Internal Revenue Code Table of Contents Edited

UNITED STATES CODE

TABLE OF CONTENTS (SELECTIONS)

TITLE 26: INTERNAL REVENUE CODE

SUBTITLE A — INCOME TAXES (SECTIONS 1 TO 1564)

Chapter 1 — Normal taxes and surtaxes (Sections 1 to 1400Z-2)

SUBCHAPTER A — DETERMINATION OF TAX LIABILITY (SECTIONS 1 TO 59B)

PART I — TAX ON INDIVIDUALS

- Sec. 1. Tax Imposed
- Sec. 2. Definitions And Special Rules
- Sec. 3. Tax Tables For Individuals
- Sec. 5. Cross References Relating To Tax On Individuals

PART II — TAX ON CORPORATIONS (SECTIONS 11 TO 12)

- Sec. 11. Tax Imposed
- Sec. 12. Cross References Relating To Tax On Corporations

PART III — CHANGES IN RATES DURING A TAXABLE YEAR (SECTION 15)

Sec. 15. Effect Of Changes

PART IV — CREDITS AGAINST TAX (SECTIONS 21 TO 54AA)

Subpart A — Nonrefundable Personal Credits (Sections 21 to 26)

- Sec. 21. Expenses For Household And Dependent Care Services Necessary For Gainful Employment
- Sec. 22. Credit For The Elderly And The Permanently And Totally Disabled
- Sec. 23. Adoption Expenses
- Sec. 24. Child Tax Credit
- Sec. 25. Interest On Certain Home Mortgages
- Sec. 25A. American Opportunity And Lifetime Learning Credits
- Sec. 25B. Elective Deferrals And IRA Contributions By Certain Individuals
- Sec. 25C. Nonbusiness Energy Property
- Sec. 25D. Residential Energy Efficient Property
- Sec. 26. Limitation Based On Tax Liability; Definition Of Tax Liability

Subpart B — Other Credits (Sections 27 to 30D)

- Sec. 27. Taxes Of Foreign Countries And Possessions Of The United States
- Sec. 29. Credit For Producing Fuel From A Nonconventional Source
- Sec. 30. Certain Plug-In Electric Vehicles [Repealed]
- Sec. 30A. Puerto Rico Economic Activity Credit [Repealed]
- Sec. 30B. Alternative Motor Vehicle Credit
- Sec. 30C. Alternative Fuel Vehicle Refueling Property Credit
- Sec. 30D. New Qualified Plug-In Electric Drive Motor Vehicles

Subpart C — **Refundable Credits (Sections 31 to 37)**

- Sec. 31. Tax Withheld On Wages
- Sec. 32. Earned Income
- Sec. 33. Tax Withheld At Source On Nonresident Aliens And Foreign Corporations
- Sec. 34. Certain Uses Of Gasoline And Special Fuels
- Sec. 35. Health Insurance Costs Of Eligible Individuals

- Sec. 36. First-Time Homebuyer Credit
- Sec. 36A. Making Work Pay Credit [Repealed]
- Sec. 36B. Refundable Credit For Coverage Under A Qualified Health Plan
- Sec. 36C. Adoption Expenses
- Sec. 37. Overpayments Of Tax

Subpart D — **Business Related Credits (Sections 38 to 45T)**

- Sec. 38. General Business Credit
- Sec. 39. Carryback And Carryforward Of Unused Credits
- Sec. 40. Alcohol, Etc. Used As Fuel
- Sec. 40A. Biodiesel And Renewable Diesel Used As Fuel
- Sec. 41. Credit For Increasing Research Activities
- Sec. 42. Low-Income Housing Credit
- Sec. 43. Enhanced Oil Recovery Credit
- Sec. 44. Expenditures To Provide Access To Disabled Individuals
- Sec. 45. Electricity Produced From Certain Renewable Resources, Etc.
- Sec. 45A. Indian Employment Credit
- Sec. 45B. Credit For Portion Of Employer Social Security Taxes Paid With Respect To Employee Cash Tips
- Sec. 45C. Clinical Testing Expenses For Certain Drugs For Rare Diseases Or Conditions
- Sec. 45D. New Markets Tax Credit
- Sec. 45E. Small Employer Pension Plan Startup Costs
- Sec. 45F. Employer-Provided Child Care Credit
- Sec. 45G. Railroad Track Maintenance Credit
- Sec. 45H. Credit For Production Of Low Sulfur Diesel Fuel.
- Sec. 45I. Credit For Producing Oil And Gas From Marginal Wells
- Sec. 45J. Credit For Production From Advanced Nuclear Power Facilities
- Sec. 45K. Credit For Producing Fuel From A Nonconventional Source
- Sec. 45L. New Energy Efficient Home Credit
- Sec. 45M. Energy Efficient Appliance Credit [Repealed]
- Sec. 45N. Mine Rescue Team Training Credit
- Sec. 45O. Agricultural Chemicals Security Credit
- Sec. 45P. Employer Wage Credit For Employees Who Are Active Duty Members Of The Uniformed Services
- Sec. 45Q. Credit For Carbon Oxide Sequestration
- Sec. 45R. Employee Health Insurance Expenses Of Small Employers
- Sec. 45S. Employer Credit For Paid Family And Medical Leave
- Sec. 45T. Auto-Enrollment Option For Retirement Savings Options Provided By Small Employers

