
TABLE OF CONTENTS

Chapter 1: Sale of a Partnership Interest	1
¶101 Introduction	1
¶102 Amount Realized	2
¶103 Adjusted Basis in Partnership Interest	3
¶104 Ordinary Income from the Sale of an Interest in the Partnership	10
¶105 Collectibles and Unrecaptured Code Sec. 1250 Gain	18
¶106 Installment Sale of a Partnership Interest	21
¶107 Abandonments and Gifts of a Partnership Interest	26
¶108 Like-Kind Exchanges and Partnership Interests	28
¶109 Miscellaneous Partnership Interest Transfer Issues	29
Chapter 1: Test Your Knowledge	33
Chapter 1: Solutions and Suggested Responses	35
 Chapter 2: Partnership Distributions	 37
¶201 Introduction	37
¶202 Operating or “Current” Distributions	38
¶203 Property Distributions—Consequences to the Partnership	42
¶204 Partner’s Basis in Distributed Property	43
¶205 Liquidating Distributions	54
¶206 Disproportionate Distributions—Results to Partner and Partnership When the Partner’s Share of Ordinary Income Assets Is Affected	62
¶207 Proposed Regulations Introduce “Hypothetical Sale” Approach	67
¶208 Unrealized Receivables Defined	74
¶209 Substantially Appreciated Inventory Items Defined	76
¶210 Distribution of Marketable Securities	78
¶211 Definition of Marketable Securities	81
¶212 Basis in Securities Distributed, Partnership Interest, and Assets Remaining in the Partnership	82
¶213 Coordination with Other Provisions	84
Chapter 2: Test Your Knowledge	85
Chapter 2: Solutions and Suggested Responses	87
 Chapter 3: Basis Adjustments to Partnership Property— Code Secs. 734(b), 743(b)	 91
¶301 Basis Adjustment to Partnership Property—Code Sec. 743(b) Basis Adjustments	91
¶302 Allocation of Code Sec. 743(b) Adjustments	104
¶303 Partnership Basis Adjustments Following Distributions of Property— Code Sec. 734(b) Basis Adjustments	122
¶304 No Code Sec. 754 Election in Effect	124
¶305 Code Sec. 754 Election in Effect or Substantial Basis Reduction	124
¶306 S Corporation Comparison	139
Chapter 3: Test Your Knowledge	141
Chapter 3: Solutions and Suggested Responses	143

Case Table	147
Glossary	148
Index	149
Final Exam Copy	150