

TAGGING PLANNING GUIDES

A. Use Topical Category

```
info.unit >
unit.start class.code="600_inc" class.name="Income" service.code="TMPG-REF" unit.code="7701-0101" unit.name="Classification: Determining Entity Type under Check-the-Box Rules (Section 7701)"
analysis.98 id="a0p3b1v8x8" origin.id="A0C8E4H2C4"
name > Classification: Determining Entity Type under Check-the-Box Rules (§7701) <name
para id="a0p3b1v8x9" origin.id="A0C8E4H2C5" > Entity: C Corporation; S Corporation; Partnership; Individuals, Foreign Entity <para
para id="a0p3b1v8y0" origin.id="A0C8E4H2C6" > Topical Category: Income <para
para id="a0p3b1v8y1" origin.id="a0p2u7w1g0" > um:bna:concept:c_corporations <para
```

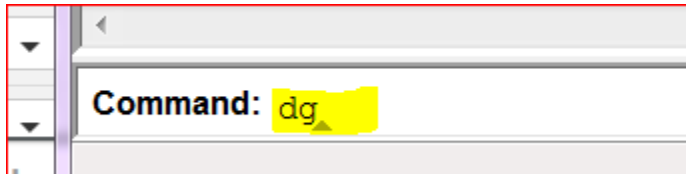
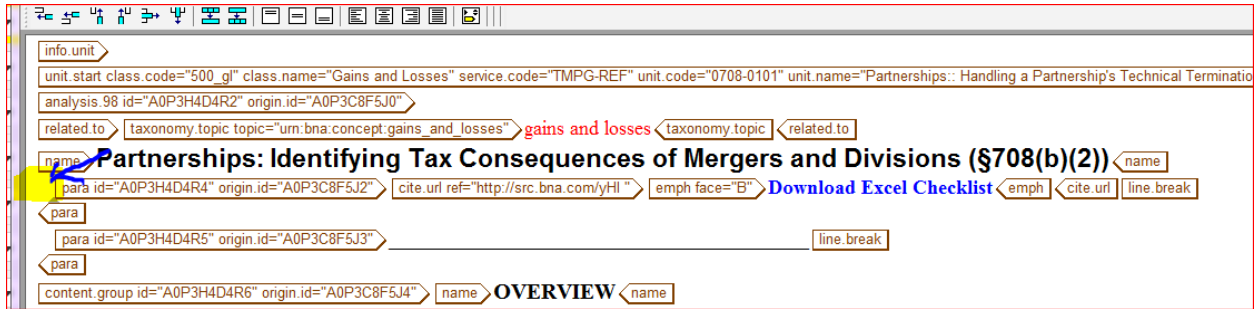
For

```
info.unit >
unit.start class.code="600_inc" class.name="Income" service.code="TMPG-REF" unit.code="7701-0101" unit.name="Classification: Determining Entity Type under Check
analysis.98 id="A0P2U7W1F7" origin.id="A0C8E4H2C4"
related.to > taxonomy.topic topic="um:bna:concept:income" > income <taxonomy.topic <related.to
name > Classification: Determining Entity Type under Check-the-Box Rules (§7701) <name
document.guide id="A0P3B4T3V3" >
toc.entry1 > text > xref.internal ref="A0P2U7W1H4" > OVERVIEW <xref.internal <text <toc.entry1
toc.entry1 > text > xref.internal ref="A0P2U7W1H7" > KEY CONSIDERATIONS <xref.internal <text <toc.entry1
```

