of spouse ... A4, A6
 retirement plan distributions after ... C14
 sale of farmland ... A183
 sale of residence ... C106
 spouse of decedent farmer ... A219
 widow/widower filing status ... A4
Debit cards
 ATM withdrawals ... A276
 checks issued in connection with ... A276
 payees related to the card issuer ... A276
 reporting transactions ... A275, C160
 shared card terminals ... A279
Debt security ... B199
Debts
 canceled/forgiven
 farming business ... A224
 mortgages ... C175
 NOL adjustments ... C72
 nonbusiness bad debts ... C105
Deceased spousal unused exclusion ... A38, A41
Deductions
 charitable ... B203–B205
 domestic production activities ... B177
 education expenses ... B206
 for Armed Forces reservists ... C149
 for farmers ... A219
 franchisee business expenses ... B112
 home mortgage interest ... B202
 home office ... A252, C166
 Internet business expenses ... C157
 investment interest ... C141
 investor expenses ... C140

investor losses ... C140
 IRA contributions. *See* Individual retirement arrangements
itemized
 adjustment in NOL carryback ... C51
 amended returns ... A28
 AMT calculation ... C71
 business vs. nonbusiness activity ... C38
 effect on NII ... A149
 employee business expenses ... C127
 in-kind wages ... A228
 joint returns ... A4
 limitation on ... A19
 marital status and ... A28
 medical expenses ... A19, C182, C192, C198
 separate returns ... A28
 timber producers ... A229–A230
 passive activity loss ... B162
 qualified production activities income ... B177
 self-employed health insurance ... B31
standard
 augmented ... C231
 business vs. nonbusiness activity ... C38
 student loan interest ... A3
 taxable income ... B177
 tuition and fees ... A3
 uniform capitalization rules ... B178
 unreimbursed employee travel expenses ... B206–B207
 Deer raising ... A220
 Defense of Marriage Act ... A1, A24
 Delinquent tax returns ... A288
 Demutualization ... B60
 tax issue ... B61
 zero cost position ... B61
Depreciation
 alternative depreciation system. *See* Alternative depreciation system
 AMT calculation ... C71
 bonus ... B170–B171
 changing due to accounting change ... A74
 franchise assets ... B111
 in farming business ... A224
 master limited partnerships ... B81

method change ... B130
 method establishment ... B130
 unrecaptured §1250 gain ... C92
 Direct and Counter-Cyclical Program ... A212
 Disability
 and material participation by decedent farmer ... A219
 qualifying child test ... A23
 retirement plan distributions due to ... C15
 tax credit for ... A4
 Disasters
 Farm Bill changes due to ... A212
 farm programs for ... A212, A217
 hurricane labor ... A225
 losses allowed for NIIT purposes ... A150
 NOL carryback period ... C47
 timber losses caused by ... A231
 Discharge of indebtedness and NOLs ... C72
 Disclosure ... B194
 Form 990 ... B194
 inadvertent ... B195
 intervening actions ... B195
 Disqualified person ... B227
 Disregarded entities
 election for tax classification ... B8
 FICA classification rules ... B26
 LLCs as ... B11
 Distributional interest. *See* Transferable interest
 Dividends
 as nonbusiness income ... C37
 publicly traded partnerships ... B83
 qualified dividends to C corporation owners ... B33
 Divorce
 as determinant in joint liability relief ... A12
 as qualifying event for COBRA coverage ... A97
 child health coverage in divorce decree ... A107
 dependency exemption for children ... A24
 effect on first-time homebuyer credit ... C176
 effect on MAGI for Medicare purposes ... C179
 effect on NOL carryback ... C67
 estate of former spouse ... A41

ethical conduct by tax practitioner ... A242–A243, A255
 liability from joint return ... A8
 sale of residence ... C106
 separation of liability relief ... A9
 tax responsibility in divorce decree ... A8, A13
 transfer of passive activity interest ... B151
 DMPP. *See* Dairy Margin Protection Program
 DOMA. *See* Defense of Marriage Act
 Domestic partners
 dependent ... B180–B182
 Forms W-2 ... B180, B182
 nondependent ... B180, B182
 Domestic partnerships. *See* Unrecognized relationships
 Domestic production activities deduction ... A188, C36, C45
 calculation of ... A188
 cooperatives ... A201
 reporting ... A201–A202
 domestic production gross receipts ... A190
 agricultural operations ... A191
 allocating deductions ... A193
 de minimis rule ... A192, A203
 estates ... A199
 partnerships ... A199
 pass-through entities ... A199
 qualifying wages ... A200
 qualified production activities income ... A189
 S corporations ... A199
 trusts ... A199
 W-2 wage limitation ... A198
 calculation of wages ... A199
 pass-through entities ... A200
 Domestic workers. *See* Household employees
 DPAD. *See* Domestic production activities deduction
 DPGR. *See* Domestic production activities deduction, domestic production gross receipts
 DSUE. *See* Deceased spousal unused exclusion

E

Earned income credit
 due diligence requirements ... A291
 effect of combat pay exclusion on ... C156
 erroneous claims ... A290
 audits of tax practitioners ... A295
 outreach and education ... A293
 penalties for tax practitioners ... A292–A293
 marital status and ... A3, A21, A25
 qualifying child ... A23, A295
 Education
 continuing education for tax practitioners ... A302
 expenses. *See* Education expenses
 savings accounts. *See* Education savings accounts
 student loans. *See* Student loans
 teacher expenses. *See* Teachers, business-related expenses
 Education expenses
 adjusted qualified education expenses. *See* Adjusted qualified education expenses
 adjustment in NOL carryback ... C51
 American opportunity and lifetime learning credit. *See* American opportunity and lifetime learning credit
 as nonbusiness expense ... C38
 education savings accounts. *See* Education savings accounts
 IRA funds used for ... B28, C17
 qualified educational expenses ... C17
 qualified higher education expenses. *See* Qualified higher education expenses
 qualified tuition programs ... B45
 retirement plan distributions for ... C17
 savings bond interest used for ... A4
 Education savings accounts ... B47
 distributions ... B54
 Educators. *See* Teachers
 EFI. *See* Elected farm income
 EIC. *See* Earned income credit

