# Table of Authorities

*(References are to pages.)*

## Cases

### A

<table>
<thead>
<tr>
<th>Case</th>
<th>Pages</th>
</tr>
</thead>
<tbody>
<tr>
<td>ABC Ltd., <em>In re</em></td>
<td>6-56</td>
</tr>
<tr>
<td>Accounting of Garretson, <em>In re</em></td>
<td>1-40</td>
</tr>
<tr>
<td>Addison v. Addison</td>
<td>4-40</td>
</tr>
<tr>
<td>Afansula, <em>In re</em></td>
<td>7-6</td>
</tr>
<tr>
<td>Albert v. Brownell</td>
<td>5-26</td>
</tr>
<tr>
<td>Albert v. McGrath</td>
<td>5-26</td>
</tr>
<tr>
<td>Alfred Dunhill of London, Inc. <em>v.</em></td>
<td></td>
</tr>
<tr>
<td>Republic of Cuba</td>
<td>5-11, 5-16, 5-49, 5-53, 5-54, 5-55, 5-66</td>
</tr>
<tr>
<td>All v. McCobb</td>
<td>2-51</td>
</tr>
<tr>
<td>Allied Bank Int'l v. Banco Crédito Agricola</td>
<td>5-12, 5-13, 5-15</td>
</tr>
<tr>
<td>Am. Int'l Grp., Inc. <em>v.</em> Islamic Republic of Iran</td>
<td>5-37, 5-45</td>
</tr>
<tr>
<td>AMPAC Grp., Inc. <em>v.</em> Republic of Honduras</td>
<td>5-11</td>
</tr>
<tr>
<td>Anderson v. N.V. Transandine Handelmaatschappij</td>
<td>5-41, 5-60</td>
</tr>
<tr>
<td>Andre v. Beha</td>
<td>5-90, 5-92</td>
</tr>
<tr>
<td>Angerhofer v. Comm'r</td>
<td>3-18</td>
</tr>
<tr>
<td>Anglo-Iranian Oil Co. <em>v.</em> Idemitsu Kosan Kabuskii Kaisha</td>
<td>5-46</td>
</tr>
<tr>
<td>Anglo-Iranian Oil Co. <em>v.</em> S.U.P.O.R. Co.</td>
<td></td>
</tr>
<tr>
<td>[Union-Petrolifera per l'Oriente, S.p.A.] [The Miriella]</td>
<td>5-46</td>
</tr>
<tr>
<td>Annesley, <em>In re</em></td>
<td>1-25</td>
</tr>
<tr>
<td>Anninger v. Hohenberg</td>
<td>5-40</td>
</tr>
<tr>
<td>Anninger c.s. <em>v.</em> de Monchy Ltd.</td>
<td>5-40</td>
</tr>
<tr>
<td>Application of Chase Manhattan Bank</td>
<td>5-32</td>
</tr>
<tr>
<td>Armstrong v. McAlpin</td>
<td>6-35</td>
</tr>
<tr>
<td>A.S. Merilaid &amp; Co. <em>v.</em> Chase Nat'l Bank</td>
<td>5-90</td>
</tr>
</tbody>
</table>
Babcock v. Jackson ............................................................... 1-21
Bach, In re ............................................................................ 4-42
Baglin v. Cusenier Co. ........................................................... 5-10
Banco de Vizcaya v. Don Alfonso de Borbón y Austria ........... 5-47
Banco do Brasil S.A. v. A.C. Israel Commodity Co. ............... 7-42, 7-43
Banco Francês a Brasiliero S.A. v. Doe 7-37, 7-43, 7-44, 7-45
Banco Nacional de Cuba v.
Chase Manhattan Bank ....................................................... 5-67, 5-69
Banco Nacional de Cuba v.
Chem. Bank N.Y. Trust Co. ................................................. 5-63, 5-64, 5-67, 5-68, 5-69, 5-70
Banco Nacional de Cuba v. Farr .............................................. 5-11, 5-64, 5-65
Banco Nacional de Cuba v. First Nat'l City Bank ...................... 5-6
Banco Nacional de Cuba v. Sabbatino ...................................... 5-5, 5-16, 5-44, 5-45, 5-46, 5-49, 5-50, 5-51, 5-52, 5-61, 5-79, 5-80, 5-85
Banco Nacional de España v. Fed. Reserve Bank ..................... 5-45, 5-62
Banco para el Comercio Exterior de Cuba v.
First Nat'l City Bank ......................................................... 5-67, 5-69, 5-70
Bandes v. Harlow & Jones, Inc. ............................................. 5-10, 5-96
Bank of N.Y. v. United States .................................................. 2-39, 3-30
Bank of United States v. Planters' Bank .................................. 5-48
Bank Tejarat v. Varsho-Saz .................................................... 5-63
Bankers Trust Co. v. Hudson ................................................. 7-24
Banks, In re ........................................................................... 6-29
Barish v. Comm'r ................................................................... 6-91
Barrie's Estate, In re ............................................................... 1-26, 1-28
Bartlett & Others v. Barclays Bank Trust Co. ......................... 6-56
Bayliss v. United States .......................................................... 2-28
Beck v. McGrath ................................................................... 5-26
Becker Steel Co. of Am. v. Cummings .................................... 5-30
Behn, Meyer & Co. v. Miller .................................................. 5-28
Bel v. United States ............................................................... 2-59
Bell v. Bell ............................................................................. 1-6
Berizzi Bros. v. S.S. Pesaro ..................................................... 5-48
Berkey v. Third Ave. Ry. ......................................................... 5-28
Bernstein v. N.V. Nederlandsche-Amerikaansche
Stoomvaart-Maatschappij [Bernstein II] 5-38, 5-62, 5-63, 5-64, 5-68, 5-70, 5-71
Bernstein v. Van Heyghen Frères,
S.A. [Bernstein I] ............................................................... 5-38, 5-45, 5-52, 5-62
Blad v. Bamfield ................................................................... 5-46, 5-47
Blanco v. Pan-Am. Life Ins. Co. .............................................. 5-60
Blank v. Clark ....................................................................... 5-25
Bliss's Trust, In re ................................................................. 7-38, 7-39
Table of Authorities

<table>
<thead>
<tr>
<th>Case</th>
<th>Page(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bloch-Sulzberger v. Comm’r</td>
<td>2-19</td>
</tr>
<tr>
<td>Blodgett v. Silberman</td>
<td>3-18, 3-19</td>
</tr>
<tr>
<td>Bloor v. Carro, Spanbock, Londin, Rodman &amp; Fass</td>
<td>6-37</td>
</tr>
<tr>
<td>Boggs v. Boggs</td>
<td>4-3, 4-23</td>
</tr>
<tr>
<td>Bokkelen v. Grumman Aerospace Corp.</td>
<td>5-55</td>
</tr>
<tr>
<td>Bollack v. Société Générale pour Favoriser le Développement du Commerce et de l'Industrie en France</td>
<td>5-60</td>
</tr>
<tr>
<td>Bond v. Hume</td>
<td>5-9</td>
</tr>
<tr>
<td>Bonner v. United States</td>
<td>5-28</td>
</tr>
<tr>
<td>Bordes v. Comm’r</td>
<td>4-64</td>
</tr>
<tr>
<td>Borne v. United States</td>
<td>1-14</td>
</tr>
<tr>
<td>Bothun v. Comm’r</td>
<td>4-73</td>
</tr>
<tr>
<td>Braka v. Bancomer, S.N.C.</td>
<td>5-13, 5-15, 5-54</td>
</tr>
<tr>
<td>Brandt v. Comm’r</td>
<td>4-54</td>
</tr>
<tr>
<td>Brennan v. Midwestern United Life Ins. Co.</td>
<td>6-36</td>
</tr>
<tr>
<td>Breyer v. Meissner</td>
<td>2-6</td>
</tr>
<tr>
<td>Brezinski v. Brezinski</td>
<td>4-15</td>
</tr>
<tr>
<td>Briesen v. A Certain Fund</td>
<td>5-26</td>
</tr>
<tr>
<td>British-Am. Tobacco Co. v. Fed. Reserve Bank</td>
<td>5-25</td>
</tr>
<tr>
<td>Brower v. Brower</td>
<td>4-12</td>
</tr>
<tr>
<td>Brown v. Lefkowitz</td>
<td>7-5</td>
</tr>
<tr>
<td>Brownell v. Oehmichen</td>
<td>5-20</td>
</tr>
<tr>
<td>Buhl v. Kavanagh</td>
<td>6-146</td>
</tr>
<tr>
<td>Bulova’s Will, In re</td>
<td>4-16, 4-37</td>
</tr>
<tr>
<td>Buvot v. Barbuit</td>
<td>5-5</td>
</tr>
<tr>
<td>B.W. Jones Trust v. Comm’r</td>
<td>7-20</td>
</tr>
<tr>
<td>California v. Texas</td>
<td>1-11, 1-13</td>
</tr>
<tr>
<td>Callejo v. Bancomer, S.A.</td>
<td>5-14, 5-15, 5-54, 5-76</td>
</tr>
<tr>
<td>Camara v. De La Camara</td>
<td>4-45, 4-47, 4-49</td>
</tr>
<tr>
<td>Carey v. Nat’l Oil Corp.</td>
<td>5-74</td>
</tr>
<tr>
<td>Carpenter v. Bell</td>
<td>1-29</td>
</tr>
<tr>
<td>Carr v. Yokohama Specie Bank Ltd.</td>
<td>5-25</td>
</tr>
<tr>
<td>Castleberry v. Comm’r</td>
<td>4-70</td>
</tr>
<tr>
<td>Caswell v. United States</td>
<td>4-67</td>
</tr>
<tr>
<td>Cates, In re</td>
<td>1-15</td>
</tr>
<tr>
<td>Cent. Hanover Bank &amp; Trust Co. v. Markham</td>
<td>5-30</td>
</tr>
<tr>
<td>Cent. Nat’l Bank of Cleveland v. Brownell</td>
<td>5-29</td>
</tr>
<tr>
<td>Chappell’s Estate, In re</td>
<td>1-32, 1-41</td>
</tr>
<tr>
<td>Cheng Yih-Chun v. Fed. Reserve Bank</td>
<td>5-33</td>
</tr>
<tr>
<td>Cherokee Tobacco</td>
<td>5-6</td>
</tr>
<tr>
<td>Chessari’s Will, In re</td>
<td>7-3</td>
</tr>
</tbody>
</table>

(Lawrence, Rel. #17, 11/14)
<table>
<thead>
<tr>
<th>Case Name</th>
<th>Page Numbers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chi. Bridge &amp; Iron Co. v. Islamic Republic of Iran</td>
<td>5-77</td>
</tr>
<tr>
<td>Cinelli v. Comm'r</td>
<td>3-41</td>
</tr>
<tr>
<td>Cities Serv. Co. v. McGrath</td>
<td>5-22</td>
</tr>
<tr>
<td>City Bank Farmers Trust Co. v. Comm'r</td>
<td>4-61</td>
</tr>
<tr>
<td>City Bank Farmers Trust Co. v. Pedrick</td>
<td>3-21</td>
</tr>
<tr>
<td>City Bank Farmers Trust Co. v. United States</td>
<td>3-15, 3-30</td>
</tr>
<tr>
<td>City of Philadelphia v. Cohen</td>
<td>7-38, 7-42, 7-43</td>
</tr>
<tr>
<td>Clafin v. Comm'r</td>
<td>3-20</td>
</tr>
<tr>
<td>Claim of Reet, In re</td>
<td>5-40</td>
</tr>
<tr>
<td>Clark, In re</td>
<td>1-36</td>
</tr>
<tr>
<td>Clark v. Übersee Finanz-Korp., A.G.</td>
<td>5-28, 5-29</td>
</tr>
<tr>
<td>Clarke v. Clarke</td>
<td>1-30, 1-45</td>
</tr>
<tr>
<td>Clayfield Petroleum Corp. v. Occidental Petroleum Corp.</td>
<td>5-58, 5-59</td>
</tr>
<tr>
<td>Clearfield Trust Co. v. United States</td>
<td>5-51</td>
</tr>
<tr>
<td>Cockerham v. Cockerham</td>
<td>4-31</td>
</tr>
<tr>
<td>Coffey’s Estate, In re</td>
<td>4-30</td>
</tr>
<tr>
<td>Colonna, Ex parte</td>
<td>5-6, 5-85</td>
</tr>
<tr>
<td>Colorado v. Harbeck</td>
<td>7-38, 7-42</td>
</tr>
<tr>
<td>Comm'r v. Bollinger</td>
<td>6-103</td>
</tr>
<tr>
<td>Comm'r v. Brandegge</td>
<td>2-81</td>
</tr>
<tr>
<td>Comm'r v. Chase Manhattan Bank</td>
<td>4-28, 4-63, 4-74</td>
</tr>
<tr>
<td>Comm'r v. Copley’s Estate</td>
<td>4-67</td>
</tr>
<tr>
<td>Comm'r v. Estate of Dwight</td>
<td>2-29</td>
</tr>
<tr>
<td>Comm'r v. Estate of Noel</td>
<td>2-53, 2-56</td>
</tr>
<tr>
<td>Comm'r v. Mills</td>
<td>4-67, 4-78</td>
</tr>
<tr>
<td>Comm'r v. Nevius</td>
<td>3-21</td>
</tr>
<tr>
<td>Comm'r v. Nubar</td>
<td>2-9</td>
</tr>
<tr>
<td>Comm'r v. Siegel</td>
<td>4-72</td>
</tr>
<tr>
<td>Comm'r v. Skaggs</td>
<td>4-37</td>
</tr>
<tr>
<td>Comm'r v. Swent</td>
<td>2-9</td>
</tr>
<tr>
<td>Comm'r v. Treganowan</td>
<td>2-55</td>
</tr>
<tr>
<td>Commonwealth v. Rutherfoord</td>
<td>1-5</td>
</tr>
<tr>
<td>Commonwealth v. Terjen</td>
<td>4-45</td>
</tr>
<tr>
<td>Cmty. Fin. Grp. v. Republic of Kenya</td>
<td>5-75</td>
</tr>
<tr>
<td>Compañía Española de Navegación Marítima, S.A. v.</td>
<td></td>
</tr>
<tr>
<td>The Navemar</td>
<td>5-10</td>
</tr>
<tr>
<td>Compañía Ron Bacardi, S.A. v. Bank of Nova Scotia</td>
<td>5-10</td>
</tr>
<tr>
<td>Cook v. Cook</td>
<td>4-4</td>
</tr>
<tr>
<td>Cook’s Estate, In re</td>
<td>1-33</td>
</tr>
<tr>
<td>Cooper v. Reynolds</td>
<td>1-7</td>
</tr>
<tr>
<td>Cordero v. Brownell</td>
<td>5-29</td>
</tr>
<tr>
<td>Cordero v. United States</td>
<td>5-29</td>
</tr>
<tr>
<td>Cory v. White</td>
<td>1-12, 1-13</td>
</tr>
<tr>
<td>Costin v. Cripe</td>
<td>2-32</td>
</tr>
</tbody>
</table>
Table of Authorities

Craig v. Craig ................................................................. 1-20
Crichton, In re ................................................................ 1-36
Crocker-Citizens Nat'l Bank v. Younger ......................... 6-11
Crow v. Comm'r .............................................................. 3-55
Crummey v. Comm'r ......................................................... 6-8
Cummings v. Deutsche Bank ............................................. 5-24
Cunard's Trusts, In re ..................................................... 6-49

Dalton v. Don J. Jackson, Inc. ......................................... 4-26
D'Angelo v. Petroleos Mexicanos .................................... 5-11, 5-54
Daubert v. United States .................................................. 4-69
David v. Veitscher Magnesitwerke A.G. ......................... 5-11
Davies v. Comm'r ........................................................... 3-24, 3-44
Davis v. Comm'r .............................................................. 2-76
De Goldschmidt-Rothschild v. Comm'r ......................... 3-44
De Guebriant v. Comm'r .................................................. 3-20
De Keller v. Maison de la Pensée Française Tribunal de la Seine 5-46
De Sanchez v. Banco Cent. de Nicaragua ....................... 5-74
Deese v. Hundley ............................................................ 1-4
DeHaber v. The Queen of Portugal ................................... 5-5
Delaney v. Murchie .......................................................... 3-9
Delli Paoli v. Comm'r ....................................................... 3-11
DeNicols v. Curlier .......................................................... 4-46
Depas v. Mayo ................................................................. 4-44, 4-49
DeRoburt v. Gannett Co. .................................................. 5-56
D.H. Overmyer Telecasting Co., In re ......................... 6-37
Diedrich v. Comm'r .......................................................... 2-76
Dilsaver v. Pollard ........................................................... 1-6
Dix v. Brownell ............................................................... 5-29
Dominicus Americana Bohio v. Gulf & W. .................... 5-54
Dorrance v. Martin .......................................................... 1-9, 2-9
Dorrance v. Pennsylvania ............................................. 1-9, 2-9
Dorrance's Estate, In re ................................................. 1-9, 1-10, 2-9
Doss v. Campbell ........................................................... 4-39
Douglas v. Douglas .......................................................... 4-24
Down v. Morris ............................................................... 1-37
Draeger Shipping Co. v. Crowley ................................. 5-26
Drahos v. Rens ............................................................... 4-30
<table>
<thead>
<tr>
<th>Case Name</th>
<th>Page(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Drazen v. Comm’r</td>
<td>4-54</td>
</tr>
<tr>
<td>Drexel Burnham Lambert Grp., Inc. v. Galadari</td>
<td>5-13</td>
</tr>
<tr>
<td>Drexel Burnham Lambert, Inc. v.</td>
<td></td>
</tr>
<tr>
<td>Saxony Heights Realty Assocs.</td>
<td>6-38</td>
</tr>
<tr>
<td>Duke of Brunswick v. King of Hanover</td>
<td>5-46</td>
</tr>
<tr>
<td>E. States Petroleum Co. v. Asiatic Petroleum Corp.</td>
<td>5-45</td>
</tr>
<tr>
<td>Edwards v. Edwards</td>
<td>4-39</td>
</tr>
<tr>
<td>Eggemeyer v. Eggemeyer</td>
<td>4-20</td>
</tr>
<tr>
<td>Ehler v. Ehler</td>
<td>4-37</td>
</tr>
<tr>
<td>Elec. Data Sys. Corp. v. Soc. Sec. Org. of Iran</td>
<td>5-77</td>
</tr>
<tr>
<td>Elkins v. Moreno</td>
<td>2-20, 2-21</td>
</tr>
<tr>
<td>Ellerman c. État Polonais</td>
<td>5-38</td>
</tr>
<tr>
<td>Emanuel v. Symon</td>
<td>6-28</td>
</tr>
<tr>
<td>Emanuel v. Twinsburg</td>
<td>5-9</td>
</tr>
<tr>
<td>Empresa Cubana Exportadora de Azucar y Sus Derivados v.</td>
<td></td>
</tr>
<tr>
<td>Lamborn &amp; Co.</td>
<td>5-66, 5-67, 5-69</td>
</tr>
<tr>
<td>Envtl. Tectonics Corp. v. W.S. Kirkpatrick</td>
<td>5-58</td>
</tr>
<tr>
<td>Esser’s Will, In re</td>
<td>1-6</td>
</tr>
<tr>
<td>Estate of Bach, In re</td>
<td>4-42</td>
</tr>
<tr>
<td>Estate of Barr v. Comm’r</td>
<td>2-51</td>
</tr>
<tr>
<td>Estate of Benedito, In re</td>
<td>7-24</td>
</tr>
<tr>
<td>Estate of Bettin v. Comm’r</td>
<td>4-63</td>
</tr>
<tr>
<td>Estate of Binkley v. United States</td>
<td>2-28</td>
</tr>
<tr>
<td>Estate of Bomash, In re</td>
<td>4-72</td>
</tr>
<tr>
<td>Estate of Brown, In re</td>
<td>1-16, 1-49, 7-23</td>
</tr>
<tr>
<td>Estate of Brunner, In re</td>
<td>1-15</td>
</tr>
<tr>
<td>Estate of Carmer, In re</td>
<td>7-14</td>
</tr>
<tr>
<td>Estate of Carroll v. Comm’r</td>
<td>2-54</td>
</tr>
<tr>
<td>Estate of Casey v. Comm’r</td>
<td>2-36, 4-73</td>
</tr>
<tr>
<td>Estate of Chopitea, In re</td>
<td>1-15</td>
</tr>
<tr>
<td>Estate of Clark, In re</td>
<td>1-23, 1-36, 1-41</td>
</tr>
<tr>
<td>Estate of Connelly v. United States</td>
<td>2-56</td>
</tr>
<tr>
<td>Estate of Crichton, In re</td>
<td>1-36, 4-48</td>
</tr>
<tr>
<td>Estate of de Perigny v. Comm’r</td>
<td>3-7</td>
</tr>
<tr>
<td>Estate of Deobald v. United States</td>
<td>4-71</td>
</tr>
<tr>
<td>Estate of Du Pont v. Comm’r</td>
<td>2-54, 3-27</td>
</tr>
<tr>
<td>Estate of Duraffourd</td>
<td>7-23</td>
</tr>
<tr>
<td>Estate of Ensley v. Comm’r</td>
<td>4-55</td>
</tr>
<tr>
<td>Estate of Faris v. Comm’r</td>
<td>3-10, 3-11</td>
</tr>
<tr>
<td>Estate of Fletcher v. Jackson</td>
<td>4-5</td>
</tr>
</tbody>
</table>
### Table of Authorities