Subpart E — Rules For Computing Investment Credit (Sections 46 to 50B)

Subpart F — Rules for Computing Work Opportunity Credit (Sections 51 to 52)

Subpart G — Credit Against Regular Tax for Prior Year Minimum Tax Liability (Section 53)

Subpart H — Nonrefundable Credit to Holders of Clean Renewable Energy Bonds (Section 54) [Repealed]

Subpart I — Qualified Tax Credit Bonds (Sections 54A to 54F) [Repealed]

Subpart J — Build America Bonds (Section 54AA) [Repealed]

PART VI — ALTERNATIVE MINIMUM TAX (SECTIONS 55 TO 59)

PART VII—BASE EROSION AND ANTI-ABUSE TAX (SECTION 59A)

PART VIII — SUPPLEMENTAL MEDICARE PREMIUM [REPEALED] (SECTION 59B)

SUBCHAPTER B — COMPUTATION OF TAXABLE INCOME (SECTIONS 61 TO 291)

PART I — DEFINITION OF GROSS INCOME, ADJUSTED GROSS INCOME, TAXABLE INCOME, ETC. (SECTIONS 61 TO 68)

- Sec. 61. Gross Income Defined
- Sec. 62. Adjusted Gross Income Defined
- Sec. 63. Taxable Income Defined
- Sec. 64. Ordinary Income Defined
- Sec. 65. Ordinary Loss Defined
- Sec. 66. Treatment Of Community Income
- Sec. 67. 2-Percent Floor On Miscellaneous Itemized Deductions
- Sec. 68. Overall Limitation On Itemized Deductions

PART II — ITEMS SPECIFICALLY INCLUDED IN GROSS INCOME (SECTIONS 72 TO 91)

- Sec. 71. Alimony And Separate Maintenance Payments [Repealed]
- Sec. 72. Annuities; Certain Proceeds Of Endowment And Life Insurance Contracts
- Sec. 73. Services Of Child
- Sec. 74. Prizes And Awards
- Sec. 75. Dealers In Tax-Exempt Securities
- Sec. 77. Commodity Credit Loans
- Sec. 78. Gross Up For Deemed Paid Foreign Tax Credit
- Sec. 79. Group-Term Life Insurance Purchased For Employees
- Sec. 80. Restoration Of Value Of Certain Securities
- Sec. 82. Reimbursement Of Moving Expenses
- Sec. 83. Property Transferred In Connection With Performance Of Services
- Sec. 84. Transfer Of Appreciated Property To Political Organizations
- Sec. 85. Unemployment Compensation
- Sec. 86. Social Security And Tier 1 Railroad Retirement Benefits
- Sec. 87. Alcohol And Biodiesel Fuels Credits
- Sec. 88. Certain Amounts With Respect To Nuclear Decommissioning Costs
- Sec. 89. Benefits Provided Under Certain Employee Benefit Plans [Repealed]
- Sec. 90. Illegal Federal Irrigation Subsidies
- Sec. 91. Certain Foreign Branch Losses Transferred To Specified 10-Percent Owned Foreign Corporations

PART III — ITEMS SPECIFICALLY EXCLUDED FROM GROSS INCOME (SECTIONS 101 TO 140)

- Sec. 101. Certain Death Benefits
- Sec. 102. Gifts And Inheritances
- Sec. 103. Interest On State And Local Bonds
- Sec. 103A. Mortgage Subsidy Bonds [Repealed]
- Sec. 104. Compensation For Injuries Or Sickness
- Sec. 105. Amounts Received Under Accident And Health Plans
- Sec. 106. Contributions By Employer To Accident And Health Plans
- Sec. 107. Rental Value Of Parsonages
- Sec. 108. Income From Discharge Of Indebtedness
- Sec. 109. Improvements By Lessee On Lessor's Property
- Sec. 110. Qualified Lessee Construction Allowances For Short-Term Leases
- Sec. 111. Recovery Of Tax Benefit Items
- Sec. 112. Certain Combat Zone Compensation Of Members Of The Armed Forces
- Sec. 113. Mustering-Out Payments For Members Of The Armed Forces [Repealed]

