



FEDERAL TAX ON CHECKPOINT®

TOP 5 REASONS TO TRY FEDERAL TAX ON CHECKPOINT®

1. Most comprehensive and authoritative integration of Federal tax analysis, explanations, annotations, headnotes and primary sources available in a research system.
2. Authoritative guidance from WG&L®, RIA® and PPC® experts.
3. Easiest searching by Code or by topic using the award-winning online Checkpoint® platform.
4. One source with content from partners such as BNA, IBFD, FASB, AICPA, PLI, WorldTrade Executive and more.
5. Integration of new Federal tax law and daily newsstand updates as well as our State & Local and International tax libraries, so you only ever need to check one source for the most up-to-date, complete and linked information.



Our federal tax product line on Checkpoint is anchored with expert guidance from RIA®, WG&L® and PPC®, the top names in federal taxation analytical research materials. Flagship tax products include the Federal Tax Coordinator 2d (topically arranged) and the U.S. Tax Reporter (code arranged). Checkpoint features authoritative analysis, guidance and interpretations from leading industry experts you know and trust. WG&L is one of the most respected brands in the industry and our federal treatises authors are acknowledged for their superior interpretative analysis and practical approach to tax. Renowned authors include James S. Eustice, Boris Bittker, Lawrence Lokken and many, many more. You can be sure that the content and analysis from our RIA, WG&L and PPC experts will always provide you with the most comprehensive guidance.

FEDERAL TAX – MAJOR FEATURES

Compare/t

Allows you to link from a tax concept in one state to the same concept in another state. Also link from Federal to State, State to Federal or across multiple countries.

Top Line and Side Line Links

Top Line Links take you directly to source materials and analysis in your subscription related to your search. Pinpoint your search results even further with targeted Side Line Links.

Tax Trackers

Use Bill Tracker to easily see if there is pending legislation pertaining to your search topic, or Citation Tracker to be notified when a document is cited by a new Federal tax case or IRS Ruling/Release.

Form/Line Finder

This innovative tool takes you from a Form line right to the analysis you need to complete your compliance task quickly and accurately.

Internal Revenue Code Linking

Link from the Code directly to the Code history. Link from any subsection directly to any Federal Tax Coordinator, Tax Advisors Planning System, Pension analysis, Estate Planning analysis or WG&L treatise that references the subsection.

Prior Regulations Databases linked from Current Regulations

Current Regs offer a link to Prior Regs (back to 1986) and Prior Regulations offer a link to Current Regulations. Not a traditional archive that only shows how a Regulation appeared at the end of the year; includes all of the changes made to the regulation during the year.

Go To U.S. Tax Reporter Code Section

One – click access to a specific Code section and its related components (Regulations, Committee Reports, Annotations, Explanations).

Custom Code Based Research Templates

Focus and speed your Code-based research.

Case Grids

Quick access to key information about each federal case, including the history of the case.

Document Assembly

The easiest way to complete Election & Compliance statements and Tax Advisors Planning System practice aids and more by simply answering a few questions.

DOCUMENT LIST

No need to worry about getting lost while you are searching, since this highlights the document you're currently viewing as well as your search terms. One click brings you back to your initial search results.

The screenshot displays the Checkpoint website interface. At the top, there are navigation tabs for Home, Research, Newsstand, Tools, Practice Development, and CPE. A search bar is located in the top right corner. The main content area is titled 'EXP 13824 Limitation on net operating loss carryforwards and certain built-in losses following ownership change. Explanations (Code Arranged - USTR) (RIA)'. Below the title, there are several tabs: Annot, IRC, Regs, Com. Rate, Hist, and Compare It. The document list on the left side of the page includes various topics related to Section 13824, such as 'Insolvency reorganizations', 'Net operating loss carryover and carryback', 'Related rules', 'Basis rules applicable to the IRC 1382 limitation on certain pre-change losses', '50% ownership change', 'Testing dates and periods', 'Equity structure shifts', 'Owner shifts', 'Worthless stock deduction', 'Relation to IRC 1381 acquisitions', 'Attribution of stock ownership', 'Options', 'Stock subject to testing requirements', 'Continuity of business enterprise test', 'How to figure the annual limitation', '5% shareholders', 'Other definitions relating to owners', and 'Aggregation of public shareholders and public owners into public groups'. The main document view shows the title 'EXP 13824 Limitation on net operating loss carryforwards and certain built-in losses following ownership change.' followed by a paragraph of text: 'Special limitations generally apply to built-in losses and net operating loss (NOL) carryforwards when a corporation undergoes a more than 50% stock ownership change (§ 13824.02) within a three-year period. Code Sec. 382. The limitations apply only if the stock ownership change occurs in conjunction with an owner shift involving a 5% shareholder (§ 13824.13) or under a reorganization.' Below this is an 'OBSERVATION' section: 'These limitations are designed to significantly reduce tax benefits to be obtained from acquiring corporations with unused losses and credits.' Another paragraph follows: 'After an ownership change, the taxable income available for offset by loss corporations with built-in losses or pre-change NOLs is limited annually to a prescribed rate (the "long-term tax-exempt rate") times the loss corporation's value immediately before the change. See § 13824.01. For how to figure the annual limitation, see § 13824.12. An ownership change occurs if, immediately after any owner shift (see § 13824.05) or any equity structure shift (defined at § 13824.04), the percentage of the stock owned by one or more 5% shareholders has increased by more than 50% over the lowest percentage of stock of the loss corporation (or any predecessor corporation) owned by such shareholders at any time during the testing period, see § 13824.01. A testing period is generally the three year period preceding a testing date, see § 13824.03. "5% shareholder" is defined at § 13824.13. For other definitions relating to owners, see § 13824.14.' A final paragraph states: 'If any stock of a 50% shareholder is treated by him as worthless in his tax year and he holds it at year-end, then the stock is treated as having been acquired by him on the first day of his next tax year and not owned by him during any earlier period for purposes of determining if an ownership change has occurred after the end of the tax year when the stock is treated as worthless, see § 13824.06.' At the bottom of the document view, there is a note: 'The attribution rules for stock ownership are based on Code Sec. 318 with a number of' followed by buttons for Document, Contents, and Keyword.

