

Internal Revenue Code Table of Contents
Edited

UNITED STATES CODE
TABLE OF CONTENTS (SELECTIONS)
TITLE 26: INTERNAL REVENUE CODE

SUBTITLE A — INCOME TAXES

Chapter 1 — NORMAL TAXES AND SURTAXES

SUBCHAPTER A — DETERMINATION OF TAX LIABILITY

PART I — TAX ON INDIVIDUALS

- Sec. 1. Tax imposed.
- Sec. 2. Definitions and special rules.
- Sec. 3. Tax tables for individuals having taxable income of less than \$20,000.
- Sec. 4. [Repealed.]
- Sec. 5. Cross references relating to tax on individuals.

PART II — TAX ON CORPORATIONS

- Sec. 11. Tax imposed.
- Sec. 12. Cross references relating to tax on corporations.

PART III — CHANGES IN RATES DURING A TAXABLE YEAR

- Sec. 15. Effect of changes.

PART IV — CREDITS AGAINST TAX

Subpart A — Nonrefundable Personal Credits

- 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. Energy efficient home improvement credit.
- Sec. 25D. Residential clean energy credit.
- Sec. 25E. Previously-owned clean vehicles.
- Sec. 25F. Qualified elementary and secondary education scholarships.
- Sec. 26. Limitation based on tax liability; definition of tax liability.

Subpart B — Other Credits

- Sec. 27. Taxes of foreign countries and possessions of the United States.
- Sec. 28. [Renumbered.]
- Sec. 30. [Repealed.]
- Sec. 30B. Alternative motor vehicle credit.
- Sec. 30C. Alternative fuel vehicle refueling property credit.
- Sec. 30D. Clean vehicle credit.

Subpart C — Refundable Credits

- 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. [Repealed.]
Sec. 36B. Refundable credit for coverage under a qualified health plan.
Sec. 36C. [Renumbered.]
Sec. 37. Overpayments of tax.

Subpart D — Business Related Credits

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. 40B. Sustainable aviation fuel credit.
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. 44A–H. [Renumbered, Repealed.]
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. [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 dioxide 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.
Sec. 45U. Zero-emission nuclear power production credit.
Sec. 45V. Credit for production of clean hydrogen.
Sec. 45W. Qualified commercial clean vehicle credit.
Sec. 45X. Advanced manufacturing production credit.
Sec. 45Y. Clean electricity production credit.
Sec. 45Z. Clean fuel production credit.
Sec. 45AA. Military spouse retirement plan eligibility credit for small employers.

Subpart E — Rules for Computing Investment Credit

Sec. 46. Amount of credit.
Sec. 47. Rehabilitation credit.
Sec. 48. Energy credit.
Sec. 48A. Qualifying advanced coal project credit.
Sec. 48B. Qualifying gasification project credit.
Sec. 48C. Qualifying advanced energy project credit.
Sec. 48D. Advanced manufacturing investment credit.
Sec. 48E. Clean electricity investment credit.
Sec. 49. At-risk rules.
Sec. 50. Other special rules.

Sec. 50A. [Repealed.]

Subpart F — Rules for Computing Work Opportunity Credit

Sec. 51. Amount of credit.

Sec. 51A. [Repealed.]

Sec. 52. Special rules.

Subpart G — Credit Against Regular Tax for Prior Year Minimum Tax Liability

Sec. 53. Credit for prior year minimum tax liability.

Subpart H — [Repealed]

Subpart I — [Repealed]

Subpart J — [Repealed]

PART V — [REPEALED]

PART VI — ALTERNATIVE MINIMUM TAX

Sec. 55. Alternative minimum tax imposed.

Sec. 56. Adjustments in computing alternative minimum taxable income.

Sec. 56A. Adjusted financial statement income.

Sec. 57. Items of tax preference.

Sec. 58. Denial of certain losses.

Sec. 59. Other definitions and special rules.

PART VII — BASE EROSION AND ANTI-ABUSE TAX

Sec. 59A. Tax on base erosion payments of taxpayers with substantial gross receipts.

PART VIII — [REPEALED]

SUBCHAPTER B — COMPUTATION OF TAXABLE INCOME

PART I — DEFINITION OF GROSS INCOME, ADJUSTED GROSS INCOME, TAXABLE INCOME, ETC.

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

Sec. 71. [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. 76. [Repealed.]

Sec. 77. Commodity credit loans.

Sec. 78. Dividends received from certain foreign corporations by domestic corporations choosing foreign tax credit.