- Sec. 114. Extraterritorial Income [Repealed]
- Sec. 115. Income Of States, Municipalities, Etc.
- Sec. 117. Qualified Scholarships
- Sec. 118. Contributions To The Capital Of A Corporation
- Sec. 119. Meals Or Lodging Furnished For The Convenience Of The Employer
- Sec. 120. Amounts Received Under Qualified Group Legal Services Plans [Repealed]
- Sec. 121. Exclusion Of Gain From Sale Of Principal Residence
- Sec. 122. Certain Reduced Uniformed Services Retirement Pay
- Sec. 123. Amounts Received Under Insurance Contracts For Certain Living Expenses
- Sec. 124. Qualified Transportation Provided By Employer [Repealed]
- Sec. 125. Cafeteria Plans
- Sec. 126. Certain Cost-Sharing Payments
- Sec. 127. Educational Assistance Programs
- Sec. 128. Interest On Certain Savings Certificates [Repealed]
- Sec. 129. Dependent Care Assistance Programs
- Sec. 130. Certain Personal Injury Liability Assignments
- Sec. 131. Certain Foster Care Payments
- Sec. 132. Certain Fringe Benefits
- Sec. 133. Interest On Certain Loans Used To Acquire Employer Securities [Repealed]
- Sec. 134. Certain Military Benefits
- Sec. 135. Income From United States Savings Bonds Used To Pay Higher Education Tuition And Fees
- Sec. 136. Energy Conservation Subsidies Provided By Public Utilities
- Sec. 137. Adoption Assistance Programs
- Sec. 138. Medicare Advantage MSA
- Sec. 139. Disaster Relief Payments
- Sec. 139A. Federal Subsidies For Prescription Drug Plans
- Sec. 139B. Benefits Provided To Volunteer Firefighters And Emergency Medical Responders
- Sec. 139C. COBRA Premium Assistance [Repealed]
- Sec. 139D. Indian Health Care Benefits
- Sec. 139E. Indian General Welfare Benefits
- Sec. 139F. Certain Amounts Received By Wrongfully Incarcerated Individuals
- Sec. 139G. Assignments To Alaska Native Settlement Trusts
- Sec. 139H. Interest Received In Action To Recover Property Seized By The Internal Revenue Service
- **Based On Structuring Transaction**
- Sec. 139I. Continuation Coverage Premium Assistance
- Sec. 140. Cross References To Other Acts

PART IV — TAX EXEMPTION REQUIREMENTS FOR STATE AND LOCAL BONDS (SECTIONS 141 TO 150)

PART V — DEDUCTIONS FOR PERSONAL EXEMPTIONS (SECTIONS 151 TO 153)

- Sec. 151. Allowance Of Deductions For Personal Exemptions
- Sec. 152. Dependent Defined
- Sec. 153. Cross References

PART VI — ITEMIZED DEDUCTIONS FOR INDIVIDUALS AND CORPORATIONS (SECTIONS 161 TO 199A)

- Sec. 161. Allowance Of Deductions
- Sec. 162. Trade Or Business Expenses
- Sec. 163. Interest
- Sec. 164. Taxes
- Sec. 165. Losses
- Sec. 166. Bad Debts

- Sec. 167. Depreciation
- Sec. 168. Accelerated Cost Recovery System
- Sec. 169. Amortization Of Pollution Control Facilities
- Sec. 170. Charitable, Etc., Contributions And Gifts
- Sec. 171. Amortizable Bond Premium
- Sec. 172. Net Operating Loss Deduction
- Sec. 173. Circulation Expenditures
- Sec. 174. Research And Experimental Expenditures (Amounts paid or incurred in taxable years beginning before 2022)
- Sec. 174. Amortization of Research And Experimental Expenditures (Amounts paid or incurred in taxable years beginning after 2021)
- Sec. 175. Soil And Water Conservation Expenditures; Endangered Species Recovery Expenditures
- Sec. 176. Payments With Respect To Employees Of Certain Foreign Corporations
- Sec. 178. Amortization Of Cost Of Acquiring A Lease
- Sec. 179. Election To Expense Certain Depreciable Business Assets
- Sec. 179A. Deduction For Clean-Fuel Vehicles And Certain Refueling Property [Repealed]
- Sec. 179B. Deduction For Capital Costs Incurred In Complying With Environmental Protection Agency Sulfur Regulations
- Sec. 179C. Election To Expense Certain Refineries
- Sec. 179D. Energy Efficient Commercial Buildings Deduction
- Sec. 179E. Election To Expense Advanced Mine Safety Equipment
- Sec. 180. Expenditures By Farmers For Fertilizer, Etc.
- Sec. 181. Treatment Of Certain Qualified Film And Television And Live Theatrical Productions
- Sec. 183. Activities Not Engaged In For Profit
- Sec. 184. Amortization Of Certain Railroad Rolling Stock [Repealed]
- Sec. 186. Recoveries Of Damages For Antitrust Violations, Etc.
- Sec. 188. Amortization Of Certain Expenditures For Child Care Facilities [Repealed]
- Sec. 189. Amortization Of Real Property Construction Period Interest And Taxes [Repealed]
- Sec. 190. Expenditures To Remove Architectural And Transportation Barriers To The Handicapped And Elderly
- Sec. 192. Contributions To Black Lung Benefit Trust
- Sec. 193. Tertiary Injectants
- Sec. 194. Treatment Of Reforestation Expenditures
- Sec. 194A. Contributions To Employer Liability Trusts
- Sec. 195. Start-Up Expenditures
- Sec. 196. Deduction For Certain Unused Business Credits
- Sec. 197. Amortization Of Goodwill And Certain Other Intangibles
- Sec. 198. Expensing Of Environmental Remediation Costs
- Sec. 198A. Expensing of Qualified Disaster Expenses [Repealed]
- Sec. 199. Income Attributable To Domestic Production Activities [Repealed]
- Sec. 199A. Qualified Business Income