<table>
<thead>
<tr>
<th>Case Name</th>
<th>Page Numbers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Estate of Fruehauf v. Comm’r</td>
<td>2-56</td>
</tr>
<tr>
<td>Estate of Gadway, <em>In re</em></td>
<td>1-16, 7-23</td>
</tr>
<tr>
<td>Estate of Garwitt</td>
<td>7-5</td>
</tr>
<tr>
<td>Estate of Georg, <em>In re</em></td>
<td>1-27</td>
</tr>
<tr>
<td>Estate of Glade v. Comm’r</td>
<td>2-55</td>
</tr>
<tr>
<td>Estate of Gould, <em>In re</em></td>
<td>1-40</td>
</tr>
<tr>
<td>Estate of Gyfteas, <em>In re</em></td>
<td>7-39</td>
</tr>
<tr>
<td>Estate of Hahnel, <em>In re</em></td>
<td>1-35</td>
</tr>
<tr>
<td>Estate of Hamilton v. Comm’r</td>
<td>3-20</td>
</tr>
<tr>
<td>Estate of Hendry v. Comm’r</td>
<td>3-28</td>
</tr>
<tr>
<td>Estate of Hollweg, <em>In re</em></td>
<td>4-15</td>
</tr>
<tr>
<td>Estate of Hon Hing Fung v. Comm’r</td>
<td>3-6, 3-33</td>
</tr>
<tr>
<td>Estate of Jack</td>
<td>2-21</td>
</tr>
<tr>
<td>Estate of Jandorf, <em>In re</em></td>
<td>7-41</td>
</tr>
<tr>
<td>Estate of Janney, <em>In re</em></td>
<td>1-26</td>
</tr>
<tr>
<td>Estate of Johnson v. Comm’r</td>
<td>4-70</td>
</tr>
<tr>
<td>Estate of Johnstone v. Comm’r</td>
<td>3-7, 3-33</td>
</tr>
<tr>
<td>Estate of Jordahl v. Comm’r</td>
<td>2-56</td>
</tr>
<tr>
<td>Estate of Kessler, <em>In re</em></td>
<td>4-39, 4-45</td>
</tr>
<tr>
<td>Estate of Kleemeier v. Comm’r</td>
<td>4-74</td>
</tr>
<tr>
<td>Estate of Lamar, <em>In re</em></td>
<td>7-38</td>
</tr>
<tr>
<td>Estate of Leigh</td>
<td>7-40</td>
</tr>
<tr>
<td>Estate of Leonori, <em>In re</em></td>
<td>1-18</td>
</tr>
<tr>
<td>Estate of Lumpkin v. Comm’r</td>
<td>2-57</td>
</tr>
<tr>
<td>Estate of Mario Sanchez</td>
<td>1-34</td>
</tr>
<tr>
<td>Estate of Marshall v. Comm’r</td>
<td>2-28</td>
</tr>
<tr>
<td>Estate of Marsland, <em>In re</em></td>
<td>1-39</td>
</tr>
<tr>
<td>Estate of Matthews v. Comm’r</td>
<td>2-58</td>
</tr>
<tr>
<td>Estate of McAllister v. Comm’r</td>
<td>7-16</td>
</tr>
<tr>
<td>Estate of McCabe v. United States</td>
<td>3-28</td>
</tr>
<tr>
<td>Estate of McClure, <em>In re</em></td>
<td>7-3</td>
</tr>
<tr>
<td>Estate of McCormas</td>
<td>7-24, 7-25</td>
</tr>
<tr>
<td>Estate of McDermott, <em>In re</em></td>
<td>7-36</td>
</tr>
<tr>
<td>Estate of McKee v. Comm’r</td>
<td>4-76</td>
</tr>
<tr>
<td>Estate of McNeel, <em>In re</em></td>
<td>7-38</td>
</tr>
<tr>
<td>Estate of Mulhern, <em>In re</em></td>
<td>1-37</td>
</tr>
<tr>
<td>Estate of Nelson, <em>In re</em></td>
<td>1-15, 1-17, 7-23</td>
</tr>
<tr>
<td>Estate of Nienhuys v. Comm’r</td>
<td>2-20</td>
</tr>
<tr>
<td>Estate of Nyemaster v. Comm’r</td>
<td>2-54</td>
</tr>
<tr>
<td>Estate of O’Connor, <em>In re</em></td>
<td>4-30</td>
</tr>
<tr>
<td>Estate of Oei Tjong Swan v. Comm’r</td>
<td>3-12, 3-21, 3-27</td>
</tr>
<tr>
<td>Estate of Ogarrio v. Comm’r</td>
<td>3-31</td>
</tr>
<tr>
<td>Estate of Olson, <em>In re</em></td>
<td>4-6, 4-23</td>
</tr>
<tr>
<td>Estate of Owen, <em>In re</em></td>
<td>7-41</td>
</tr>
</tbody>
</table>

(Lawrence, Rel. #17, 11/14)
Estate of Paquette v. Comm’r ........................................................ 3-9
Estate of Paxton v. Comm’r .......................................................... 3-28
Estate of Perry, In re ............................................................... 4-49
Estate of Prince, In re ............................................................. 1-34
Estate of Renard (Renard I), In re ........................................ 1-17, 1-37, 1-38
Estate of Renard (Renard II), In re ........................................ 1-38, 6-32
Estate of Roberts v. Comm’r ..................................................... 3-6
Estate of Robinson, In re ........................................................ 7-39
Estate of Rosenthal, In re ......................................................... 4-11
Estate of Rougeron, In re ..................................................... 1-10, 1-16
Estate of Schelberg v. Comm’r ............................................... 2-50
Estate of Siegel, In re ............................................................ 1-16
Estate of Skifter v. Comm’r ...................................................... 2-56
Estate of Smead v. Comm’r ..................................................... 2-56
Estate of Smith v. Comm’r ....................................................... 2-56
Estate of Sparling v. Comm’r ................................................... 4-72
Estate of Syrczynski, In re ..................................................... 4-15
Estate of Tabbagh, In re ....................................................... 1-35, 1-47
Estate of Tarver v. Comm’r ...................................................... 2-32
Estate of Taylor ................................................................. 1-29
Estate of Thornton, In re ..................................................... 4-4, 4-40
Estate of Turrentine, In re .................................................... 7-24
Estate of Turton, In re ........................................................ 1-16
Estate of Vandenhoveck v. Comm’r ........................................ 3-18
Estate of Vardell v. Comm’r .................................................... 4-73
Estate of Violi, In re .............................................................. 4-12
Estate of Wadewitz v. Comm’r ............................................. 2-51, 2-52
Estate of Warburg, In re ........................................................ 4-37
Estate of Whitt v. Comm’r ..................................................... 4-63
Estate of Willis v. Comm’r ...................................................... 2-58
Estate of Wolf, In re ............................................................. 1-18
Estate of Wyly v. Comm’r ................................................... 4-70, 4-71
Estate of Zietz, In re ............................................................. 1-42
Estonian State Cargo & Passenger S.S. Line v. United States .............................................. 5-11
Estrem’s Estate, In re ........................................................... 1-14
Evans v. Wall ........................................................................ 4-4
Ewen v. Am. Fid. Co. .............................................................. 5-86
Ex parte Colonna ................................................................ 5-6, 5-85
Ex parte Republic of Peru ..................................................... 5-49
Ex parte Young ..................................................................... 1-13
Executor of Martin, In re ...................................................... 7-39
Expropriation of E. Zone Co. (Germany) Case .................... 5-40
Table of Authorities

**F**

<table>
<thead>
<tr>
<th>Case</th>
<th>Pages</th>
</tr>
</thead>
<tbody>
<tr>
<td>F. Palicio y Compañía, S.A. v. Brush</td>
<td>5-10, 5-11, 5-17, 5-65</td>
</tr>
<tr>
<td>Fair v. Comm’r</td>
<td>3-7</td>
</tr>
<tr>
<td>Falk v. Falk</td>
<td>4-32</td>
</tr>
<tr>
<td>Farmers’ Loan &amp; Trust Co. v. United States</td>
<td>2-19</td>
</tr>
<tr>
<td>Fed. Deposit Ins. Corp. v. Porco</td>
<td>6-37</td>
</tr>
<tr>
<td>Feller v. McGrath</td>
<td>5-27, 5-29, 5-30</td>
</tr>
<tr>
<td>Fifth Ave. Bank v. Comm’r</td>
<td>2-19</td>
</tr>
<tr>
<td>Fillman v. United States</td>
<td>3-11</td>
</tr>
<tr>
<td>Finn v. Finn</td>
<td>4-25</td>
</tr>
<tr>
<td>Firm of Komotau v. Kommissarischer Verwalter</td>
<td>5-40</td>
</tr>
<tr>
<td>First Am. Corp. v. Price Waterhouse LLP</td>
<td>5-32</td>
</tr>
<tr>
<td>First Nat’l Bank (Int’l) v. Banco Nacional de Cuba</td>
<td>5-67</td>
</tr>
<tr>
<td>First Nat’l City Bank v. Banco Nacional de Cuba</td>
<td>5-10, 5-62, 5-63, 5-68</td>
</tr>
<tr>
<td>First Nat’l City Bank v. Banco Para el Comercio Exterior de Cuba</td>
<td>5-71</td>
</tr>
<tr>
<td>Florida v. Estoduras S.S. Co.</td>
<td>5-11</td>
</tr>
<tr>
<td>Fort Lee Sav. &amp; Loan Ass’n v. Li Butti</td>
<td>4-11</td>
</tr>
<tr>
<td>Franfurter v. W.L. Exner, Ltd.</td>
<td>5-40</td>
</tr>
<tr>
<td>Frankel v. United States</td>
<td>4-71</td>
</tr>
<tr>
<td>Frazier v. Frazier</td>
<td>4-11</td>
</tr>
<tr>
<td>Fred S. James &amp; Co. v. Rossia Ins. Co.</td>
<td>5-90, 5-92</td>
</tr>
<tr>
<td>Fred S. James &amp; Co. v. Second Russian Ins. Co.</td>
<td>5-60</td>
</tr>
<tr>
<td>Free v. Bland</td>
<td>4-3</td>
</tr>
<tr>
<td>Freedman v. United States</td>
<td>4-76</td>
</tr>
<tr>
<td>French v. Banco Nacional de Cuba</td>
<td>5-45, 5-65</td>
</tr>
<tr>
<td>Friedman, <em>In re</em></td>
<td>4-15</td>
</tr>
<tr>
<td>Friedman v. Comm’r</td>
<td>2-9</td>
</tr>
<tr>
<td>Frolova v. Union of Soviet Socialist Republics</td>
<td>5-77</td>
</tr>
<tr>
<td>Fujino v. Clark</td>
<td>5-27, 5-29</td>
</tr>
<tr>
<td>Furstenberg v. Comm’r</td>
<td>3-46</td>
</tr>
</tbody>
</table>

**G**

<table>
<thead>
<tr>
<th>Case</th>
<th>Pages</th>
</tr>
</thead>
<tbody>
<tr>
<td>Garcia v. Chase Manhattan Bank</td>
<td>5-13, 5-14</td>
</tr>
<tr>
<td>Garner v. Bermuda Trust Co.</td>
<td>6-29</td>
</tr>
<tr>
<td>Garwitt, <em>In re</em></td>
<td>7-5, 7-6</td>
</tr>
<tr>
<td>Gathright’s Trustee v. Gaut</td>
<td>6-11</td>
</tr>
<tr>
<td>Geesbreght v. Geesbreght</td>
<td>4-25</td>
</tr>
<tr>
<td>Genet v. Del. &amp; Hudson Canal Co.</td>
<td>7-3</td>
</tr>
<tr>
<td>Gonzalez v. Indus. Bank of Cuba</td>
<td>5-10</td>
</tr>
</tbody>
</table>

(Lawrence, Rel. #17, 11/14)
Gonzalez v. Mo. Pac. R.R. Co. .................................................... 4-24
Gotthelf’s Will, In re ............................................................ 1-15, 7-41
Gov’t of India v. Taylor ............................................................ 7-37, 7-38
Grand Jury Proceedings (United States v. Field), In re .......... 5-32
Grand Jury Subpoena Duces Tecum Dated Sept. 15, 1983 ...... 6-38
Grass v. Crédito Mexicano, S.A. .............................................. 5-57
Green v. Comm’r of Corps. & Taxation ................................. 1-6
Greenblatt v. Dillon ............................................................... 5-25
Gregory v. Comm’r ................................................................. 4-73
Griffin v. Kennedy .................................................................. 5-20
Gristy v. Hudgens .................................................................... 4-33
Gruen v. Gruen ....................................................................... 2-77
Guar. Trust Co. of N.Y., In re .................................................. 7-38
Guessefeldt v. McGrath ......................................................... 5-20, 5-24
Guirlando v. T.C. Ziraat Bankasi A.S. ................................. 5-78, 5-79
Guynn v. United States ......................................................... 2-28

H

Haas v. Voigt ............................................................................ 4-58
Haggerty v. Pratt Inst. ................................................................. 2-19
Haldeman’s Estate, In re .......................................................... 1-20
Hamilton Nat'l Bank v. Hutcheson ........................................... 1-31
Hammonds v. Comm’r ............................................................... 4-36
Haneke v. United States .......................................................... 2-28
Hanil Bank v. PT. Bank Negara Indonesia ............................... 5-78, 5-79
Hanson v. Denckla ................................................................... 1-47, 6-11
Harris v. VAO Intourist, Moscow ............................................. 5-77
Harrison v. Nixon .................................................................... 1-32
Hartmann v. Fed. Reserve Bank ............................................... 5-21
Hatch v. Baez .......................................................................... 5-47
Havey v. Patton ........................................................................ 6-33
Hawthorne v. Hawthorne ......................................................... 4-11
Heaton v. United States .......................................................... 5-25
Helbert Wagg & Co., Ltd., In re ............................................... 5-47
Heller-Baghero, In re ............................................................... 1-17
Helvering v. City Bank Farmers Trust Co. .............................. 2-39
Helvering v. Helmholz .............................................................. 2-39
Helvering v. Hutchings ............................................................ 2-81
Helvering v. Le Gierse ............................................................. 2-50
Hernandez, In re ...................................................................... 4-48
Hernandez v. Becker ............................................................... 4-64
Heubach’s Will, In re .............................................................. 5-24
Table of Authorities

<table>
<thead>
<tr>
<th>Authority</th>
<th>Pages</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hiller v. Kaliwerke Aschersleben A.G.</td>
<td>5-19</td>
</tr>
<tr>
<td>Hilley v. Hilley</td>
<td>4-58</td>
</tr>
<tr>
<td>Hilton v. Guyot</td>
<td>5-9, 5-85</td>
</tr>
<tr>
<td>Hinds v. Comm'r</td>
<td>4-70</td>
</tr>
<tr>
<td>Hodge v. First Presbyterian Church</td>
<td>1-26</td>
</tr>
<tr>
<td>Hollins, In re</td>
<td>7-39</td>
</tr>
<tr>
<td>Holman v. Johnson</td>
<td>7-37</td>
</tr>
<tr>
<td>Honduras Aircraft Registry v. Republic of Honduras</td>
<td>5-11</td>
</tr>
<tr>
<td>Hrudka v. Hrudka</td>
<td>4-28</td>
</tr>
<tr>
<td>Hudson v. Guestier</td>
<td>5-45, 5-47</td>
</tr>
<tr>
<td>Hudson v. United States</td>
<td>4-55</td>
</tr>
<tr>
<td>Hughes v. Hughes</td>
<td>4-30</td>
</tr>
<tr>
<td>Hungarian-Soviet Gov't Case</td>
<td>5-46</td>
</tr>
<tr>
<td>Hunt v. Mobil Oil Corp.</td>
<td>5-11, 5-54, 5-59</td>
</tr>
<tr>
<td>Hunter v. United States</td>
<td>2-56</td>
</tr>
<tr>
<td>Huntington v. Attrill</td>
<td>7-44</td>
</tr>
<tr>
<td>Hurley v. Hurley</td>
<td>4-25</td>
</tr>
<tr>
<td>Hutchison v. Ross</td>
<td>1-35, 1-47</td>
</tr>
</tbody>
</table>

I

<table>
<thead>
<tr>
<th>Authority</th>
<th>Pages</th>
</tr>
</thead>
<tbody>
<tr>
<td>IIT v. Cornfeld</td>
<td>6-35, 6-36</td>
</tr>
<tr>
<td>Imel v. Comm'r</td>
<td>6-91</td>
</tr>
<tr>
<td>In re ABC Ltd.</td>
<td>6-56</td>
</tr>
<tr>
<td>In re Accounting of Garretson</td>
<td>1-40</td>
</tr>
<tr>
<td>In re Afansula</td>
<td>7-6</td>
</tr>
<tr>
<td>In re Annesley</td>
<td>1-25</td>
</tr>
<tr>
<td>In re Bach</td>
<td>4-42</td>
</tr>
<tr>
<td>In re Banks</td>
<td>6-29</td>
</tr>
<tr>
<td>In re Barrie's Estate</td>
<td>1-26, 1-28</td>
</tr>
<tr>
<td>In re Bliss's Trust</td>
<td>7-38, 7-39</td>
</tr>
<tr>
<td>In re Bulova's Will</td>
<td>4-16, 4-37</td>
</tr>
<tr>
<td>In re Cates</td>
<td>1-15</td>
</tr>
<tr>
<td>In re Chappell's Estate</td>
<td>1-32, 1-41</td>
</tr>
<tr>
<td>In re Chessari's Will</td>
<td>7-3</td>
</tr>
<tr>
<td>In re Claim of Reet</td>
<td>5-40</td>
</tr>
<tr>
<td>In re Coffey's Estate</td>
<td>4-30</td>
</tr>
<tr>
<td>In re Cook's Estate</td>
<td>1-33</td>
</tr>
<tr>
<td>In re Crichton</td>
<td>1-36</td>
</tr>
<tr>
<td>In re Cunard's Trusts</td>
<td>6-49</td>
</tr>
<tr>
<td>In re D.H. Overmyer Telecasting Co.</td>
<td>6-37</td>
</tr>
<tr>
<td>In re Dorrance's Estate</td>
<td>1-9, 1-10, 2-9</td>
</tr>
<tr>
<td>In re Esser's Will</td>
<td>1-6</td>
</tr>
</tbody>
</table>

(Lawrence, Rel. #17, 11/14) T-11
In re Estate of Bach ................................................................. 4-42
In re Estate of Benedito ............................................................. 7-24
In re Estate of Bomash ............................................................... 4-72
In re Estate of Brown .............................................................. 1-16, 1-49, 7-23
In re Estate of Brunner .............................................................. 1-15
In re Estate of Carmer ............................................................... 7-14
In re Estate of Chopitea ............................................................ 1-15
In re Estate of Clark ............................................................... 1-23, 1-36, 1-41
In re Estate of Crichton ............................................................. 1-36, 4-48
In re Estate of Gadway ............................................................. 1-16, 7-23
In re Estate of Georg ............................................................... 1-27
In re Estate of Gould ................................................................. 1-40
In re Estate of Gyfteas ................................................................. 7-39
In re Estate of Hahnel ............................................................... 1-35
In re Estate of Hollweg ............................................................. 4-15
In re Estate of Jandorf ............................................................... 7-41
In re Estate of Janney ............................................................... 1-26
In re Estate of Kessler ............................................................... 4-39, 4-45
In re Estate of Lamar ............................................................... 7-38
In re Estate of Leonori ............................................................... 1-18
In re Estate of Marsland ............................................................ 1-39
In re Estate of McClure ............................................................. 7-3
In re Estate of McDermott ........................................................ 7-36
In re Estate of McNeel ............................................................. 7-38
In re Estate of Mulhern ............................................................. 1-37
In re Estate of Nelson ............................................................... 1-15, 1-17, 7-23
In re Estate of O’Connor .......................................................... 4-30
In re Estate of Olson ................................................................. 4-6, 4-23
In re Estate of Owen ................................................................. 7-41
In re Estate of Perry ................................................................. 4-49
In re Estate of Prince ................................................................. 1-34
In re Estate of Renard (Renard I) ............................................. 1-17, 1-37, 1-38
In re Estate of Renard (Renard II) ........................................... 1-38, 6-32
In re Estate of Robinson ............................................................ 7-39
In re Estate of Rosenthal ........................................................... 4-11
In re Estate of Rougeron ............................................................ 1-10, 1-16
In re Estate of Siegel ................................................................. 1-16
In re Estate of Syrocynski .......................................................... 4-15
In re Estate of Tabbag ............................................................... 1-35, 1-47
In re Estate of Thornton ........................................................... 4-4, 4-40
In re Estate of Turrentine ........................................................... 7-24
In re Estate of Turton ............................................................... 1-16
In re Estate of Violi ................................................................. 4-12
## Table of Authorities

<table>
<thead>
<tr>
<th>Case Title</th>
<th>Page(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>In re Estate of Warburg</td>
<td>4-37</td>
</tr>
<tr>
<td>In re Estate of Wolf</td>
<td>1-18</td>
</tr>
<tr>
<td>In re Estate of Zietz</td>
<td>1-42</td>
</tr>
<tr>
<td>In re Estrem’s Estate</td>
<td>1-14</td>
</tr>
<tr>
<td>In re Executor of Martin</td>
<td>7-39</td>
</tr>
<tr>
<td>In re Friedman</td>
<td>4-15</td>
</tr>
<tr>
<td>In re Garwitt</td>
<td>7-5, 7-6</td>
</tr>
<tr>
<td>In re Goldstein’s Will</td>
<td>1-15</td>
</tr>
<tr>
<td>In re Gotthelf’s Will</td>
<td>7-41</td>
</tr>
<tr>
<td>In re Grand Jury Proceedings (United States v. Field)</td>
<td>5-32</td>
</tr>
<tr>
<td>In re Grand Jury Subpoena Duces</td>
<td>6-38</td>
</tr>
<tr>
<td>Tecum Dated Sept. 15, 1983</td>
<td></td>
</tr>
<tr>
<td>In re Guar. Trust Co. of N.Y.</td>
<td>7-38</td>
</tr>
<tr>
<td>In re Haldeman’s Estate</td>
<td>1-20</td>
</tr>
<tr>
<td>In re Helbert Wagg &amp; Co., Ltd.</td>
<td>5-47</td>
</tr>
<tr>
<td>In re Heller-Baghero</td>
<td>1-17</td>
</tr>
<tr>
<td>In re Hernandez</td>
<td>4-48</td>
</tr>
<tr>
<td>In re Heubach’s Will</td>
<td>5-24</td>
</tr>
<tr>
<td>In re Hollins</td>
<td>7-39</td>
</tr>
<tr>
<td>In re Investors Funding Corp. of N.Y. Sec. Litig.</td>
<td>6-35</td>
</tr>
<tr>
<td>In re Jane M. Renard (Renard I)</td>
<td>1-17</td>
</tr>
<tr>
<td>In re Kahane</td>
<td>2-6</td>
</tr>
<tr>
<td>In re Khotim</td>
<td>7-5</td>
</tr>
<tr>
<td>In re Majot’s Estate</td>
<td>4-39, 4-46</td>
</tr>
<tr>
<td>In re Marriage of Brown</td>
<td>4-24</td>
</tr>
<tr>
<td>In re Marriage of Hebrin</td>
<td>4-66</td>
</tr>
<tr>
<td>In re Marriage of Hilke</td>
<td>4-31</td>
</tr>
<tr>
<td>In re Marriage of Konzen</td>
<td>4-24</td>
</tr>
<tr>
<td>In re Marriage of Morrison</td>
<td>4-21, 4-26</td>
</tr>
<tr>
<td>In re Marriage of Whelchel</td>
<td>4-38</td>
</tr>
<tr>
<td>In re Martin’s Estate</td>
<td>1-7, 7-39</td>
</tr>
<tr>
<td>In re Martin’s Will</td>
<td>7-39</td>
</tr>
<tr>
<td>In re Matthews’ Trust</td>
<td>7-38</td>
</tr>
<tr>
<td>In re Menschrefrend’s Estate</td>
<td>7-5</td>
</tr>
<tr>
<td>In re Mesa’s Estate</td>
<td>4-48</td>
</tr>
<tr>
<td>In re Messaros</td>
<td>1-20</td>
</tr>
<tr>
<td>In re Moore</td>
<td>1-37</td>
</tr>
<tr>
<td>In re Nat’l Sur. Co.</td>
<td>5-86</td>
</tr>
<tr>
<td>In re Newcomb’s Estate</td>
<td>2-9</td>
</tr>
<tr>
<td>In re Pratt’s Trust</td>
<td>1-49</td>
</tr>
<tr>
<td>In re Renard</td>
<td>1-38</td>
</tr>
<tr>
<td>In re Rogers’ Will</td>
<td>1-48</td>
</tr>
<tr>
<td>In re Schneider’s Estate</td>
<td>1-24, 1-25, 1-26, 1-32, 1-39</td>
</tr>
<tr>
<td>In re Seale’s M.S.</td>
<td>6-49</td>
</tr>
</tbody>
</table>

