

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)

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PART VIII — SUPPLEMENTAL MEDICARE PREMIUM [REPEALED] (SECTION 59B)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

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

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

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

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)

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

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

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)

**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)

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)