PART VII — ADDITIONAL ITEMIZED DEDUCTIONS FOR INDIVIDUALS (SECTIONS 211 TO 224)

- Sec. 211. Allowance Of Deductions
- Sec. 212. Expenses For Production Of Income
- Sec. 213. Medical, Dental, Etc., Expenses
- Sec. 215. Alimony, Etc., Payments [Repealed]
- Sec. 216. Deduction Of Taxes, Interest, And Business Depreciation By Cooperative Housing Corporation Tenant-Stockholder
- Sec. 217. Moving Expenses
- Sec. 219. Retirement Savings

- Sec. 220. Archer MSAs
- Sec. 221. Interest On Education Loans
- Sec. 222. Qualified Tuition And Related Expenses [Repealed]
- Sec. 223. Health Savings Accounts
- Sec. 224. Cross Reference

PART VIII — SPECIAL DEDUCTIONS FOR CORPORATIONS (SECTIONS 241 TO 250)

PART IX — ITEMS NOT DEDUCTIBLE (SECTIONS 261 TO 280H)

- Sec. 261. General Rule For Disallowance Of Deductions
- Sec. 262. Personal, Living, And Family Expenses
- Sec. 263. Capital Expenditures
- Sec. 263A. Capitalization And Inclusion In Inventory Costs Of Certain Expenses
- Sec. 264. Certain Amounts Paid In Connection With Insurance Contracts
- Sec. 265. Expenses And Interest Relating To Tax-Exempt Income
- Sec. 266. Carrying Charges
- Sec. 267. Losses, Expenses, And Interest With Respect To Transactions Between Related Taxpayers
- Sec. 267A. Certain Related Party Amounts Paid Or Accrued In Hybrid Transactions Or With Hybrid Entities
- Sec. 268. Sale Of Land With Unharvested Crop
- Sec. 269. Acquisitions Made To Evade Or Avoid Income Tax
- Sec. 269A. Personal Service Corporations Formed Or Availed Of To Avoid Or Evade Income Tax
- Sec. 269B. Stapled Entities
- Sec. 271. Debts Owed By Political Parties, Etc.
- Sec. 272. Disposal Of Coal Or Domestic Iron Ore
- Sec. 273. Holders Of Life Or Terminable Interest
- Sec. 274. Disallowance Of Certain Entertainment, Etc., Expenses
- Sec. 275. Certain Taxes
- Sec. 276. Certain Indirect Contributions To Political Parties
- Sec. 277. Deductions Incurred By Certain Membership Organizations In Transactions With Members
- Sec. 279. Interest On Indebtedness Incurred By Corporation To Acquire Stock Or Assets Of Another Corporation
- Sec. 280A. Disallowance Of Certain Expenses In Connection With Business Use Of Home, Rental Of Vacation Homes, Etc.
- Sec. 280B. Demolition Of Structures
- Sec. 280C. Certain Expenses For Which Credits Are Allowable
- Sec. 280E. Expenditures In Connection With The Illegal Sale Of Drugs
- Sec. 280F. Limitation On Depreciation For Luxury Automobiles; Limitation Where Certain Property Used For Personal Purposes
- Sec. 280G. Golden Parachute Payments
- Sec. 280H. Limitation On Certain Amounts Paid To Employee-Owners By Personal Service Corporations Electing Alternative Taxable Years
 - PART X TERMINAL RAILROAD CORPORATIONS AND THEIR SHAREHOLDERS (SECTION 281)
 - PART XI SPECIAL RULES RELATING TO CORPORATE PREFERENCE ITEMS (SECTION 291)

SUBCHAPTER C — CORPORATE DISTRIBUTIONS AND ADJUSTMENTS (SECTIONS 301 TO 385)

PART I—DISTRIBUTIONS BY CORPORATIONS (SECTIONS 301 – 318)

Subpart A—Effects on Recipients (Sections 301 – 307)

Sec. 301. Distributions of property

- Sec. 302. Distributions in redemption of stock
- Sec. 303. Distributions in redemption of stock to pay death taxes
- Sec. 304. Redemption through use of related corporations
- Sec. 305. Distributions of stock and stock rights
- Sec. 306. Dispositions of certain stock
- Sec. 307. Basis of stock and stock rights acquired in distributions