- EIN. *See* Employer identification numbers
- Elderly taxpayers
claiming as dependents ... C232
tax credit for ... A4
- Elected farm income ... A203, A222
- Electricity production
domestic production gross receipts ... A190
- Electronic payment
facilitators ... A276
- Emergency medical services
volunteer employees ... A123
- Employee benefits
C corporations ... B32
definition of employee ... B30
dependent care assistance ... A3
health insurance ... A31, A36, A167–A168
health reimbursement plans ... A171, A175
partnerships ... B30
retirement plan ... A35–A36
S corporations ... A36, B31
selection of business entity ... B29
sole proprietorships ... A36
statutory fringe benefits ... B29
- Employee business expenses
accountable plans ... C127
deduction ... C132
examples of expenses ... C133
limitations ... C133
in determining employee v. independent contractor ... B70
nonaccountable plans ... C132
recordkeeping ... C128, C134
time period safe harbor ... C130
transportation workers ... C133
unreimbursed ... C132
- Employee Retirement Income Security Act of 1974 (ERISA) ... A263, C200
- Employee stock ownership plans ... C25
- Employer identification numbers
applying for ... B72
need for ... B72
- Employers
benefits offered by. *See* Employee benefits
credit for small employer health insurance premiums ... A168
farmers as ... A225–A226
health insurance mandate. *See* Affordable Care Act
military differential pay ... C153
tax withholding ... A162
- Employment Tax Issues
domestic partner benefits ... B180
FICA severance payments ... B179
- Energy-related credits
nonbusiness energy property credit ... C175
residential energy efficient property credit ... C175
- Engineering
domestic production gross receipts ... A190
- Entity types
additional Medicare tax ... A185
C corporation issues ... B32
comparison of ... B82
family business considerations ... B24
FICA exemptions ... B26
spousal ownership ... B24
formation issues ... B2
liability protection ... B12
corporations ... B13
limited partnerships ... B15
LLCs ... B17
partnerships ... B15
piercing the corporate veil ... B13
tax treatment ... B3, B80–B81
corporations ... B4
election by entity ... B5, B9, B11, B105
inadvertent classification changes ... B9
noncorporate entities ... B4
taxation of fringe benefits ... B29
- Environmental Quality Incentives Program ... A217
- EPF. *See* Electronic payment facilitators
- EQUIP. *See* Environmental Quality Incentives Program
- Errors
by tax practitioners. *See* Tax practitioners
due diligence to prevent. *See* Tax practitioners
earned income credits. *See* Earned income credit
on Forms 1099-R. *See* Retirement plans
ESA. *See* Education savings accounts
- ESBT. *See* Trusts
- ESOP. *See* Employee stock ownership plans
- Estate and gift
Form 706 ... B183
late filing penalty ... B183
- Estates
bankruptcy estates ... A140
domestic production activities deduction ... A189, A199
federal estate tax ... A36–A37, A41, A220
foreign holdings ... A140, A320
former spouses ... A41
installment provision ... A41
material participation ... B147
net investment income tax ... A138
passive activity special allowance ... B145
planning considerations ... B60
property transferred to surviving spouse ... A37
qualified terminable interest property ... A39
real estate ... A39
special valuation method ... A39
special-use valuation of farmland ... A237
- Estimated tax payments
for farming income ... A221
- Ethics. *See* Tax practitioners
- Excise taxes ... A225
- Exemptions
dependents ... A4, A107
children ... A23–A24
spouses/partners ... A29
personal ... A4, A20, A29
- Expenses
accrual accounting ... B123
12-month rule ... B124
prepaid expenses ... B124
recurring expenses ... B125
education. *See* Education expenses
interest. *See* Interest expenses
medical. *See* Medical expenses
moving. *See* Moving expenses
of employees. *See* Employee business expenses
travel. *See* Travel expenses

F

- Farm Bill of 2014 ... A207
- Farm Service Agency
 - agricultural risk coverage ... A212
 - election of ... A213
 - computation of AGI ... A207
 - conservation programs ... A217
 - crop insurance ... A191
 - complemented with PLC ... A214
 - participation requirements ... A212
 - STAX ... A213
 - supplemental coverage option ... A214
- dairy programs ... A216
- payments
 - domestic production activities deduction ... A191
 - limitations ... A212
 - price loss coverage ... A212
 - election of ... A213
 - program requirements ... A212
 - subsidies ... A207
 - supplemental coverage option ... A214
- Farming
 - accounting method ... B121
 - actual production history ... A212
 - Affordable Care Act and agricultural producers ... A167
 - AMT calculation ... C71
 - as hobby activity ... A239
 - bees ... A212
 - business vs. nonbusiness income/losses ... C37
 - businesses structured as multiple entities ... A168, A188
 - canceled debt ... A224
 - capitalization ... A224, A229
 - conservation ... A222
 - easements ... A235
 - government programs ... A217
 - required participation for crop insurance ... A212
 - cooperatives
 - domestic production activities deduction ... A189, A201
 - processors of commodities ... A223
 - cotton ... A212–A213, A225
 - court cases ... A234
 - dairy ... A216
 - definition of farmer ... A217–A218
 - definition of farming activities ... A217
 - depreciation ... A224
 - domestic production gross receipts ... A191
 - employee tax withholding ... B73
 - employees
 - health insurance ... A167
 - in-kind wages ... A226
 - work that qualifies worker as employee ... A225
 - estimated tax payments ... A221
 - excise taxes ... A225
 - expenditures not subject to mandatory capitalization ... B126
 - Farm Bill of 2014 ... A207
 - farm management companies ... A188
 - farm-raised fish ... A212
 - fee for medical reimbursement plans ... A176
 - fertilizer ... A218–A219, A230, A234
 - government programs ... A207, A223
 - income averaging ... A203, A219, A222
 - in-kind wages ... A226
 - proper structuring of ... A226
 - reporting ... A228
 - landlords ... A219
 - lime ... A219
 - livestock. *See* Livestock
 - NOL carryback period ... C47–C48
 - ornamental plants ... A220
 - peanuts ... A212, A215
 - processing of commodities ... A223–A225
 - raising deer ... A220
 - real estate valuation ... A39
 - rental income. *See* Landlords
 - risk ... A218
 - S corporations ... A221
 - sale of farmland ... A183
 - sale of sod ... A220
 - self-employment ... A221
 - self-rentals ... A180, A188
 - special-use valuation of farmland ... A237
 - syndicates ... A234
 - tenant farmers ... A221
 - tobacco ... A220–A221
 - trust beneficiaries ... A220
 - wheat ... A215
- FATCA. *See* Foreign Account Tax Compliance Act
- FBAR filing ... A312, A321
- Federal employees
 - business expenses of fee-basis officials ... C37
 - health insurance ... A92
 - IRS personnel ... A306–A307
 - retirement plan distribution ... C28
- Federal Employees Retirement System ... C29
- Federal unemployment tax. *See* FUTA taxes
- FEIE. *See* Foreign earned income exclusion
- Fellowship grant ... B188
 - qualified scholarship ... B188
- FERS. *See* Federal Employees Retirement System
- FICA taxes
 - exemption for child-employees ... B26, B78
 - exemption for family employees ... B78
 - exemption for in-kind wages ... A226
 - household employees ... C196, C198
- Film production
 - domestic production gross receipts ... A190
- Financial Crimes Enforcement Network ... A310
- FinCEN. *See* Financial Crimes Enforcement Network
- Firefighters
 - volunteer employees ... A123
- First-time homebuyer
 - retirement plan distributions ... C27
- First-time homebuyer credit ... C176
- Fishermen
 - income averaging ... A203
- Flexible spending arrangements
 - administrative issues ... B57
 - advantages of ... B55
 - carryover provision for unused amounts ... B56–B57, C154
 - disadvantages of ... B55
 - distributions to Armed Forces reservists ... C154
 - grace period ... B55, B57, C154