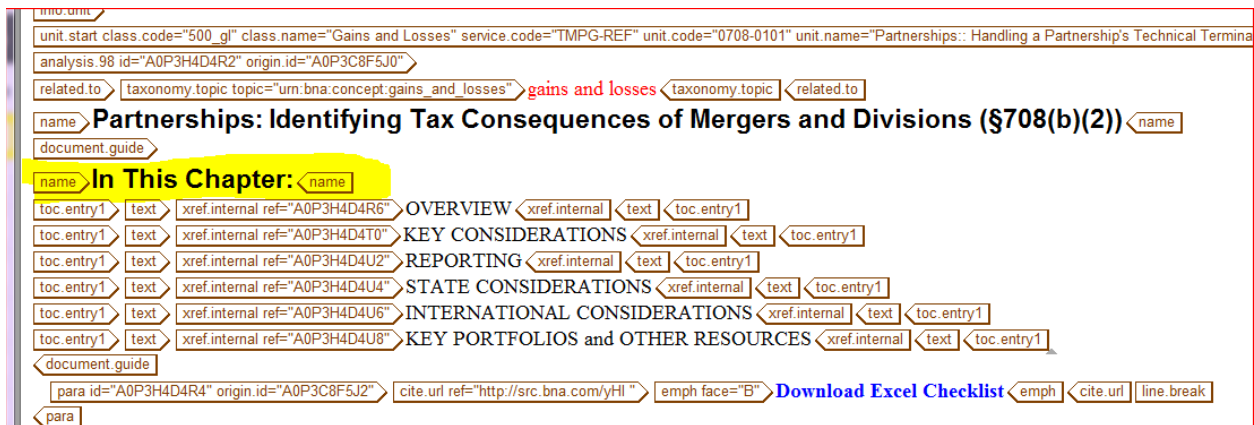
B. DELETE OLD TOC

```
info.unit >
unit.start class.code="500_gl" class.name="Gains and Losses" service.code="TMPG-REF" unit.code="0708-0101" unit.name="Partnerships:: Handling a Partnership's Technical Terminations (Secti
analysis.98 id="A0P3H4D4R2" origin.id="A0P3C8F5J0"
related.to > taxonomy.topic topic="um:bna:concept:gains_and_losses" > gains and losses <taxonomy.topic <related.to
name > Partnerships: Identifying Tax Consequences of Mergers and Divisions (§708(b)(2)) <name
document.guide id="A0P3H4D4R3" origin.id="A0P3C8F5J1" >
toc.entry1 > text > xref.internal ref="A0P2U7Q8J3" > Overview <xref.internal <text <toc.entry1
toc.entry1 > text > xref.internal ref="A0P2U7Q8J7" > Key Considerations <xref.internal <text <toc.entry1
toc.entry1 > text > xref.internal ref="A0P2U7Q8K9" > Reporting <xref.internal <text <toc.entry1
toc.entry1 > text > xref.internal ref="A0P2U7Q8M1" > State Considerations <xref.internal <text <toc.entry1
toc.entry1 > text > xref.internal ref="A0P2U7Q8M3" > International Considerations <xref.internal <text <toc.entry1
toc.entry1 > text > xref.internal ref="A0P2U7Q8M5" > Key Portfolios And Other Resources <xref.internal <text <toc.entry1
document.guide >
para id="A0P3H4D4R4" origin.id="A0P3C8F5J2" > cite.url ref="http://src.bna.com/yHI " > emph face="B" > Download Excel Checklist <emph <cite.url <line.break
para
para id="A0P3H4D4R5" origin.id="A0P3C8F5J3" >
para
content.group id="A0P3H4D4R6" origin.id="A0P3C8F5J4" > name > OVERVIEW <name
para id="A0P3H4D4R7" origin.id="A0P3C8F5J5" > emph face="B" > Legislative Change Note: <emph <emph > The 2017 tax act ( <cite.pl ref="PL\115-97" > Pub. L. No. 115
```

Put cursor after name tag and type dg on the command line to create new TOC



Delete in this Chapter



Make sure the ref id's are the same with the content group id's

analysis.98 id="A0P3H4D4R2" origin.id="A0P3C8F5J0" >

related.to > taxonomy.topic topic="urn:bna:concept:gains_and_losses" > gains and losses < taxonomy.topic < related.to <

name > **Partnerships: Identifying Tax Consequences of Mergers and Divisions (\$**

document.guide >

toc.entry1 > text > xref.internal ref="A0P3H4D4R6" > OVERVIEW < xref.internal < text < toc.entry1 <

toc.entry1 > text > xref.internal ref="A0P3H4D4T0" > KEY CONSIDERATIONS < xref.internal < text < toc.entry1 <

toc.entry1 > text > xref.internal ref="A0P3H4D4U2" > REPORTING < xref.internal < text < toc.entry1 <

toc.entry1 > text > xref.internal ref="A0P3H4D4U4" > STATE CONSIDERATIONS < xref.internal < text < toc.entry1 <

toc.entry1 > text > xref.internal ref="A0P3H4D4U6" > INTERNATIONAL CONSIDERATIONS < xref.internal < text < toc.entry1 <

toc.entry1 > text > xref.internal ref="A0P3H4D4U8" > KEY PORTFOLIOS and OTHER RESOURCES < xref.internal < text < toc.e