Sec. 79. Group-term life insurance purchased for employees.

Sec. 80. Restoration of value of certain securities.

Sec. 81. [Repealed.]

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. [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

Sec. 101. Certain death payments.
Sec. 102. Gifts and inheritances.
Sec. 103. Interest on State and local bonds.
Sec. 103A. [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. [Repealed.]
Sec. 115. Income of States, municipalities, etc.
Sec. 116. [Repealed.]
Sec. 117. Qualified scholarships.
Sec. 118. Contributions to the capital of a corporation.
Sec. 119. Meals or lodging furnished for convenience of employer.
Sec. 120. [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. [Repealed.]
Sec. 125. Cafeteria plans.
Sec. 126. Certain cost-sharing payments.
Sec. 127. Educational assistance programs.
Sec. 128. Employer contributions to Trump accounts.
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. [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. Certain disability-related first responder retirement payments.
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. 139J. Certain contributions to Trump accounts.
Sec. 139K. Scholarships for qualified elementary or secondary education expenses of eligible students.
Sec. 139L. Interest on loans secured by rural or agricultural real property.
Sec. 140. Cross references to other Acts.

PART IV — TAX EXEMPTION REQUIREMENTS FOR STATE AND LOCAL BONDS

Subpart A — Private Activity Bonds

Sec. 141. Private activity bond; qualified bond.
Sec. 142. Exempt facility bond.
Sec. 143. Mortgage revenue bonds; qualified mortgage bond and qualified veterans' mortgage bond.
Sec. 144. Qualified small issue bond; qualified student loan bond; qualified redevelopment bond.
Sec. 145. Qualified 501(c)(3) bond.
Sec. 146. Volume cap.
Sec. 147. Other requirements applicable to certain private activity bonds.

Subpart B — Requirements Applicable to All State and Local Bonds

Sec. 148. Arbitrage.
Sec. 149. Bonds must be registered to be tax exempt; other requirements.

Subpart C — Definitions and Special Rules

Sec. 150. Definitions and special rules.

PART V — DEDUCTIONS FOR PERSONAL EXEMPTIONS

Sec. 151. Allowance of deductions for personal exemptions.
Sec. 152. Dependent defined.
Sec. 153. Cross references.

PART VI — ITEMIZED DEDUCTIONS FOR INDIVIDUALS AND CORPORATIONS

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. Amortization of research and experimental expenditures.
Sec. 174A. Domestic research or experimental expenditures.
Sec. 175. Soil and water conservation expenditures; endangered species recovery expenditures.
Sec. 176. Payments with respect to employees of certain foreign corporations.
Sec. 177. [Repealed.]
Sec. 178. Amortization of cost of acquiring a lease.
Sec. 179. Election to expense certain depreciable business assets.
Sec. 179A. [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 productions.
Sec. 182. [Repealed.]
Sec. 183. Activities not engaged in for profit.
Sec. 184. [Repealed.]
Sec. 186. Recoveries of damages for antitrust violations, etc.
Sec. 187. [Repealed.]
Sec. 190. Expenditures to remove architectural and transportation barriers to the handicapped and elderly.
Sec. 191. Amortization of certain rehabilitation expenditures for certified historic structures.
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. [Repealed.]
Sec. 199A. Qualified business income.

PART VII — ADDITIONAL ITEMIZED DEDUCTIONS FOR INDIVIDUALS

Sec. 211. Allowance of deductions.
Sec. 212. Expenses for production of income.
Sec. 213. Medical, dental, etc., expenses.
Sec. 214. [Repealed.]
Sec. 216. Deduction of taxes, interest, and business depreciation by cooperative housing corporation tenant-stockholder.
Sec. 217. Moving expenses.
Sec. 218. [Repealed.]
Sec. 219. Retirement savings.
Sec. 220. Archer MSAs.
Sec. 221. Interest on education loans.
Sec. 222. [Repealed.]
Sec. 223. Health savings accounts.
Sec. 224. Qualified tips.
Sec. 225. Qualified overtime compensation.
Sec. 226. Cross reference.