use-it-or-lose-it rule ... B55
 Foreclosure ... B199
 Foreign Account Tax Compliance Act ... A324
 Foreign assets
 bank and financial
 accounts ... A310–A311
 FBAR ... A312, A321
 offshore tax evasion
 penalties ... A324
 streamlined filing compliance
 procedures ... A325
 voluntary disclosure ... A324
 penalties for failure to
 report ... A311, A320
 requirement to report ... A310,
 A312, A320
 trusts ... A140, A320
 Foreign earned income
 exclusion ... A135
 qualified individual ... B185
 tax-home ... B186
 Form 1099-K
 suspected underreporting of
 receipts ... A276
 Letter 5035 ... A276
 Letter 5036 ... A279
 Letter 5039 ... A280
 Letter 5043 ... A286
 Franchise ... B110
 acquisition ... B110
 fee ... B111
 goodwill ... B111
 operation ... B112
 selling ... B113
 Fraud
 by spouse filing joint return ... A11
 prevention by TIGTA ... A305–
 A307
 Fringe benefits. *See* Employee benefits
 FSA. *See* Farm Service Agency
 FSA. *See* Flexible spending
 arrangements
 FTHBC. *See* First-time homebuyer
 credit
 FUTA taxes
 employee-spouse ... A36
 exemption for family
 employees ... B78
 exemption for in-kind
 wages ... A226
 household employees ... B74,
 C196–C198

G

Gambling losses
 allowed for NIIT purposes ... A150
 Gas activity
 active participation ... B148
 bonus payments ... A238
 General rule
 plan distributions ... C215
 Generation-skipping transfer
 tax ... A39
 Gifts
 effect on Medicaid
 eligibility ... C188
 gift tax and amended
 returns ... A41
 gift tax and spouses ... A36–A37
 gift tax annual exclusion ... B46
 passive activity property ... B151
 Goodwill ... B111
 Grandfathered debt ... C162
 Guardian IRAs ... B28

H

HDHP. *See* High-deductible health
 plans
 HE. *See* Household employees
 Head of household filing status ... A4,
 A22
 Health FSAs. *See* Flexible spending
 arrangements
 Health insurance. *See* Insurance,
 health
 Health reimbursement arrangement
 (HRA) ... A125, A171, A173
 fees for employer ... A175
 integration with another group
 health plan ... A126, A173–
 A174
 market reform rules ... A173–
 A175
 Health savings accounts
 contributions to ... A177
 eligibility ... A177
 limits ... A178
 distributions used to pay long-term
 care premiums ... C193
 withdrawals from ... A178
 Healthcare reimbursement
 plans ... A171, A175
 §105 plans ... A171, A173–A175
 ACA impact on ... A172
 Hedging ... A184, A192

High-deductible health plans ... A175,
 A177–A178
 Highway Investment, Job Creation,
 and Economic Growth Act of
 2012 ... C28
 Hobby losses ... A239
 HoH. *See* Head of household filing
 status
 Home equity
 indebtedness ... C162
 reverse mortgage ... C224
 Home offices
 deduction ... A252, C166
 actual expense method ... C166
 ordering rules ... C167
 safe harbor method ... C172
 depreciation issues ... C174
 Home sales
 acceleration of first-time
 homebuyer credit
 repayment ... C176
 capital gains ... A252, C105
 §121 exclusion ... C105
 business or rental use of
 home ... C110
 reduced exclusion ... C107,
 C109
 taxpayers incapable of self-
 care ... C106
 marital status and ... A30
 principal residence ... C166
 reporting ... C106
 Household employees ... B69
 citizenship and immigration
 requirements ... B71
 deducting wages paid to ... C198
 family employees ... B78
 identifying employer ... B77
 requirements for employer ... B71
 tax obligations ... B72, B78, C196
 v. independent contractors ... B69,
 C194
 HRA. *See* Health reimbursement
 arrangements
 HRP. *See* Healthcare reimbursement
 plans
 HSA. *See* Health savings accounts

I

Illness
 “chronically ill” defined ... B67,
 C182
 “spell of illness” defined ... C189

- life insurance distributions due to ... B63, B66
- long-term care due to ... B66, C182, C192
- relief from joint liability due to ... A14
- Immigrants
 - aliens
 - NIIT exemption ... A138
 - documentation for employment ... B71
- Improvements
 - vs. repairs ... A43, A58
- Income
 - accrual accounting ... B123
 - business vs. nonbusiness ... C37
 - foreign earned ... B185
 - gross ... B186–B191
 - passive ... B83
 - sale of lots ... B174
- Income averaging ... A203, A222
 - disposition of property ... A203–A204
 - effect on other taxes ... A204
 - elected farm income ... A203
 - impact of NOL ... A204
 - landlords ... A219
- Indian tribe members
 - Indian Health Service ... A103
 - individual mandate exemption for ... A103
- Individual mandate. *See* Affordable Care Act
- Individual retirement
 - arrangements ... B226–B231, B233–B234, C1
 - basis ... C1, C5
 - child-employees ... B28
 - contributions
 - as nonbusiness expense ... C37
 - deductible
 - contributions ... A21, C3
 - excess contributions ... C10
 - inherited IRAs ... A35
 - nondeductible
 - contributions ... C2–C3, C5
 - Roth IRAs ... A22
 - deductions
 - NOL carryback ... C51–C52
 - phaseout ... A21
 - distributions from ... C3, C18, C37
 - inherited ... A35, B172
 - nonspousal inherited ... B172
 - rollover ... A35, B229–B230
 - Roth IRAs ... A22, C18
 - traditional ... A35, B229–B230, C1, C5, C37, C52
 - wash sales ... C111
- Information
 - accountant-client
 - privilege ... A256
 - attorney-client privilege ... A255
 - disclosure by tax
 - practitioners ... A254
 - federally authorized tax practitioner
 - privilege ... A255
 - reliance on taxpayer
 - information ... A250–A251
- Information reporting
 - ACA employer mandate ... A126
 - annuity distributions ... A141
- Information Return Master
 - File ... A271
- Information Returns Processing
 - System ... A271
- Inherited assets
 - as long-term gain ... C95–C96
- Injury compensation ... B186
 - Form 1099-MISC ... B187
 - workmen's compensation ... B187
- Innocent spouse relief ... A8
- Inseperable unit ... B176
- Insurance
 - business ... C158
 - crop. *See* Farm Service Agency
 - health
 - as employee benefit ... A31, A36, A92, A97, A118, A167–A168, B30–B31
 - dependent coverage ... A96, A101, A106, A120–A121
 - federal exchanges ... A112
 - group coverage ... A92
 - Medicare. *See* Medicare
 - Medigap plans ... C181
 - minimum essential
 - coverage ... A92, A118, C177
 - retirement plan distribution used for ... C24
 - same-sex partners ... A31
 - SE deduction ... B31, C37
 - state exchanges ... A93, A112
 - liabilities arising from ... B126
 - life ... B58
 - accelerated death
 - benefits ... B63
 - company
 - demutualization ... B60
 - estate tax planning ... B60
 - spouse as beneficiary ... A37
 - surrender of policy ... B58
 - viatical settlements ... B63
 - whole life policy ... B58
- life insurance companies ... B60, C113
- long-term care ... C191, C193
- mortgage ... C51, C165
- unemployment. *See* Unemployment insurance
- Interest
 - mortgage ... B202
 - qualified residence ... B202
- Interest expenses
 - Internet businesses ... C158
 - investment interest ... C141
 - mortgage interest
 - payments ... C162
- Interest income
 - accrual method of
 - accounting ... B123
 - as nonbusiness income ... C37
 - from U.S. savings bonds ... A4
 - publicly traded partnerships ... B83
 - self-charged interest ... A182
- Internal Revenue Service
 - Annual Filing Season
 - Program ... A302
 - appealing determinations
 - by ... A273–A274
 - formal written protest ... A274
 - small case request ... A273
 - audits/examinations ... A243, A252, A259, A263, A295, A303
 - audit reconsideration
 - process ... A272
 - collection division ... A271
 - Criminal Investigation
 - Office ... A326
 - due diligence visits by ... A294
 - EITC Preparer Compliance
 - program ... A294–A295
 - employee misconduct ... A306–A307
 - impersonation of
 - personnel ... A307
 - letters to tax professionals ... A286
 - letters to taxpayers ... A275
 - Office of Appeals ... A272–A273
 - Office of Professional
 - Responsibility ... A246, A248, A288, A293
 - Offshore Voluntary Disclosure
 - Program ... A324–A325
 - Return Preparer Office ... A288
 - spending by ... A308