Federal Taxes Weekly Alert

A digest of the most critical federal tax news and developments delivered straight to your desktop every week. Authoritative and concise analysis of the issues and their potential impact provides timely tax-saving tips and guidance.

Tax Alerts

Tax Alerts is an invaluable service for the tax practitioner that integrates tax research, compliance, and a way to grow. Tax Alerts helps the practitioner grow their business efficiently by reporting recent tax developments and evaluating their importance.

Citator 2nd

Citator 2nd provides not only complete cite information, but also provides an analysis of the cases and rulings that were cited by either the court or the IRS in reaching the holding or the conclusion of the ruling.

BNA News and Reports

Get instant access to BNA Daily Tax RealTime™ Update, Daily Tax Report, Int'l Tax Monitor, State Survey Charts, Portfolios and more.

Cost Basis Plus

Cost Basis Plus simplifies the technical task of performing cost basis calculations. Use this tool to get the critical securities information needed to complete 1040 Schedules B and D.

MAJOR FEDERAL TAX LIBRARIES ON CHECKPOINT

FEDERAL LIBRARIES

Federal Tax Coordinator Library (WEB1)

- Federal Tax Coordinator
- Complete Analysis of New Law(s)
- Pending & Enacted Legislation
- Source Materials (Code, Regs, TDs, PUBS)
- IRS Rulings and Releases (FSAs, SCAs, IRB, LMSBs, etc)
- U.S. Tax Treaties in Force
- e-Form® RS: Federal

Ask about packages containing one or more of these additional titles:

- PLRs
- State tax reporters
- State forms
- All States Tax Guide (WASTG)
- Tax Advisors Planning System: Core Series (TAPS II)

U.S. Tax Reporter Library (WEB3)

- U.S. Tax Reporter
- Code Arranged Committee Reports
- Current Year AFTR Cases
- RIA's Complete Analysis of New Law(s)
- Pending & Enacted Legislation
- Source Materials (Code, Regs, TDs, PUBS)
- IRS Rulings and Releases (FSAs, SCAs, IRB, LMSBs, etc)
- PLRs
- U.S. Tax Treaties in Force
- e-Form® RS: Federal

Ask about libraries containing one or more of these additional titles:

- All States Tax Guide (WASTG)
- Tax Advisors Planning System: Core Series (TAPS II)
- Citator 2nd (WCIIT)
- State Forms
- Election & Compliance Statements
- State Tax Reporters
- IRS Practice (includes the Internal Revenue Manual)

Federal Analytical Reporter Library (WEB4)

- Federal Tax Coordinator Library
- U.S. Tax Reporter Library
- e-Form® RS: Federal

Ask about packages containing one or more of these additional titles:

- Citator 2nd (WCIIT)
- State Forms
- Election & Compliance Statements
- State Tax Reporters
- Tax Advisors Planning System (WTAPS)

Core Federal Research and Planning Library (WEB5)

- Federal Analytical Reporter Library
- Public Domain Library w/Citator 2nd
- Election and Compliance Statements
- IRS Practice (includes Internal Revenue Manual)
- Tax Advisors Planning System (WTAPS)
- e-Form® RS: Complete

Core Federal Research Library for Corporate Practitioners (WEB5K)

- Core Federal Research and Planning Library – without WTAPS
- WG&L Journal of Taxation
- WG&L Corporate Taxation
- WG&L Journal of Multistate Taxation & Incentives
- WG&L Business Entities
- WG&L Practical Tax Strategies

Tax Desk (WTD)

Tax Desk is a complete analytical service packaged with Federal and State forms, primary source materials, elections and compliance statements with document assembly, additional practice aids and a comprehensive weekly newsletter. It is compliance focused and includes a complete collection of client letters covering a wide range of topics. Developed for the practitioner who services small businesses and individuals.