< document.guide <

para id="A0P3H4D4R4" origin.id="A0P3C8F5J2" > cite.url ref="http://src.bna.com/yHl " > emph face="B" > **Download Excel Checklist**

< para <

para id="A0P3H4D4R5" origin.id="A0P3C8F5J3" > line.break <

< para <

content.group id="A0P3H4D4R6" origin.id="A0P3C8F5J4" > name > **OVERVIEW** < name <

para id="A0P3H4D4R7" origin.id="A0P3C8F5J5" > emph face="B" > **Legislative Change Note:** < emph < emph > *The 2017 tax ac*
exchange technical termination rule under pre-2017 tax act < cite.usc ref="USC\26\708(b)(1)(B)" > §708(b)(1)(B) < cite.usc > , e
 < cite.usc ref="USC\26\708(b)(1)" > §708(b)(1) < cite.usc > , as amended. *IRS regulations have not yet been updated for this cha*
inadvertent late filing of tax returns and assessment of penalties. Additionally, it should reduce the failure to make
is no longer available as a planning technique. < emph < para <

para id="A0P3H4D4R8" origin.id="A0P3C8F5J6" > emph > *The special rules under* < cite.usc ref="USC\26\708(b)(2)" > §708(b)(2) < cit
continuation of any merging or consolidating partnership whose members own an interest of more than 50 percent
guidance under the < cite.usc ref="USC\26\708(b)(2)" > §708(b)(2) < cite.usc > *special rules is needed regarding the status of pa*

para id="A0P3H4D4R9" origin.id="A0P3C8F5J7" > Partnerships may be combined, divided, or otherwise restructured. This pra
 nonrecognition transactions, collateral tax consequences—some of them significant—depend on the legal form used to e

< cite.bna.reference bna.id.ref="TPS\4060.01.E" > ¶4060.01.E < cite.bna.reference > ; TPS < cite.bna.reference bna.id.ref="TPS\4060.01.F" > ¶40

< content.group <

content.group id="A0P3H4D4T0" origin.id="A0P3C8F5J8" > name > **KEY CONSIDERATIONS** < name <

para id="A0P3H4D4T1" origin.id="A0P3C8F5J9" > emph face="b" > **If the Taxpayer Has Combined or Merged Two or More**

C. Edit > Change Case>Title Case

info.unit

unit.start.class.code="600_inc" class.name="Income" service.code="TMPG-REF" unit.code="7701-0101" unit.name="Classification: Determining Entity Type under Check-the-Box Rules (S)

analysis.98 id="A0P2U7W1F7" origin.id="A0C8E4H2C4"

related.to taxonomy.topic topic="um:bn:concept:income" income taxonomy.topic related.to

name **Classification: Determining Entity Type under Check-the-Box Rules (§7701)** name

document.guide id="A0P3B4T3V3"

toc.entry1 text xref.internal.ref="A0P2U7W1H4" Overview xref.internal text toc.entry1

toc.entry1 text xref.internal.ref="A0P2U7W1H7" KEY CONSIDERATIONS xref.internal text toc.entry1

toc.entry1 text xref.internal.ref="A0P2U7W1J5" REPORTING xref.internal text toc.entry1

toc.entry1 text xref.internal.ref="A0P2U7W1J7" STATE CONSIDERATIONS xref.internal text toc.entry1

toc.entry1 text xref.internal.ref="A0P2U7W1J9" INTERNATIONAL CONSIDERATIONS xref.internal text toc.entry1

toc.entry1 text xref.internal.ref="A0P2U7W1K1" KEY PORTFOLIOS and OTHER RESOURCES xref.internal text toc.entry1

document.guide

para id="A0P3B8D6Q1" cite.url emph.face="B" Download Excel Checklist emph cite.url