(Lawrence, Rel. #17, 11/14)
In re Skeats Settlement ............................................................... 6-12
In re Smart’s Trust ................................................................. 7-24
In re Smith’s Estate ................................................................. 1-40
In re Smith’s Trust ................................................................. 6-49
In re Spitzer’s Estate ................................................................. 7-38
In re Star I [Revised] and Star II [Revised] Trusts .................. 6-12
In re Stebbins-Vallois’ Estate ................................................... 1-40
In re Succession of Hubbard ................................................... 1-41
In re Tahtabournian’s Estate ................................................. 7-38
In re Trowbridge’s Estate ........................................................ 1-13
In re Turner .................................................................................. 6-51
In re Utassi’s Will ................................................................. 7-5, 7-6
In re Vischer’s Estate ................................................................. 1-16
In re Vitamin C Antitrust Litig. ............................................... 5-59
In re Wachman’s Estate ........................................................... 1-16
In re Weinberger’s Trust .......................................................... 7-24
In re Weiss’ Will ................................................................. 1-32
In re Weston’s Settlements .................................................... 6-49
In re Whitehead’s W.T. .......................................................... 6-49
In re Will of Chrisman .............................................................. 1-10
In re Will of Coletti ................................................................. 1-4
In re Will of Heller-Baghero ..................................................... 1-17
In re Williams ................................................................. 6-50
In re Williams’ Will ............................................................. 7-41
In re Windeatt’s ................................................................. 6-49
Indus. Trust Co. v. Comm’t ..................................................... 2-29
Ingenohl v. Olsen & Co. ........................................................... 5-10
Ingram v. United States ........................................................ 6-39
Ings v. Ferguson ................................................................. 5-32
Investors Funding Corp. of N.Y. Sec. Litig., In re ................ 6-35
Isenberg v. Trent Trust Co. ...................................................... 5-30
Ismail v. Ismail ................................................................. 4-35
Iveagh v. IRC ........................................................................... 6-29

J

J. Zeevi & Sons, Ltd. v. Grindlays Bank (Uganda) Ltd. .......... 5-10
Jackson v. Comm’t .................................................................. 3-10
Jane M. Renard [Renard I], In re ........................................ 1-17
Jennings v. Smith ................................................................. 2-38
Jessup v. Comm’t ................................................................. 6-91
Jewett v. Brown ................................................................. 6-11
Jewett v. Comm’t ................................................................. 2-46
Jimenez v. Aristeguieta ......................................................... 5-5, 5-11
Table of Authorities

Johnson v. Briggs, Inc. ................................................................. 5-61
Johnson v. Comm’r ................................................................. 4-39, 4-47
Johnson v. La Grange State Bank .............................. 1-4, 1-41, 6-28, 6-32
Judah v. Del. Trust Co. ................................................................. 7-42

K

Kahane, In re ................................................................................. 2-6
Kalamazoo Spice Extraction Co. v.
    Provisional Military Gov’t of Socialist Ethiopia ........ 5-64, 5-80
Katz v. United States .......................................................... 4-69, 4-75
Kaufman v. Brownell .......................................................... 5-30
Kaufman v. Société Internationale pour
    Participations Industrielles et Commerciales, S.A. ........ 5-29
Khotim, In re ............................................................................... 7-5
Kind v. Clark ................................................................. 4-39, 4-48, 4-49
Kirchberg v. Feenstra .......................................................... 4-33
Kjarsstad v. State ................................................................. 1-6
Klochkov v. Petrogradski Mejdunarodni Commercheski Bank ... 5-60
Kober v. Brownell ................................................................. 5-29
Koehler v. Clark ................................................................. 5-22, 5-26
Koehring Co. v. United States ........................................... 6-125
Kolovrat v. Oregon ................................................................. 1-42
Kozicki v. Baltyska Spolka Rybna ................................................ 5-40
Kronenberg v. Comm’r .......................................................... 3-46
Kuerschner & Rauchwarenfabrik, A.G. v. N.Y. Trust Co. .... 5-25

L

La Due & Co. v. Rogers ................................................................. 5-30
Ladd v. Ladd ................................................................. 4-30
Laird v. United States ................................................................. 3-6
Land v. Marshall ................................................................. 4-33
Landy v. Fed. Deposit Ins. Corp. ........................................... 6-36
Lang v. Comm’r ................................................................. 4-63, 4-69
Lanius v. Fletcher ................................................................. 1-32
Latvian Shipping Co. v. Montan Export Ltd. ......................... 5-40
Latvian State Cargo & Passenger S.S. Line v. McGrath ........ 5-10
Laughlin v. Pink ................................................................. 5-86
Leanoyd v. Whitely ................................................................. 6-55
Lecouturier v. Rey ................................................................. 5-17
Lee v. United States ................................................................. 3-20

(Lawrence, Rel. #17, 11/14)
Letelier v. Republic of Chile ................................................5-74, 5-75
Lewis v. Hanson .............................................................. 1-47, 1-49, 6-11
Libyan Am. Oil Co. v. Socialist People’s
      Libyan Arab Jamahiriya .............................................. 5-45
Lightwater Corp. v. Republic of Argentina ..................... 5-14
Lincoln House, Inc. v. Dupre ............................................. 6-38
Lindsay v. Miller .................................................................. 6-29
Lober v. United States ....................................................... 2-37
London & Cnty. Banking Co. v. Goddard ....................... 6-12, 6-51
Lorenz-Auxier Fin. Grp. v. Bidewell .............................. 4-28
Lucchetti v. Lucchetti ........................................................ 6-33
Lummis v. White ............................................................... 1-12, 1-13
Luther v. James Sagor & Co. ............................................ 5-46

M

M. Salimoff & Co. v. Standard Oil Co. ............................. 5-47
Majot’s Estate, In re .......................................................... 4-39, 4-46
Maltina Corp. v. Cawy Bottling Co. ............................... 5-11, 5-16, 5-65
Manes v. Kommissarischer Verwalter ............................. 5-40
Mann v. Compañía Petrolera Trans-Cuba ...................... 5-10
Mfrs. Trust Co. v. Kennedy .............................................. 5-30
Marks v. Higgins ............................................................... 2-30
Marlborough [Duke] v. Attorney-General ....................... 6-29
Marriage of Brown, In re ............................................... 4-24
Marriage of Hebbring, In re .......................................... 4-66
Marriage of Hilke, In re .................................................. 4-31
Marriage of Konzen, In re .............................................. 4-24
Marriage of Morrison, In re ........................................... 4-21, 4-26
Marriage of Whelchel, In re ......................................... 4-38
Marshall v. Land ............................................................... 4-28
Martin v. Banque d’Espagne, Cour de Cassation .......... 5-46
Martin v. Republic of S. África ........................................ 5-78
Martin’s Estate, In re ...................................................... 1-7, 7-39
Martin’s Will, In re .......................................................... 7-39
Martinez v. California ..................................................... 1-46
Martin-Montis Trust v. Comm’r ................................. 3-30, 6-80, 6-98
Marvin v. Marvin .............................................................. 4-4
Mas v. Perry .......................................................... 1-5
Matter of Daggett ............................................................. 1-6
Matter of Hudson ............................................................. 7-24
Matthews’ Trust, In re .................................................. 7-38
Maximov v. United States ............................................. 6-98
Table of Authorities

McCarty v. McCarty ................................................................. 4-24
McCrary v. Thompson ............................................................. 4-20
McDonnell Douglas Corp. v. Islamic Republic of Iran ............ 5-75
McKee v. Comm’r ................................................................. 4-71
McNabney v. McNabney ..................................................... 4-25
McPherson v. McKay ......................................................... 1-27
Meinertzhagen v. Davis ..................................................... 6-49
Meltzer & Weisberg v. Commonwealth Unemployment Comp. Bd. of Review .................................................. 1-6
Menendez v. Faber, Coe & Gregg, Inc. ................................. 5-11
Menendez v. Saks & Co. .................................................. 5-11, 5-65
Menschfreid’s Estate, In re ................................................. 7-5
Menzel v. List ......................................................................... 5-11
Mesa’s Estate, In re ................................................................. 4-48
Messaros, In re ........................................................................ 1-20
Milwaukee Cnty. v. M.E. White Co. .................................... 7-38
Minpeco, S.A. v. Conticommodity Servs., Inc. ....................... 5-32
Mobil Oil Corp. v. Geer ........................................................ 4-24
Montgomery v. Nat’l Sav. & Trust ........................................... 1-14, 1-15
Moore, In re ........................................................................... 1-37
Moore v. Mitchell ................................................................. 7-38
Morgan v. Comm’r ................................................................ 4-63
Morley v. Comm’r ................................................................ 6-91
Morrisssey v. Comm’r ......................................................... 6-18
Moscow Fire Ins. Co. v. Bank of N.Y. & Trust Co. ................. 5-60, 5-61, 5-85
Moultrie v. Hunt ...................................................................... 1-27

N
Nat’l Shawmut Bank v. Cumming ........................................... 1-42, 6-30
Nat’l Surety Co., In re .......................................................... 5-86
Newcomb’s Estate, In re ..................................................... 2-9
Newman v. Dore .................................................................... 6-31
N.V. Verenigde Deli-Maatschappijen & N.V. Senembah Maatschappij v. Deutsch-Indonesische Tabak Handelsgesellschaft m.b.H .................................................. 5-46
Nye & Nissen v. United States .............................................. 6-36

(Lawrence, Rel. #17, 11/14)
O

Occidental of Umm Al Qaywayn, Inc. v. Cities Serv. Oil Co. ......................................................5-64, 5-65
Oetjen v. Cent. Leather Co. ......................................................5-51, 5-61
Okura & Co. v. Forsbacka Jernverks Aktiebolag ......................................................... 6-28
Old Colony Trust Co. v. Comm’r .................................................................................. 2-53
Old Colony Trust Co. v. United States ........................................................................ 2-24, 2-37, 2-38
Oliva v. Pan Am. Life Ins. Co. ...................................................................................... 5-10
Olmsted v. Olmsted ........................................................................................................ 7-3
Optopics Labs. Corp. v. Savannah Bank of Nigeria, Ltd. ................................................ 5-14
Orr v. Orr .................................................................................................................................. 4-33
Ossorio v. Leon ..................................................................................................................... 4-35
Osthoff v. Hofele .................................................................................................................. 5-38
Outwin v. Comm’r .............................................................................................................. 2-77, 6-155

P

Pan Am. Life Ins. Co. v. Blanco ............................................................................................ 5-10
Para Techs. v. Comm’r ...................................................................................................... 6-40
Parson v. United States ....................................................................................................... 4-76
Paymer v. Comm’r ............................................................................................................... 3-11
Pearson v. Campbell ............................................................................................................. 4-70
Peebles v. Comm’r ................................................................................................................ 3-6
Pemberton v. Colonna ......................................................................................................... 2-19
Pendleton v. Russell ............................................................................................................. 5-86
People v. Wells ....................................................................................................................... 5-86
People ex rel. v. Bejarano .................................................................................................... 4-34
Perez v. Chase Manhattan Bank ........................................................................................ 5-13
Permanent Tr. Co. (Canberra) Ltd. v. Permanent Tr. Co. of New S. Wales Ltd. ............ 6-29
Perry v. United States ........................................................................................................... 5-23
Peter Buchanan, Ltd. v. McVey .......................................................................................... 7-37
Peters v. McKay ................................................................................................................... 5-5
Petrogradsky Mejdunarodny Kommerchesky Bank v. Nat’l City Bank ........................................ 5-90
Petroservice S.A. & Crédit Minier Franco-Rouman S.A. v. Compañía Méxicana de Petroleo “El Aguila” ................................................................................................................ 5-46
Plesch v. Banque Nationale de la Republique d’Haiti .................................................... 5-9, 5-17
Pöhllmann v. Kulmbacher Spinnerei A.G. ......................................................................... 5-38
Pratt’s Trust, In re ................................................................................................................. 1-49
Pravin Banker Assocs., Ltd. v. Banco Popular del Peru ...................................................... 5-14
Prichard v. United States ..................................................................................................... 2-54
Princess Paloy Olga v. Weisz .............................................................................................. 5-46
Propetrol, Petroservice, et Petrolst. v. Compañía Mexicana de Petroleo ............................................... 5-46
Propper v. Clark ........................................................................... 5-23
Psaty v. Psaty ................................................................................. 1-6
Pub. Adm'r v. McGrath ............................................................... 5-30
Pullman’s Palace Car Co. v. Pennsylvania ................................. 1-14

Q
Quintana v. Ordono ........................................................................ 4-44, 4-49

R
Racca v. Comm’r ........................................................................ 4-61
Rahman v. Chase Bank (CI) Trust Co. Ltd. ................................. 6-40, 6-41
Ramsey v. Ramsey ........................................................................ 4-24
Rau v. Rau ................................................................................... 4-41
Reese v. Comm’r ........................................................................ 4-34, 6-90, 6-91
Republic of Argentina v. City of New York .................................. 5-5
Republic of Argentina v. NML Capital, Ltd. ................................ 5-73
Republic of Argentina v. Weltover, Inc. ...................................... 5-74, 5-75, 5-78
Republic of Austria v. Altmann ................................................... 5-59
Republic of China v. Pang-Tsu Mow ........................................... 5-15, 5-61
Republic of Iraq v. First Nat’l City Bank ................................. 5-9, 5-11, 5-16, 5-61
Republic of Mexico v. Hoffman ................................................ 5-49, 5-63
Republic of Peru, Ex parte .......................................................... 5-49
Republic of Philippines v. Marcos ............................................. 5-55, 5-56
Respublica v. De Longchamps ................................................. 5-5
Ricaud v. Am. Metal Co. .............................................................. 5-51, 5-61
Richardson v. Blumenthal .......................................................... 7-33
Richardson v. Simon ................................................................... 5-23, 7-33
Riddle v. Harmon ......................................................................... 4-5
Riedel v. Bancam, S.A. ................................................................ 5-57
Rodiek v. Comm’r ....................................................................... 3-18
Rodiek v. Helvering ...................................................................... 3-18
Roeser v. Comm’r ....................................................................... 4-78
Rogers’ Will, In re ....................................................................... 1-48
Rollins v. Comm’r ........................................................................ 6-91
Rose v. St. Louis Union Trust Co. .............................................. 1-41
Rose v. United States .................................................................. 2-57
Rosenkranz v. Comm’r ................................................................ 3-18
Rougeron v. Rougeron ............................................................... 1-10
Rozan v. Rozan .......................................................................... 4-49
Rudow v. Fogel ............................................................................. 1-23
Rupali Bank v. Provident Nat’l Bank ........................................... 5-10
Russian Reinsurance Co. v. Stoddard ......................................5-90, 5-92
Russian Socialist Federated Soviet Republic v. Cibrario ..........5-85
Russian Volunteer Fleet v. United States .............................. 5-24

S
Sachs v. Republic of Austria ......................................................... 5-76
Sales v. Comm’r ........................................................................... 6-91
Sanchez v. Bowers ................................................................. 3-18
Sanchez v. Sanchez De Davila .............................................1-35, 6-29
S&H, Inc. v. Comm’r ................................................................. 6-91
Santissima Trinidad ................................................................... 5-47
Sapphire, The .............................................................................. 5-85
Sardino v. Fed. Reserve Bank ...........................................5-23, 5-24, 5-25, 5-32, 7-34
Sarraf v. Szunics ........................................................................... 1-10
Saunders v. Vautier ................................................................... 6-54
Schmeusser v. Katzenbach ......................................................... 5-20
Schneider’s Estate, In re ...................................................1-24, 1-25, 1-26, 1-32, 1-39
Schooner Exch. v. M’Taddon ...................................................5-47, 5-48
Seale’s M.S., In re ........................................................................ 6-49
Second Bank-State St. Trust Co. v. Weston .........................1-31
See v. See ............................................................................4-30, 4-31
Senembah Maatschappij N.V. v. Bank Indonesia & Twentsche Bank N.V. .................. 5-46
Severnoe Sec. Corp. v. Westminster Bank ..........................5-90, 5-92
Shannon v. Irving Trust Co. ...................................................... 1-47
Shapleigh v. Mier .....................................................................5-60, 5-61
Sharon v. Time, Inc. .................................................................. 5-57
Shepherd v. Shepherd ................................................................ 4-12
Siderman de Blake v. Republic of Argentina .......................5-63, 5-64
Silesian-Am. Corp. v. Clark ...................................................5-23, 5-24
Simon v. Comm’r .....................................................................3-18, 4-64
Singer v. Shaughnessy ............................................................... 4-54
Skeats Settlement, In re ........................................................... 6-12
Smart’s Trust, In re .................................................................... 7-24
Smith v. Idaho State Univ. Fed. Credit Union ......................4-27
Smith’s Estate, In re ................................................................. 1-40
Smith’s Trust, In re ................................................................. 6-49
Se. Bank, N.A. v. Lawrence ....................................................... 1-20
S. Pac. R.R. Co. v. Gonzalez ...................................................5-9
Spindel v. Spindel .................................................................... 1-5
Spitzer’s Estate, In re ...............................................................7-38
### Table of Authorities

<table>
<thead>
<tr>
<th>Case</th>
<th>Page Numbers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stacher v. United States</td>
<td>1-7</td>
</tr>
<tr>
<td>Stadt Würzburg v. Institut der Englischen Fräulein</td>
<td>5-38</td>
</tr>
<tr>
<td>Stadtmuller v. Miller</td>
<td>2-20</td>
</tr>
<tr>
<td>Stallforth v. Comm'r</td>
<td>2-9</td>
</tr>
<tr>
<td>Standard Oil Co. v. Clark</td>
<td>5-27</td>
</tr>
<tr>
<td>Star I (Revised) and Star II (Revised) Trusts, In re</td>
<td>6-12</td>
</tr>
<tr>
<td>State of Colorado v. Harbeck</td>
<td>7-42</td>
</tr>
<tr>
<td>State of the Netherlands v. Fed. Reserve Bank</td>
<td>5-41</td>
</tr>
<tr>
<td>State-Adams Corp. v. Comm'r</td>
<td>3-11</td>
</tr>
<tr>
<td>Stebbins-Vallois' Estate, In re</td>
<td>1-40</td>
</tr>
<tr>
<td>Stecco v. Stecco</td>
<td>4-41</td>
</tr>
<tr>
<td>Steffens v. Comm'r</td>
<td>6-90</td>
</tr>
<tr>
<td>Stein-Sapir v. Stein-Sapir</td>
<td>4-46</td>
</tr>
<tr>
<td>Steingut v. Guar. Trust Co.</td>
<td>5-15, 5-60, 5-61</td>
</tr>
<tr>
<td>Stephen v. Zivnostenska Banka Nat'l Corp.</td>
<td>5-10, 5-60</td>
</tr>
<tr>
<td>Stephenson v. United States</td>
<td>3-28</td>
</tr>
<tr>
<td>Stern v. Newton</td>
<td>5-24</td>
</tr>
<tr>
<td>Sternberg v. St. Louis Union Trust Co.</td>
<td>1-28</td>
</tr>
<tr>
<td>Stoehr v. Wallace</td>
<td>5-27, 5-30</td>
</tr>
<tr>
<td>Strauss's Estate v. Comm'r</td>
<td>2-55</td>
</tr>
<tr>
<td>Sturchler v. Hicks</td>
<td>5-26</td>
</tr>
<tr>
<td>Succession of Hubbard, In re</td>
<td>1-41</td>
</tr>
<tr>
<td>Succession of Packwood</td>
<td>4-46</td>
</tr>
<tr>
<td>Sulyok v. Penzintezeti Kosport Budapest</td>
<td>5-60</td>
</tr>
<tr>
<td>Swan v. Comm'r</td>
<td>3-12</td>
</tr>
<tr>
<td>Swiss Nat'l Ins. Co. v. Miller</td>
<td>5-26</td>
</tr>
</tbody>
</table>

---

**T**

<table>
<thead>
<tr>
<th>Case</th>
<th>Page Numbers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tabacalera Severiano Jorge, S.A. v. Standard Cigar Co.</td>
<td>5-10, 5-11, 5-12, 5-96</td>
</tr>
<tr>
<td>Tag v. Rogers</td>
<td>5-6</td>
</tr>
<tr>
<td>Tagle v. Regan</td>
<td>7-34</td>
</tr>
<tr>
<td>Tahtabourounian's Estate, In re</td>
<td>7-38</td>
</tr>
<tr>
<td>Tarver v. Tarver</td>
<td>4-31</td>
</tr>
<tr>
<td>Tate v. Tate</td>
<td>1-6</td>
</tr>
<tr>
<td>Taylor v. Comm'r</td>
<td>3-10</td>
</tr>
<tr>
<td>Teamsters Local Union v. Port Auth. Transit Corp.</td>
<td>5-9</td>
</tr>
<tr>
<td>Tenn. Gas Transmission Co. v. Violet Trapping Co.</td>
<td>5-8, 5-9</td>
</tr>
<tr>
<td>Terrazas v. Haig</td>
<td>2-6</td>
</tr>
<tr>
<td>Terrazas v. Muskie</td>
<td>2-6</td>
</tr>
<tr>
<td>Terriberry v. United States</td>
<td>2-57</td>
</tr>
<tr>
<td>Texas v. Florida</td>
<td>1-11, 1-12, 1-13</td>
</tr>
<tr>
<td>Texas v. New Jersey</td>
<td>3-19</td>
</tr>
</tbody>
</table>