Taxpayer Advocate
Service ... A273
Internet businesses ... C157
 auctions ... C160
 casual sales ... C160
 payment facilitators ... A276
 selling online as a
 business ... C160
deductions of expenses ... C157
 depreciable personal
 property ... C157
payment settlement
 entities ... A276, C160
sales tax ... C161
Inventories
 accrual accounting ... B120
 method of valuation
 LCM ... B122
 LIFO ... B122
IRA. *See* Individual retirement
 arrangements
IRMF. *See* Information Return Master
 File
IRP. *See* Information Returns
 Processing System
IRS. *See* Internal Revenue Service

J

Joint tax refunds
 minority approach ... B173
 proportionately ... B173
 separate filings rule ... B173

K

Kiddie tax ... A108, B28

L

Landlords
 of farmland ... A189–A190, A203,
 A218–A219, A223
 cash rent ... A213, A220,
 A222–A223
 crop sharing ... A203, A219,
 A221–A223
 tobacco farms ... A220
 of pasture land ... A223
Layover hours ... A124
Lenity ... B199
LFD program ... A217
Liability
 business liability for personal acts
 of owners ... B17

 federal court application of state
 law ... B18
 joint and several ... B173
 joint liability of spouses ... A8
 personal liability protection of
 business owners ... B12
 charging orders ... B18
 fraud and misuse ... B13
 taxable distribution ... B199
Liability losses
 NOL carryback period ... C47, C49
Life expectancy
 for calculating SEPPs ... C18
 IRS tables ... C19–C20
Life insurance policy ... B189
 Form 1099-R ... B189
Like-kind exchanges ... B208–B209
 passive activity property ... B151
 residences ... C105
 timber/timberland ... A232
Limited liability companies ... B221
 additional Medicare tax ... A186
 charging orders ... B18
 election for tax
 classification ... B11
 formation issues ... B2–B3
 manager-managed LLCs ... A186
Livestock
 government programs ... A212,
 A217
 pasturing of ... A223
 sale of ... A191
 share leases ... A219, A223
 weather-related sales ... A225
Livestock Forage Disaster
 program ... A217
LLC. *See* Limited liability companies
Loans
 nonrecourse
 reverse mortgage ... C224
Long-term care ... C185
 by family members ... C198
 costs ... C185
 in-home care ... C189, C194
 insurance ... C191
 benefits ... C191, C193
 premiums ... C192
 need for ... C185
 paying for ... C186
 Medicaid ... C186
 Medicare ... C189
 private pay ... C186
 veterans' benefits ... C190
 skilled nursing facility ... C189
Losses
 business vs. nonbusiness ... C37

gambling ... B212
hobby ... B214
nonpassive ... B221
passive ... B83
 allocation of PALS for multiple
 activities ... B152
 capital losses ... B162
 limitations on PAL ... B142,
 B149, B162
passive activity ... B216–B218,
 B220
LP. *See* Partnerships

M

Marital status
 and NOLs ... C67
 annulment. *See* Annulment
 as determinant in joint liability
 relief ... A12
 change in ... A5–A6, C179
 common law marriages. *See*
 Common law marriage
 divorce. *See* Divorce
 married persons living
 apart ... A3–A4, A7, A9,
 A12, A24
 same-sex couples. *See* Same-sex
 marriage
 tax effects ... A18
Mark-to-market accounting ... A159,
 C144, C146, C148
Married filing jointly
 amending returns due to
 annulment ... A6
 NOL carrybacks and
 carryforwards ... C70
 qualifications to file as ... A3
Married filing separately
 NOL carrybacks and
 carryforwards ... C70
 rules when filing as ... A3
Master limited partnerships ... B79
 advantages of ... B80
 basis ... B82
 compared to other entity
 types ... B82
 disadvantages of ... B81
 examples of ... B79
 general partners ... B80
 history of ... B79
 income ... B83
 industry concentration ... B79
 passive losses ... B83
 structure of ... B80

tax packages ... B87
 unitholders ... B80
 Material participation ... B132
 100 hours and not less than others
 test ... B135
 3 years of personal services
 test ... B138
 5 out of 10 years test ... B137
 500-hour test ... B134
 7 tests used by IRS ... B134
 agricultural producers ... A180,
 A183, A188, A203, A219,
 A223
 burden of proof ... B139
 documentation ... B139
 facts and circumstances
 test ... B139
 grouping activities ... A144–A145,
 A153, A180, B142, B154
 in renting real estate ... A155
 limited partners ... B146
 oil and gas property ... B148
 significant participation
 test ... B136
 substantially all of the participation
 test ... B135
 tests ... B219
 trusts and estates ... B147
 MEC. *See* Affordable Care Act,
 minimum essential coverage
 Medicaid
 coverage ... A92
 eligibility ... A103, C187–C188
 long-term care coverage ... C187
 Medical expenses
 adjustment in NOL
 carryback ... C51
 deduction ... A19, C182
 limitation on ... C184
 long-term care
 premiums ... C192
 long-term care services ... C198
 qualifying expenses ... C182
 reporting ... C184
 retirement plan distributions
 for ... C24
 Medicare
 coverage ... A92, C177
 long-term care coverage ... C189
 Medigap plans ... C181
 Part A ... C178
 Part B ... C178
 Part D ... C180
 taxes
 additional ... A20