Ask about libraries containing one or more of these additional titles:

- State Tax Reporters
- All States Tax Guide (WASTG)
- Tax Advisors Planning System: Core Series (TAPS II)

MAJOR FEDERAL TAX LIBRARIES ON CHECKPOINT

Tax Advisors Planning System (WTAPS)

Tax Advisors Planning System provides planning guidance for general tax attorneys and accountants who represent closely held businesses and their owners. Written by a national network of practitioners and consisting of over 43 titles, TAPS focuses on topics covering every stage of the business cycle: formation, operation, sales or transfer, even estate and compensation planning for the owners. Each title includes:

- **Commentary** – current rules of a transaction and planning insights and techniques;
- **Practice aids** – over 900 sample agreements, business generating client letters, election statements, wills, trusts, checklists, interoffice memoranda etc., which can be customized using Checkpoint Document Assembly feature
- Citations to controlling authorities
- Click on a “Planning” button and link to TAPS commentary and planning insights with respect to the relevant Code or Regulation section.

Citator 2nd (WCIIT)

Citator 2nd notes specific relationships between cases, such as when one case has affirmed or reversed another. Citator is completely integrated and provides a quick and thorough citation check of all AFTR 2d, TC Memo and TC cases and IRS rulings. Key case issues can be tracked across the entire breadth of the Citator’s case inventory. Check the strength or weakness of a case or ruling quickly and accurately with Citator 2nd.

- Complete judicial history of federal tax cases, rulings and Treasury decisions
- Accurate, up-to-date evaluations of how each case or ruling has stood up over time
- Evaluations, written in plain English, clearly identified by the key legal issue
- Imbedded links from citations to the pertinent Checkpoint reference
- Parallel citations to West and CCH from most AFTR 2d and Tax Court cases

Public Domain Library w/Citator (WEBPD)

- American Federal Tax Reports (1860-current)
- Tax Court & Board of Tax Appeals Reported Decisions (1924-current)
- Tax Court & Board of Tax Appeals Memo Decisions (1928-current)
- IRS Rulings & Releases and PLRs
- Code, Regulations
- Citator 2nd

Public Domain Subset (WPD1)

- Public Domain Library without Citator

Tax Alerts™ on Checkpoint (WTANE)

Tax Alerts is an invaluable service for the tax practitioner that integrates tax research, compliance and away to grow revenue. Tax Alerts helps the practitioner grow their business efficiently by reporting recent tax developments and evaluating their importance. Tax Alerts indicates which forms(s) may be affected by the change, providing links to related materials and offering recommended actions on how to address the issue. The practitioner can then use this information to notify clients of tax developments that affect them, as a way to build both client relationships and revenue. Informing affected taxpayers is also made simple with the Tax Alerts database of client letters, prepared to specifically explain the tax event.

THESE PRODUCTS ARE GOOD FOR PROFESSIONALS WHO:

Plan taxation for corporations or clients, file tax compliance forms or provide taxation advice including tax managers, accounting firm partners, accounting associates, tax attorneys, and educators.

WG&L FEDERAL TREATISE LIBRARIES

Business Entity Treatise Library (WTRE)

- ***Federal Income Taxation of Corporations and Shareholders*** by Boris I. Bittker and James S. Eustice
- ***Federal Income Taxation of S Corporations*** by James S. Eustice and Joel D. Kuntz
- ***Federal Taxation of Income, Estates & Gifts*** by Boris I. Bittker and Lawrence Lokken
- ***Federal Taxation of Partnerships & Partners*** by William S. McKee, William F. Nelson and Robert L. Whitmire
- ***IRS Practice & Procedure*** by Michael Saltzman
- ***Limited Liability Companies: Tax & Business Law*** by Carter G. Bishop and Daniel S. Kleinberger

Complete WG&L Treatise Library (WWGLC)

- U.S. Bilateral Tax Treaties Database
- WG&L Treatises: Federal, State & Local, International, Estate, Pension & Benefits
- WG&L Journals:
 - Journal of Taxation
 - Practical Tax Strategies
 - Journal of Multistate Taxation
 - Corporate Taxation
 - Business Entities
 - Journal of International Taxation

Core Treatise Library (WWGL)

- U.S. Bilateral Tax Treaties Database
- WG&L Treatises: Federal, State & Local, International