PART VIII — SPECIAL DEDUCTIONS FOR CORPORATIONS

Sec. 241. Allowance of special deductions.
Sec. 242. [Repealed.]
Sec. 243. Dividends received by corporations.
Sec. 244. [Repealed.]
Sec. 245. Dividends received from certain foreign corporations.
Sec. 245A. Deduction for foreign source-portion of dividends received by domestic corporations from certain 10-percent owned foreign corporations.
Sec. 246. Rules applying to deductions for dividends received.
Sec. 246A. Dividends received deduction reduced where portfolio stock is debt financed.
Sec. 247. Contributions to Alaska Native Settlement Trusts.
Sec. 248. Organizational expenditures.
Sec. 249. Limitation on deduction of bond premium on repurchase.
Sec. 250. Foreign-derived deduction eligible income and net CFC tested income.

PART IX — ITEMS NOT DEDUCTIBLE

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. 270. [Repealed.]
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. 278. [Repealed.]
Sec. 279. Interest on indebtedness incurred by corporation to acquire stock or assets of another corporation.
Sec. 280. [Repealed.]
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. 280D. [Repealed.]
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

PART XI — SPECIAL RULES RELATING TO CORPORATE PREFERENCE ITEMS

SUBCHAPTER C — CORPORATE DISTRIBUTIONS AND ADJUSTMENTS

PART I — DISTRIBUTIONS BY CORPORATIONS

Subpart A — Effects on Recipients

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

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

Subpart C — Definitions; Constructive Ownership of Stock

Sec. 316. Dividend defined.
Sec. 317. Other definitions.

Sec. 318. Constructive ownership of stock.

PART II — CORPORATE LIQUIDATIONS

Subpart A — Effects on Recipients

Sec. 331. Gain or loss to shareholder in corporate liquidations.

Sec. 332. Complete liquidations of subsidiaries.

Sec. 333. [Repealed.]

Sec. 334. Basis of property received in liquidations.

Subpart B — Effects on Corporation

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]

Subpart D — Definition and Special Rule

Sec. 346. Definition and special rule.

PART III — CORPORATE ORGANIZATIONS AND REORGANIZATIONS

Subpart A — Corporate Organizations

Sec. 351. Transfer to corporation controlled by transferor.

Subpart B — Effects on Shareholders and Security Holders

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

Sec. 361. Nonrecognition of gain or loss to corporations; treatment of distributions.

Sec. 362. Basis to corporations.

Sec. 363. [Repealed.]

Subpart D — Special Rule; Definitions

Sec. 367. Foreign corporations.

Sec. 368. Definitions relating to corporate reorganizations.

PART IV — [REPEALED]

PART V — CARRYOVERS

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

Sec. 385. Treatment of certain interests in corporations as stock or indebtedness.

PART VII — [REPEALED]

SUBCHAPTER D — DEFERRED COMPENSATION, ETC.

PART I — PENSION, PROFIT-SHARING, STOCK BONUS PLANS, ETC.

Subpart A — General Rule

- Sec. 401. Qualified pension, profit-sharing, and stock bonus plans.
- Sec. 402. Taxability of beneficiary of employees' trust.
- Sec. 402A. Optional treatment of elective deferrals as Roth contributions.
- Sec. 403. Taxation of employee annuities.
- Sec. 404. Deduction for contributions of an employer to an employees' trust or annuity plan and compensation under a deferred-payment plan.
- Sec. 404A. Deduction for certain foreign deferred compensation plans.
- Sec. 405. [Repealed.]
- Sec. 406. Employees of foreign affiliates covered by section 3121.
- Sec. 407. Certain employees of domestic subsidiaries engaged in business outside the United States.
- Sec. 408. Individual retirement accounts.
- Sec. 408A. Roth IRAs.
- Sec. 409. Qualifications for tax credit employee stock ownership plans.
- Sec. 409A. Inclusion in gross income of deferred compensation under nonqualified deferred compensation plans.

Subpart B — Special Rules

- Sec. 410. Minimum participation standards.
- Sec. 411. Minimum vesting standards.
- Sec. 412. Minimum funding standards.
- Sec. 413. Collectively bargained plans, etc.
- Sec. 414. Definitions and special rules.
- Sec. 414A. Requirements related to automatic enrollment.
- Sec. 415. Limitations on benefits and contribution under qualified plans.
- Sec. 416. Special rules for top-heavy plans.
- Sec. 417. Definitions and special rules for purposes of minimum survivor annuity requirements.

Subpart C — Insolvent Plans

- Sec. 418. [Repealed.]
- Sec. 418E. Insolvent plans.

Subpart D — Treatment of Welfare Benefit Funds

- Sec. 419. Treatment of funded welfare benefit plans.
- Sec. 419A. Qualified asset account; limitation on additions to account.

Subpart E — Treatment of Transfers to Retiree Health Accounts

- Sec. 420. Transfers of excess pension assets to retiree health accounts.