additional. *See* Additional
 Medicare tax
 employee-spouse ... A36
 NIIT. *See* Net investment
 income tax
 rates ... C197
 MFJ. *See* Married filing jointly
 MFS. *See* Married filing separately
 MILC. *See* Milk Income Loss Contract
 program
 Military service
 business expenses of
 reservists ... C37
 combat pay ... C155
 death gratuities ... C156
 deductions for reservists ... C149
 travel expenses ... C149
 uniform costs ... C152
 differential pay for
 reservists ... C153
 effect on first-time homebuyer
 credit ... C176
 health coverage ... A92
 health FSA distributions to
 reservists ... C154
 moving expenses of
 reservists ... C156
 retirement plan distribution
 exemption for
 reservists ... C28, C153
 veterans
 health coverage ... A92
 long-term care benefits ... C190
 Milk Income Loss Contract
 program ... A216
 Mining
 expenditures not subject to
 mandatory
 capitalization ... B126
 partnerships engaged in natural
 resource activities ... B83
 Minors. *See* Children
 Misappropriation of funds ... A11,
 A261
 MLP. *See* Master limited partnerships
 Mortgage Forgiveness Debt Relief Act
 of 2007 ... C176
 Mortgages
 cancellation of
 indebtedness ... C175
 insurance ... C165
 insurance premiums. *See* Insurance
 interest credit certificate ... C166
 interest payments ... C162
 prepaid ... C164

points ... C164
 refinancing ... C163
 reverse. *See* reverse mortgage
 Moving expenses
 as business activity ... C37
 of Armed Forces
 reservists ... C156

N

National Conference of
 Commissioners on Uniform
 State Laws ... B15
 Native Americans. *See* Indian tribe
 members
 Natural gas production
 domestic production gross
 receipts ... A190
 Natural resource activities
 partnerships earning income
 from ... B80, B83
 Natural Resources Conservation
 Service ... A207
 NCCUSL. *See* National Conference of
 Commissioners on Uniform
 State Laws
 Net investment income (NII) ... A134,
 A139
 deductions from ... A146, A149–
 A150
 estates and trusts ... A139
 grouping activities ... A180–A181
 income categories ... A141
 payments to retiring
 partners ... A157
 self-charged interest
 income ... A182
 self-rentals ... A180, A188
 Net investment income tax
 (NIIT) ... A20, A134, A179,
 B35, B131, B139, C144
 annuity distributions ... A141
 fresh-start regrouping ... B158
 income subject to. *See* Net
 investment income
 net losses to offset other
 NII ... A182
 sale of farmland ... A183
 land held in trust ... A184
 taxpayers affected ... A135
 threshold levels ... A179
 trading in commodities ... A184
 Net operating losses
 AMT ... C71

carryback and carryforward ... C45
 carryback period ... C45, C47
 carryforward ... C65
 carryover ... C64
 claiming carryback ... C49–C50
 deciding when to use ... C36, C49
 effect of carryback on IRA deductions ... C52
 election to forgo carryback ... C36, C46
 recalculating AGI for carryback years ... C51
 rules ... C45
 change in filing status ... C70
 change in marital status ... C67
 death of taxpayer ... C71
 debt forgiveness income ... C72
 effect on income averaging ... A204
 Form 1045 ... C54
 pass-through entities ... C74
 qualified small business stock ... C36
 NOL. *See* Net operating losses
 NRCS. *See* Natural Resources Conservation Service

O

OA. *See* Treasury Inspector General for Tax Administration, Office of Audit
 OASDI. *See* Social security
 Office of Personnel Management ... C28
 Office of Professional Responsibility ... A288, A293
 censure by ... A246
 examination of a tax preparer ... A248
 Offshore financial accounts ... B239
 Offshore Voluntary Disclosure Program ... A324–A325
 pre-clearance ... A325
 OI. *See* Treasury Inspector General for Tax Administration, Office of Investigation
 Oil activity
 active participation ... B148
 bonus payments ... A238
 On-call hours ... A124
 Online businesses. *See* Internet businesses
 OPM. *See* Office of Personnel Management

OPR. *See* Office of Professional Responsibility
 Ornamental plants ... A220
 OVDP. *See* Offshore Voluntary Disclosure Program

P

PA. *See* Passive activity
 PAC. *See* Credits, premium assistance credit
 PAL. *See* Losses, passive activity
 Parents
 as dependents. *See* Elderly taxpayers
 as employees ... B78
 as employers ... B78
 child support ... A15
 cost of educating child. *See* Education expenses
 custodial IRAs. *See* Custodial IRAs
 noncustodial ... A4, A23–A25, A107
 same-sex spouses ... A24
 second-parent adoptions ... A24, A32
 stock attribution rules ... B132
 Partnerships
 accounting method ... B120
 additional Medicare tax ... A185
 and NOLs ... C74
 conflict of interest for tax practitioner ... A243
 domestic production activities deduction ... A189, A199
 election for tax classification ... B8
 election to capitalize spare parts ... A49
 employee benefits ... B30
 formation issues ... B2–B3
 general partnerships
 charging orders ... B18
 limited partnerships ... B146
 charging orders ... B18
 general partner
 exception ... B147
 material participation ... B146–B147
 veil-piercing ... B15
 MLP. *See* Master limited partnerships
 payments to retiring partners ... A157
 PTP. *See* Publicly traded partnerships
 tax matters partner ... A244

Passive activity ... B219–B222
 ACA impact
 amending returns ... B158
 fresh-start regrouping ... B158
 affected taxpayers ... B131
 allocation of PALs ... B152
 as net investment income ... A141, A143, A152
 audit technique guide ... B151
 capital gains/losses ... B162
 change to active ... B152
 deductions allowed under §62 ... A146
 defined ... B131
 disposition of ... B150
 elections ... B157
 grouping rental real estate ... B154
 late ... B159
 fresh-start regrouping ... B158
 gifts ... B151
 grouping ... B154
 adding new activity to existing group ... B157
 failure to report ... B157
 partnerships and S corps ... B159
 income from. *See* Income, passive
 installment sale ... B151
 like-kind exchange ... B151
 limited partners ... B146
 losses ... B162
 limitations ... B149, B162
 losses from. *See* Losses
 material participation ... B131–B132, B149
 7 tests ... B134
 oil and gas property ... B148
 partial disposition ... B152
 pros and cons ... B154
 qualifying taxpayer ... B158
 real estate professional ... B141
 regrouping ... B157
 rental activity defined ... B140
 rental real estate ... B140
 subject to NIIT ... A141, A143, A152
 tax credits ... B150
 trusts and estates ... B147
 Patient Protection and Affordable Care Act. *See* Affordable Care Act
 Payment settlement entities ... A275
 as Internet business expense ... C158
 reporting transactions ... C160

