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Tax Center is organized by area of concentration – Federal, State, International, and Accounting & SEC. Given the breadth of federal tax, we further categorized applicable analytical materials by subtopic such as Business Entities, Estates, Gifts & Trusts, Exempt Organizations, Pensions & Benefits, IRS Practice & Procedure and Specialized Tax Planning. This allowed us to place all sources exactly where you think they should be so that you can spend your time focusing on the content, not searching for it!

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§ 179 Election to expense certain depreciable business assets.		IRC Sec. 179 INTERNAL REVENUE CODE	-
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Proposed Regulations & Treasury Decisions		*** CURRENT THROUGH PL 111-82, APPROVED 10/26/2009 ***	
() EC Annotations		INTERNAL REVENUE CODE SUBTITLE A. INCOME TAXES	
LexisNexis IRC Explanations In IRC 5.179(a)		CHAPTER 1. NORMAL TAXES AND SURTAXES SUBCHAPTER B. COMPUTATION OF TAXABLE INCOME PART VI. ITEMIZED DEDUCTIONS FOR INDIVIDUALS AND CORPORATIONS	
BC 5.17900	property is placed in ser	vice.	
E BC 51780 R 8C 51780	(b) Limitations. (1) Dollar limitation [Ci	aution: For taxable years beginning in 2009, see § 3.20 of <u>Rev. Proc. 2008-66</u>	5 (26 USCS § 1 note), for
E) RC.5.179(e)	provision that the aggre not exceed \$ 133,000.].	gate cost of any § 179 property a taxpayer may elect to treat as an expense . The aggregate cost which may be taken into account under subsection (a)	a under this paragraph shall
Analytical Materials Sec. 179: Special Allowance for Certain Property Acquired After December 31, 2007, and Before	(2) Reduction in limital USCS § 1 note), for prov	,000 in the case of taxable years beginning after 2006 and before 2011). tion [Caution: For taxable years beginning in 2009, see § 3.20 of <u>Rev. Proc. 2</u> vision that the limitation under paragraph (1) shall be reduced (but not below	zero) by the amount by
Sec. 179(a): Expension deduction, Equipment Leasing (Matthew Bender 2009).	paragraph (1) for any ta	property placed in service during the 2006 taxable year exceeds \$ 530,000.] xable year shall be reduced (but not below zero) by the amount by which the ce during such taxable year exceeds \$ 200,000 (\$ 500,000 in the case of taxa	e cost of section 179
Sec. 179(b): Dolar Initiations, Tax Planning for S Corporations (Matthew Bender 2009).	2006 and before 2011). (3) Limitation based or	n income from trade or business.	
Sec. 179(d): Definitions, Rakkin & Johnson, Federal Tax Guidebook(Matthew Bender 2009), Osearch for Recert Developments	application of paragraphs	amount allowed as a deduction under subsection (a) for any taxable year (de s (1) and (2)) shall not exceed the aggregate amount of taxable income of the m the active conduct by the taxpayer of any trade or business during such ta	ne taxpayer for such taxable
Search Primary Law i Search Tax News - select sources	(B) Carryover of dis be increased by the less	allowed deduction. The amount allowable as a deduction under subsection (a ser of) for any taxable year shall
		amount disallowed under subparagraph (A) for all prior taxable years (to the n of this subparagraph), or	extent not previously allowed





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	Part 2. Taxpayer Groups	
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	CHAPTER 2D:8 Distributing Partnership/LLC Property to Partners or Members **	
	LexisNexis Tax Advisor Federal Topical § 2D:8.05	
§ 2D:8.05 Characterizing Partner's	's Gain or Loss on Disposition of Distributed Property	
time of the disposition. Thus, a partr	partner recognizes when he disposes of property received in a distribution generally depends on the ner recognizes capital gain or loss on a sale of distributed property he holds as a capital asset even is ordinary income on a sale of distributed property that is inventory in his hands even if it was not in the second of the same second sec	if it was not a capital asset for the
Example:		
	a parcel of real estate to one of its partners, Albert. The partnership held the real estate as invest I property, immediately after the distribution, Albert holds the property as inventory and, on its sale	

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