para

para id="A0P3B8D6Q2" line.break

para

content.group id="A0P2U7W1H4" origin.id="A0C8E4H2E1" name **OVERVIEW** name

para id="A0P2U7W1H5" origin.id="A0C8E4H2E2" The "check-the-box" rules generally permit an unincorporated entity to elect its entity classification for federal income tax purposes. An entity may be treated as either an association taxable as a corporation, as a partnership, or as an entity disregarded as separate from its owner, without regard to the number of owners, the continuity of life, centralized management, and free transferability of interests) it may possess. Entities that are organized as corporations under state law but that do not resemble U.S. corporations, entities that are taxable as corporations under a special provision of the Code, and trusts are excluded from this elective tax classification.

Change Case dialog box:

- Sentence case
- lowercase
- UPPERCASE
- Title Case

OK Cancel

D. Delete underline taggings

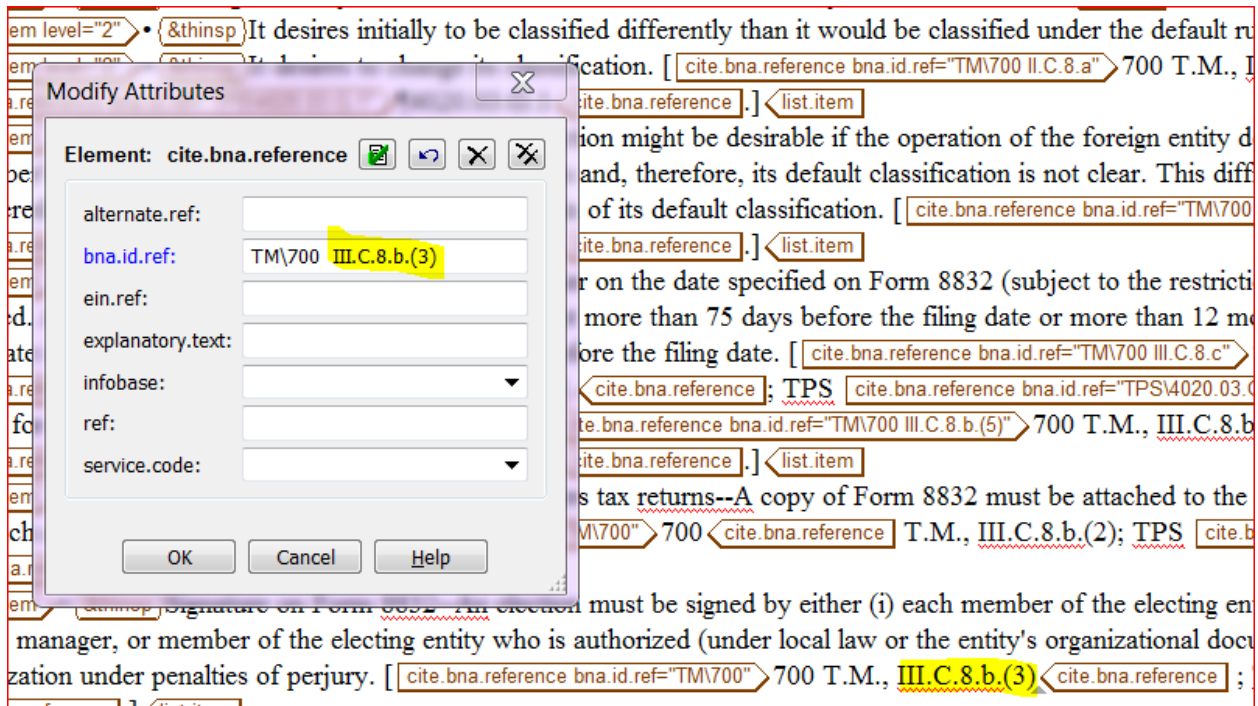
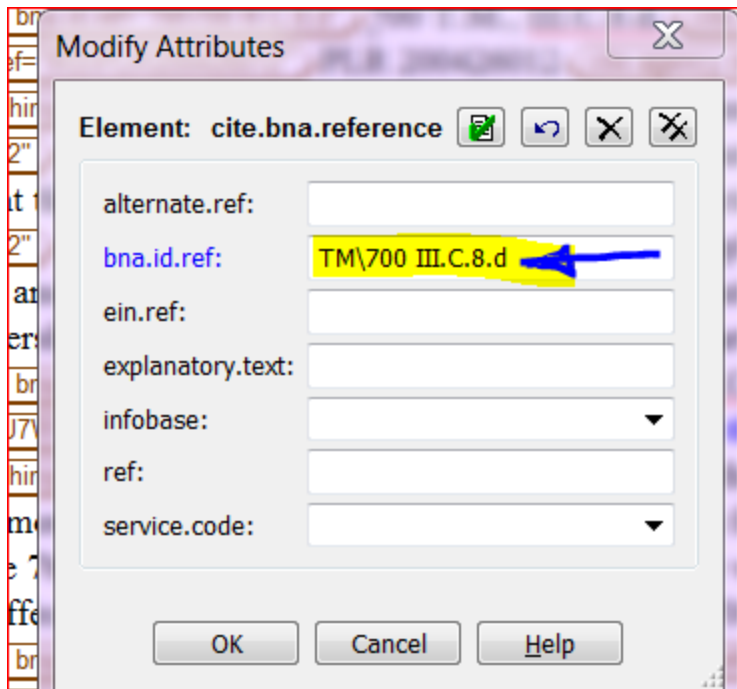
1. RUN acta
2. RUN irs-ref (will tag usc then tag Regs & Proposed Regs [cite.cfr])
3. Cross-ref