Payroll service providers ... B102–B103

Peace Corps
health coverage ... A92

Pease limitation ... A19

Penalty ... B196, B198–B199
accuracy-related ... A74, B171, B189–B190, B197–B198, B200, B202, B204, B209–B212, B215–B217, B221, B225, B228–B230, B232

credit ... B201

early distribution ... B199, B228, B231
annuity ... C220

early withdrawals from retirement plans ... C12

early withdrawals of
savings ... A146, C38

failure to exercise due diligence ... A292–A293

failure to have minimum health coverage. *See* Shared responsibility payments

failure to pay ... A74, A272, B212

failure to provide minimum health coverage ... A119, A168

failure to report foreign assets ... A311, A320

failure to timely file Form 8606 ... C7

failure to withhold additional Medicare tax ... A163–A164

fraud ... B171

good faith ... B197, B203, B225, B232

IRC §6694 ... A250–A252
anti-stacking provision ... A254

late filing ... B216

offshore tax evasion ... A324

overstating nondeductible contribution on Form 8606 ... C7

reasonable cause
exception ... B190

substantial
understatement ... B197, B203

tax on excess IRA contributions ... C10

violation of healthcare insurance market reform rules ... A172, A175

PEO. *See* Professional employer organizations

Personal service activity ... B138

Personal service corporations ... B37
defined ... B132
qualified PSCs ... B37

Per-unit retain allocations ... A201–A202

Plant nurseries ... A220

PLC. *See* Farm Service Agency, price loss coverage

Potable water production
domestic production gross receipts ... A190

Poverty
Medicaid eligibility ... A103

Premium assistance credit. *See* Credits

Premium tax credit. *See* Credits

Premiums. *See* Insurance

Preparer tax identification numbers ... A248, A288

Principal residence ... B223–B224
reacquisition ... B223

Professional employer organizations ... B102

Profit motive ... B210

Property
§1250
types of real property ... C92
unrecaptured gains ... C87, C92, C110, C123

PSC. *See* Personal service corporations

PSE. *See* Payment settlement entities

PSP. *See* Payroll service providers

PTC. *See* Credits, premium tax credit

PTIN. *See* Preparer tax identification numbers

PTP. *See* Publicly traded partnerships

Public safety employees
retirement plan
distributions ... C24
volunteer employees ... A123

Publicly traded partnerships ... B79–B80, B83

Purchase of franchise ... B110

Q

QDRO. *See* Qualified domestic relations orders

QHEE. *See* Qualified higher education expenses

QJV. *See* Qualified joint ventures

QPAI. *See* Qualified production activities income

QPP. *See* Qualifying production property

QPRI. *See* Qualified principal residence indebtedness

QSBS. *See* Qualified small business stock

QTIP. *See* Qualified terminable interest property

QTP. *See* Qualified tuition programs

Qualified dividends. *See* Dividends, qualified

Qualified domestic relations orders ... C25

Qualified educational expenses ... C17

Qualified higher education expenses ... B48–B49

Qualified intermediary ... B208–B209

Qualified joint ventures ... B25
proper reporting ... B25
real estate rental income ... B25

Qualified principal residence indebtedness ... C176

Qualified production activities income ... A189

Qualified reservist
distributions ... C153
repayments ... C154

Qualified residence interest ... C162

Qualified small business stock
capital gains
exclusion ... C93
reporting on Form 8949 ... C113
tax rate ... C87

Qualified terminable interest property ... A39

Qualified tuition programs ... B45

Qualifying production property ... A190

Qualifying widow/widower ... A4

QW. *See* Qualifying widow/widower

R

Railroad retirement
benefits ... A4, C51

Railroad Retirement Tax Act ... A166

Real estate
active v. material
participation ... B141–B142
active v. passive income/
losses ... A155–A156, B142
as part of franchise
purchase ... B111
land leased ... B111
land purchased ... B112
grouping rule ... B142
qualification as
professional ... A155, B141

reacquisition of ... A239
 rental income in qualified joint
 venture ... B25
 special valuation by estate ... A39
 trusts as real estate
 professionals ... B147
 Real estate investment trusts
 and NOLs ... C47
 Real estate professional
 \$25,000 exception ... B142
 grouping late election ... B142
 grouping rule ... B142
 qualifications ... B141
 special allowance
 qualifications ... B144
 income phaseout ... B145
 Reasonable compensation ... B235
 Recapture tax ... C22
 Reforestation ... A230
 Refunds
 of spouse's portion of joint
 overpayment ... A9–A10
 seized to pay taxpayer's
 debts ... A15
 theft of ... A307
 to injured spouse ... A15
 Registered tax return preparer
 program ... A302
 REITs. *See* Real estate investment
 trusts
 Religious orders
 employer mandate exemption
 for ... A123
 Rental activity
 accrual method of
 accounting ... B123
 active v. material
 participation ... A152, B140,
 B142, B149
 active v. passive income/
 losses ... B140, B142
 adjustment in NOL
 carryback ... C51
 as a trade or business ... A154
 as business income ... C38
 defined ... A152, B140
 domestic production gross
 receipts ... A190
 farmland ... A219, A223
 incidental to development ... A154
 income included in NII ... A152
 publicly traded partnerships ... B83
 real estate professionals ... A155
 self-rental ... A156, A180, A188
 Rental income
 as business activity ... C37

Repairs
 vs. improvements ... A43, A58
 Reporting agents ... B103
 Reservists. *See* Military service
 Residential energy credits ... C175
 Restorations ... A61
 major components ... A62
 substantial structural parts ... A62
 Restructuring and Reform Act of
 1998 ... A305
 Retirement income ... C199
 annuities ... C215
 from retirement plans ... C200
 social security benefits ... C204
 Retirement plans
 contributions ... C38
 defined benefit plans ... C200
 defined contribution plans ... C200
 employment-based ... C200
 incorrect Forms 1099-R ... C8
 IRAs. *See* Individual retirement
 arrangements
 IRS levies on ... C26
 withdrawals
 annuity distributions ... C201
 death ... C14
 disability ... C15
 distribution options ... C201
 distributions after age
 59½ ... C14
 educational expenses ... C17
 ESOP dividends ... C25
 federal employees ... C28
 first-time homebuyers ... C27
 installment
 distributions ... C201
 lump-sum distribution ... C201
 medical expenses ... C24
 penalty for early
 withdrawal ... C12
 permitted early
 withdrawals ... C13–C15,
 C17–C18, C23–C29
 proration ... C3
 QDROs ... C25
 qualified reservists ... C28,
 C153
 separation from
 employer ... C23
 substantially equal periodic
 payments ... C18
 Retirement savings contributions
 credit ... A4
 Retiring partners
 tax treatment of payments
 to ... A157

