

Fundamentals Of Partnership Taxation Solutions

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11-a. Once a partnership makes a § 754 election, it can only be
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concept because many deductions ...

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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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