(Lawrence, Rel. #17, 11/14)
The Appolon ............................................................................. 5-47
The Maret .................................................................................. 5-11
The Paquete Habana ................................................................ 5-5, 5-6, 5-8
The Pesaro .................................................................................. 5-48
The Sapphire ............................................................................. 5-85
The Schooner Exchange v. M’Faddon ........................................ 5-47, 5-48
Theye y Ajuria v. Pan Am. Life Ins. Co. .................................. 5-10
Thomas P. Gonzalez Corp. v. Council Nacional de Producción de Costa Rica .......... 5-71
Thorsch v. Miller ..................................................................... 5-30
Tillman v. United States ............................................................ 5-60, 5-61
Toll v. Moreno ........................................................................... 2-20, 2-21
Tomaier v. Tomaier ................................................................... 4-49
Trafton v. Comm’r .................................................................... 4-54
Tran Qui Than v. Regan ............................................................... 7-33
Trotter v. Van Pelt ................................................................... 1-27
Trowbridge’s Estate, In re ............................................................ 1-13
Turner, In re ............................................................................. 6-51
Twin Falls Bank & Trust Co. v. Holley ...................................... 4-27

Übersee Finanz-Korp., A.G. v. Brownell .................................... 5-21
Übersee Finanz-Korp., A.G. v. Clark .......................................... 5-28
Übersee Finanz-Korp., A.G. v. McGrath .................................. 5-28, 5-29
Ujvari v. United States ............................................................... 3-41
Underhill v. Hernandez ............................................................... 5-47, 5-48, 5-61
Union Planters Nat’l Bank v. United States ............................... 3-28, 4-70
Union Trust Co. v. Driscoll ......................................................... 2-37
United Bank, Ltd. v. Cosmic Int’l, Inc. ......................................... 5-11
United Drug Co. v. Theodore Rectanus Co. .............................. 5-10
United States v. A.C. Burbank & Co. ......................................... 5-33
United States v. Antoinetta ......................................................... 5-30
United States v. Bank of N.Y. & Trust Co. ................................. 5-60, 5-61
United States v. Belmont ............................................................. 5-5, 5-10, 5-15,
.................................................................................................. 5-37, 5-61, 5-85
United States v. Broverman ........................................................ 5-25
United States v. Brown ............................................................... 5-9, 5-16
United States v. Byrum ............................................................... 2-27
United States v. China Daily News ............................................. 5-25
United States v. Estate of Pearce ............................................... 7-38
United States v. Field .................................................................. 5-32
United States v. First Nat’l City Bank .......................................... 5-32

INTERNATIONAL TAX & ESTATE PLANNING
## Table of Authorities

<table>
<thead>
<tr>
<th>Case</th>
<th>Pages</th>
</tr>
</thead>
<tbody>
<tr>
<td>United States v. Frank</td>
<td>5-32</td>
</tr>
<tr>
<td>United States v. Goodyear</td>
<td>4-64, 4-73</td>
</tr>
<tr>
<td>United States v. Grace Estate</td>
<td>4-71</td>
</tr>
<tr>
<td>United States v. Harden</td>
<td>7-37</td>
</tr>
<tr>
<td>United States v. Lucienne D’Hotelle de Benitez Rexach</td>
<td>2-7</td>
</tr>
<tr>
<td>United States v. Manhattan Co.</td>
<td>5-10, 5-85</td>
</tr>
<tr>
<td>United States v. Martinez</td>
<td>6-39</td>
</tr>
<tr>
<td>United States v. Melekh</td>
<td>5-5</td>
</tr>
<tr>
<td>United States v. N.Y. Trust Co.</td>
<td>5-15</td>
</tr>
<tr>
<td>United States v. Newman</td>
<td>6-39</td>
</tr>
<tr>
<td>United States v. Past</td>
<td>4-73</td>
</tr>
<tr>
<td>United States v. Peoni</td>
<td>6-36</td>
</tr>
<tr>
<td>United States v. Pink</td>
<td>5-5, 5-10, 5-15, 5-24, 5-60, 5-61, 5-85</td>
</tr>
<tr>
<td>United States v. Pizzarusso</td>
<td>5-44</td>
</tr>
<tr>
<td>United States v. Pomponio</td>
<td>6-142</td>
</tr>
<tr>
<td>United States v. Sinclair</td>
<td>7-38</td>
</tr>
<tr>
<td>United States v. Stewart</td>
<td>4-74, 4-77</td>
</tr>
<tr>
<td>United States v. Verdugo-Urquidez</td>
<td>5-24</td>
</tr>
<tr>
<td>United States v. Wagman</td>
<td>5-25</td>
</tr>
<tr>
<td>United States v. Weishaupt</td>
<td>5-25</td>
</tr>
<tr>
<td>United States v. Wieschenberg</td>
<td>6-39</td>
</tr>
<tr>
<td>United States v. Wilder</td>
<td>5-48</td>
</tr>
<tr>
<td>United States v. Yoshida Int’l, Inc.</td>
<td>5-23, 5-33</td>
</tr>
<tr>
<td>Upton v. Empire of Iran</td>
<td>5-75, 5-77</td>
</tr>
<tr>
<td>U.S. Trust Co. v. Helvering</td>
<td>2-53</td>
</tr>
<tr>
<td>Utassi’s Will, <em>In re</em></td>
<td>7-5, 7-6</td>
</tr>
</tbody>
</table>

### V

<table>
<thead>
<tr>
<th>Case</th>
<th>Pages</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vallone v. Miller</td>
<td>4-26</td>
</tr>
<tr>
<td>Vance v. Terrazas</td>
<td>2-6</td>
</tr>
<tr>
<td>Vandenhoeck v. Comm’r</td>
<td>4-64</td>
</tr>
<tr>
<td>Varas v. Crown Life Ins. Co.</td>
<td>5-10</td>
</tr>
<tr>
<td>Verlinden B.V. v. Cent. Bank of Nigeria</td>
<td>5-77</td>
</tr>
<tr>
<td>Veterans &amp; Reservists for Peace in Vietnam v.</td>
<td></td>
</tr>
<tr>
<td>Reg’l Comm. of Customs</td>
<td>5-23</td>
</tr>
<tr>
<td>Vischer’s Estate, <em>In re</em></td>
<td>1-16</td>
</tr>
<tr>
<td>Viso v. Chase Manhattan Corp.</td>
<td>6-41, 6-55, 6-56</td>
</tr>
<tr>
<td>Viso v. Chase Manhattan Corp., Supreme Court, Bahamas</td>
<td>6-41</td>
</tr>
<tr>
<td>Vita Food Prods., Inc. v. Unus Shipping Co.</td>
<td>6-29</td>
</tr>
<tr>
<td>Vitamin C Antitrust Litig., <em>In re</em></td>
<td>5-59</td>
</tr>
<tr>
<td>Vladikavkazsky Ry. Co. v. N.Y. Trust Co.</td>
<td>5-10, 5-16, 5-17, 5-90</td>
</tr>
</tbody>
</table>

(Lawrence, Rel. #17, 11/14)
INTERNATIONAL TAX & ESTATE PLANNING

Von Clemm v. Banuelos .............................................................. 5-26
Von Hennig v. Kennedy ............................................................... 5-21
Vondermuhll v. Comm’r .............................................................. 6-98
Vort v. McGrath ..................................................................5-26, 5-27

W

Wachman’s Estate, In re .......................................................... 1-16
Waggener v. Waggener ............................................................ 4-20
Wallack v. Wallack ................................................................. 4-35, 4-37
Walter v. United States ............................................................ 2-37
Ware v. Hylton ...................................................................... 5-47
Watts v. Swiss Bank Corp. ...................................................... 1-35, 4-16, 4-48, 4-49
Weible v. United States .......................................................... 1-7
Weinberger’s Trust, In re ......................................................... 7-24
Weiss v. Simon ....................................................................... 5-40
Weiss’ Will, In re ................................................................. 1-32
Welch v. Kennedy .................................................................. 5-33
Welch v. Paine ....................................................................... 2-81
West v. Multibanco Comermex, S.A. ..................................... 5-8, 5-45, 5-57
West v. Ortego ....................................................................... 4-24
W. Rand Cent. Gold Mining Co. v. Rox .................................. 5-46
W. River Bridge Co. v. Dix ...................................................... 5-4
Weston’s Settlements, In re .................................................... 6-49
White v. Poor ......................................................................... 2-36
Whitehead’s W.T., In re ........................................................ 6-49
Wier v. Comm’r ...................................................................... 4-70
Wilcoxen v. United States ...................................................... 1-29
Will of Chrisman, In re .......................................................... 1-10
Will of Coletti, In re ............................................................. 1-4
Will of Heller-Baghero, In re .................................................. 1-17
Williams, In re ...................................................................... 6-50
Williams v. McKnight ............................................................ 4-58
Williams v. Paxton ................................................................. 4-27
Williams v. Portland State Bank ............................................ 4-26
Williams v. United States ...................................................... 6-91
Williams v. Williams .............................................................. 4-22
Williams’ Will, In re ............................................................. 7-41
Williamson v. Osenton ........................................................... 1-5
Wilmington Trust Co. v. Wilmington Trust Co. ...................... 1-47
Windeatt’s, In re ................................................................... 6-49
Wissner v. Wissner ................................................................ 1-46
Wittschen v. Comm’r ................................................................ 6-99

T-24
Table of Authorities

Wodehouse v. Comm’r ................................................................. 3-22
Worcester Cnty. Trust Co. v. Riley .............................................. 1-10
W.S. Kirkpatrick & Co. v. Envtl. Tectonics Corp. ..... 5-57, 5-58, 5-59
Wyatt v. Fulrath .............................................................. 1-34, 1-35, 4-48, 4-49

Y
Yessenin-Volpin v. Novosti Press Agency ..................................... 5-74
Yiatchos v. Yiatchos ..................................................................... 1-46
Young, Ex parte ................................................................. 1-13

Z
Zaffaroni v. Comm’r ................................................................. 4-64
Zernicek v. Brown & Root, Inc. ................................................. 5-78
Zschernig v. Miller .................................................................. 7-6, 7-34
Zwack v. Kraus Bros. & Co. .............................................. 5-9, 5-11, 5-16, 5-38
U.S. Constitution

amend. V ......................................................... 5-5, 5-23, 5-24
amend. XIV ....................................................... 5-5
art. I
§ 8, cl. 3 ..................................................... 5-5, 5-23, 5-65
§ 8, cl. 9 .......................................................... 5-65
§ 8, cl. 10 ...................................................... 5-5, 5-65
§ 8, cl. 11 ..................................................... 5-5, 5-23
§ 8, cl. 18 ..................................................... 5-65
art. II
§ 2 .......................................................................... 5-60
art. III
§ 1 .......................................................................... 5-65
§ 2 .......................................................................... 5-85
§ 2, cl. 2 .......................................................... 5-65
art. VI [Supremacy Clause] ........................................ 1-46

Statutes by Name

1976 Act [Pub. L. No. 97-34] .................................. 2-21, 2-64, 2-78,
................................................................... 2-79, 2-81, 2-82, 4-78

Act of December 28, 1977
(Amendments to the Trading with the Enemy Act)
(Pub. L. No. 95-223, tit. I)
§ 101(a) ....................................................... 5-17, 5-18
§ 101(d) ........................................................ 5-18
§ 102 .............................................................. 5-17, 5-18
§ 103(b) ...................................................... 5-17, 5-18

Act of December 28, 1977
(International Emergency Economic Powers Act)
(Pub. L. No. 95-223, tit. II)
§ 201–08 ......................................................... 5-18

Act of March 9, 1933
§ 2 .......................................................................... 5-17

Act of May 7, 1940
§ 1 .......................................................................... 5-17

Act of October 6, 1917, See Trading with the Enemy Act

§ 1 ................................................................. 2-6

§ 1 ................................................................. 2-6

Act of September 24, 1918
§ 5 .......................................................................... 5-17
**Table of Authorities**

Agricultural Foreign Investment Disclosure Act of 1978 .......... 3-8
American Jobs Creation Act of 2004
  [Pub. L. No. 108-357] ........................................ 3-45, 3-46, 3-48, 3-49, 3-50,
 ................................................................. 6-114, 6-117, 6-119, 6-123
Bank Secrecy Act .............................................. 5-33
Burmese Freedom and Democracy Act of 2003 ................. 5-35
Deficit Reduction Act of 1984 (DEFRA)
  § 525(a) ......................................................... 2-49
  § 525(b)(3) .................................................... 2-49
  § 1026 ............................................................. 2-76
Economic Growth and Tax Relief Reconciliation Act of 2001
  [Pub. L. No. 107-16] ........................................ 2-2, 3-3, 3-45, 6-106
  generally .................................................. 2-21, 2-78, 2-81, 2-82, 4-13, 4-50,
  .............................. 4-51, 4-53, 4-56, 4-58, 4-60, 4-61, 4-62, 4-64
  § 403 ................................................................ 2-79, 4-63, 4-78
  § 403(a)[1]|A] .................................................. 2-64
  § 403(b)[1]|a] .................................................... 2-82
  § 403[c] ................................................................ 2-78, 2-79
  § 425[a] .......................................................... 4-57
England Wills Act ................................................. 1-27
English Trustee Act of 1926
  § 40 ................................................................. 6-51
Federal Deposit Insurance Act ........................................... 3-12
First War Powers Act of December 18, 1941 ....................... 5-17
Foreign Assistance Act of 1961 ......................................... 5-64
Foreign Assistance Act of 1964 (Pub. L. No. 88-633)
  (“Hickenlooper Amendment”
  or “Sabbatino Amendment”) ................................. 5-7, 5-46, 5-49,
  .............................. 5-64, 5-65, 5-66, 5-68
Foreign Corrupt Practices Act of 1977 ............................... 6-119
Foreign Direct Investment and
  International Financial Data Improvements Act of 1990 ...... 3-8
Foreign Investment in Real Property Tax
  Act of 1980 (FIRPTA)
  [Pub. L. No. 96-499]
  generally ....................................................... 3-8, 3-13, 6-82,
  ................................................................. 6-83, 6-86, 6-87, 6-89
  § 1121 et seq. .................................................. 3-4, 3-6, 3-25
  § 1121–25 ........................................................ 6-81
Foreign Judgment Reciprocal Enforcement Act of 1933 .......... 6-28
Foreign Service Act of 1946 ............................................. 5-7

(Lawrence, Rel. #17, 11/14) T–27
Foreign Sovereign Immunities Act of 1976 (Pub. L. No. 94-583) 
   generally .............................. 5-37, 5-50, 5-71, 5-72, 5-77, 5-78, 5-79
   § 1605 ................................................................. 5-75, 5-76
   § 1609 ................................................................. 5-73
   § 1610(2) ......................................................... 5-74
Fraudulent Dispositions Act of 1989 ........................................ 6-33
Helms-Burton Act [Cuban Liberty and Democratic Solidarity 
   Libertad] Act of 1996) ................................................. 5-80
   tit. III ........................................................................... 5-81
Heroes Earnings Assistance and Relief Tax Act of 2008 
Illegal Immigration Reform and Immigration 
   Responsibility Act 1996 
Immigration and Nationality Act Amendments of 1986 
   § 12 ................................................................................. 2-5
Immigration and Nationality Act of 1952 .............................. 2-9
   § 101(15) ................................................................. 2-12, 2-13
   § 310(a) ........................................................................... 1-7
   § 340(a) ........................................................................... 1-7
Inheritance Tax Act 
   § 267 ........................................................................... 1-3, 1-8
International Claims Settlement Act ........................................ 5-43
International Emergency Economic Powers Act 
   generally ..................................................... 5-18, 5-19, 5-33, 7-33
   § 203[a][1][A] .......................................................... 5-21
   § 1701[a] ................................................................. 5-34
   § 1702[a][1][A][ii] ................................................... 5-33
   § 1702[a][1][A][ii] ................................................... 5-33
   § 1702[a][1][B] ....................................................... 5-33
   § 1706(b) ............................................................... 5-34
International Investment and 
   Trade in Services Survey Act of 1984 .............................. 3-7
International Money Laundering Abatement and 
   Anti-Terrorism Financing Act of 2001 .......................... 5-81
Investment Company Act of 1940 ................................... 6-85, 6-123
Lanham Act ........................................................................... 5-10
Married Woman’s Property Act ................................. 1-5, 4-26
National Emergencies Act of 1976 
   § 202 ................................................................. 5-34
Omnibus Budget Reconciliation Act of 1989 ........ 2-63, 4-50, 4-55
Omnibus Budget Reconciliation Act of 1990 .............. 4-50, 4-55
Table of Authorities

Personal Status and Company Law Act ........................................ 6-17
Revenue Act of 1978 .............................................................. 4-59
Revenue Reconciliation Act of 1993
§ 13,237 .................................................................................. 3-15
Securities Exchange Act of 1934 ............................................. 6-84
generally ........................................... 3-3, 6-42, 6-57, 6-65, 6-66,
.................................................. 6-70, 6-105, 6-134, 6-135, 6-137
§ 1906[a] ............................................................................... 6-101
§ 1907[a](3)[B] ..................................................................... 6-61, 6-62
Tax Act of 2001 ........................................ 2-18, 2-21, 2-22, 2-60, 2-83, 2-85
Tax Act of 2010 ................................................................. 2-83
Tax Act of 2012 ................................................................. 2-22, 2-83
Tax Reform Act of 1976
[Pub. L. No. 94-455] ........................................ 2-3, 2-61, 2-83, 4-59, 4-78, 6-70, 6-100
§ 1013[a] ............................................................................... 6-71
Tax Reform Act of 1986
[Pub. L. No. 99-514] ..................................... 3-14, 3-29, 2-83, 6-63,
.................................................. 6-64, 6-97, 6-100, 6-125
§ 1433[b](3) .......................................................................... 2-85
§ 1433[c] .............................................................................. 2-83
Tax Relief, Unemployment Insurance Reauthorization, and
Job Creation Act of 2010
Taxpayer Relief Act of 1997
[Pub. L. No. 105-34] ........................................ 3-16, 6-57, 6-105, 6-136
Technical and Miscellaneous Revenue Act of 1988 [TAMRA]
[Pub. L. No. 100-647] ...................... 2-62, 2-78, 3-14, 3-29, 3-38,
.................................................. 3-47, 4-50, 4-51, 4-55, 4-63, 6-141
§ 5033 ............................................................................... 3-33, 3-34
Tom Lantos Block Burmese JADE
Trading with the Enemy Act
[Act of Oct. 6, 1917, ch. 106, 40 stat. 411 [1917],
as amended, 50 U.S.C. app. § 1 et seq.
(1990)] ........................................ 3-30, 5-3, 5-6, 5-24, 5-26, 5-27,
.................................................. 5-30, 5-31, 5-32, 5-35, 7-33, 7-34
§ 2 ........................................................................ 5-19, 5-20
§ 5[a](3) .............................................................................. 5-19, 5-20
§ 5[b] ............................................................................... 7-32
§ 5[b][1] .................................. 5-17, 5-18, 5-21, 5-22, 5-23, 5-24
§ 5[b][1][A] ........................................................................ 5-17

(Lawrence, Rel. #17, 11/14) T–29
Table of Authorities

96-499 [Foreign Investment in Real Property Tax Act of 1980] ......................... 3-4, 3-6, 3-25
§ 1121–25 ........................................................................................................ 6-81
§ 403 ........................................................................................................... 2-79
§ 403[a][1][A] .................................................................................. 2-64
§ 403[b][1][a] .................................................................................. 2-82
§ 403[c] ................................................................. 2-78, 2-79
98-369 [Deficit Reduction Act of 1984] [DEFRA] ......................... 2-9
§ 525[a] ...................................................................................... 2-49
§ 525[b][3] ...................................................................................... 2-49
§ 1433[b][3] ........................................................................... 2-85
§ 1433[c] ...................................................................................... 2-83
99-653 [Immigration and Nationality Act Amendments of 1986]
§ 12 .......................................................................................... 2-5
100-647 [Technical and Miscellaneous Revenue Act of 1988] [TAMRA] .................. 3-14, 3-38, 3-47
§ 5033 ...................................................................................... 3-33, 3-34
101-239 [Revenue Reconciliation Act of 1989] ...................... 3-34
103-66 [Revenue Reconciliation Act of 1993] ...................... 3-16
104-188 [Small Business Job Protection Act of 1996] ............ 3-3, 6-42
105-34 [Taxpayer Relief Act of 1997] .................................. 3-16, 6-57
107-16 [Economic Growth and Tax Relief Reconciliation Act of 2001] .................... 2-2, 3-3, 6-127
107-56 [Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism [USA PATRIOT] Act of 2001] 5-81
109-177 [USA PATRIOT Improvement and Reauthorization Act of 2005]
§ 406[a][3] .................................................................................. 5-82
110-245 [Heroes Earnings Assistance and Relief Tax Act of 2008] .................. 3-45
111-312 [Tax Relief Unemployment Insurance Reauthorization, and Job Creation Act of 2010] 2-2, 3-3
112-240 [American Taxpayer Relief Act of 2012] ............... 2-2, 2-22
# United States Code

## TITLE 5

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>§ 552a</td>
<td>5-26</td>
</tr>
</tbody>
</table>

## TITLE 7

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>§ 3501 et seq.</td>
<td>3-8</td>
</tr>
</tbody>
</table>

## TITLE 8

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>§ 1101(a)(22)</td>
<td>2-5</td>
</tr>
<tr>
<td>§ 1101(a)(29)</td>
<td>2-4</td>
</tr>
<tr>
<td>§ 1401(a)</td>
<td>2-4</td>
</tr>
<tr>
<td>§ 1401(b)</td>
<td>2-6</td>
</tr>
<tr>
<td>§ 1401(d)</td>
<td>2-5</td>
</tr>
<tr>
<td>§ 1401(e)</td>
<td>2-4</td>
</tr>
<tr>
<td>§ 1401(g)</td>
<td>2-5</td>
</tr>
<tr>
<td>§ 1402</td>
<td>2-4</td>
</tr>
<tr>
<td>§ 1403</td>
<td>2-4</td>
</tr>
<tr>
<td>§ 1406-07</td>
<td>2-4</td>
</tr>
<tr>
<td>§ 1408</td>
<td>2-5</td>
</tr>
<tr>
<td>§ 1421[a]</td>
<td>1-7</td>
</tr>
<tr>
<td>§ 1451[a]</td>
<td>1-7</td>
</tr>
<tr>
<td>§ 1481[a]</td>
<td>2-6</td>
</tr>
<tr>
<td>§ 1481<a href="1">a</a>–(7)</td>
<td>2-7</td>
</tr>
</tbody>
</table>