Form 8832 to entity or owners tax returns--A copy of Form 8832 must be attached to the tax return. **700** T.M., III.C.8.b.(2);

Move

700 T.M., III.C.8.b.(3);

Fill ref. id's (no periods after last character-link will not work if there is a period)



4. TPS tagging remains the same

TPS, not the disregarded entity's EIN, for federal tax purposes, including on the
 : TPS cite.bna.reference bna.id.ref="TPS\4020.03.G.2" ¶4020.03.G.2 <cite.bna.reference .]

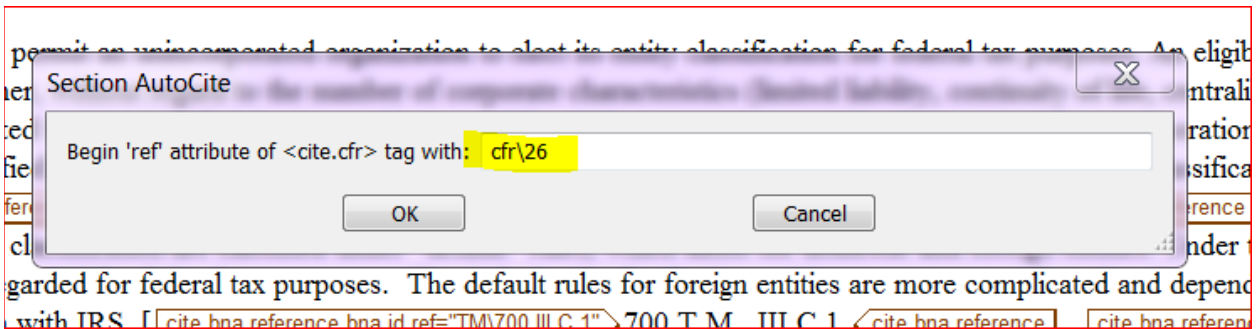
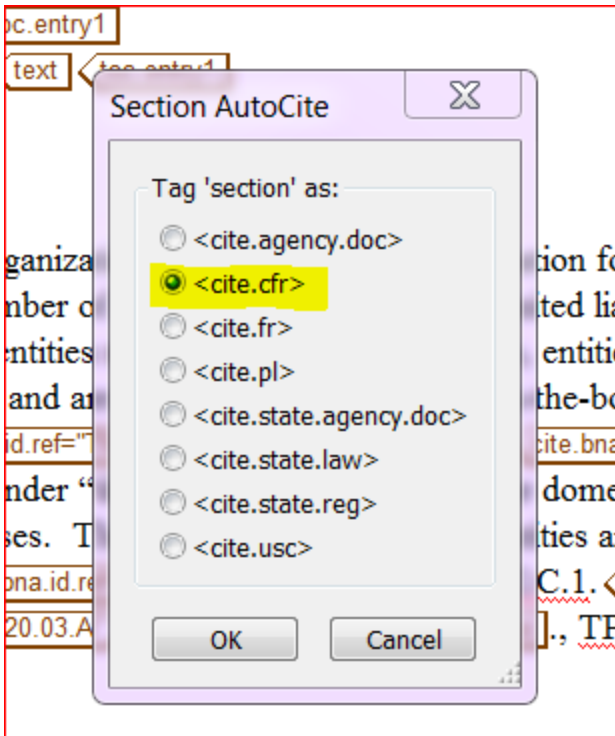
5. To tag Regs & Proposed Regs go to tools, section auto cite (use cfr\26)

