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Inclusions and Exclusions Chapter 4 Adjustments for Adjusted Gross Income Chapter 5 Itemized
Deductions Chapter 6 Self-Employed Business Income (Line 12 of Form 1040 and Schedule C)

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of this area. In addition, partnership tax provides a flexibility found nowhere else in the Code, affording the attorney or accountant an unparalleled opportunity to engage in tax planning on behalf of his client. In approaching partnership tax, it is helpful to understand a few basic concepts. First, a partnership is a “ flow-through ” entity.

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the partnership sold all of its assets for cash equal to the fair market value of the assets and then liquidated.⁸ The “ liquidation value ” rule is pro-taxpayer because it disregards discounts that might apply to the fair market value of the partnership interest due to lack of marketability for such an interest.

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