## TITLE 10

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>§ 1408</td>
<td>4-24</td>
</tr>
</tbody>
</table>

## TITLE 12

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>§ 5(b)(1)</td>
<td>5-22</td>
</tr>
<tr>
<td>§ 95a</td>
<td>5-21, 5-22</td>
</tr>
</tbody>
</table>

## TITLE 18

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>§ 2</td>
<td>6-38</td>
</tr>
<tr>
<td>§ 371</td>
<td>6-38</td>
</tr>
<tr>
<td>§ 981</td>
<td>5-82</td>
</tr>
<tr>
<td>§ 981(k)</td>
<td>5-82</td>
</tr>
<tr>
<td>§ 981<a href="1">k</a>(B)</td>
<td>5-83</td>
</tr>
<tr>
<td>§ 981<a href="2">k</a></td>
<td>5-82</td>
</tr>
<tr>
<td>§ 981<a href="3">k</a></td>
<td>5-83</td>
</tr>
<tr>
<td>§ 981<a href="4">k</a></td>
<td>5-83</td>
</tr>
<tr>
<td>§ 983(d)</td>
<td>5-83</td>
</tr>
<tr>
<td>§ 984</td>
<td>5-82</td>
</tr>
<tr>
<td>§ 984(2)(B)</td>
<td>5-82</td>
</tr>
<tr>
<td>§ 984(c)(2)(A)</td>
<td>5-82</td>
</tr>
<tr>
<td>§ 1001</td>
<td>6-142</td>
</tr>
<tr>
<td>§ 1032</td>
<td>6-38, 6-107</td>
</tr>
<tr>
<td>§ 1332</td>
<td>2-19</td>
</tr>
<tr>
<td>§ 1341</td>
<td>6-38</td>
</tr>
<tr>
<td>§ 1408</td>
<td>4-24</td>
</tr>
<tr>
<td>§ 1451(a)</td>
<td>1-7</td>
</tr>
<tr>
<td>§ 1481(a)(1)–(7)</td>
<td>2-7</td>
</tr>
</tbody>
</table>

## TITLE 22

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>§ 801 et seq.</td>
<td>5-7</td>
</tr>
<tr>
<td>§ 1641</td>
<td>5-43</td>
</tr>
<tr>
<td>§ 1643</td>
<td>5-80</td>
</tr>
<tr>
<td>§ 2370(e)(2)</td>
<td>5-7, 5-64</td>
</tr>
<tr>
<td>§ 3101 et seq.</td>
<td>3-7</td>
</tr>
<tr>
<td>§ 3141 et seq.</td>
<td>3-8</td>
</tr>
<tr>
<td>§ 6021–91</td>
<td>5-80</td>
</tr>
<tr>
<td>§ 6082(a)(6)</td>
<td>5-81</td>
</tr>
<tr>
<td>§ 6085(b)</td>
<td>5-81</td>
</tr>
</tbody>
</table>

## TITLE 28

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>§ 1330</td>
<td>5-72</td>
</tr>
<tr>
<td>§ 1338</td>
<td>1-46</td>
</tr>
<tr>
<td>§ 1602 et seq.</td>
<td>5-50</td>
</tr>
<tr>
<td>§ 1602</td>
<td>5-72</td>
</tr>
<tr>
<td>§ 1602–11</td>
<td>5-72</td>
</tr>
<tr>
<td>§ 1603</td>
<td>5-72</td>
</tr>
<tr>
<td>§ 1603[e]</td>
<td>5-71, 5-73</td>
</tr>
<tr>
<td>§ 1604</td>
<td>5-72</td>
</tr>
<tr>
<td>§ 1605</td>
<td>5-72, 5-73</td>
</tr>
<tr>
<td>§ 1605<a href="2">a</a></td>
<td>5-74</td>
</tr>
<tr>
<td>§ 1605<a href="5">a</a></td>
<td>5-78</td>
</tr>
<tr>
<td>§ 1605–07</td>
<td>5-72</td>
</tr>
<tr>
<td>§ 1606</td>
<td>5-73</td>
</tr>
<tr>
<td>§ 1607</td>
<td>5-73</td>
</tr>
<tr>
<td>§ 1608</td>
<td>5-73</td>
</tr>
<tr>
<td>§ 1609–11</td>
<td>5-73</td>
</tr>
<tr>
<td>§ 1611</td>
<td>5-80</td>
</tr>
</tbody>
</table>

## TITLE 31

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>§ 5322(a)</td>
<td>6-142</td>
</tr>
<tr>
<td>§ 5322(b)</td>
<td>6-142</td>
</tr>
</tbody>
</table>

## TITLE 50

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>§ 1701</td>
<td>5-35</td>
</tr>
<tr>
<td>§ 1701 et seq.</td>
<td>5-33, 7-33</td>
</tr>
</tbody>
</table>
Table of Authorities

<table>
<thead>
<tr>
<th>Section</th>
<th>Pages</th>
<th>Section</th>
<th>Pages</th>
<th>Section</th>
<th>Pages</th>
</tr>
</thead>
<tbody>
<tr>
<td>§ 1701(a)</td>
<td>5-34</td>
<td>app. § 5(b)</td>
<td>7-32</td>
<td>§ 1702(a)(1)(A)(i)</td>
<td>5-33</td>
</tr>
<tr>
<td>§ 1702(a)(1)(A)(ii)</td>
<td>5-33</td>
<td>app. § 7–39</td>
<td>7-32</td>
<td>§ 1702(a)(1)(B)</td>
<td>5-33</td>
</tr>
<tr>
<td>§ 1706(b)</td>
<td>5-34</td>
<td>app. § 9(b)(11)</td>
<td>5-28</td>
<td>app. § 1 et seq.</td>
<td>5-5, 5-6, 5-35</td>
</tr>
<tr>
<td>app. § 1–6</td>
<td>7-32</td>
<td>app. § 41–44</td>
<td>7-32</td>
<td>app. § 5</td>
<td>5-17</td>
</tr>
</tbody>
</table>

Internal Revenue Code
(26 U.S.C.)

<table>
<thead>
<tr>
<th>Section</th>
<th>Pages</th>
<th>Section</th>
<th>Pages</th>
<th>Section</th>
<th>Pages</th>
</tr>
</thead>
<tbody>
<tr>
<td>§ 11</td>
<td>6-108, 6-113</td>
<td>§ 318(a)</td>
<td>6-118</td>
<td>§ 318(a)</td>
<td>6-118</td>
</tr>
<tr>
<td>§ 11(b)</td>
<td>6-121</td>
<td>§ 337</td>
<td>6-144</td>
<td>§ 337</td>
<td>6-144</td>
</tr>
<tr>
<td>§ 11(b)(1)[A]</td>
<td>6-108</td>
<td>§ 351</td>
<td>3-26, 3-27</td>
<td>§ 351(a)</td>
<td>3-26</td>
</tr>
<tr>
<td>§ 11(b)(1)[B]</td>
<td>6-108</td>
<td>§ 351(a)</td>
<td>3-26</td>
<td>§ 367[b]</td>
<td>3-27</td>
</tr>
<tr>
<td>§ 11(b)(1)[C]</td>
<td>6-108</td>
<td>§ 367<a href="2">c</a></td>
<td>3-26</td>
<td>§ 367<a href="2">c</a></td>
<td>3-26</td>
</tr>
<tr>
<td>§ 11(b)(1)[D]</td>
<td>6-108</td>
<td>§ 402[b]</td>
<td>6-69, 6-71</td>
<td>§ 402[b]</td>
<td>6-69, 6-71</td>
</tr>
<tr>
<td>§ 55–59</td>
<td>6-108</td>
<td>§ 404[a][4]</td>
<td>6-71</td>
<td>§ 404[a][4]</td>
<td>6-71</td>
</tr>
<tr>
<td>§ 63</td>
<td>6-108</td>
<td>§ 404A</td>
<td>6-71</td>
<td>§ 404A</td>
<td>6-71</td>
</tr>
<tr>
<td>§ 103</td>
<td>6-97</td>
<td>§ 453</td>
<td>6-151</td>
<td>§ 453</td>
<td>6-151</td>
</tr>
<tr>
<td>§ 116</td>
<td>6-97</td>
<td>§ 501(c)(3)</td>
<td>6-67, 6-71, 6-107</td>
<td>§ 501(c)(3)</td>
<td>6-67, 6-71, 6-107</td>
</tr>
<tr>
<td>§ 128</td>
<td>6-97</td>
<td>§ 508[a]</td>
<td>6-107</td>
<td>§ 508[a]</td>
<td>6-107</td>
</tr>
<tr>
<td>§ 152[a][1–9]</td>
<td>6-69</td>
<td>§ 541</td>
<td>6-117</td>
<td>§ 541</td>
<td>6-117</td>
</tr>
<tr>
<td>§ 162</td>
<td>2-14</td>
<td>§ 542[a][1]</td>
<td>6-116</td>
<td>§ 542[a][1]</td>
<td>6-116</td>
</tr>
<tr>
<td>§ 162[c]</td>
<td>6-119</td>
<td>§ 542[a][2]</td>
<td>6-116</td>
<td>§ 542[a][2]</td>
<td>6-116</td>
</tr>
<tr>
<td>§ 163(f)[2]</td>
<td>3-15</td>
<td>§ 542[c]</td>
<td>6-116</td>
<td>§ 542[c]</td>
<td>6-116</td>
</tr>
<tr>
<td>§ 163(f)[2][B]</td>
<td>3-15</td>
<td>§ 542<a href="5">c</a></td>
<td>6-114, 6-117</td>
<td>§ 542<a href="5">c</a></td>
<td>6-114, 6-117</td>
</tr>
<tr>
<td>§ 164[a][3]</td>
<td>6-99</td>
<td>§ 543[a]</td>
<td>6-117</td>
<td>§ 543[a]</td>
<td>6-117</td>
</tr>
<tr>
<td>§ 165</td>
<td>6-91</td>
<td>§ 543[b][1]</td>
<td>6-117</td>
<td>§ 543[b][1]</td>
<td>6-117</td>
</tr>
<tr>
<td>§ 165[f]</td>
<td>3-4</td>
<td>§ 543[b][2]</td>
<td>6-116, 6-117</td>
<td>§ 543[b][2]</td>
<td>6-116, 6-117</td>
</tr>
<tr>
<td>§ 170[c]</td>
<td>6-67</td>
<td>§ 543[b][2]</td>
<td>6-116, 6-117</td>
<td>§ 543[b][2]</td>
<td>6-116, 6-117</td>
</tr>
<tr>
<td>§ 172[b][1][A]</td>
<td>6-109</td>
<td>§ 547</td>
<td>6-117</td>
<td>§ 547</td>
<td>6-117</td>
</tr>
<tr>
<td>§ 243[a]</td>
<td>6-109</td>
<td>§ 551[a]</td>
<td>6-114</td>
<td>§ 551[a]</td>
<td>6-114</td>
</tr>
<tr>
<td>§ 243[b]</td>
<td>6-109</td>
<td>§ 551[b]</td>
<td>6-114</td>
<td>§ 551[b]</td>
<td>6-114</td>
</tr>
<tr>
<td>§ 267</td>
<td>6-101</td>
<td>§ 551–58</td>
<td>6-114</td>
<td>§ 551–58</td>
<td>6-114</td>
</tr>
<tr>
<td>§ 267[a]–(b)</td>
<td>3-4</td>
<td>§ 552[a][1]</td>
<td>6-114, 6-115</td>
<td>§ 552[a][1]</td>
<td>6-114, 6-115</td>
</tr>
<tr>
<td>§ 267[c][4]</td>
<td>6-101</td>
<td>§ 552[a][2]</td>
<td>6-114, 6-115</td>
<td>§ 552[a][2]</td>
<td>6-114, 6-115</td>
</tr>
<tr>
<td>§ 274[l][1][B]</td>
<td>2-13</td>
<td>§ 553</td>
<td>6-115, 6-120</td>
<td>§ 553</td>
<td>6-115, 6-120</td>
</tr>
<tr>
<td>§ 275[a][4]</td>
<td>6-99</td>
<td>§ 554</td>
<td>6-114, 6-115</td>
<td>§ 554</td>
<td>6-114, 6-115</td>
</tr>
<tr>
<td>§ 303[b]</td>
<td>2-24</td>
<td>§ 554[a][2]</td>
<td>6-115</td>
<td>§ 554[a][2]</td>
<td>6-115</td>
</tr>
<tr>
<td>§ 316</td>
<td>5-83</td>
<td>§ 554[c][1]</td>
<td>6-115</td>
<td>§ 554[c][1]</td>
<td>6-115</td>
</tr>
<tr>
<td>§ 318</td>
<td>2-27, 6-118</td>
<td>§ 554[c][2]</td>
<td>6-115</td>
<td>§ 554[c][2]</td>
<td>6-115</td>
</tr>
</tbody>
</table>