The screenshot displays a software interface with a 'Tools' menu on the left and a document preview on the right. The menu items and their keyboard shortcuts are as follows:

- Assign Unique IDs
- Check Completeness
- Check Dictionary/Thesaurus (Ctrl+Shift+F10)
- Check Spelling (Shift+F10)
- Clear Paste Buffer
- DTD viewer
- Match Footnotes/Endnotes
- Renummer Footnotes/Endnotes
- Autocite
- PowerPanel (F9)
- SaveGet Directory (Ctrl+F8)
- Footnote Viewer (Ctrl+Shift+F7)
- Section AutoCite
- Check Current Table
- Check All Tables
- Mark string as...
- Link Info
- Check Current URL
- Validate file

The document preview on the right shows the following content with various tags:

nit.name="Classification:
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 1
 text toc.entry1
 y1
 text toc.entry1
 xref.internal text
 SOURCES xref.internal
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 ates, specified foreign
 s "per se corporation
 e , cite.bna.reference b



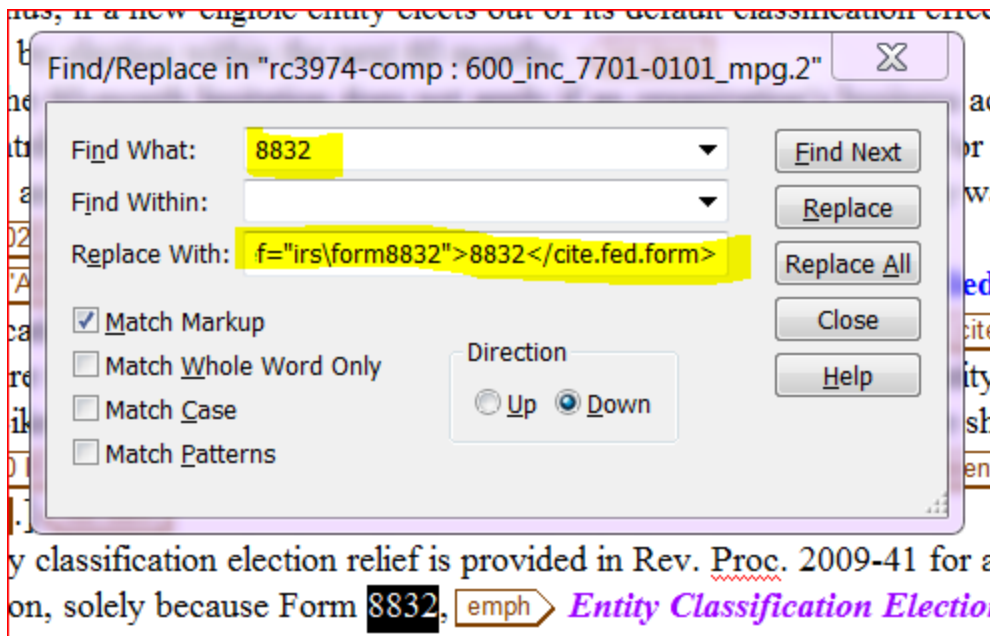
Reg. tagging

Reg. `<cite.cfr ref="cfr\26\1.482-7A">` §1.482-7A `<cite.cfr>` and Reg. `<cite.cfr ref="cfr\26\1.482-7T">` §1.482-7T `<cite.cfr>`.