PART II — CERTAIN STOCK OPTIONS

- Sec. 421. General rules.
- Sec. 422. Incentive stock options.
- Sec. 422A. [Renumbered.]
- Sec. 423. Employee stock purchase plans.
- Sec. 424. Definitions and special rules.
- Sec. 425. [Renumbered.]

PART III — RULES RELATING TO MINIMUM FUNDING STANDARDS AND BENEFIT LIMITATIONS

SUBCHAPTER E — ACCOUNTING PERIODS AND METHODS OF ACCOUNTING

PART I — ACCOUNTING PERIODS

- 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

Subpart A — Methods of Accounting in General

- 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

- Sec. 451. General rule for taxable year of inclusion.
- Sec. 452. [Repealed.]
- Sec. 453. Installment method.
- Sec. 453A. Special rules for nondealers.
- Sec. 453B. Gain or loss on disposition of installment obligations.
- Sec. 453C. [Repealed.]
- 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

- Sec. 461. General rule for taxable year of deduction.
- Sec. 462. [Repealed.]
- Sec. 464. Limitations on deductions for certain farming expenses.
- Sec. 465. Deductions limited to amount at risk.
- Sec. 466. [Repealed.]
- 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

PART III — ADJUSTMENTS

- Sec. 481. Adjustments required by changes in method of accounting.
- Sec. 482. Allocation of income and deductions among taxpayers.
- Sec. 483. Interest on certain deferred payments.

SUBCHAPTER F — EXEMPT ORGANIZATIONS

PART I — GENERAL RULE

- 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

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

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

PART V — SHIPOWNERS' PROTECTION AND INDEMNITY ASSOCIATIONS

PART VI — POLITICAL ORGANIZATIONS

Sec. 527. Political organizations.

PART VII — CERTAIN HOMEOWNERS ASSOCIATIONS

PART VIII — CERTAIN SAVINGS ENTITIES

Sec. 529. Qualified tuition programs.
Sec. 529A. Qualified ABLE programs.
Sec. 530. Coverdell education savings accounts.

PART IX — TRUMP ACCOUNTS

Sec. 530A. Trump accounts.

SUBCHAPTER G — CORPORATIONS USED TO AVOID INCOME TAX ON SHAREHOLDERS

SUBCHAPTER H — BANKING INSTITUTIONS

SUBCHAPTER I — NATURAL RESOURCES

SUBCHAPTER J — ESTATES, TRUSTS, BENEFICIARIES, AND DECEDENTS

SUBCHAPTER K — PARTNERS AND PARTNERSHIPS

PART I — DETERMINATION OF TAX LIABILITY

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

Subpart A — Contributions to a Partnership

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

- 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

- 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

- 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

- Sec. 761. Terms defined.

PART IV — [REPEALED]

SUBCHAPTER L — INSURANCE COMPANIES

SUBCHAPTER M — REGULATED INVESTMENT COMPANIES AND REAL ESTATE INVESTMENT TRUSTS

SUBCHAPTER N — TAX BASED ON INCOME FROM SOURCES WITHIN OR WITHOUT THE UNITED STATES

SUBCHAPTER O — GAIN OR LOSS ON DISPOSITION OF PROPERTY

PART I — DETERMINATION OF AMOUNT OF AND RECOGNITION OF GAIN OR LOSS

- Sec. 1001. Determination of amount of and recognition of gain or loss.
- Sec. 1002. [Repealed.]

PART II — BASIS RULES OF GENERAL APPLICATION

- Sec. 1011. Adjusted basis for determining gain or loss.
- Sec. 1012. Basis of property—cost.
- Sec. 1013. Basis of property included in inventory.
- Sec. 1014. Basis of property acquired from a decedent.
- Sec. 1015. Basis of property acquired by gifts and transfers in trust.
- Sec. 1016. Adjustments to basis.
- Sec. 1017. Discharge of indebtedness.
- Sec. 1018. [Repealed.]
- Sec. 1019. Property on which lessee has made improvements.
- Sec. 1020. [Repealed.]
- Sec. 1021. Sale of annuities.
- Sec. 1022. [Repealed.]
- Sec. 1023. Cross references.
- Sec. 1024. [Renumbered.]