(Lawrence, Rel. #17, 11/14)  T–33
<table>
<thead>
<tr>
<th>Section</th>
<th>Pages</th>
</tr>
</thead>
<tbody>
<tr>
<td>§ 555</td>
<td>6-115</td>
</tr>
<tr>
<td>§ 581</td>
<td>2-68</td>
</tr>
<tr>
<td>§ 591</td>
<td>3-14</td>
</tr>
<tr>
<td>§ 642(a)</td>
<td>6-99</td>
</tr>
<tr>
<td>§ 642[g]</td>
<td>2-61</td>
</tr>
<tr>
<td>§ 643</td>
<td>6-96</td>
</tr>
<tr>
<td>§ 643(a)</td>
<td>6-96</td>
</tr>
<tr>
<td>§ 643[a][1]</td>
<td>6-96</td>
</tr>
<tr>
<td>§ 643[a][2]</td>
<td>6-96</td>
</tr>
<tr>
<td>§ 643[a][4]</td>
<td>6-97</td>
</tr>
<tr>
<td>§ 643[a][5]</td>
<td>6-97</td>
</tr>
<tr>
<td>§ 643[a][6][A]</td>
<td>6-97</td>
</tr>
<tr>
<td>§ 643[a][6][B]</td>
<td>6-97</td>
</tr>
<tr>
<td>§ 643[a][6][C]</td>
<td>6-97</td>
</tr>
<tr>
<td>§ 643[a][6][D]</td>
<td>6-97</td>
</tr>
<tr>
<td>§ 643[a][7]</td>
<td>6-97</td>
</tr>
<tr>
<td>§ 643[h]</td>
<td>6-102</td>
</tr>
<tr>
<td>§ 643[i]</td>
<td>6-101, 6-102, 6-139</td>
</tr>
<tr>
<td>§ 643[i][2][B]</td>
<td>6-104</td>
</tr>
<tr>
<td>§ 651</td>
<td>6-96, 6-98</td>
</tr>
<tr>
<td>§ 651[a]</td>
<td>6-97</td>
</tr>
<tr>
<td>§ 651[b]</td>
<td>6-96</td>
</tr>
<tr>
<td>§ 652</td>
<td>6-96</td>
</tr>
<tr>
<td>§ 652[a]</td>
<td>6-96</td>
</tr>
<tr>
<td>§ 652[b]</td>
<td>3-30, 6-98</td>
</tr>
<tr>
<td>§ 661</td>
<td>6-96</td>
</tr>
<tr>
<td>§ 661[a]</td>
<td>6-96, 6-97, 6-98</td>
</tr>
<tr>
<td>§ 662</td>
<td>6-96, 6-148</td>
</tr>
<tr>
<td>§ 662[a]</td>
<td>6-96</td>
</tr>
<tr>
<td>§ 662[b]</td>
<td>6-98</td>
</tr>
<tr>
<td>§ 663[b]</td>
<td>6-96</td>
</tr>
<tr>
<td>§ 664</td>
<td>2-62</td>
</tr>
<tr>
<td>§ 665[a]</td>
<td>6-76, 6-96</td>
</tr>
<tr>
<td>§ 665[b]</td>
<td>6-96, 6-100, 6-145</td>
</tr>
<tr>
<td>§ 665[e][2]</td>
<td>6-145</td>
</tr>
<tr>
<td>§ 665–68</td>
<td>6-70</td>
</tr>
<tr>
<td>§ 666[a]</td>
<td>6-145</td>
</tr>
<tr>
<td>§ 667[a]</td>
<td>6-100, 6-146</td>
</tr>
<tr>
<td>§ 667[b]</td>
<td>6-100</td>
</tr>
<tr>
<td>§ 667[c][1]</td>
<td>6-100</td>
</tr>
<tr>
<td>§ 667[c][2]</td>
<td>6-100</td>
</tr>
<tr>
<td>§ 667[d]</td>
<td>6-99</td>
</tr>
<tr>
<td>§ 668</td>
<td>6-101, 6-146</td>
</tr>
<tr>
<td>§ 668[a]</td>
<td>6-101</td>
</tr>
<tr>
<td>§ 668[a][1]–[6]</td>
<td>6-101</td>
</tr>
<tr>
<td>§ 668[b]</td>
<td>6-102</td>
</tr>
<tr>
<td>§ 668[c]</td>
<td>6-101</td>
</tr>
<tr>
<td>§ 671</td>
<td>6-64, 6-106, 6-107</td>
</tr>
<tr>
<td>§ 671–77</td>
<td>6-42, 6-147</td>
</tr>
<tr>
<td>§ 671–79</td>
<td>3-52</td>
</tr>
<tr>
<td>§ 672[a]</td>
<td>6-68</td>
</tr>
<tr>
<td>§ 672[b]</td>
<td>6-68</td>
</tr>
<tr>
<td>§ 672[c]</td>
<td>2-29, 6-68</td>
</tr>
<tr>
<td>§ 672[e]</td>
<td>2-25, 6-42, 6-64</td>
</tr>
<tr>
<td>§ 672[e][1]</td>
<td>6-64</td>
</tr>
<tr>
<td>§ 672[e][2]</td>
<td>6-64</td>
</tr>
<tr>
<td>§ 672[f]</td>
<td>6-65, 6-66, 6-68, 6-69, 6-70</td>
</tr>
<tr>
<td>§ 672[f][2][A]</td>
<td>6-123</td>
</tr>
<tr>
<td>§ 672[f][2][A][ii]</td>
<td>6-69</td>
</tr>
<tr>
<td>§ 672[f][3][B]</td>
<td>6-127</td>
</tr>
<tr>
<td>§ 672[f][4]</td>
<td>6-66</td>
</tr>
<tr>
<td>§ 673</td>
<td>6-64</td>
</tr>
<tr>
<td>§ 673–77</td>
<td>6-63, 6-75</td>
</tr>
<tr>
<td>§ 674</td>
<td>6-64</td>
</tr>
<tr>
<td>§ 675</td>
<td>6-64</td>
</tr>
<tr>
<td>§ 675[4][C]</td>
<td>6-43</td>
</tr>
<tr>
<td>§ 676</td>
<td>2-25, 3-30, 6-64, 6-69</td>
</tr>
<tr>
<td>§ 677</td>
<td>6-64</td>
</tr>
<tr>
<td>§ 677[a][1]</td>
<td>6-69</td>
</tr>
<tr>
<td>§ 677[a][2]</td>
<td>6-69</td>
</tr>
<tr>
<td>§ 678</td>
<td>6-66, 6-75</td>
</tr>
<tr>
<td>§ 679</td>
<td>6-43, 6-44, 6-70, 6-71, 6-72, 6-73, 6-74, 6-75, 6-76, 6-77, 6-106, 6-148, 6-151, 6-152, 6-153, 6-154</td>
</tr>
<tr>
<td>§ 679[a][1]</td>
<td>6-71</td>
</tr>
<tr>
<td>§ 679[a][2][A]</td>
<td>6-71, 6-153, 6-154</td>
</tr>
<tr>
<td>§ 679[a][2][B]</td>
<td>6-71</td>
</tr>
<tr>
<td>§ 679[a][3]</td>
<td>6-71, 6-151</td>
</tr>
<tr>
<td>§ 679[a][4][A]</td>
<td>6-44, 6-74, 6-78</td>
</tr>
<tr>
<td>§ 679[a][4][B]</td>
<td>6-44, 6-74</td>
</tr>
<tr>
<td>§ 679[a][5]</td>
<td>6-75</td>
</tr>
<tr>
<td>§ 679[b]</td>
<td>6-74, 6-148</td>
</tr>
<tr>
<td>§ 679[c][1]</td>
<td>6-72, 6-75, 6-151</td>
</tr>
<tr>
<td>§ 679[c][2][A]</td>
<td>6-73</td>
</tr>
<tr>
<td>§ 679(c)(2)(B)</td>
<td>6-73</td>
</tr>
<tr>
<td>§ 679(c)(2)(C)</td>
<td>6-73</td>
</tr>
<tr>
<td>§ 679(c)(3)</td>
<td>6-73</td>
</tr>
<tr>
<td>§ 679(c)(4)</td>
<td>6-73</td>
</tr>
<tr>
<td>§ 679(c)(5)</td>
<td>6-74</td>
</tr>
<tr>
<td>§ 679[d]</td>
<td>6-72</td>
</tr>
<tr>
<td>§ 684</td>
<td>6-77, 6-105, 6-106, 6-107, 6-154</td>
</tr>
<tr>
<td>§ 684[a]</td>
<td>3-40, 6-105, 6-106</td>
</tr>
<tr>
<td>§ 684[b]</td>
<td>6-106</td>
</tr>
<tr>
<td>§ 684[c]</td>
<td>6-106</td>
</tr>
<tr>
<td>§ 691[b]</td>
<td>2-61</td>
</tr>
<tr>
<td>§ 707[b]</td>
<td>6-101</td>
</tr>
<tr>
<td>§ 811<a href="2">d</a></td>
<td>2-38</td>
</tr>
<tr>
<td>§ 861</td>
<td>3-30</td>
</tr>
<tr>
<td>§ 861<a href="1">a</a></td>
<td>6-112</td>
</tr>
<tr>
<td>§ 861<a href="1">a</a>[A]</td>
<td>3-16</td>
</tr>
<tr>
<td>§ 861<a href="2">a</a></td>
<td>6-111, 6-112</td>
</tr>
<tr>
<td>§ 861<a href="2">a</a>[A]</td>
<td>6-111</td>
</tr>
<tr>
<td>§ 861<a href="2">a</a>[B]</td>
<td>6-113</td>
</tr>
<tr>
<td>§ 861<a href="2">a</a>[D]</td>
<td>6-111</td>
</tr>
<tr>
<td>§ 861[c]</td>
<td>3-16</td>
</tr>
<tr>
<td>§ 861[c][1]</td>
<td>6-112</td>
</tr>
<tr>
<td>§ 861[c][2]</td>
<td>6-112</td>
</tr>
<tr>
<td>§ 861[c][2][A]</td>
<td>6-112</td>
</tr>
<tr>
<td>§ 861[c][2][B]</td>
<td>6-112</td>
</tr>
<tr>
<td>§§ 864[b]</td>
<td>6-91</td>
</tr>
<tr>
<td>§§ 864[b][1]</td>
<td>6-92</td>
</tr>
<tr>
<td>§§ 864[b][2]</td>
<td>6-92</td>
</tr>
<tr>
<td>§§ 864[b][2][C]</td>
<td>6-91</td>
</tr>
<tr>
<td>§§ 864[b][4][A]</td>
<td>6-95</td>
</tr>
<tr>
<td>§§ 864[c][2][A]</td>
<td>6-93</td>
</tr>
<tr>
<td>§§ 864[c][2][B]</td>
<td>6-93</td>
</tr>
<tr>
<td>§§ 864[c][4][A]</td>
<td>6-90, 6-93</td>
</tr>
<tr>
<td>§§ 864[c][4][B]</td>
<td>6-95</td>
</tr>
<tr>
<td>§§ 864[c][5]</td>
<td>6-95</td>
</tr>
<tr>
<td>§§ 864[c][6]</td>
<td>6-94</td>
</tr>
<tr>
<td>§§ 864[c][7]</td>
<td>6-94</td>
</tr>
<tr>
<td>§§ 864[d][4]</td>
<td>6-81</td>
</tr>
<tr>
<td>§§ 865[e][1]</td>
<td>6-95</td>
</tr>
<tr>
<td>§ 871</td>
<td>7-20</td>
</tr>
<tr>
<td>§ 871[a]</td>
<td>6-80, 6-111, 6-112, 6-113</td>
</tr>
<tr>
<td>§ 871[a][1]</td>
<td>6-79, 6-80, 6-93</td>
</tr>
<tr>
<td>Section</td>
<td>Page</td>
</tr>
<tr>
<td>---------</td>
<td>------</td>
</tr>
<tr>
<td>§ 881(a)</td>
<td>6-111</td>
</tr>
<tr>
<td>§ 881(c)</td>
<td>6-81</td>
</tr>
<tr>
<td>§ 881(c)(3)</td>
<td>6-81</td>
</tr>
<tr>
<td>§ 881(c)(3)(C)</td>
<td>6-81</td>
</tr>
<tr>
<td>§ 882</td>
<td>6-109, 6-113</td>
</tr>
<tr>
<td>§ 882(b)(1)</td>
<td>6-90</td>
</tr>
<tr>
<td>§ 884</td>
<td>6-93, 6-110</td>
</tr>
<tr>
<td>§ 884(a)</td>
<td>6-93</td>
</tr>
<tr>
<td>§ 884(d)</td>
<td>6-110</td>
</tr>
<tr>
<td>§ 884(e)</td>
<td>6-110, 6-113</td>
</tr>
<tr>
<td>§ 884(e)(3)</td>
<td>6-110, 6-113</td>
</tr>
<tr>
<td>§ 884(f)</td>
<td>6-111, 6-112</td>
</tr>
<tr>
<td>§ 894</td>
<td>6-112</td>
</tr>
<tr>
<td>§ 894(a)(1)</td>
<td>6-111</td>
</tr>
<tr>
<td>§ 897</td>
<td>2-8, 3-6, 6-113</td>
</tr>
<tr>
<td>§ 897(a)</td>
<td>6-82, 6-83</td>
</tr>
<tr>
<td>§ 897(a)(6)(B)</td>
<td>6-81</td>
</tr>
<tr>
<td>§ 897(c)(1)</td>
<td>6-81</td>
</tr>
<tr>
<td>§ 897(c)(1)(A)(i)</td>
<td>3-6, 6-81</td>
</tr>
<tr>
<td>§ 897(c)(1)(A)(ii)</td>
<td>6-82</td>
</tr>
<tr>
<td>§ 897(c)(1)(B)</td>
<td>6-85</td>
</tr>
<tr>
<td>§ 897(c)(1)(B)</td>
<td>6-85</td>
</tr>
<tr>
<td>§ 897(c)(2)</td>
<td>6-83</td>
</tr>
<tr>
<td>§ 897(c)(3)</td>
<td>6-85</td>
</tr>
<tr>
<td>§ 897(c)(A)</td>
<td>6-84</td>
</tr>
<tr>
<td>§ 897(c)(A)(B)</td>
<td>6-84</td>
</tr>
<tr>
<td>§ 897(c)(5)</td>
<td>6-84</td>
</tr>
<tr>
<td>§ 897(c)(6)(A)</td>
<td>6-81</td>
</tr>
<tr>
<td>§ 897(c)(6)(B)</td>
<td>3-6</td>
</tr>
<tr>
<td>§ 897(c)(6)(C)</td>
<td>6-84</td>
</tr>
<tr>
<td>§ 897(e)(1)</td>
<td>6-86</td>
</tr>
<tr>
<td>§ 897(e)(2)</td>
<td>6-86</td>
</tr>
<tr>
<td>§ 897(g)</td>
<td>6-85</td>
</tr>
<tr>
<td>§ 897(h)</td>
<td>6-86</td>
</tr>
<tr>
<td>§ 897(h)(1)</td>
<td>6-86</td>
</tr>
<tr>
<td>§ 897(h)(2)</td>
<td>6-86</td>
</tr>
<tr>
<td>§ 897(h)(4)</td>
<td>6-86</td>
</tr>
<tr>
<td>§ 897(h)(4)(c)</td>
<td>6-86</td>
</tr>
<tr>
<td>§ 897(i)</td>
<td>3-25, 6-84, 6-87, 6-88</td>
</tr>
<tr>
<td>§ 901</td>
<td>3-13</td>
</tr>
<tr>
<td>§ 901(b)(5)</td>
<td>6-99</td>
</tr>
<tr>
<td>§ 901(j)</td>
<td>6-119</td>
</tr>
<tr>
<td>§ 911(d)(3)</td>
<td>2-12, 2-68</td>
</tr>
<tr>
<td>§ 936</td>
<td>6-111</td>
</tr>
<tr>
<td>§ 951</td>
<td>6-128</td>
</tr>
<tr>
<td>§ 951(a)</td>
<td>6-117</td>
</tr>
<tr>
<td>§ 951(a)(1)</td>
<td>6-119</td>
</tr>
<tr>
<td>§ 951(a)(1)(B)</td>
<td>6-122</td>
</tr>
<tr>
<td>§ 951(b)</td>
<td>6-73, 6-117, 6-118</td>
</tr>
<tr>
<td>§ 951(d)</td>
<td>6-119</td>
</tr>
<tr>
<td>§ 951-55</td>
<td>6-119</td>
</tr>
<tr>
<td>§ 952</td>
<td>6-118</td>
</tr>
<tr>
<td>§ 952(a)(1)</td>
<td>6-119</td>
</tr>
<tr>
<td>§ 952(a)(2)</td>
<td>6-119</td>
</tr>
<tr>
<td>§ 952(a)(3)</td>
<td>6-119</td>
</tr>
<tr>
<td>§ 952(a)(4)</td>
<td>6-119</td>
</tr>
<tr>
<td>§ 952(a)(5)</td>
<td>6-119</td>
</tr>
<tr>
<td>§ 952-54</td>
<td>6-122</td>
</tr>
<tr>
<td>§ 953</td>
<td>6-119</td>
</tr>
<tr>
<td>§ 954</td>
<td>6-91, 6-119</td>
</tr>
<tr>
<td>§ 954(a)(4)</td>
<td>6-119</td>
</tr>
<tr>
<td>§ 954(b)(3)(A)</td>
<td>6-121</td>
</tr>
<tr>
<td>§ 954(b)(3)(B)</td>
<td>6-121</td>
</tr>
<tr>
<td>§ 954(b)(4)</td>
<td>6-121</td>
</tr>
<tr>
<td>§ 954(c)</td>
<td>6-120</td>
</tr>
<tr>
<td>§ 954(c)(1)(C)</td>
<td>6-120</td>
</tr>
<tr>
<td>§ 954(c)(1)(F)</td>
<td>6-120</td>
</tr>
<tr>
<td>§ 954(c)(1)(G)</td>
<td>6-120</td>
</tr>
<tr>
<td>§ 954(c)(1)(H)</td>
<td>6-120</td>
</tr>
<tr>
<td>§ 954(c)(2)(C)</td>
<td>6-121</td>
</tr>
<tr>
<td>§ 954(c)(3)</td>
<td>6-121</td>
</tr>
<tr>
<td>§ 954(d)(1)</td>
<td>6-120</td>
</tr>
<tr>
<td>§ 954(d)(2)</td>
<td>6-120</td>
</tr>
<tr>
<td>§ 954(d)(3)</td>
<td>6-112, 6-120, 6-121</td>
</tr>
<tr>
<td>§ 954(e)</td>
<td>6-121</td>
</tr>
<tr>
<td>§ 954(g)</td>
<td>6-121</td>
</tr>
<tr>
<td>§ 954(g)(1)</td>
<td>6-121</td>
</tr>
<tr>
<td>§ 954(g)(2)</td>
<td>6-121</td>
</tr>
<tr>
<td>§ 954(h)</td>
<td>6-121</td>
</tr>
<tr>
<td>§ 956(a)</td>
<td>6-122</td>
</tr>
<tr>
<td>§ 956(c)(1)</td>
<td>6-122</td>
</tr>
<tr>
<td>§ 956(c)(2)</td>
<td>6-122</td>
</tr>
<tr>
<td>§ 957(a)</td>
<td>6-44, 6-73, 6-118</td>
</tr>
<tr>
<td>§ 958(a)</td>
<td>6-73, 6-124</td>
</tr>
<tr>
<td>§ 958(a)(2)</td>
<td>6-118</td>
</tr>
<tr>
<td>§ 958(b)</td>
<td>6-73, 6-118</td>
</tr>
<tr>
<td>§ 999</td>
<td>6-119</td>
</tr>
</tbody>
</table>
Table of Authorities

| § 1014 .......... 3-41, 4-58, 6-124 | § 1926(a) .................. 6-126 |
| § 1014(a) ....................... 6-107 | § 1926(e) ..................... 6-126 |
| § 1014(b)[5] ................... 6-116 | § 1927[a] ..................... 6-125 |
| § 1014(b)[6] .... 4-58, 4-65, 4-75 | § 1927[b] ...................... 6-125 |
| § 1014(b)[9] .... 3-41, 3-42, 4-58 | § 1927[e] ..................... 6-125 |
| § 1014(e) ....................... 3-41, 4-57 | § 1928[a] ..................... 6-127 |
| § 1015[a] ....................... 3-41 | § 1928[a][2](A) .............. 6-127 |
| § 1015(d) ....................... 3-41 | § 1928[a][2](B) .............. 6-127 |
| § 1032 ......................... 6-107 | § 1928[b][1] .................. 6-126 |
| § 1057 ......................... 6-105 | § 1928[f] ....................... 6-127 |
| § 1058 ......................... 6-120 | § 1441 .......... 6-111, 6-112, 6-141 |
| § 1091 ......................... 3-52 | § 1441[a] ..................... 6-80, 6-90 |
| § 1201 ......................... 6-113 | § 1442 .......... 6-111, 6-112, 6-141 |
| § 1201(a) ....................... 6-108 | § 1445[a] ..................... 6-87 |
| § 1202 ......................... 6-97, 6-100 | § 1445[b][2] .................. 6-88 |
| § 1211[b] ....................... 3-4 | § 1445[b][3] .................. 6-88 |
| § 1221 ......................... 6-90 | § 1445[b][4] .................. 6-89 |
| § 1231 ......................... 6-93 | § 1445[b][5] .................. 6-88 |
| § 1246 ......................... 6-123, 6-124 | § 1445[b][6] .................. 6-88 |
| § 1246(a)[1] ................... 6-124 | § 1445[b][7][A] .............. 6-88 |
| § 1246(a)[2] ................... 6-124 | § 1445[e] ...................... 6-89 |
| § 1246(a)[4] ................... 6-124 | § 1445[e][4] .................. 6-89 |
| § 1246[b] ....................... 6-124 | § 1445[e][5] .................. 6-89 |
| § 1246[b][1] ................... 6-123 | § 1446 ......................... 6-95 |
| § 1246[b][2] ................... 6-124 | § 1461 ......................... 6-87 |
| § 1246[e][1] ................... 6-124 | § 1491 ......................... 6-105 |
| § 1247 ......................... 6-123 | § 1491–94 ..................... 6-136 |
| § 1248 ......................... 6-123, 6-152 | § 1492 ......................... 6-105 |
| § 1248[a] ....................... 6-123 | § 1494 ......................... 6-105, 6-136 |
| § 1274(d) ....................... 6-143 | § 1501–04 ..................... 6-109 |
| § 1291 ......................... 6-128 | § 1504[a] ..................... 6-109 |
| § 1291[a] ....................... 6-125 | § 2001 .......... 1-7, 2-18, 2-75, 3-38 |
| § 1291(a)[1] ................... 6-125 | § 2001[b] ...................... 3-68 |
| § 1291[a][2] ................... 6-125 | § 2001[c] ...................... 3-39 |
| § 1291[b][3][F] ................ 6-125 | § 2002 ......................... 7-31 |
| § 1291[c] ....................... 6-125 | § 2010 ......................... 2-70 |
| § 1291[d][2][A] ............... 6-126 | § 2010[c] ...................... 3-39 |
| § 1291[d][2][B] ............... 6-127 | § 2011 ......................... 2-75, 3-32 |
| § 1291[e] ....................... 6-127 | § 2012[a] ...................... 2-70 |
| § 1291–98 ....................... 6-125 | § 2012[e] ...................... 3-38 |
| § 1293 ......................... 6-126 | § 2013 ......................... 2-65, 3-37, |
| § 1293[a][1] ................... 6-126 | § 1294 ......................... 6-126 |
| § 1294 ......................... 6-126 | § 1295 ......................... 6-126 |

(Lawrence, Rel. #17, 11/14) T–37
<table>
<thead>
<tr>
<th>Reference</th>
<th>Page Numbers</th>
</tr>
</thead>
<tbody>
<tr>
<td>§ 2055(e)</td>
<td>2-82</td>
</tr>
<tr>
<td>§ 2056</td>
<td>2-60, 2-62, 3-36, 4-51, 4-78</td>
</tr>
<tr>
<td>§ 2056(a)</td>
<td>3-36, 7-15</td>
</tr>
<tr>
<td>§ 2056(b)(5)</td>
<td>2-64, 7-15</td>
</tr>
<tr>
<td>§ 2056(b)(7)</td>
<td>2-64, 7-15</td>
</tr>
<tr>
<td>§ 2056(b)(7)(B)(v)</td>
<td>3-36</td>
</tr>
<tr>
<td>§ 2056(c)</td>
<td>4-78</td>
</tr>
<tr>
<td>§ 2056(c)(1)</td>
<td>4-78</td>
</tr>
<tr>
<td>§ 2056(d)</td>
<td>2-62, 4-51, 4-57</td>
</tr>
<tr>
<td>§ 2056(d)(1)[A]</td>
<td>7-15</td>
</tr>
<tr>
<td>§ 2056(d)(1)[B]</td>
<td>4-53</td>
</tr>
<tr>
<td>§ 2056(d)(2)</td>
<td>2-63, 2-83, 3-34, 7-16</td>
</tr>
<tr>
<td>§ 2056(d)(2)(B)</td>
<td>2-63</td>
</tr>
<tr>
<td>§ 2056(d)(3)</td>
<td>2-65, 3-38</td>
</tr>
<tr>
<td>§ 2056(d)(4)</td>
<td>2-65</td>
</tr>
<tr>
<td>§ 2056A</td>
<td>2-64, 3-36</td>
</tr>
<tr>
<td>§ 2056A(a)</td>
<td>3-34</td>
</tr>
<tr>
<td>§ 2056A(a)(1)</td>
<td>3-34</td>
</tr>
<tr>
<td>§ 2056A(a)(1)(A)</td>
<td>2-63</td>
</tr>
<tr>
<td>§ 2056A(a)(1)(B)</td>
<td>2-63, 3-34</td>
</tr>
<tr>
<td>§ 2056A(a)[2]</td>
<td>2-63, 3-34</td>
</tr>
<tr>
<td>§ 2056A(a)[3]</td>
<td>3-36</td>
</tr>
<tr>
<td>§ 2056A(a)[4]</td>
<td>3-34</td>
</tr>
<tr>
<td>§ 2056A(b)[1][A]</td>
<td>2-65</td>
</tr>
<tr>
<td>§ 2056A(b)[1][B]</td>
<td>2-65</td>
</tr>
<tr>
<td>§ 2056A(b)[2]</td>
<td>2-65</td>
</tr>
<tr>
<td>§ 2056A(b)[2][B][i]</td>
<td>2-66</td>
</tr>
<tr>
<td>§ 2056A(b)[2][B][ii]</td>
<td>2-66</td>
</tr>
<tr>
<td>§ 2056A(b)(2)[C][i]</td>
<td>2-68</td>
</tr>
<tr>
<td>§ 2056A(b)(3)[B]</td>
<td>2-66</td>
</tr>
<tr>
<td>§ 2056A(b)[4]</td>
<td>2-65</td>
</tr>
<tr>
<td>§ 2056A(b)[5]</td>
<td>2-67</td>
</tr>
<tr>
<td>§ 2056A(b)[6]</td>
<td>3-34</td>
</tr>
<tr>
<td>§ 2056A(b)[9]</td>
<td>2-65</td>
</tr>
<tr>
<td>§ 2056A(d)</td>
<td>2-64, 3-36</td>
</tr>
<tr>
<td>§ 2058</td>
<td>2-3, 2-60, 3-31, 3-32</td>
</tr>
<tr>
<td>§ 2101</td>
<td>2-76, 7-16</td>
</tr>
<tr>
<td>§ 2101(b)</td>
<td>3-39, 3-40</td>
</tr>
<tr>
<td>§ 2101(c)</td>
<td>3-40</td>
</tr>
<tr>
<td>§ 2102</td>
<td>3-37, 3-39</td>
</tr>
<tr>
<td>§ 2102(b)</td>
<td>3-38, 3-39</td>
</tr>
<tr>
<td>§ 2102(b)(1)</td>
<td>3-39, 3-63</td>
</tr>
<tr>
<td>§ 2102(b)(2)</td>
<td>3-37</td>
</tr>
<tr>
<td>§ 2102(b)(3)[A]</td>
<td>3-13, 3-16</td>
</tr>
<tr>
<td>§ 2102(b)(5)</td>
<td>3-14, 3-29</td>
</tr>
<tr>
<td>§ 2102(b)[2]</td>
<td>3-15</td>
</tr>
<tr>
<td>§ 2102(c)[1]</td>
<td>3-39, 3-63</td>
</tr>
<tr>
<td>§ 2102(c)[3]</td>
<td>3-40</td>
</tr>
<tr>
<td>§ 2102(c)(5)</td>
<td>3-37</td>
</tr>
<tr>
<td>§ 2103</td>
<td>3-5</td>
</tr>
<tr>
<td>§ 2103–05</td>
<td>2-18</td>
</tr>
<tr>
<td>§ 2104(a)</td>
<td>3-10</td>
</tr>
<tr>
<td>§ 2104(b)</td>
<td>3-23, 3-24, 3-25, 3-26, 3-27, 3-43</td>
</tr>
<tr>
<td>§ 2105(b)[1]</td>
<td>3-14, 3-29</td>
</tr>
<tr>
<td>§ 2105(b)[2]</td>
<td>3-15</td>
</tr>
<tr>
<td>§ 2105(b)[3]</td>
<td>3-15</td>
</tr>
<tr>
<td>§ 2105(b)[4]</td>
<td>3-16</td>
</tr>
<tr>
<td>§ 2105(c)</td>
<td>3-9</td>
</tr>
<tr>
<td>§ 2105(c)[2]</td>
<td>3-9</td>
</tr>
<tr>
<td>§ 2106(a)[1]</td>
<td>3-31, 3-61</td>
</tr>
<tr>
<td>§ 2106(a)[2][A]</td>
<td>7-16</td>
</tr>
<tr>
<td>§ 2106(a)[3]</td>
<td>4-57</td>
</tr>
<tr>
<td>§ 2106(b)</td>
<td>3-6, 3-7, 3-32, 3-33</td>
</tr>
<tr>
<td>§ 2107</td>
<td>3-4, 3-26, 3-46</td>
</tr>
<tr>
<td>§ 2107(a)</td>
<td>3-47, 3-49</td>
</tr>
<tr>
<td>§ 2107(b)</td>
<td>3-47</td>
</tr>
<tr>
<td>§ 2203</td>
<td>3-36, 7-31</td>
</tr>
<tr>
<td>§ 2209</td>
<td>3-37</td>
</tr>
<tr>
<td>§ 2501</td>
<td>2-76</td>
</tr>
<tr>
<td>§ 2501[a]</td>
<td>3-42</td>
</tr>
<tr>
<td>§ 2501[a][1]</td>
<td>2-18, 4-62</td>
</tr>
<tr>
<td>§ 2501[a][2]</td>
<td>2-19, 6-147</td>
</tr>
<tr>
<td>§ 2501[a][3]</td>
<td>3-4, 3-42, 3-46, 3-49, 6-147</td>
</tr>
<tr>
<td>§ 2501[a][5][A]</td>
<td>3-49</td>
</tr>
<tr>
<td>§ 2502(c)</td>
<td>2-76</td>
</tr>
<tr>
<td>§ 2503</td>
<td>4-79</td>
</tr>
<tr>
<td>§ 2503(b)</td>
<td>2-18, 2-19, 2-22, 2-26, 2-82, 3-43, 3-44, 3-53</td>
</tr>
<tr>
<td>§ 2503[c]</td>
<td>2-81</td>
</tr>
<tr>
<td>§ 2503[d]</td>
<td>2-81</td>
</tr>
<tr>
<td>§ 2503[e]</td>
<td>2-80</td>
</tr>
<tr>
<td>Section</td>
<td>References</td>
</tr>
<tr>
<td>---------</td>
<td>------------</td>
</tr>
<tr>
<td>§ 2505</td>
<td>2-76</td>
</tr>
<tr>
<td>§ 2505(a)</td>
<td>3-43</td>
</tr>
<tr>
<td>§ 2511</td>
<td>2-19, 3-42, 3-49, 6-147</td>
</tr>
<tr>
<td>§ 2511(b)</td>
<td>3-42, 3-49</td>
</tr>
<tr>
<td>§ 2512</td>
<td>2-78</td>
</tr>
<tr>
<td>§ 2513</td>
<td>2-19</td>
</tr>
<tr>
<td>§ 2513(a)(1)</td>
<td>3-43</td>
</tr>
<tr>
<td>§ 2513(a)(2)</td>
<td>2-76</td>
</tr>
<tr>
<td>§ 2514</td>
<td>2-77</td>
</tr>
<tr>
<td>§ 2515</td>
<td>2-78, 4-63</td>
</tr>
<tr>
<td>§ 2515(b)</td>
<td>2-79</td>
</tr>
<tr>
<td>§ 2515A</td>
<td>2-78, 2-79, 4-63</td>
</tr>
<tr>
<td>§ 2516</td>
<td>2-48</td>
</tr>
<tr>
<td>§ 2518</td>
<td>2-46, 2-47, 2-77, 4-58, 4-59</td>
</tr>
<tr>
<td>§ 2518(b)</td>
<td>4-59</td>
</tr>
<tr>
<td>§ 2518(b)(3)</td>
<td>4-60</td>
</tr>
<tr>
<td>§ 2518(b)(4)</td>
<td>4-58</td>
</tr>
<tr>
<td>§ 2518(c)(1)</td>
<td>4-59</td>
</tr>
<tr>
<td>§ 2518(c)(3)</td>
<td>2-67, 4-60</td>
</tr>
<tr>
<td>§ 2522</td>
<td>2-82</td>
</tr>
<tr>
<td>§ 2522(b)</td>
<td>3-43</td>
</tr>
<tr>
<td>§ 2522(c)</td>
<td>2-82</td>
</tr>
<tr>
<td>§ 2523</td>
<td>2-80, 3-43, 4-56, 4-56</td>
</tr>
<tr>
<td>§ 2523(a)</td>
<td>2-82</td>
</tr>
<tr>
<td>§ 2523(i)</td>
<td>2-80, 3-43, 4-51, 4-55, 4-56, 4-78</td>
</tr>
<tr>
<td>§ 2523(i)(1)</td>
<td>2-77, 4-67</td>
</tr>
<tr>
<td>§ 2523(i)(2)</td>
<td>2-77, 2-80, 4-67, 4-79</td>
</tr>
<tr>
<td>§ 2523(i)(3)</td>
<td>2-78, 2-79, 4-63</td>
</tr>
<tr>
<td>§ 2602</td>
<td>2-86</td>
</tr>
<tr>
<td>§ 2603(a)(2)</td>
<td>2-86</td>
</tr>
<tr>
<td>§ 2603(a)(3)</td>
<td>2-86</td>
</tr>
<tr>
<td>§ 2611(a)(3)</td>
<td>2-84</td>
</tr>
<tr>
<td>§ 2612(a)</td>
<td>2-84</td>
</tr>
<tr>
<td>§ 2612(b)</td>
<td>2-85</td>
</tr>
<tr>
<td>§ 2612(c)</td>
<td>2-85</td>
</tr>
<tr>
<td>§ 2613(a)</td>
<td>2-84</td>
</tr>
<tr>
<td>§ 2623</td>
<td>2-86</td>
</tr>
<tr>
<td>§ 2631</td>
<td>2-86, 3-45</td>
</tr>
<tr>
<td>§ 2631(c)</td>
<td>2-84</td>
</tr>
<tr>
<td>§ 2641</td>
<td>2-86</td>
</tr>
<tr>
<td>§ 2641(a)</td>
<td>2-84</td>
</tr>
<tr>
<td>§ 2642</td>
<td>2-86</td>
</tr>
<tr>
<td>§ 2651</td>
<td>2-84</td>
</tr>
<tr>
<td>§ 2651(a)</td>
<td>2-84</td>
</tr>
<tr>
<td>§ 2652(a)</td>
<td>2-84</td>
</tr>
<tr>
<td>§ 2652(a)(2)</td>
<td>2-86</td>
</tr>
<tr>
<td>§ 2652(b)(1)</td>
<td>2-84</td>
</tr>
<tr>
<td>§ 2652(c)(1)</td>
<td>2-85</td>
</tr>
<tr>
<td>§ 2663</td>
<td>3-44</td>
</tr>
<tr>
<td>§ 2663(2)</td>
<td>3-44</td>
</tr>
<tr>
<td>§ 2801</td>
<td>3-53</td>
</tr>
<tr>
<td>§ 2801(a)(1)</td>
<td>3-54</td>
</tr>
<tr>
<td>§ 2801(b)</td>
<td>3-53</td>
</tr>
<tr>
<td>§ 2801(c)</td>
<td>3-53</td>
</tr>
<tr>
<td>§ 2801(d)</td>
<td>3-53</td>
</tr>
<tr>
<td>§ 2801(e)(1)</td>
<td>3-54</td>
</tr>
<tr>
<td>§ 2801(e)(2)</td>
<td>3-54</td>
</tr>
<tr>
<td>§ 2801(e)(3)</td>
<td>3-54</td>
</tr>
<tr>
<td>§ 2801(e)(4)(A)</td>
<td>3-54</td>
</tr>
<tr>
<td>§ 2801(e)(4)(B)(i)</td>
<td>3-54</td>
</tr>
<tr>
<td>§ 2801(e)(4)(B)(ii)</td>
<td>3-54</td>
</tr>
<tr>
<td>§ 2801(e)(4)(B)(iii)</td>
<td>3-54</td>
</tr>
<tr>
<td>§ 4371-74</td>
<td>6-142</td>
</tr>
<tr>
<td>§ 6012(a)(2)</td>
<td>6-141</td>
</tr>
<tr>
<td>§ 6012(b)</td>
<td>6-141</td>
</tr>
<tr>
<td>§ 6013(g)</td>
<td>6-75</td>
</tr>
<tr>
<td>§ 6013(h)</td>
<td>7-31</td>
</tr>
<tr>
<td>§ 6019</td>
<td>2-25, 2-26, 4-79</td>
</tr>
<tr>
<td>§ 6019(2)</td>
<td>2-25, 2-26</td>
</tr>
<tr>
<td>§ 6038(a)(4)</td>
<td>6-134</td>
</tr>
<tr>
<td>§ 6039C</td>
<td>6-89, 6-141</td>
</tr>
<tr>
<td>§ 6039F</td>
<td>6-103</td>
</tr>
<tr>
<td>§ 6039G</td>
<td>3-50, 3-51</td>
</tr>
<tr>
<td>§ 6046(a)(1)(A)</td>
<td>6-133</td>
</tr>
<tr>
<td>§ 6046(a)(1)(B)</td>
<td>6-133</td>
</tr>
<tr>
<td>§ 6046(a)(1)(C)</td>
<td>6-133</td>
</tr>
<tr>
<td>§ 6046(a)(1)(D)</td>
<td>6-133</td>
</tr>
<tr>
<td>§ 6048</td>
<td>6-44, 6-74, 6-77, 6-136</td>
</tr>
<tr>
<td>§ 6048(a)(2)</td>
<td>6-135</td>
</tr>
<tr>
<td>§ 6048(a)(3)</td>
<td>6-134</td>
</tr>
<tr>
<td>§ 6048(a)(3)(B)(ii)</td>
<td>6-135</td>
</tr>
<tr>
<td>§ 6048(a)(3)(B)(iii)</td>
<td>6-135</td>
</tr>
</tbody>
</table>
### Table of Authorities