Proposed Reg tagging (use REG then edit to add prule)

Prop. Reg. `<cite.cfr ref="prule\cfr\26\1.743-1(a)">` §1.743-1(a)(2)(ii) `<cite.cfr>`;

Tagging Forms use search and replace [ex. attributes= irs\form8832(no space) copy tagging on replace with:



For Tagging Elections (put cursor-arrow on headline then right click, inspect

Results for: RELATED(26 usc 7701)
[Elections & Compliance Statements](#) > [Deductions & Credits: Busines](#)

Entity Classification Election (§7701)

References: Reg. [§301.7701-1](#) through -3
[Rev. Proc. 2009-41](#), [Rev. Proc. 2010-32](#)
[Document Form 8832 Entity Classification Election](#)

Entity Classification Election (§7701)

References: Reg. [§301.7701-1](#) through [-3](#)
[Rev. Proc. 2009-41](#), [Rev. Proc. 20](#)

Documents: Form [8832](#), *Entity Classification Election*

Analysis: [710 T.M.](#); [TPS ¶4095.01.B.](#); [TPS ¶](#)

Under the entity classification regulations (referred to as the "entity classification rules"), an organization qualifies to make the election if it is an eligible entity. If an eligible entity does not make a classification election, it is classified as a default business entity.

A default business entity that is not a per se corporation is classified as a partnership by default or by affirmative election) is classified as a partnership.

The default rule for foreign entities that are not per se corporations and have more than one member and at least one member does not have a U.S. principal office is that they are classified as a partnership if they do not elect to be classified as a corporation. Reg. [§301.7701-2\(b\)\(8\)](#).

Election Method:

An eligible entity is not required to accept its default classification.

To make an election, an eligible entity must file Form [8832](#) with the IRS Service Center department.

Timing: The form signed by each member of the election entity must be submitted at the time the election is made.

Back	Alt+Left Arrow
Forward	Alt+Right Arrow
Reload	Ctrl+R
Save as...	Ctrl+S
Print...	Ctrl+P
Cast...	
Translate to English	
View page source	Ctrl+U
View frame source	
Reload frame	
Inspect	Ctrl+Shift+I

This window will show up, copy id.

```

...
<a name=
  "tmelec_300_bus_7701_0101">
</a> == $0
<div class="sample SAMPLE
name_wrapper">Entity
Classification Election
($7701)</div>
<a name="a0g2y9u1t7"></a>
▶ <div class="content-table">...
</div>
<a name="a0g2y9u1u1"></a>
▶ <div class="p ">...</div>
<a name="a0g2y9u1u2"></a>
▶ <div class="n "> </div>
... html #body #main_article #body #doc a
Styles Computed Event Listeners >>
Filter :hov .cls +
element.style {
}
Inherited from body#body.rrl_off
body {      jquery-ui.custom_addons.css:44
font-size: 11px;

```

[list.item.level="2"]>• (&thinsp)To make an election, use IRS Form [cite.fed.form.ref="irs/form9832">]8832</cite.fed.form> [emph]>Entity Classification Election</emph> [see [cite.bna.reference.ref="tmelec_300_bus_7701_0101"]>Entity Classification Election (§7701)</cite.bna.reference>], Bloomberg Tax Elections and Compliance Statements Library [cite.bna.reference.bna.id.ref="TM700 III.C.8.b"]>700 T.M., III.C.8.b.</cite.bna.reference>]; TPS

Rev. Proc.

PLR 200426012 <cite.agency.doc | <list.item

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Classification

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election is filed.
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<cite.bna.reference ; <cite.bna.reference bna.id.ref="TM\725 III.C.8"> 725 T.M., III.C.8. <cite.bna.refer

tion is not a change in th

entity by liquidating into i
ically terminates, the succ
<.id.ref="TM\700 III.C.8.d"> 700

<cite.fed.form so long as the
ffective on the first day of
than 12 months before th

ded in <cite.agency.doc ref="IRS\RevProc\2009-41"> Rev. Proc. 2009-41 <cite.agency.doc for an e

Modify Attributes

Element: cite.agency.doc

alternate.ref:

explanatory.text:

ref: *

* Required attribute

OK Cancel Help

Rev. Rul.