Subpart B—Effects on Corporation (Sections 311 – 312)

- Sec. 311. Taxability of corporation on distribution
- Sec. 312. Effect on earnings and profits

Subpart C—Definitions; Constructive Ownership of Stock (Sections 316 – 318)

- Sec. 316. Dividend defined
- Sec. 317. Other definitions
- Sec. 318. Constructive ownership of stock

PART II—CORPORATION LIQUIDATIONS (SECTIONS 331 – 346)

Subpart A—Effects on Recipients (Sections 331 – 334)

- Sec. 331. Gain or loss to shareholder in corporate liquidations
- Sec. 332. Complete liquidations of subsidiaries
- [Sec. 333. Repealed. Pub. L. 99–514, title VI, Sec. 631(e)(3), Oct. 22, 1986, 100 Stat. 2273]
- Sec. 334. Basis of property received in liquidations

Subpart B—Effects on Corporation (Sections 336 – 338)

- Sec. 336. Gain or loss recognized on property distributed in complete liquidation
- Sec. 337. Nonrecognition for property distributed to parent in complete liquidation of subsidiary
- Sec. 338. Certain stock purchases treated as asset acquisitions

[Subpart C—Repealed] (Sections 341 – 342)

Subpart D—Definition and Special Rule (Section 346)

Sec. 346. Definition and special rule

PART III—CORPORATE ORGANIZATIONS AND REORGANIZATIONS (SECTIONS 351 – 368)

Subpart A—Corporate Organizations (Section 351)

Sec. 351. Transfer to corporation controlled by transferor

Subpart B—Effects on Shareholders and Security Holders (Sections 354 – 358)

- Sec. 354. Exchanges of stock and securities in certain reorganizations
- Sec. 355. Distribution of stock and securities of a controlled corporation
- Sec. 356. Receipt of additional consideration
- Sec. 357. Assumption of liability
- Sec. 358. Basis to distributees

Subpart C—Effects on Corporations (Sections 361 – 363)

- Sec. 361. Nonrecognition of gain or loss to corporations; treatment of distributions
- Sec. 362. Basis to corporations
- [Sec. 363. Repealed. Pub. L. 94–455, title XIX, Sec. 1901(a)(49), Oct. 4, 1976, 90 Stat. 1773]

Subpart D—Special Rule; Definitions (Sections 367 – 368)

Sec. 367. Foreign corporations

Sec. 368. Definitions relating to corporate reorganizations

[PART IV—REPEALED] (SECTIONS 370 – 374)

PART V—CARRYOVERS (SECTIONS 381 – 384)

Sec. 381. Carryovers in certain corporate acquisitions

Sec. 382. Limitation on net operating loss carryforwards and certain built-in losses following ownership change

Sec. 383. Special limitations on certain excess credits, etc.

Sec. 384. Limitation on use of preacquisition losses to offset built-in gains

PART VI—TREATMENT OF CERTAIN CORPORATE INTERESTS AS STOCK OR INDEBTEDNESS (SECTION 385)

[PART VII—REPEALED] (SECTIONS 386 – 391)

SUBCHAPTER D — DEFERRED COMPENSATION, ETC. (SECTIONS 401 TO 436)

SUBCHAPTER E — ACCOUNTING PERIODS AND METHODS OF ACCOUNTING (SECTIONS 441 TO 483)

PART I — ACCOUNTING PERIODS (SECTIONS 441 TO 444)

Sec. 441. Period For Computation Of Taxable Income

Sec. 442. Change Of Annual Accounting Period

Sec. 443. Returns For A Period Of Less Than 12 Months

Sec. 444. Election Of Taxable Year Other Than Required Taxable Year

PART II — METHODS OF ACCOUNTING (SECTIONS 446 TO 475)

Subpart A — Methods of Accounting in General (Sections 446 to 448)

Sec. 446. General Rule For Methods Of Accounting

Sec. 447. Method Of Accounting For Corporations Engaged In Farming

Sec. 448. Limitation On Use Of Cash Method Of Accounting

Subpart B — Taxable Year for Which Items of Gross Income Included (Sections 451 to 460)

Sec. 451. General Rule For Taxable Year Of Inclusion

Sec. 453. Installment Method

Sec. 453A. Special Rules For Nondealers

Sec. 453B. Gain Or Loss On Disposition Of Installment Obligations

Sec. 454. Obligations Issued At Discount

Sec. 455. Prepaid Subscription Income

Sec. 456. Prepaid Dues Income Of Certain Membership Organizations

Sec. 457. Deferred Compensation Plans Of State And Local Governments And Tax-Exempt Organizations

Sec. 457A. Nonqualified Deferred Compensation From Certain Tax Indifferent Parties