PART III — COMMON NONTAXABLE EXCHANGES

- Sec. 1031. Exchange of real property held for productive use or investment.
- Sec. 1032. Exchange of stock for property.
- Sec. 1033. Involuntary conversions.
- Sec. 1034. [Repealed.]
- Sec. 1035. Certain exchanges of insurance policies.
- Sec. 1036. Stock for stock of same corporation.
- Sec. 1037. Certain exchanges of United States obligations.
- Sec. 1038. Certain reacquisitions of real property.
- Sec. 1039. [Repealed.]
- Sec. 1040. Transfer of certain farm, etc., real property.
- Sec. 1041. Transfers of property between spouses or incident to divorce.
- Sec. 1042. Sales of stock to employee stock ownership plans or certain cooperatives.
- Sec. 1043. Sale of property to comply with conflict-of-interest requirements.
- Sec. 1044. [Repealed.]
- Sec. 1045. Rollover of gain from qualified small business stock to another qualified small business stock.

PART IV — SPECIAL RULES

- Sec. 1051. [Repealed.]
- Sec. 1052. Basis established by the Revenue Act of 1932 or 1934 or by the Internal Revenue Code of 1939.
- Sec. 1053. Property acquired before
- Sec. 1054. Certain stock of Federal National Mortgage Association.
- Sec. 1055. Redeemable ground rents.
- Sec. 1056. [Repealed.]
- Sec. 1058. Transfers of securities under certain agreements.
- Sec. 1059. Corporate shareholder's basis in stock reduced by nontaxed portion of extraordinary dividends.
- Sec. 1059A. Limitation on taxpayer's basis or inventory cost in property imported from related persons.
- Sec. 1060. Special allocation rules for certain asset acquisitions.
- Sec. 1061. Partnership interests held in connection with performance of services.
- Sec. 1062. Gain from the sale or exchange of qualified farmland property to qualified farmers.
- Sec. 1063. Cross references.

PART V — [REPEALED]

PART VI — [REPEALED]

PART VII — WASH SALES; STRADDLES

- Sec. 1091. Loss from wash sales of stock or securities.
- Sec. 1092. Straddles.

PART VIII — [REPEALED]

PART IX — [REPEALED]

SUBCHAPTER P — CAPITAL GAINS AND LOSSES

PART I — TREATMENT OF CAPITAL GAINS

- Sec. 1201. [Repealed.]
- Sec. 1202. Partial exclusion for gain from certain small business stock.

PART II — TREATMENT OF CAPITAL LOSSES

- Sec. 1211. Limitation on capital losses.
- Sec. 1212. Capital loss carrybacks and carryovers.

PART III — GENERAL RULES FOR DETERMINING CAPITAL GAINS AND LOSSES

- 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

Sec. 1231. Property used in the trade or business and involuntary conversions.
Sec. 1232. [Repealed.]
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. [Repealed.]
Sec. 1239. Gain from sale of certain property between spouses or between an individual and a controlled corporation.
Sec. 1240. [Repealed.]
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. [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. 1251. [Repealed.]
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

Subpart A — Original Issue Discount

Sec. 1271. Treatment of amounts received on retirement or sale or exchange of debt instruments.
Sec. 1272. Current inclusion in income of original issue discount.
Sec. 1273. Determination of amount of original issue discount.
Sec. 1274. Determination of issue price in the case of certain debt instruments issued for property.
Sec. 1274A. Special rules for certain transactions where stated principal amount does not exceed \$2,800,000.
Sec. 1275. Other definitions and special rules.

Subpart B — Market Discount on Bonds

Subpart C — Discount on Short-Term Obligations

Subpart D — Miscellaneous Provisions

PART VI — TREATMENT OF CERTAIN PASSIVE FOREIGN INVESTMENT COMPANIES

SUBCHAPTER Q — READJUSTMENT OF TAX BETWEEN YEARS AND SPECIAL LIMITATIONS

PART I — INCOME AVERAGING

Sec. 1301. Averaging of farm income.

PART II — MITIGATION OF EFFECT OF LIMITATIONS AND OTHER PROVISIONS

- Sec. 1311. Correction of error.
- Sec. 1312. Circumstances of adjustment.
- Sec. 1313. Definitions.
- Sec. 1314. Amount and method of adjustment.
- Sec. 1315. [Repealed.]

PART III — [REPEALED]

PART IV — [REPEALED]

PART V — CLAIM OF RIGHT

- Sec. 1341. Computation of tax where taxpayer restores substantial amount held under claim of right.
- Sec. 1342. [Repealed.]

PART VI — [REPEALED]

PART VII — RECOVERIES OF FOREIGN EXPROPRIATION LOSSES

- Sec. 1351. Treatment of recoveries of foreign expropriation losses.

