

INCOME TAX—Continued

- Capital expenditures—Continued
 - Land preparation costs, electric and gas distribution systems (RR 93) 50
 - Out-of-court settlement, actual and threatened claims, acquisition of stock (RR 119) 40
- Capital gains and losses (*See also*: Capital assets):
 - Alternative tax:
 - Pass-through entity (PL 96-222) 499
 - Rates (PL 96-222) 499
 - Deduction for capital gains:
 - Pass-through entity (PL 96-222) 499
 - Transitional rule (PL 96-222) 499
- Individuals:
 - Employees' trust, distribution by one of two employers (RR 128) 86
- Redemptions (*See*: Redemption of stock and bonds)
- Carrybacks and carryovers (*See also*: Net operating loss):
 - Capital loss, regulated investment companies, carryover period (TD 7659) 184
- Foreign tax credit:
 - Acquiring corporation, reorganization (RR 144) 80
- Investment credit:
 - Affiliated group, newly formed parent (RR 79) 191
- Casualty (*See*: Losses)
- Charitable contributions:
 - Automobile costs, standard mileage rate (RP 7) 590
 - Benefits to donors (RR 77) 56
 - Deductibility, rulings and determination procedures (RP 25) 667
 - Fair market value, gems (RR 69) 55
- Limitations:
 - Private foundation (TD 7679) 59
 - Remainder trust, alternate beneficiary (RR 38) 56
- Section 306 stock (RR 33) 69
- Unreimbursed expenses, VITA volunteers (RR 45) 54

INCOME TAX—Continued

- Citizens (*See*: Nonresidents)
- Claim of right (*See*: Repayments)
- Claims (*See*: Refunds and credits)
- Clergymen (*See*: Ministers)
- Closing agreements:
 - Ruling procedures (RP 20) 633
 - Ruling procedures, employee plan and exempt organization matters (RP 24) 658
- Collection of tax (*See*: Levy)
- Community property and income:
 - Nonresident alien spouse, failure to elect to be treated as resident (TD 7670) 159
- Compensation paid:
 - Stock to employee, transferred by parent's majority stockholder (RR 76) 15
- Compensation received:
 - Deferred (*See*: Employee plans)
- Property other than cash:
 - Barter club transactions (RR 52) 100
 - Cafeteria plans (PL 96-222) 499
 - Stock, transferred to corporate employee by parent's majority stockholder (RR 76) 15
- Sickness or injuries (*See*: Disability benefits; Sick pay)
- Compromises (*See*: Offers in compromise)
- Condemnation awards (*See*: Involuntary conversions)
- Conference (*See*: Appeals)
- Consolidated returns:
 - Losses, limitation, amount at risk (TD 7685) 192
 - Net operating loss and unused investment credit, carryback, newly formed parent (RR 79) 191
- Small business corporation:
 - Stock acquired in reorganization (RR 169) 188
- Constructive ownership of stock:
 - Redemption, family hostility preventing actual control (RR 26) 66
- Constructive receipt of income:
 - Interest:
 - Limitations or restrictions (TD 7663) 101
 - Unmatured savings certificates (RR 157) 186

INCOME TAX—Continued

- Contracts:
 - Long-term, engineer (RR 18) 103
 - Renegotiation, Vinson-Trammell Act, Forms 949 and 949-A, filing extension (RP 13) 617
- Contributions (*See*: Charitable contributions; Employee plans)
- Controlled corporations:
 - Net operating loss carryovers, special limitations (PL 96-167) 483
- Controlled foreign corporations:
 - Transfers, branch with initial losses to new subsidiary (RR 163) 78
- Cooperatives (*See also*: Exempt organizations):
 - Housing:
 - Tenant-stockholder, original seller (PL 96-222) 499
- Corporations (*See also* specific subject headings):
 - Stock transferred to employee by parent's majority stockholder (RR 76) 15
 - Virgin Islands, U.S. corporation (RR 40) 175
- Court decisions (*See* specific subject headings)
- Credits against tax (*See also* specific subject headings):
 - Earned income credit (TD 7683) 3; (PL 96-222) 499
 - New jobs credit (PL 96-222) 499
- Crude oil windfall profits tax (*See*: Windfall profit tax)
- Damages:
 - Dishonored note, recovery from seller (RR 24) 47
 - Out-of-court settlement, actual and threatened claims, acquisition of stock (RR 119) 40
- Deductions (*See also* specific subject headings):
 - Contributions, limitation, compensation defined (RR 145) 89
 - Expenses of living abroad (PL 96-222) 499
- General:
 - Citizens living abroad, nonresident alien spouse, joint return (RR 170) 285
 - Nonprofit activity, rental, house swapping (RR 55) 65