Sec. 458. Magazines, Paperbacks, And Records Returned After The Close Of The Taxable Year

Sec. 460. Special Rules For Long-Term Contracts

Subpart C — Taxable Year for Which Deductions Taken (Sections 461 to 470)

Sec. 461. General Rule For Taxable Year Of Deduction

Sec. 464. Limitations On Deductions For Certain Farming Expenses

Sec. 465. Deductions Limited To Amount At Risk

Sec. 467. Certain Payments For The Use Of Property Or Services

Sec. 468. Special Rules For Mining And Solid Waste Reclamation And Closing Costs

Sec. 468A. Special Rules For Nuclear Decommissioning Costs

Sec. 468B. Special Rules For Designated Settlement Funds

Sec. 469. Passive Activity Losses And Credits Limited

Sec. 470. Limitation On Deductions Allocable To Property Used By Governments Or Other Tax-Exempt

Entities

Subpart D — **Inventories (Sections 471 to 475)**

PART III — ADJUSTMENTS (SECTIONS 481 TO 483)

SUBCHAPTER F — EXEMPT ORGANIZATIONS (SECTIONS 501 TO 530)

PART I — GENERAL RULE (SECTIONS 501 TO 506)

Sec. 501. Exemption from tax on corporations, certain trusts, etc.

Sec. 502. Feeder organizations

Sec. 503. Requirements for exemption

Sec. 504. Status after organization ceases to qualify for exemption under section 501(c)(3) because of substantial lobbying or because of political activities

Sec. 505. Additional requirements for organizations described in paragraph (9) or (17) of section 501(c)

Sec. 506. Organizations required to notify Secretary of intent to operate under 501(c)(4)

PART II — PRIVATE FOUNDATIONS (SECTIONS 507 TO 509)

Sec. 507. Termination of private foundation status

Sec. 508. Special rules with respect to section 501(c)(3) organizations

Sec. 509. Private foundation defined

PART III — TAXATION OF BUSINESS INCOME OF CERTAIN EXEMPT ORGANIZATIONS (SECTIONS 511 TO 515)

Sec. 511. Imposition of tax on unrelated business income of charitable, etc., organizations

Sec. 512. Unrelated business taxable income

Sec. 513. Unrelated trade or business

Sec. 514. Unrelated debt-financed income

Sec. 515. Taxes of foreign countries and possessions of the United States

PART IV—FARMERS' COOPERATIVES (SECTIONS 521 – 522)

PART V—SHIPOWNER'S PROTECTION AND INDEMNITY ASSOCIATIONS (SECTION 526)

PART VI—POLITICAL ORGANIZATIONS (SECTION 527)

Sec. 527. Political organizations

PART VII—CERTAIN HOMEOWNERS ASSOCIATIONS (SECTION 528)

PART VIII—CERTAIN SAVINGS ENTITIES (SECTIONS 529 – 530)

SUBCHAPTER G — CORPORATIONS USED TO AVOID INCOME TAX ON SHAREHOLDERS (SECTIONS 531 TO 565)

SUBCHAPTER H — BANKING INSTITUTIONS (SECTIONS 581 TO 597)

SUBCHAPTER I — NATURAL RESOURCES (SECTIONS 611 TO 638)

SUBCHAPTER J — ESTATES, TRUSTS, BENEFICIARIES, AND DECEDENTS (SECTIONS 641 TO 692)

SUBCHAPTER K — PARTNERS AND PARTNERSHIPS (SECTIONS 701 TO 777)

PART I — DETERMINATION OF TAX LIABILITY (SECTIONS 701 TO 709)

- Sec. 701. Partners, Not Partnership, Subject To Tax
- Sec. 702. Income And Credits Of Partner
- Sec. 703. Partnership Computations
- Sec. 704. Partner's Distributive Share
- Sec. 705. Determination Of Basis Of Partner's Interest
- Sec. 706. Taxable Years Of Partner And Partnership
- Sec. 707. Transactions Between Partner And Partnership
- Sec. 708. Continuation Of Partnership
- Sec. 709. Treatment Of Organization And Syndication Fees

PART II — CONTRIBUTIONS, DISTRIBUTIONS, AND TRANSFERS (SECTIONS 721 TO 755)

Subpart A — Contributions to a Partnership (Sections 721 to 724)

- Sec. 721. Nonrecognition Of Gain Or Loss On Contribution
- Sec. 722. Basis Of Contributing Partner's Interest
- Sec. 723. Basis Of Property Contributed To Partnership
- Sec. 724. Character Of Gain Or Loss On Contributed Unrealized Receivables, Inventory Items, And Capital Loss Property

Subpart B — Distributions by a partnership (Sections 731 to 737)

