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Other important partnership tax developments were the issuance of various proposed and final regulations, including sweeping proposals to change the rules on allocation of partnership liabilities and the mechanics of Section 751(b) and new guidance under Section 707(a) on disguised payments for services.

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of this area. In addition, partnership tax provides a flexibility found nowhere else in the Code, affording the attorney or accountant an unparalleled opportunity to engage in tax planning on behalf of his client. In approaching partnership tax, it is helpful to understand a few basic concepts. First, a partnership is a "flow-through" entity.

Problems and Solutions in Partnership Tax

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