Partnership Taxation Library (WPTN)

- ***Federal Taxation of Partnerships & Partners*** by William S. McKee, William F. Nelson and Robert L. Whitmire
- ***Partnership Taxation*** by Arthur B. Willis, and Philip F. Postlewaite

Partnership/LLC Taxation Library (WPLL)

- ***Federal Taxation of Partnerships & Partners*** by William S. McKee, William F. Nelson and Robert L. Whitmire
- ***Limited Liability Companies: Tax & Business Law*** by Carter G. Bishop and Daniel S. Kleinberger
- ***Partnership Taxation*** by Arthur B. Willis, and Philip F. Postlewaite

Pass-through Taxation Library (WPAS)

- ***Federal Income Taxation of S Corporations*** by James S. Eustice and Joel D. Kuntz
- ***Federal Taxation of Partnerships & Partners*** by William S. McKee, William F. Nelson and Robert L. Whitmire
- ***Limited Liability Companies: Tax & Business Law*** by Carter G. Bishop and Daniel S. Kleinberger
- ***Partnership Taxation*** by Arthur B. Willis, John S. Pennell, and Philip F. Postlewaite
- ***Subchapter S Taxation*** by William Christian and Irving Grant

Procedural Taxation Library (WPRC)

- ***Federal Tax Collections, Liens & Levies*** by William D. Elliott
- ***IRS Practice & Procedure*** by Michael Saltzman
- ***Litigation of Federal Civil Tax Controversies*** by Gerald A. Kafka and Rita A. Cavanagh
- ***Tax Fraud & Evasion: Offenses, Trials, Civil Penalties (Vol.1)*** by Ian M. Comisky, Lawrence S. Feld and Steven M. Harris
- ***Tax Fraud & Evasion: Money Laundering, Asset Forfeiture, Sentencing (Vol. 2)*** by Ian M. Comisky, Lawrence S. Feld and Steven M. Harris

WG&L FEDERAL TREATISE LIBRARIES

WG&L Banking Library on Checkpoint (WGLB)

- *Bank Auditing & Accounting Report* by John E. Palmer
- *The Bank Income Tax Return Manual* by Stanley I. Langbein
- *Bank Internal Auditing Manual* by Jerry Felicelli
- *Federal Income Taxation of Banks & Financial Institutions* by Stanley I. Langbein
- *Federal Taxation of Financial Instruments & Transactions* by Kevin M. Keyes

WG&L Nonprofit Library on Checkpoint (WGLN)

- *Nonprofit Accounting & Auditing Disclosure Manual* by Allan B. Afterman and Rowan H. Jones
- *Nonprofit Controller's Manual* by Craig Stevens
- *Nonprofit GAAP Practice Manual* by Allan B. Afterman, Martha L. Benson and Rowan H. Jones
- *Taxation of Exempt Organizations* by Frances Hill and Doug Mancino
- *Taxation of Exempts*
- *The Nonprofit Report* by Murray Dropkin

IN ADDITION TO OUR FEDERAL TAX LIBRARIES, WE OFFER:

- PPC's Federal Tax Compliance Library on Checkpoint (WTXLR)
- International Create-a-Chart (WICC)
- International Tax Rates Create-a-Chart (WWCAC)
- PPC Tax Titles on Checkpoint

ONLINE TRAINING

Checkpoint training and CPE Credits are available for FREE to all subscribers.

To see a list of available Checkpoint training options go to:
support.rg.thomsonreuters.com/training

PRODUCT SUPPORT

For system requirements, installation instructions and more go to: support.rg.thomsonreuters.com

AWARD & ACCOLADES:

Checkpoint® is the award-winning, industry-leading online research platform for tax and accounting professionals.

Here are some of the many awards Checkpoint has earned over the years:

SIIA CODIE AWARDS FOR SOFTWARE EXCELLENCE

2009: Three Checkpoint products are finalists in the 2009 SIIA CODiE Awards!

- Accounting & Compliance Alert for Best Online Government Information Service
- SEC Filings Navigator: Periodic Forms for Best Online Government Information Service
- PPC's SMART Practice Aids for Best Solution Integrating Content into Workflow

2008: Finalist in the category Best Online Government Information Service

THE CPA TECHNOLOGY ADVISOR

Checkpoint receives a 5 STAR rating in The CPA Technology Advisor's annual review of tax research systems (2007, 2008, 2009)

Plus, in 2008 and 2009, Checkpoint received an unequalled 5 out of 5 stars in EVERY category rated!!

Accounting Today/WebCPA Annual Top 100 Products List

Checkpoint ranked among Top 100 Products (2006, 2007)

"Checkpoint's available resource collections are exhaustively comprehensive, but the program maintains a general ease of use..." – **The CPA Technology Advisor, January 2009**