- Sec. 731. Extent Of Recognition Of Gain Or Loss On Distribution
- Sec. 732. Basis Of Distributed Property Other Than Money
- Sec. 733. Basis Of Distributee Partner's Interest
- Sec. 734. Adjustment To Basis Of Undistributed Partnership Property Where Section 754 Election Or Substantial Basis Reduction
- Sec. 735. Character Of Gain Or Loss On Disposition Of Distributed Property
- Sec. 736. Payments To A Retiring Partner Or A Deceased Partner's Successor In Interest
- Sec. 737. Recognition Of Precontribution Gain In Case Of Certain Distributions To Contributing Partner

Subpart C — Transfers of interests in a partnership (Sections 741 to 743)

- Sec. 741. Recognition And Character Of Gain Or Loss On Sale Or Exchange
- Sec. 742. Basis Of Transferee Partner's Interest
- Sec. 743. Special Rules Where Section 754 Election Or Substantial Built-In Loss

Subpart D — Provisions Common to Other Subparts (Sections 751 to 755)

- Sec. 751. Unrealized Receivables And Inventory Items
- Sec. 752. Treatment Of Certain Liabilities
- Sec. 753. Partner Receiving Income In Respect Of Decedent
- Sec. 754. Manner Of Electing Optional Adjustment To Basis Of Partnership Property
- Sec. 755. Rules For Allocation Of Basis

PART III — DEFINITIONS (SECTION 761)

Sec. 761. Terms Defined

SUBCHAPTER L — INSURANCE COMPANIES (SECTIONS 801 TO 848)

SUBCHAPTER M — REGULATED INVESTMENT COMPANIES AND REAL ESTATE INVESTMENT TRUSTS (SECTIONS 851 TO 860L)

SUBCHAPTER N — TAX BASED ON INCOME FROM SOURCES WITHIN OR WITHOUT THE UNITED STATES (SECTIONS 861 TO 999)

SUBCHAPTER O — GAIN OR LOSS ON DISPOSITION OF PROPERTY (SECTIONS 1001 TO 1103)

SUBCHAPTER P — CAPITAL GAINS AND LOSSES (SECTIONS 1202 TO 1298)

PART I — TREATMENT OF CAPITAL GAINS (SECTION 1202)

PART II — TREATMENT OF CAPITAL LOSSES (SECTIONS 1211 TO 1212)

- Sec. 1211. Limitation On Capital Losses
- Sec. 1212. Capital Loss Carrybacks And Carryovers
- PART III GENERAL RULES FOR DETERMINING CAPITAL GAINS AND LOSSES (SECTIONS 1221 TO 1223)
- Sec. 1221. Capital Asset Defined
- Sec. 1222. Other Terms Relating To Capital Gains And Losses
- Sec. 1223. Holding Period Of Property
 - PART IV SPECIAL RULES FOR DETERMINING CAPITAL GAINS AND LOSSES (SECTIONS 1231 TO 1260)
- Sec. 1231. Property Used In The Trade Or Business And Involuntary Conversions
- Sec. 1233. Gains And Losses From Short Sales
- Sec. 1234. Options To Buy Or Sell
- Sec. 1234A. Gains Or Losses From Certain Terminations
- Sec. 1234B. Gains Or Losses From Securities Futures Contracts
- Sec. 1235. Sale Or Exchange Of Patents
- Sec. 1236. Dealers In Securities
- Sec. 1237. Real Property Subdivided For Sale
- Sec. 1238. Amortization In Excess Of Depreciation [Repealed]
- Sec. 1239. Gain From Sale Of Depreciable Property Between Certain Related Taxpayers
- Sec. 1241. Cancellation Of Lease Or Distributor's Agreement
- Sec. 1242. Losses On Small Business Investment Company Stock
- Sec. 1243. Loss Of Small Business Investment Company
- Sec. 1244. Losses On Small Business Stock
- Sec. 1245. Gain From Dispositions Of Certain Depreciable Property
- Sec. 1246. Gain On Foreign Investment Company Stock [Repealed]
- Sec. 1247. Election By Foreign Investment Companies To Distribute Income Currently [Repealed]
- Sec. 1248. Gain From Certain Sales Or Exchanges Of Stock In Certain Foreign Corporations
- Sec. 1249. Gain From Certain Sales Or Exchanges Of Patents, Etc., To Foreign Corporations
- Sec. 1250. Gain From Dispositions Of Certain Depreciable Realty
- Sec. 1252. Gain From Disposition Of Farm Land
- Sec. 1253. Transfers Of Franchises, Trademarks, And Trade Names
- Sec. 1254. Gain From Disposition Of Interest In Oil, Gas, Geothermal, Or Other Mineral Properties
- Sec. 1255. Gain From Disposition Of Section 126 Property
- Sec. 1256. Section 1256 Contracts Marked To Market
- Sec. 1257. Disposition Of Converted Wetlands Or Highly Erodible Croplands
- Sec. 1258. Recharacterization Of Gain From Certain Financial Transactions
- Sec. 1259. Constructive Sales Treatment For Appreciated Financial Positions
- Sec. 1260. Gains From Constructive Ownership Transactions
 - PART V SPECIAL RULES FOR BONDS AND OTHER DEBT INSTRUMENTS (SECTIONS 1271 TO 1288)
 - PART VI TREATMENT OF CERTAIN PASSIVE FOREIGN INVESTMENT COMPANIES (SECTIONS 1291 TO 1298)