<table>
<thead>
<tr>
<th>Code</th>
<th>6048(b)(1)</th>
<th>6048(b)(2)(B)</th>
<th>6048(c)</th>
<th>6048(c)(2)(A)</th>
<th>6075(b)</th>
<th>6114</th>
<th>6163(a)</th>
<th>6163(b)</th>
<th>6166(a)(1)</th>
<th>6325</th>
<th>6601(a)</th>
<th>6621</th>
<th>6622</th>
<th>6651(a)(2)</th>
<th>6662</th>
<th>6662(a)</th>
<th>6662(b)(1)</th>
<th>6664(c)(1)</th>
<th>6677</th>
<th>6677(c)</th>
<th>6712</th>
<th>7203</th>
<th>7701</th>
<th>7701(a)(3)</th>
<th>7701(a)(3)(A)</th>
<th>7701(a)(3)(B)</th>
<th>7701(a)(30)</th>
<th>7701(a)(30)(E)</th>
<th>7701(a)(31)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Section</td>
<td>6-137</td>
<td>6-138</td>
<td>6-138</td>
<td>6-139</td>
<td>3-68</td>
<td>2-18, 6-141</td>
<td>2-75, 2-76</td>
<td>2-76</td>
<td>2-25</td>
<td>7-32</td>
<td>6-143</td>
<td>6-143</td>
<td>6-143</td>
<td>6-143</td>
<td>6-143</td>
<td>6-139, 6-140</td>
<td>6-140</td>
<td>6-141</td>
<td>6-142</td>
<td>3-12</td>
<td>3-12</td>
<td>6-105</td>
<td>3-13, 6-15, 6-59, 6-61, 6-62, 6-73, 6-75, 6-105</td>
<td>6-57, 6-61, 6-62</td>
<td>7-20</td>
<td>6-57, 6-107</td>
<td>2-9, 2-18, 3-25</td>
<td>2-10</td>
<td>2-15, 6-44, 6-74</td>
</tr>
</tbody>
</table>

### Code of Federal Regulations

**Title 7**

§ 781 ................................ 3-8

**Title 15**

§ 806 ................................ 3-7
§ 806.8 ............................... 3-7

**Title 31**

§ 103 ................................ 5-33
§ 128 ................................ 5-30, 5-33
§ 128.3 ................................ 5-26

$Lawrence, Rel. #17, 11/14$
<table>
<thead>
<tr>
<th>Treasury Regulations</th>
</tr>
</thead>
<tbody>
<tr>
<td>§ 500.502–.565                        .................................... 5-25</td>
</tr>
<tr>
<td>§ 500.518–.519                        .................................... 5-26</td>
</tr>
<tr>
<td>§ 500.578                            .................................... 7-33</td>
</tr>
<tr>
<td>§ 500.601–.611                        .................................... 5-25</td>
</tr>
<tr>
<td>§ 500.809                            .................................... 5-26</td>
</tr>
<tr>
<td>§ 510                                 .................................... 5-35</td>
</tr>
<tr>
<td>§ 515                                 .................................... 7-34</td>
</tr>
<tr>
<td>§ 515.101–.809                        .................................... 5-21</td>
</tr>
<tr>
<td>§ 515.101–.901                        .................................... 7-32</td>
</tr>
<tr>
<td>§ 515.101–.901                        .................................... 5-35</td>
</tr>
<tr>
<td>§ 515.210                             .................................... 7-33</td>
</tr>
<tr>
<td>§ 515.305                             .................................... 5-34</td>
</tr>
<tr>
<td>§ 515.314                             .................................... 5-34</td>
</tr>
<tr>
<td>§ 1.163-5(c)                          .................................... 6-81</td>
</tr>
<tr>
<td>§ 1.551-2[a]                          .................................... 6-116</td>
</tr>
<tr>
<td>§ 1.551-2[b]                          .................................... 6-116</td>
</tr>
<tr>
<td>§ 1.551-2[c]                          .................................... 6-116</td>
</tr>
<tr>
<td>§ 1.555-1                             .................................... 6-115</td>
</tr>
<tr>
<td>§ 1.643[a]-1                          .................................... 6-96</td>
</tr>
<tr>
<td>§ 1.643[a]-2                          .................................... 6-96</td>
</tr>
<tr>
<td>§ 1.643[a]-4                          .................................... 6-97</td>
</tr>
<tr>
<td>§ 1.643[a]-5                          .................................... 6-97</td>
</tr>
<tr>
<td>§ 1.643[a]-6[a][1]                    .................................... 6-97</td>
</tr>
<tr>
<td>§ 1.643[a]-6[a][3][i]                 .................................... 6-97</td>
</tr>
<tr>
<td>§ 1.643[a]-7                          .................................... 6-97</td>
</tr>
<tr>
<td>§ 1.643[h]-1[a]                       .................................... 6-103</td>
</tr>
<tr>
<td>§ 1.643[h]-1[b]                       .................................... 6-103</td>
</tr>
<tr>
<td>§ 1.643[h]-1[c][1]                    .................................... 6-103</td>
</tr>
<tr>
<td>§ 1.643[h]-1[c][3]                    .................................... 6-104</td>
</tr>
<tr>
<td>§ 1.643[h]-1[d]                       .................................... 6-104</td>
</tr>
<tr>
<td>§ 1.643[h]-1[e][2]                    .................................... 6-103</td>
</tr>
<tr>
<td>§ 1.651[a]-1                          .................................... 6-97</td>
</tr>
<tr>
<td>§ 1.651[a]-1                          .................................... 6-97</td>
</tr>
<tr>
<td>§ 1.671-2(e)                          .................................... 6-63, 6-77</td>
</tr>
<tr>
<td>§ 1.671-3                             .................................... 6-43</td>
</tr>
<tr>
<td>§ 1.671-3[a][1]                       .................................... 6-147</td>
</tr>
<tr>
<td>§ 1.672[f]-1                          .................................... 6-66</td>
</tr>
<tr>
<td>§ 1.672[f]-2[a]                       .................................... 6-65</td>
</tr>
<tr>
<td>§ 1.672[f]-3                          .................................... 6-65</td>
</tr>
<tr>
<td>§ 1.672[f]-3[a][1]                    .................................... 6-68</td>
</tr>
<tr>
<td>§ 1.672[f]-3[a][2]                    .................................... 6-68</td>
</tr>
<tr>
<td>§ 1.672[f]-3[a][3]                    .................................... 6-69</td>
</tr>
<tr>
<td>§ 1.672[f]-3[b][2]                    .................................... 6-69</td>
</tr>
<tr>
<td>§ 1.672[f]-3[b][2][ii][A]             .................................... 6-69</td>
</tr>
<tr>
<td>§ 1.672[f]-3[b][2][ii][B]             .................................... 6-69</td>
</tr>
<tr>
<td>§ 1.672[f]-3[b][2][ii][C]             .................................... 6-69</td>
</tr>
<tr>
<td>§ 1.672[f]-3[b][2][i]                 .................................... 6-69</td>
</tr>
<tr>
<td>§ 1.672[f]-3[b][2][i]                 .................................... 6-69</td>
</tr>
<tr>
<td>§ 1.672[f]-3[b][2][ii][B]             .................................... 6-69</td>
</tr>
<tr>
<td>§ 1.672[f]-3[b][2][ii][C]             .................................... 6-69</td>
</tr>
<tr>
<td>§ 1.672[f]-3[b][2][ii][D]             .................................... 6-69</td>
</tr>
<tr>
<td>§ 1.672[f]-3[b][2][ii][E]             .................................... 6-69</td>
</tr>
<tr>
<td>§ 1.672[f]-3[b][2][ii][F]             .................................... 6-69</td>
</tr>
<tr>
<td>§ 1.672[f]-3[b][2][ii][G]             .................................... 6-69</td>
</tr>
<tr>
<td>§ 1.672[f]-3[b][2][ii][H]             .................................... 6-69</td>
</tr>
<tr>
<td>§ 1.679-1[b]                          .................................... 6-75</td>
</tr>
<tr>
<td>§ 1.679-1[c]                          .................................... 6-75</td>
</tr>
<tr>
<td>§ 1.679-1[c][5]                       .................................... 6-107</td>
</tr>
<tr>
<td>§ 1.679-2[a]                          .................................... 6-72</td>
</tr>
<tr>
<td>§ 1.679-2[a][2][i]                    .................................... 6-75</td>
</tr>
<tr>
<td>§ 1.679-2[a][2][ii]                   .................................... 6-76</td>
</tr>
<tr>
<td>§ 1.679-2[a][3]                       .................................... 6-76</td>
</tr>
<tr>
<td>§ 1.679-2[a][4]                       .................................... 6-76</td>
</tr>
<tr>
<td>§ 1.679-2[b][2]                       .................................... 6-76</td>
</tr>
<tr>
<td>§ 1.679-2[c][1]                       .................................... 6-76</td>
</tr>
<tr>
<td>§ 1.679-2[c][2]                       .................................... 6-77</td>
</tr>
<tr>
<td>§ 1.679-3[b]                          .................................... 6-77</td>
</tr>
<tr>
<td>§ 1.679-3[c][1]                       .................................... 6-77</td>
</tr>
<tr>
<td>§ 1.679-3[d]                          .................................... 6-77</td>
</tr>
<tr>
<td>§ 1.679-3[e]                          .................................... 6-77</td>
</tr>
<tr>
<td>§ 1.679-3[f]                          .................................... 6-77</td>
</tr>
<tr>
<td>§ 1.679-4[b][1]                       .................................... 6-78</td>
</tr>
<tr>
<td>§ 1.679-4[b][2]                       .................................... 6-78</td>
</tr>
<tr>
<td>§ 1.679-4[d]                          .................................... 6-78</td>
</tr>
<tr>
<td>§ 1.679-5[b][1]                       .................................... 6-78</td>
</tr>
<tr>
<td>§ 1.684-1                             .................................... 6-106</td>
</tr>
<tr>
<td>§ 1.684-1[a][2]                       .................................... 6-106</td>
</tr>
<tr>
<td>§ 1.684-2[d]                          .................................... 6-106</td>
</tr>
<tr>
<td>§ 1.684-2[e]                          .................................... 6-106</td>
</tr>
</tbody>
</table>

INTERNATIONAL TAX & ESTATE PLANNING
### Table of Authorities

<table>
<thead>
<tr>
<th>Reference</th>
<th>Page(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>§ 20.2056A-2[d][1][i]</td>
<td>3-35</td>
</tr>
<tr>
<td>§ 20.2056A-2[d][1][ii]</td>
<td>2-69, 3-35</td>
</tr>
<tr>
<td>§ 20.2056A-2[d][1][iii]</td>
<td>3-35</td>
</tr>
<tr>
<td>§ 20.2056A-2[d][1][iv]</td>
<td>2-69</td>
</tr>
<tr>
<td>§ 20.2056A-2[d][1][v]</td>
<td>3-35</td>
</tr>
<tr>
<td>§ 20.2056A-2[d][3]</td>
<td>3-35</td>
</tr>
<tr>
<td>§ 20.2056A-3[a]</td>
<td>2-63</td>
</tr>
<tr>
<td>§ 20.2056A-3[b]</td>
<td>2-67</td>
</tr>
<tr>
<td>§ 20.2056A-3[c]</td>
<td>2-67</td>
</tr>
<tr>
<td>§ 20.2056A-3[d][5]</td>
<td>2-67</td>
</tr>
<tr>
<td>§ 20.2056A-3[e]</td>
<td>2-68</td>
</tr>
<tr>
<td>§ 20.2056A-5[a]</td>
<td>2-66</td>
</tr>
<tr>
<td>§ 20.2056A-5[b]</td>
<td>2-66</td>
</tr>
<tr>
<td>§ 20.2056A-5[c]</td>
<td>2-67</td>
</tr>
<tr>
<td>§ 20.2056A-6</td>
<td>2-67</td>
</tr>
<tr>
<td>§ 20.2056A-7</td>
<td>2-67</td>
</tr>
<tr>
<td>§ 20.2056A-9</td>
<td>2-68</td>
</tr>
<tr>
<td>§ 20.2056A-11[a]</td>
<td>2-67</td>
</tr>
<tr>
<td>§ 20.2102-1[b]</td>
<td>3-38</td>
</tr>
<tr>
<td>§ 20.2103-1</td>
<td>3-5</td>
</tr>
<tr>
<td>§ 20.2104-1[a][1]</td>
<td>3-6</td>
</tr>
<tr>
<td>§ 20.2104-1[a][2]</td>
<td>3-9</td>
</tr>
<tr>
<td>§ 20.2104-1[a][4]</td>
<td>3-17</td>
</tr>
<tr>
<td>§ 20.2104-1[a][5]</td>
<td>3-10</td>
</tr>
<tr>
<td>§ 20.2104-1[a][7]</td>
<td>3-9, 3-13, 3-16</td>
</tr>
<tr>
<td>§ 20.2105-1[a][2]</td>
<td>3-9</td>
</tr>
<tr>
<td>§ 20.2105-1[b]</td>
<td>3-9</td>
</tr>
<tr>
<td>§ 20.2105-1[b][2]</td>
<td>3-9</td>
</tr>
<tr>
<td>§ 20.2105-1[e]</td>
<td>3-17</td>
</tr>
<tr>
<td>§ 20.2105-1[f]</td>
<td>3-10, 3-26</td>
</tr>
<tr>
<td>§ 20.2105-1[g]</td>
<td>3-16</td>
</tr>
<tr>
<td>§ 20.2105-1[k]</td>
<td>3-13</td>
</tr>
<tr>
<td>§ 20.2106-1</td>
<td>3-31</td>
</tr>
<tr>
<td>§ 20.2106-1[b]</td>
<td>3-6, 3-32</td>
</tr>
<tr>
<td>§ 20.2106-2</td>
<td>3-31</td>
</tr>
<tr>
<td>§ 20.2106-2[a]</td>
<td>3-32</td>
</tr>
<tr>
<td>§ 20.2106-2[a][2]</td>
<td>3-32</td>
</tr>
<tr>
<td>§ 20.2106-2[b]</td>
<td>3-32</td>
</tr>
<tr>
<td>§ 20.2106-2[2][d][1][ii]</td>
<td>3-46</td>
</tr>
<tr>
<td>§ 20.2203-1</td>
<td>7-31</td>
</tr>
<tr>
<td>§ 20.6018-2</td>
<td>7-31</td>
</tr>
<tr>
<td>§ 20.6325-1</td>
<td>7-32</td>
</tr>
<tr>
<td>§ 20.6325-1[a]</td>
<td>3-69</td>
</tr>
<tr>
<td>§ 20.6325-1[b]</td>
<td>7-32</td>
</tr>
<tr>
<td>§ 20.6325-1[c]</td>
<td>3-69</td>
</tr>
<tr>
<td>§ 25.2501-1[a]</td>
<td>2-19</td>
</tr>
<tr>
<td>§ 25.2501-1[a][1]</td>
<td>2-76</td>
</tr>
<tr>
<td>§ 25.2501-1[a][3]</td>
<td>3-46</td>
</tr>
<tr>
<td>§ 25.2501-1[b]</td>
<td>2-19</td>
</tr>
<tr>
<td>§ 25.2502-2</td>
<td>2-76</td>
</tr>
<tr>
<td>§ 25.2503-3[a]</td>
<td>2-80</td>
</tr>
<tr>
<td>§ 25.2503-3[b]</td>
<td>2-80</td>
</tr>
<tr>
<td>§ 25.2511-1[h][4]</td>
<td>2-79, 4-63</td>
</tr>
<tr>
<td>§ 25.2511-3[b][1]</td>
<td>3-42</td>
</tr>
<tr>
<td>§ 25.2511-3[b][3][ii]</td>
<td>3-49</td>
</tr>
<tr>
<td>§ 25.2512-1</td>
<td>2-78</td>
</tr>
<tr>
<td>§ 25.2518-2[e][4]</td>
<td>4-60</td>
</tr>
<tr>
<td>§ 25.2523[a]-1[b][3]</td>
<td>2-82</td>
</tr>
<tr>
<td>§ 25.2523[f]-1A</td>
<td>4-78</td>
</tr>
<tr>
<td>§ 25.2523[i]-1[a]</td>
<td>3-33</td>
</tr>
<tr>
<td>§ 26.2663-2</td>
<td>2-87, 3-45</td>
</tr>
<tr>
<td>§ 35a.9999-5 [Temp.]</td>
<td>6-81</td>
</tr>
<tr>
<td>§ 301.6114-1</td>
<td>2-18</td>
</tr>
<tr>
<td>§ 301.6114-1[d]</td>
<td>6-141</td>
</tr>
<tr>
<td>§ 301.7701[b]-1[b]</td>
<td>2-15</td>
</tr>
<tr>
<td>§ 301.7701[b]-1[b][1]</td>
<td>2-10</td>
</tr>
<tr>
<td>§ 301.7701[b]-1[c][1]</td>
<td>2-11</td>
</tr>
<tr>
<td>§ 301.7701[b]-2[c][1]</td>
<td>2-12, 2-16</td>
</tr>
<tr>
<td>§ 301.7701[b]-2[d]</td>
<td>2-16</td>
</tr>
<tr>
<td>§ 301.7701[b]-3[b][2][i]</td>
<td>2-12</td>
</tr>
<tr>
<td>§ 301.7701[b]-3[b][2][iii]</td>
<td>2-12</td>
</tr>
<tr>
<td>§ 301.7701[b]-3[b][3]</td>
<td>2-13</td>
</tr>
<tr>
<td>§ 301.7701[b]-3[b][4]</td>
<td>2-13</td>
</tr>
<tr>
<td>§ 301.7701[b]-3[b][5]</td>
<td>2-13</td>
</tr>
<tr>
<td>§ 301.7701[b]-3[b][6]</td>
<td>2-13</td>
</tr>
<tr>
<td>§ 301.7701[b]-3[b][8]</td>
<td>2-12</td>
</tr>
<tr>
<td>§ 301.7701[b]-3[c][3]</td>
<td>2-14</td>
</tr>
<tr>
<td>§ 301.7701[b]-3[d]</td>
<td>2-14</td>
</tr>
<tr>
<td>§ 301.7701[b]-3[e][1]</td>
<td>2-14</td>
</tr>
<tr>
<td>§ 301.7701[b]-3[e][2][i]</td>
<td>2-14</td>
</tr>
<tr>
<td>§ 301.7701[b]-3[e][2][iii]</td>
<td>2-14</td>
</tr>
<tr>
<td>§ 301.7701[b]-3[e][4][a]</td>
<td>2-15</td>
</tr>
<tr>
<td>§ 301.7701[b]-4[b][2]</td>
<td>2-17</td>
</tr>
<tr>
<td>§ 301.7701[b]-4[c][1]</td>
<td>2-17</td>
</tr>
<tr>
<td>§ 301.7701[b]-5</td>
<td>2-17</td>
</tr>
<tr>
<td>§ 301.7701[b]-7</td>
<td>2-18</td>
</tr>
</tbody>
</table>