...ing partner pursuant to [cite.usc ref="usc26704\(c\)\(1\)\(B\)"](#) / [§704\(C\)\(1\)\(B\)](#) / [cite.usc](#) .

s, where a contribut

[emph](#) *gain* [emph](#)

[ref="usc26704\(c\)\(1\)\(B\)"](#)

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[7\(a\)\(1\)"](#) [§737\(a\)\(1\)](#) <

[B"](#) **In Choosing an**

outside Basis of the

of [cite.usc ref="USCV](#)

Find/Replace in "rc3974-comp : tmpg_template"

Find What: Find Next

Find Within: Replace

Replace With: Replace All

Match Markup Cancel

Match Whole Word Only Direction

Match Case Up Down

Match Patterns Help

Section 704(c) [cite.usc](#) provides a great deal of flexibility to partnerships in electing a

) [cite.usc](#) methodologies elected will create varying amounts of income, gain, losses or

course liabilities under [cite.usc ref="USC26752"](#) [§752](#) [cite.usc](#) , i.e., the calculation of

ee [cite.agency.doc ref="IRS\RevRul\95-41"](#) **Rev. Rul. 95-41** [cite.agency.doc](#) , 1995-1 C.B. 13

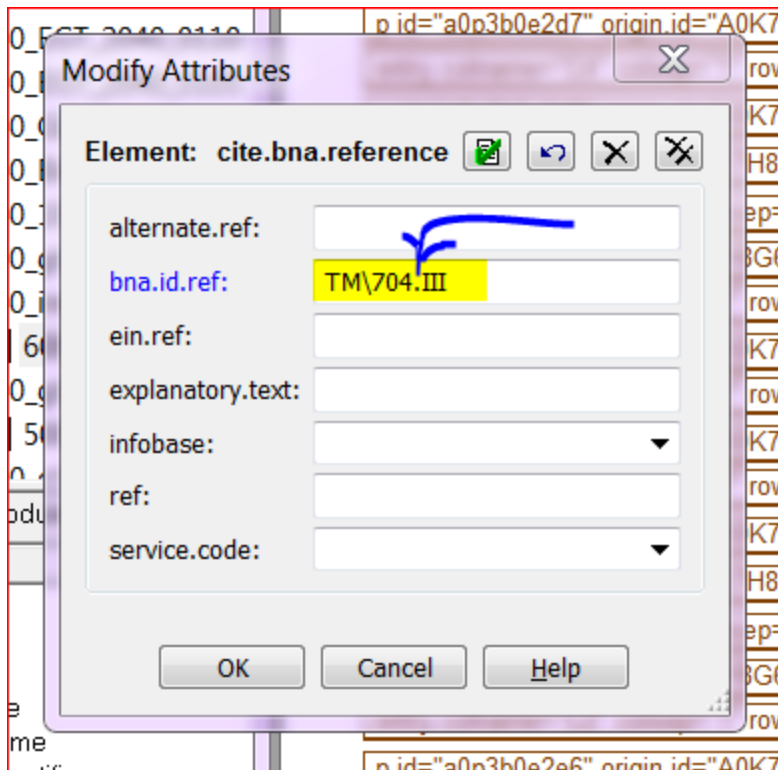
Worksheet

..., IV [cite.bna.reference](#) , Grantor Trusts. [emph](#) **Section 672 Definitions and Rules** [emph](#) [list.item](#)

s [[cite.bna.reference bna.id.ref="TM\700.wks3"](#) **700 T.M., Worksheet 3** [cite.bna.reference](#)] [list.item](#)

Entity Classification Election (§7701) [cite.bna.reference](#) | [link to Bloomberg Tax Elections and Com](#)

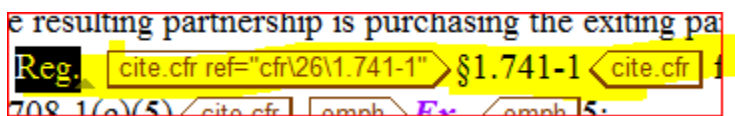
Make sure there is a period after portfolio number on the attributes (only)



Delete spaces between > , & > :

To tag Regs & USCs use Tools>Section Autocite

REgs have periods in filename ex. Reg. &1.708-1(c)(4) &1.708-1(c)(5) [use cite.cfr]



Usc don't have periods in filemanes ex. &741 [use cite.usc]

cite.usc ref="usc\26\751" §751 cite.usc