SUBCHAPTER Q — READJUSTMENT OF TAX BETWEEN YEARS AND SPECIAL LIMITATIONS (SECTIONS 1301 TO 1351)

SUBCHAPTER R — ELECTION TO DETERMINE CORPORATE TAX ON CERTAIN INTERNATIONAL SHIPPING ACTIVITIES USING PER TON RATE (SECTIONS 1352 TO 1359)

SUBCHAPTER S — TAX TREATMENT OF S CORPORATIONS AND THEIR SHAREHOLDERS (SECTIONS 1361 TO 1379)

PART I—IN GENERAL (SECTIONS 1361 – 1363)

Sec. 1361. S corporation defined

Sec. 1362. Election; revocation; termination

Sec. 1363. Effect of election on corporation

PART II—TAX TREATMENT OF SHAREHOLDERS (SECTIONS 1366 – 1368)

Sec. 1366. Pass-thru of items to shareholders

Sec. 1367. Adjustments to basis of stock of shareholders, etc.

Sec. 1368. Distributions

PART III—SPECIAL RULES (SECTIONS 1371 – 1375)

Sec. 1371. Coordination with subchapter C

Sec. 1372. Partnership rules to apply for fringe benefit purposes

Sec. 1373. Foreign income

Sec. 1374. Tax imposed on certain built-in gains

Sec. 1375. Tax imposed when passive investment income of corporation having accumulated earnings and profits exceeds 25 percent of gross receipts

PART IV—DEFINITIONS, MISCELLANEOUS (SECTIONS 1377 – 1379)

Sec. 1377. Definitions and special rule

Sec. 1378. Taxable year of S corporation

Sec. 1379. Transitional rules on enactment

SUBCHAPTER T — COOPERATIVES AND THEIR PATRONS (SECTIONS 1381 TO 1388)

SUBCHAPTER U — DESIGNATION AND TREATMENT OF EMPOWERMENT ZONES, ENTERPRISE COMMUNITIES, AND RURAL DEVELOPMENT INVESTMENT AREAS (SECTIONS 1391 TO 1397F)

SUBCHAPTER V — TITLE 11 CASES (SECTIONS 1398 TO 1399)

SUBCHAPTER W — DISTRICT OF COLUMBIA ENTERPRISE ZONE (SECTIONS 1400 TO 1400C) [REPEALED]

SUBCHAPTER X — RENEWAL COMMUNITIES (SECTIONS 1400E TO 1400J) [REPEALED]

SUBCHAPTER Y — SHORT-TERM REGIONAL BENEFITS (SECTIONS 1400L - 1400U-3) [REPEALED]

SUBCHAPTER Z — OPPORTUNITY ZONES (SECTIONS 1400Z-1 TO 1400Z-2)

Chapter 2 — Tax on Self-Employment Income (Sections 1401 to 1403)

Chapter 2A — Unearned Income Medicare Contribution (Section 1411)

Chapter 3 — Withholding of Tax on Nonresident Aliens and Foreign Corporations (Sections 1441 to 1464)

Chapter 4 — Taxes to Enforce Reporting on Certain Foreign Accounts (Sections 1471 to 1474)

Chapter 5 — Tax on Transfers to Avoid Income Tax (Sections 1491 to 1494) [Repealed]

Chapter 6 — Consolidated Returns (Sections 1501 to 1564)

SUBTITLE B — ESTATE AND GIFT TAXES (SECTIONS 2001 TO 2801)

SUBTITLE C — EMPLOYMENT TAXES (SECTIONS 3101 TO 3510)

SUBTITLE D — MISCELLANEOUS EXCISE TAXES (SECTIONS 4001 TO 5000C)

SUBTITLE E — ALCOHOL, TOBACCO, AND CERTAIN OTHER EXCISE TAXES (SECTIONS 5001 TO 5891)

SUBTITLE F — PROCEDURE AND ADMINISTRATION (SECTIONS 6001 TO 7874)

SUBTITLE G — THE JOINT COMMITTEE ON TAXATION (SECTIONS 8001 TO 8023)

SUBTITLE H — FINANCING OF PRESIDENTIAL ELECTION CAMPAIGNS (SECTIONS 9001 TO 9042)

SUBTITLE I — TRUST FUND CODE (SECTIONS 9500 TO 9602)

SUBTITLE J — COAL INDUSTRY HEALTH BENEFITS (SECTIONS 9701 TO 9722)

SUBTITLE K — GROUP HEALTH PLAN REQUIREMENTS (SECTIONS 9801 TO 9834)