Revenue Act of 1987 ... B80
 Reverse mortgage ... C224
 benefits ... C230
 borrower rights and
 responsibilities ... C229
 definition ... C224
 effect on social security ... C230
 fees, costs and payments ... C227
 FHA-insured ... C225
 home equity ... C224
 lender responsibilities ... C229
 lender-insured ... C225
 loan amounts ... C226
 loan repayment ... C228
 other alternatives ... C231
 payments from ... C227
 qualifying for ... C226
 risks ... C229
 tax issues ... C230
 types ... C224
 uninsured ... C226
 Revised Uniform Limited Partnership
 Act (RULPA) ... B16
 Revised Uniform Partnership Act
 (RUPA) ... B15
 Roth IRAs. *See* Individual retirement
 arrangements, Roth IRAs
 Routine maintenance ... A68
 buildings ... A69
 property other than
 buildings ... A69
 Royalties
 as nonbusiness income ... C38
 RPO. *See* Internal Revenue Service,
 Return Preparer Office
 RRA 98. *See* Restructuring and
 Reform Act of 1998
 RRTA. *See* Railroad Retirement Tax
 Act
 RTRP. *See* Registered tax return
 preparer program
 RUPA. *See* Revised Uniform
 Partnership Act

S

S corporations ... B197, B234, B236
 additional Medicare tax ... A186
 and NOLs ... C74
 domestic production activities
 deduction ... A189, A199
 election for tax
 classification ... B11, B105
 late elections ... B106
 qualifications ... B105

- election to capitalize spare parts ... A49
- employee benefits ... B31
- farming income ... A221
- formation issues ... B2
- Sales tax
 - Internet businesses ... C161
- Same-sex marriage ... A1
 - amended returns ... A5, A7, A25, A28–A29, A31, A33, A37, A40–A41
 - Defense of Marriage Act ... A1
 - divorce ... A41
 - estate and gift taxes ... A36, A39
 - filing status ... A3, A5
 - statute of limitations ... A7
 - real estate inheritance ... A40
 - retroactive recognition for civil union ... A5
 - states that allow ... A2
 - Supreme Court ruling ... A1, A24, A36
- Savings bonds
 - interest ... C51
- SCO. *See* Farm Service Agency, supplemental coverage option
- Seasonal workers ... A122, A167
- Section 529 plans. *See* Qualified tuition programs
- Securities. *See* Stocks and securities
- Self-employment tax ... A160, B188
 - as business activity ... C37
 - farmers ... A221, A223
 - online auctions ... C160
 - spouse-owners ... B24
- Senior citizens. *See* Elderly taxpayers
- SEPP. *See* Substantially equal periodic payments
- SFCP. *See* Streamlined filing compliance procedures
- Shared responsibility
 - payments ... A91, A96, A106, A262
 - calculation ... A107
 - dependents ... A106
 - phase-in periods ... A109
- SHOP exchanges. *See* Small Business Health Options Program exchanges
- Short sales ... C113
- Significant participation
 - activities ... A156, B136
- Significant participation passive activities ... B137
- Simplified method
 - annuity withdrawals ... C219
- Single-member LLCs
 - charging orders ... B22
- Small Business Health Options Program exchanges ... A112, A169
- Small Business Jobs Act of 2010 ... C113
- SMLLC. *See* Single-member LLCs
- SNF. *See* Long-term care, skilled nursing facility
- Social security
 - benefit calculators ... C205
 - benefits ... C38
 - adjustment in NOL
 - carryback ... C51
 - and material participation by decedent farmer ... A219
 - in spouses' combined income ... A4
 - marital status and ... A29–A30
 - full retirement age ... C205
 - retirement benefits
 - at age 62 ... C206
 - calculating ... C206
 - effect of gov't pensions ... C209
 - government pension offset
 - calculating reduced benefits ... C214
 - primary insurance
 - amount ... C206
 - spouses ... C207
 - windfall elimination
 - provision ... C209
 - calculating reduced benefits ... C211
- taxes
 - employee-spouse ... A36
 - rates ... C197
- Sod ... A220
- Software
 - as qualifying production property ... A190
- Soil conservation. *See* Farming
- Sole proprietorships
 - employee-spouse ... A36
 - formation issues ... B2
- Sound recordings
 - as qualifying production property ... A190
- SPA. *See* Significant participation activities
- Spare parts
 - election to capitalize ... A48
- optional accounting
 - method ... A49
- rotatable spare parts ... A46
- standby emergency spare parts ... A46
- temporary spare parts ... A46
- units of property ... A57
- Spouses
 - abuse ... A9–A14
 - aggregation under material participation rules ... B134
 - as employees ... A36, B78
 - death of ... A4, A6
 - joint and several liability ... A8
 - community property
 - states ... A15
 - equitable relief ... A9
 - innocent spouse relief ... A8
 - separation of liability
 - relief ... A9
 - joint business ownership ... B24
 - qualified joint ventures ... B25
 - refund to injured spouse ... A15
 - same-sex. *See* Same-sex marriage
 - stock attribution rules ... B132
 - vs. partners in unrecognized relationship ... A18
- SPPA. *See* Significant participation passive activities
- State laws
 - accountant-client
 - privilege ... A256
 - community property ... B24
 - owner liability ... B18
 - Nevada charging order
 - protection ... B23
 - Wyoming charging order
 - protection ... B23
 - practice of law by non-attorneys ... A242
- Statute of limitations ... B237
- Statutory fringe benefits. *See* Employee benefits, statutory fringe benefits
- Stocks and securities
 - §1202 stock ... C93
 - classification of buyers and sellers ... C139
 - definitions ... C145
 - floor specialists ... C145
 - mark-to-market rules ... C144, C146, C148
 - securities dealers ... C144
 - defined ... C145
 - securities investors ... C139

- deductions ... C140–C141
- net investment income
 - tax ... C144
- securities traders ... C112, C146
- tax implications ... C148
- trader test ... C147
- wash sales ... C111, C140
- worthless ... C105
- Storage
 - of agricultural products ... A192
- Streamlined filing compliance
 - procedures ... A324–A325
- Student employees ... A123
- Student loans
 - forgiven debt ... C72
 - interest
 - adjustment in NOL
 - carryback ... C51
 - as nonbusiness expense ... C38
 - deduction ... A3
- Substantial authority ... A249, B165
 - evaluation of authorities ... B165
 - nature of analysis ... B166
- Substantially equal periodic
 - payments ... C18
 - fixed amortization method ... C19
 - fixed annuitization method ... C19
 - recapture tax ... C21
 - RMD method ... C19
- Supplemental Revenue Assistance
 - Payments program ... A212
- SURE program ... A212

T

- Tax brackets and rates ... A19, B33
- Tax Equity and Fiscal Responsibility
 - Act ... A272
- Tax matters partners ... A244
- Tax practitioners
 - AFSP designation ... A303–A304
 - audits of ... A295
 - competency rule of Circular
 - 230 ... A244, A261–A262
 - complaints against ... A306
 - confidentiality ... A255
 - conflicts of interest ... A241
 - example of violation ... A246
 - of person providing
 - advice ... A264
 - waiver by client ... A241
 - within the same firm ... A247
 - consulting colleagues ... A251,
 - A263–A264

