Obligations: Losses-Continued States and subdivisions: Indemnifying payment, loan to sever Industrial development bonds: business relationship. 89 Interest, § 107, 715 Investment trust certificates ex-Small issue exemption, 775 changed for underlying stock, 329 Industrial project, leasing arrange-Meals and lodging: ment, 66 Federal employee, one-day trip, 71 Oil and gas properties: Foreign Service Officer on "home Depletion: leave", 114 Accumulated royalties attributa-State mental hospital employees, 60 ble to loss years, 263 Utilities with lodging furnished em-Gross income from property, dry plovee, 61 gas, 280 Medical expenses: Extraction costs: Insurance: Suspension of issuance of advance Hospital, guaranteed weekly payrulings, 943 ments, 111 Foreign deposits, sublicensee, 261 Prescription drug costs, 110 Leases: expenses Kidney transplant, Installment bonus contract, 42 donor, 111 Offshore government, abndonment Lump-sum payment and monthly loss, 281 fee to retirement home, 112 Options (See also: Employee stock Armed personnel (See: Military options) Forces) Options, constructive ownership: Mines and mining (See: Depletion; Warrants and debentures, 124 Natural Resources) Overpayments: voluntary withholding. Ministers, Interest, small business corporations plan, 485 distributions after close of taxable Natural resources (See also: Depletion) year, § 1.1375-6, 342 Natural resources: Partnerships: Extraction costs, advance rulings, Qualified trust, corporate partners, "employer securities", 183 Foreign petroleum deposits, sub-Retirement plans: licensee, 261 Annuity and bond purchase plans, French convention, Art. 5, 691 Mineral property: Patents, attorneys' fees, acquisition of Leased with equipment, 264 foreign patents, 104 Sale and leaseback with subsidi-Penalties: ary, 44 Bankruptcy, etc., non-pecuniary loss Net operating loss: penalties, 595 Carryback, resulting in unused in-Underpayment of estimated tax, vestment credit, § 1.46-2, 6 corporations, § 103, 715 Carryover: Pension trusts (See: Employees' plans; Liquidation of subsidiary: Self-employed plans) Indebtedness to parent, 135 Pensions (See: Annuities) Losses prior to distribution, 161 Period of limitation (See: Limitation Nonbusiness expenses legal, criminal indictment, evasion of taxes, corporperiod) Personal expenses: ate officer, 69 Meals and lodging, Foreign Service Nonresidents (See also: Withholding) Officer on "home leave," 114 Utilities with lodging furnished em-Nonresidents: Citizen, Trust Territory of Pacific ployee, 61 Islands, 309 Personal holding companies: French convention, professor, re-French convention, Art. 13, 691 search in U.S., 705 Qualified indebtedness, test of rea-Swiss convention, visiting professor sonableness, 254

change of status, 706