



## Tax Reduction Letter

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### Internal Revenue Code Section 7701(g)

#### Definitions

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- (g) Clarification of fair market value in the case of nonrecourse indebtedness. For purposes of subtitle A, in determining the amount of gain or loss (or deemed gain or loss) with respect to any property, the fair market value of such property shall be treated as being not less than the amount of any nonrecourse indebtedness to which such property is subject.

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