

# DISGUISED SALE PLANNING

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Andrea M. Whiteway  
E&Y LLP  
Washington, D.C.

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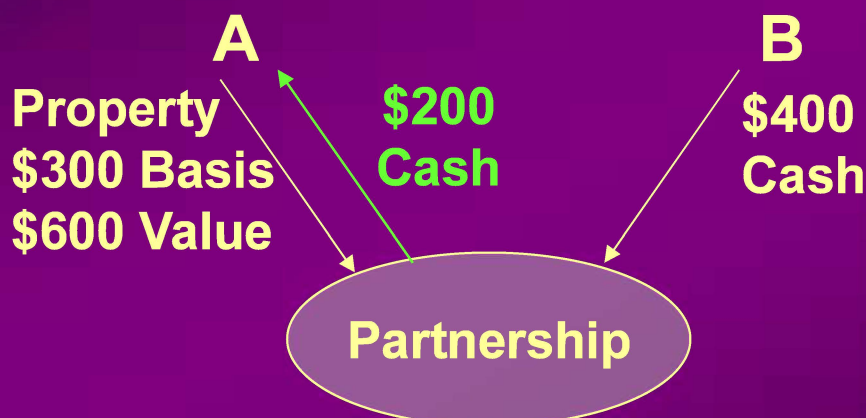
*A has no gain; \$100 basis*

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*A is deemed to sell 1/3 of property for \$200;  
has \$100 gain, \$200 basis in interest*

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*A is presumed to have sold 185/600 of property on  
1/1/20 for \$185 plus \$15 imputed interest*

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*A is presumed not to have sold the property.*

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## Capital Account Distortions

As Maintained		As Adjusted	
Prop 600		Prop	
		Cont 415	
Cash 200		Purch 185	
	400 A		407.5 A
	400 B	Cash 200	392.5 B

*Imputed interest expense must be specially allocated to A to avoid capital account distortion.*

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"Disguised Sales"