- continuing education ... A302
- criminal conviction of ... A261,
 - A265, A304
- criminal investigation of ... A293
- disciplinary actions
 - against ... A241, A254,
 - A265, A293
- disclosure of information
 - by ... A254
- due diligence
 - responsibilities ... A247,
 - A253, A265, A286, A288,
 - A291–A293, A295
- EIC errors ... A290, A292–A293
- errors
 - frequency of ... A250
 - good faith exception for
 - reasonable error ... A250
 - materiality of ... A251
 - office practices to
 - avoid ... A251
- fees charged by ... A257
 - contingent fees ... A258
 - excessive ... A257
- filing/paying their own
 - taxes ... A262, A265, A288
- good faith determinations ... A250
- incompetence ... A261–A262
- IRS letters to ... A286, A293
 - Letter 4810 ... A288
 - Letter 4833 ... A294
 - Letter 4911 ... A288
 - Letter 5025 ... A294
 - Letter 5025-C ... A294
 - Letter 5025-D ... A294
 - Letter 5025-Q ... A294
 - Letter 5105 ... A286
 - Letter 5271 ... A288
 - Letter 5272 ... A288
- misconduct by ... A261, A265,
 - A304, A307
- noncredentialed tax return
 - preparers ... A303
- penalties ... A250–A252, A254,
 - A292–A293
- preparer tax identification
 - numbers ... A248, A288
- reliance on taxpayer
 - information ... A250
- solicitation of
 - employment ... A261, A304
- standards for tax returns ... A248
- suspension of ... A262, A265,
 - A304

- unauthorized practice of law
 - by ... A242–A243
- visits by IRS ... A294
- willful or reckless conduct
 - by ... A251
- written advice by ... A263
- Tax preparer regulation
 - 31 USC §330 ... B192–B193
 - representation ... B193
- Tax Relief, Unemployment Insurance
 - Reauthorization and Jobs
 - Creation Act of 2010 ... C113
- Tax-exempt status ... B238
- Taxpayer Advocate Service ... A273
- Taxpayer statistics ... B196
 - alternative minimum tax ... B196
 - earned income credit ... B196
- Teachers
 - business-related expenses ... C37
- TEFRA. *See* Tax Equity and Fiscal
 - Responsibility Act
- Termination of employment
 - firm's right ... B70, B77
 - insurance for. *See* Unemployment
 - insurance
 - qualifying event for COBRA
 - coverage ... A97
 - worker's right ... B70
- TFRP. *See* Trust fund recovery penalty
- Theft
 - as business loss ... C37
 - as disposition of passive
 - activity ... B150
 - deduction ... A19
 - Form 4684 ... C54
 - losses allowed for NIIT
 - purposes ... A150
 - NOL carryback period ... C47
 - of tax refunds ... A307
- Third party network
 - transactions ... A275, C160
- Third party payers ... A276
- TIGTA. *See* Treasury Inspector
 - General for Tax Administration
- Timber ... A228
 - capitalization ... A229
 - casualty losses ... A231
 - corporate owners ... A230
 - cut timber ... A228–A229
 - expenses ... A229
 - carrying charges ... A229
 - development costs ... A230
 - holding costs ... A230
 - management and operating
 - expenses ... A229

reforestation expenses ... A230
 thinning ... A230
 timber stand
 improvements ... A230
 like-kind exchanges ... A232
 qualified timber property ... A230–A231
 sellers of
 farmers ... A228
 investors ... A228
 standing timber ... A228–A229
 unimproved timberland ... A230
 unproductive timberland ... A230
 TMP. *See* Tax matters partners
 Tobacco ... A220–A221
 TOP. *See* Treasury Offset Program
 TPP. *See* Third party payers
 Traditional IRAs. *See* Individual retirement arrangements
 Transferable interest
 charging orders ... B18
 Travel expenses
 as employee business
 expenses ... B70, C128, C133
 deduction for Armed Forces reservists ... C149
 in determining employee v. independent contractor ... B70
 per diem allowances ... C149
 Treasury Inspector General for Tax Administration (TIGTA) ... A305
 Complaint Management Team ... A306
 current happenings ... A307
 Office of Audit ... A305
 Office of Investigation ... A306
 reporting misconduct to ... A307
 reports ... A307
 2013-40-123 ... B201
 2014-10-007 ... B191
 Special Inquiries and Intelligence Division ... A306
 Treasury Offset Program ... A15
 Tree Assistance Program ... A212
 Trees. *See* Timber
 TRICARE ... A92
 Trust fund recovery penalty ... B101
 amount of ... B105
 outsourced payroll ... B103
 persons responsible ... B102
 Trust fund tax ... B101

Trusts
 accounting method ... B120
 additional Medicare tax ... A185
 charitable remainder trusts ... A140
 domestic production activities deduction ... A189, A199
 electing small business trusts ... A140, A185
 farming income ... A220
 foreign holdings ... A140, A320
 material participation ... B147
 net investment income tax ... A138
 passive activity rules ... B147
 qualified personal residence trust ... C231
 qualified terminable interest property ... A39
 sale of farmland ... A184
 unused NOLs ... C74

U

U.S. Citizenship and Immigration Services ... B71
 UGMA. *See* Uniform Gifts to Minors Act
 ULPA. *See* Uniform Limited Partnership Act
 Unemployment insurance
 compensation debts owed to a state ... A15
 FUTA taxes ... A36, B74, C197–C198
 state unemployment taxes ... B74, B76, C196, C198
 UNICAP. *See* Uniform capitalization
 Uniform capitalization ... A224, A229
 Uniform Gifts to Minors Act ... B46
 Uniform Limited Partnership Act ... B16, B18
 Uniform Partnership Act ... A243, B15
 Uniform Transfers to Minors Act ... B46
 Uniforms
 deduction for Armed Forces reservists ... C152
 United States Department of Agriculture. *See* USDA
 Units of property ... A52
 buildings ... A52
 cost segregation ... A53, A78
 general rule ... A52

 special rules ... A54
 condominiums ... A54
 cooperatives ... A55
 leased buildings ... A55
 leased property other than buildings ... A56
 network assets ... A56
 plant property ... A56
 property other than buildings ... A55
 general rule ... A55
 special rules ... A55
 spare parts ... A57
 special rules ... A54–A55, A57
 Unrecognized relationships
 adoption ... A24, A32
 civil unions ... A2, A5, A7
 domestic partnerships ... A7
 employment of partner ... A36
 HoH filing status ... A22
 stepchildren ... A24
 vs. marriage ... A18
 USCIS. *See* U.S. Citizenship and Immigration Services
 USDA
 programs ... A223
 UTMA. *See* Uniform Transfers to Minors Act

V

Vehicles. *See* Automobiles
 Viatical settlement companies ... B63
 Volunteers ... A123

W

Wash sales ... C111, C140
 Willfulness ... B104
 Workers
 employees v. volunteers ... A123
 farmworkers ... A225
 seasonal ... A122, A167
 Working interest ... B148