SUBCHAPTER R — ELECTION TO DETERMINE CORPORATE TAX ON CERTAIN INTERNATIONAL SHIPPING ACTIVITIES USING PER TON RATE

SUBCHAPTER S — TAX TREATMENT OF S CORPORATIONS AND THEIR SHAREHOLDERS

PART I — IN GENERAL

- Sec. 1361. S corporation defined.
- Sec. 1362. Election; revocation; termination.
- Sec. 1363. Effect of election on corporation.

PART II — TAX TREATMENT OF SHAREHOLDERS

- 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

- 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

- 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

SUBCHAPTER U — DESIGNATION AND TREATMENT OF EMPOWERMENT ZONES, ENTERPRISE
COMMUNITIES, AND RURAL DEVELOPMENT INVESTMENT AREAS

SUBCHAPTER V — TITLE 11 CASES

SUBCHAPTER W — [REPEALED]

SUBCHAPTER X — [REPEALED]

SUBCHAPTER Y — [REPEALED]

SUBCHAPTER Z — OPPORTUNITY ZONES

Chapter 2 — TAX ON SELF-EMPLOYMENT INCOME

Chapter 2A — UNEARNED INCOME MEDICARE CONTRIBUTION

Chapter 3 — WITHHOLDING OF TAX ON NONRESIDENT ALIENS AND FOREIGN CORPORATIONS

Chapter 4 — TAXES TO ENFORCE REPORTING ON CERTAIN FOREIGN ACCOUNTS

Chapter 5 — [REPEALED]

Chapter 6 — CONSOLIDATED RETURNS

SUBTITLE B — ESTATE AND GIFT TAXES

Chapter 11 — ESTATE TAX

SUBCHAPTER A — ESTATES OF CITIZENS OR RESIDENTS

PART I — TAX IMPOSED

Sec. 2001. Imposition and rate of tax.

Sec. 2002. Liability for payment.

PART II — CREDITS AGAINST TAX

Sec. 2010. Unified credit against estate tax.

Sec. 2011. [Repealed.]

Sec. 2012. Credit for gift tax.

Sec. 2013. Credit for tax on prior transfers.

Sec. 2014. Credit for foreign death taxes.

Sec. 2015. Credit for death taxes on remainders.

Sec. 2016. Recovery of taxes claimed as credit.

PART III — GROSS ESTATE

Sec. 2031. Definition of gross estate.

Sec. 2032. Alternate valuation.

Sec. 2032A. Valuation of certain farm, etc., real property.

Sec. 2033. Property in which the decedent had an interest.

Sec. 2033A. [Renumbered.]

Sec. 2034. Dower or curtesy interests.

Sec. 2035. Adjustments for certain gifts made within 3 years of decedent's death.

Sec. 2036. Transfers with retained life estate.

Sec. 2037. Transfers taking effect at death.

Sec. 2038. Revocable transfers.

Sec. 2039. Annuities.

Sec. 2040. Joint interests.

Sec. 2041. Powers of appointment.

Sec. 2042. Proceeds of life insurance.

Sec. 2043. Transfers for insufficient consideration.

Sec. 2044. Certain property for which marital deduction was previously allowed.

Sec. 2045. Prior interests.
Sec. 2046. Disclaimers.

PART IV — TAXABLE ESTATE

Sec. 2051. Definition of taxable estate.
Sec. 2052. [Repealed.]
Sec. 2053. Expenses, indebtedness, and taxes.
Sec. 2054. Losses.
Sec. 2055. Transfers for public, charitable, and religious uses.
Sec. 2056. Bequests, etc., to surviving spouse.
Sec. 2056A. Qualified domestic trust.
Sec. 2057. [Repealed.]
Sec. 2058. State death taxes.

SUBTITLE C — EMPLOYMENT TAXES

SUBTITLE D — MISCELLANEOUS EXCISE TAXES

SUBTITLE E — ALCOHOL, TOBACCO, AND CERTAIN OTHER EXCISE TAXES

SUBTITLE F — PROCEDURE AND ADMINISTRATION

SUBTITLE G — THE JOINT COMMITTEE ON TAXATION

SUBTITLE H — FINANCING OF PRESIDENTIAL ELECTION CAMPAIGNS

SUBTITLE I — TRUST FUND CODE

SUBTITLE J — COAL INDUSTRY HEALTH BENEFITS

SUBTITLE K — GROUP HEALTH PLAN REQUIREMENTS