

# Table of Contents

<b>Introduction</b> .....	<b>1</b>
<b>Partnerships</b> .....	<b>1</b>
Partner loss limitations .....	1
Basis.....	1
At-risk.....	19
Passive activity loss.....	21
Excess business loss .....	25
Profit, loss and capital .....	25
Tax basis capital accounts.....	26
Book basis capital accounts.....	28
Allocations of income and loss .....	30
Guaranteed payments.....	44
Section 754.....	51
Purpose of §754 .....	52
Making the election .....	81
Disguised sales .....	82
Change in partners .....	91
Sale .....	91
Gift.....	93
Redemption .....	95
Death of a partner .....	101
Hot assets.....	102
Disproportionate distributions.....	104
<b>S Corporations</b> .....	<b>113</b>
Shareholder loss limitations.....	113
Basis limit.....	115
At-risk limit .....	141
Passive activity loss limit.....	149

Excess business loss .....	160
<b>Distributions.....</b>	<b>168</b>
Amount distributed.....	169
No earnings and profits .....	170
With earnings and profits.....	174
Noncash property distributions.....	180
<b>Reasonable compensation .....</b>	<b>181</b>
Historical data .....	183
Fringe benefits .....	194
<b>Built-in gains tax .....</b>	<b>201</b>
Assets subject to built-in gains tax .....	201
Assets acquired after the S election .....	205
Determining built-in gain.....	206
Determining built-in loss .....	208
Recognition period .....	209
Calculating and reporting .....	211
<b>Change in stock ownership .....</b>	<b>218</b>
Disposition of stock.....	219
Allocation of income (loss) .....	227
<b>Index .....</b>	<b>239</b>