(Lawrence, Rel. #17, 11/14) T–45
§ 301.7701(b)-7(a) ............. 6-75
§ 301.7701(b)-7(b) ............. 2-18
§ 301.7701(b)-7(c) ............. 2-18
§ 301.7701(b)-8 ................. 2-15
§ 301.7701(b)-8(b)(3) ......... 2-17
§ 301.7701-1–301.7701-5 .... 3-12
§ 301.7701-2–301.7701-4 .. 6-18
§ 301.7701-2(b) ................. 3-12
§ 301.7701-3 ..................... 6-19
§ 301.7701-3(a) ................. 3-12
§ 301.7701-3(b)(2) ............. 3-17
§ 301.7701-4(a) ................. 6-18
§ 301.7701-4(b) ................. 6-18
§ 301.7701-4(c) ................. 6-78
§ 301.7701-4(d) ................. 6-78
§ 301.7701-4(e) ................. 6-78
§ 301.7701-5 ................... 6-145
§ 301.7701-7(a)(3) .. 6-63, 6-90
§ 301.7701-7(b) ................. 6-58
§ 301.7701-7(c) ................. 6-58

Proposed Regulations
§ 1.1291-1(b)(8)(iii)(C) ..... 6-127
§ 1.1291-1–4 ................... 6-125
§ 1.958-1(b) ..................... 6-123

Federal Rules of Procedure
Civil Procedure
12(h)(3) .............................. 5-67
17(b) ................................. 5-86

Federal Register
5 Fed. Reg. 1400 ................................................................. 5-22
5 Fed. Reg. 1401 ................................................................. 5-25
5 Fed. Reg. 2863 ................................................................. 5-26
7 Fed. Reg. 1409 ................................................................. 5-22
8 Fed. Reg. 14,341 ............................................................. 5-25
11 Fed. Reg. 7517 ............................................................... 5-17
21 Fed. Reg. 5777 ............................................................... 5-21
44 Fed. Reg. 65,729 ........................................................... 5-34
45 Fed. Reg. 24,099 ........................................................... 5-34
45 Fed. Reg. 26,685 ........................................................... 5-34

T–46
Table of Authorities

<table>
<thead>
<tr>
<th>Authority</th>
<th>Page Range</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>66 Fed. Reg. 37,886</td>
<td>........................................</td>
<td>6-75</td>
</tr>
<tr>
<td>66 Fed. Reg. 37,897</td>
<td>................................................</td>
<td>6-106, 6-107</td>
</tr>
<tr>
<td>76 Fed. Reg. 35,739-01</td>
<td>5-21, 5-24, 5-25, 5-26</td>
<td>5-35</td>
</tr>
<tr>
<td>76 Fed. Reg. 41, 11,315–317</td>
<td>........................................</td>
<td>5-35</td>
</tr>
<tr>
<td>76 Fed. Reg. 162, 52,209–211</td>
<td>........................................</td>
<td>5-34</td>
</tr>
<tr>
<td>77 Fed. Reg. 79, 24,571–573</td>
<td>........................................</td>
<td>5-35</td>
</tr>
<tr>
<td>79 Fed. Reg. 46, 13,493–495</td>
<td>........................................</td>
<td>5-34</td>
</tr>
<tr>
<td>79 Fed. Reg. 53, 15,535–537</td>
<td>........................................</td>
<td>5-34</td>
</tr>
<tr>
<td>79 Fed. Reg. 56, 16,169–171</td>
<td>........................................</td>
<td>5-34</td>
</tr>
</tbody>
</table>

General Counsel Memoranda

<table>
<thead>
<tr>
<th>Memorandum</th>
<th>Date</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>18,718</td>
<td></td>
<td>3-19</td>
</tr>
<tr>
<td>22,419</td>
<td></td>
<td>3-14, 3-29</td>
</tr>
<tr>
<td>36,647</td>
<td>Mar. 23, 1976</td>
<td>2-79</td>
</tr>
<tr>
<td>37,310</td>
<td>Nov. 2, 1977</td>
<td>2-79</td>
</tr>
<tr>
<td>37,689</td>
<td>Sept. 25, 1978</td>
<td>2-79</td>
</tr>
<tr>
<td>38,756</td>
<td>June 22, 1981</td>
<td>2-77</td>
</tr>
<tr>
<td>39,506</td>
<td></td>
<td>3-30</td>
</tr>
</tbody>
</table>

IRS Notices

<table>
<thead>
<tr>
<th>Notice</th>
<th>Page Range</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>88-1</td>
<td>........................................</td>
<td>6-86</td>
</tr>
<tr>
<td>88-53</td>
<td>................................................</td>
<td>6-86</td>
</tr>
<tr>
<td>97-34</td>
<td>6-78, 6-102, 6-103,</td>
<td>6-139</td>
</tr>
<tr>
<td>§ III.C.2</td>
<td>........................................</td>
<td>6-136</td>
</tr>
<tr>
<td>§ III.E</td>
<td>................................................</td>
<td>6-135</td>
</tr>
<tr>
<td>§ IVA</td>
<td>................................................</td>
<td>6-137</td>
</tr>
<tr>
<td>§ V.B</td>
<td>................................................</td>
<td>6-139</td>
</tr>
<tr>
<td>2009-85</td>
<td>........................................</td>
<td>3-51, 3-52, 3-53</td>
</tr>
<tr>
<td>2010-34</td>
<td>........................................</td>
<td>6-127</td>
</tr>
<tr>
<td>2011-55</td>
<td>........................................</td>
<td>6-127</td>
</tr>
</tbody>
</table>

Private Letter Rulings

<table>
<thead>
<tr>
<th>Ruling</th>
<th>Page Range</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>77-37-063</td>
<td>........................................</td>
<td>3-9</td>
</tr>
<tr>
<td>78-42-002</td>
<td>........................................</td>
<td>2-9</td>
</tr>
<tr>
<td>79-17-037</td>
<td>Jan. 24, 1979</td>
<td>6-145</td>
</tr>
</tbody>
</table>

(Lawrence, Rel. #17, 11/14)
79-17-063 (Jan. 25, 1979) ......................................................... 6-145
87-52-064 [Sept. 30, 1987] .......................................................... 2-77
88-02-007 [Sept. 30, 1987] .......................................................... 6-91
200243031 (Oct. 25, 2002) ......................................................... 3-13

**Revenue Procedures**

<table>
<thead>
<tr>
<th>Year</th>
<th>Year</th>
<th>Page Ranges</th>
</tr>
</thead>
<tbody>
<tr>
<td>96-54</td>
<td>2-64, 2-68, 2-69</td>
<td>2-19, 2-22, 2-70, 2-76, 2-77, 2-80, 2-82, 2-84, 2-85</td>
</tr>
</tbody>
</table>

**Revenue Rulings**

<table>
<thead>
<tr>
<th>Year</th>
<th>Year</th>
<th>Page Ranges</th>
</tr>
</thead>
<tbody>
<tr>
<td>54-272</td>
<td>4-64</td>
<td>70-59</td>
</tr>
<tr>
<td>55-143</td>
<td>3-9, 3-15</td>
<td>70-155</td>
</tr>
<tr>
<td>55-163</td>
<td>3-20, 3-21</td>
<td>70-401</td>
</tr>
<tr>
<td>55-414</td>
<td>6-99</td>
<td>70-513</td>
</tr>
<tr>
<td>55-605</td>
<td>4-74</td>
<td>71-497</td>
</tr>
<tr>
<td>55-701</td>
<td>3-19</td>
<td>72-271</td>
</tr>
<tr>
<td>55-709</td>
<td>4-67</td>
<td>72-307</td>
</tr>
<tr>
<td>56-30</td>
<td>6-99</td>
<td>72-443</td>
</tr>
<tr>
<td>57-54</td>
<td>2-53</td>
<td>73-143</td>
</tr>
<tr>
<td>59-177</td>
<td>6-99</td>
<td>74-43</td>
</tr>
<tr>
<td>59-245</td>
<td>3-30</td>
<td>74-284</td>
</tr>
<tr>
<td>60-181</td>
<td>3-20, 7-20</td>
<td>74-364</td>
</tr>
<tr>
<td>60-218</td>
<td>2-81</td>
<td>74-424</td>
</tr>
<tr>
<td>62-154</td>
<td>7-20</td>
<td>74-625</td>
</tr>
<tr>
<td>65-218</td>
<td>3-13</td>
<td>75-72</td>
</tr>
<tr>
<td>65-245</td>
<td>3-31</td>
<td>75-100</td>
</tr>
<tr>
<td>65-311</td>
<td>6-99</td>
<td>75-357</td>
</tr>
<tr>
<td>66-60</td>
<td>4-61</td>
<td>75-551</td>
</tr>
<tr>
<td>66-85</td>
<td>2-23</td>
<td>76-261</td>
</tr>
<tr>
<td>66-86</td>
<td>6-147</td>
<td>76-303</td>
</tr>
<tr>
<td>67-278</td>
<td>4-74</td>
<td>76-490</td>
</tr>
<tr>
<td>67-463</td>
<td>2-59</td>
<td>77-181</td>
</tr>
<tr>
<td>68-554</td>
<td>7-15</td>
<td>77-182</td>
</tr>
<tr>
<td>68-621</td>
<td>6-90</td>
<td>78-166</td>
</tr>
<tr>
<td>69-54</td>
<td>2-55, 2-58</td>
<td>78-418</td>
</tr>
<tr>
<td>69-70</td>
<td>6-65</td>
<td>79-46</td>
</tr>
<tr>
<td>69-596</td>
<td>3-14, 3-29</td>
<td>79-152</td>
</tr>
</tbody>
</table>

T-48
<table>
<thead>
<tr>
<th>Restatements</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Conflict of Laws</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>§ 42, cmt. a</td>
<td>5-47</td>
<td></td>
</tr>
<tr>
<td><strong>Conflict of Laws (Second)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>§ 6</td>
<td>1-22</td>
<td>§ 239–63</td>
</tr>
<tr>
<td>§ 7</td>
<td>1-19</td>
<td>§ 239(2)</td>
</tr>
<tr>
<td>§ 8</td>
<td>1-23</td>
<td>§ 240</td>
</tr>
<tr>
<td>§ 9 cmt. d</td>
<td>5-47</td>
<td>§ 244</td>
</tr>
<tr>
<td>§ 10</td>
<td>1-23</td>
<td>§ 258</td>
</tr>
<tr>
<td>§ 11 cmt. c</td>
<td>1-3</td>
<td>§ 258 cmt. c</td>
</tr>
<tr>
<td>§ 11 cmt. k</td>
<td>1-7</td>
<td>§ 259</td>
</tr>
<tr>
<td>§ 11(2)</td>
<td>1-3</td>
<td></td>
</tr>
<tr>
<td>§ 14</td>
<td>1-4</td>
<td></td>
</tr>
<tr>
<td>§ 15</td>
<td>1-6</td>
<td>§ 259 cmt. b [1971]</td>
</tr>
<tr>
<td>§ 15 cmt. a</td>
<td>1-6</td>
<td>§ 259 cmt. c [1971]</td>
</tr>
<tr>
<td>§ 21 cmt. A</td>
<td>1-5</td>
<td>§ 263</td>
</tr>
<tr>
<td>§ 21(2)</td>
<td>1-5</td>
<td>§ 263(2)</td>
</tr>
<tr>
<td>§ 122</td>
<td>1-21</td>
<td>§ 264</td>
</tr>
<tr>
<td>§ 166</td>
<td>4-25</td>
<td>§ 265</td>
</tr>
<tr>
<td>§ 224</td>
<td>1-31</td>
<td>§ 268</td>
</tr>
<tr>
<td>§ 233</td>
<td>4-16</td>
<td>§ 268 cmt. d</td>
</tr>
<tr>
<td>§ 234</td>
<td>4-36</td>
<td>§ 269</td>
</tr>
<tr>
<td>§ 239</td>
<td>1-26, 1-32</td>
<td>§ 270</td>
</tr>
<tr>
<td>§ 239 cmt. c</td>
<td>1-26</td>
<td>§ 270 cmt. e</td>
</tr>
<tr>
<td>§ 239 cmt. d</td>
<td>1-28</td>
<td>§ 272</td>
</tr>
<tr>
<td>§ 876</td>
<td>6-35</td>
<td>§ 281</td>
</tr>
</tbody>
</table>

<p>| <strong>Torts (Second)</strong>                |                              |                              |
| § 876                             | 6-35                         | § 876(b) cmt. d              | 6-36                          |</p>
<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>§ 172</td>
<td>5-43</td>
</tr>
</tbody>
</table>

**Foreign Relations Law of the United States (Second)**

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>§ 1 cmt. b</td>
<td>5-5</td>
</tr>
<tr>
<td>§ 101, reporter’s n.1</td>
<td>5-5</td>
</tr>
<tr>
<td>§ 101[d]</td>
<td>5-19</td>
</tr>
<tr>
<td>§ 102</td>
<td>5-5, 5-8</td>
</tr>
<tr>
<td>§ 103, reporter’s n.2</td>
<td>5-5</td>
</tr>
<tr>
<td>§ 103(2)</td>
<td>5-8</td>
</tr>
<tr>
<td>§ 114</td>
<td>5-6</td>
</tr>
<tr>
<td>§ 204</td>
<td>5-60</td>
</tr>
<tr>
<td>§ 205</td>
<td>5-60</td>
</tr>
<tr>
<td>§ 211–13</td>
<td>5-83</td>
</tr>
<tr>
<td>§ 213</td>
<td>5-42</td>
</tr>
<tr>
<td>§ 213 cmt. a</td>
<td>5-42</td>
</tr>
<tr>
<td>§ 213 cmt. c</td>
<td>5-43</td>
</tr>
<tr>
<td>§ 213 cmt. d</td>
<td>5-43</td>
</tr>
<tr>
<td>§ 213, reporter’s nn.3–9</td>
<td>5-43</td>
</tr>
<tr>
<td>§ 301–39</td>
<td>5-5</td>
</tr>
<tr>
<td>§ 321</td>
<td>5-7, 5-24, 5-36, 5-41</td>
</tr>
<tr>
<td>§ 401</td>
<td>5-7</td>
</tr>
<tr>
<td>§ 402(1)</td>
<td>5-44</td>
</tr>
<tr>
<td>§ 402(2)</td>
<td>5-44, 5-84</td>
</tr>
<tr>
<td>§ 403(3)</td>
<td>5-32, 5-44, 5-85</td>
</tr>
<tr>
<td>§ 412–13</td>
<td>5-84</td>
</tr>
<tr>
<td>§ 414</td>
<td>5-84</td>
</tr>
<tr>
<td>§ 414, reporter’s n.7</td>
<td>5-3</td>
</tr>
<tr>
<td>§ 414, reporter’s n.9</td>
<td>5-3</td>
</tr>
<tr>
<td>§ 441(2)</td>
<td>5-31</td>
</tr>
<tr>
<td>§ 443, reporter’s n.4</td>
<td>5-4</td>
</tr>
<tr>
<td>§ 443 cmt. b, reporter’s n.4</td>
<td>5-10</td>
</tr>
<tr>
<td>§ 469, reporter’s n.4</td>
<td>5-15</td>
</tr>
<tr>
<td>§ 487, reporter’s n.6</td>
<td>5-3</td>
</tr>
</tbody>
</table>

**Foreign Relations Law of the United States (Third)**

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>§ 701(a)</td>
<td>5-7</td>
</tr>
<tr>
<td>§ 701(b)</td>
<td>5-7</td>
</tr>
<tr>
<td>§ 701(c)</td>
<td>5-7</td>
</tr>
<tr>
<td>§ 711 cmt. a, reporter’s n.1</td>
<td>5-7</td>
</tr>
<tr>
<td>§ 711 cmt. e</td>
<td>5-7</td>
</tr>
<tr>
<td>§ 711 cmt. g</td>
<td>5-7</td>
</tr>
<tr>
<td>§ 712</td>
<td>5-7, 5-9, 5-24, 5-36, 5-44</td>
</tr>
<tr>
<td>§ 712 cmt. g</td>
<td>5-44</td>
</tr>
<tr>
<td>§ 712 cmt. j</td>
<td>5-7</td>
</tr>
<tr>
<td>§ 712 et seq.</td>
<td>5-9</td>
</tr>
<tr>
<td>§ 712, reporter’s nn.1–2</td>
<td>5-44</td>
</tr>
<tr>
<td>§ 712[2] &amp; cmt. h, reporter’s n.8</td>
<td>5-42</td>
</tr>
<tr>
<td>§ 713 cmt. a</td>
<td>5-43, 5-44</td>
</tr>
<tr>
<td>§ 713 cmt. e</td>
<td>5-7, 5-43</td>
</tr>
<tr>
<td>§ 713 cmt. h</td>
<td>5-44</td>
</tr>
<tr>
<td>§ 713[2]</td>
<td>5-7, 5-8</td>
</tr>
<tr>
<td>§ 721</td>
<td>5-7</td>
</tr>
<tr>
<td>§ 722</td>
<td>5-7</td>
</tr>
<tr>
<td>§ 901–07</td>
<td>5-7</td>
</tr>
<tr>
<td>§ 903, reporter’s nn.2–3</td>
<td>5-44</td>
</tr>
<tr>
<td>§ 906–07</td>
<td>5-8</td>
</tr>
<tr>
<td>introductory note to pt. I, ch. 1</td>
<td>5-5, 5-8</td>
</tr>
<tr>
<td>introductory note to pt. II</td>
<td>5-43</td>
</tr>
<tr>
<td>introductory note to pt. IV</td>
<td>5-44</td>
</tr>
</tbody>
</table>

**Law of Trusts (Third)**

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>§ 75</td>
<td>6-11</td>
</tr>
<tr>
<td>§ 90–91</td>
<td>6-55, 6-155</td>
</tr>
</tbody>
</table>

Prudent Investor Rule 1992 ....... 7-21
<table>
<thead>
<tr>
<th>Uniform Acts</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unif. Disposition of Community Prop. Rights at Death Act</td>
<td>4-41</td>
</tr>
<tr>
<td>generally</td>
<td></td>
</tr>
<tr>
<td>§ 1</td>
<td>4-41</td>
</tr>
<tr>
<td>Unif. Partnership Act</td>
<td>4-7</td>
</tr>
<tr>
<td>generally</td>
<td></td>
</tr>
<tr>
<td>§ 26</td>
<td>3-18</td>
</tr>
<tr>
<td>Unif. Prob. Code</td>
<td>4-17</td>
</tr>
<tr>
<td>§ 2-202</td>
<td></td>
</tr>
<tr>
<td>art. VII</td>
<td>6-59</td>
</tr>
<tr>
<td>Uniform Services Former Spouses’ Protection Act</td>
<td>4-24</td>
</tr>
<tr>
<td>Unif. Simultaneous Death Act</td>
<td>4-61</td>
</tr>
<tr>
<td>generally</td>
<td></td>
</tr>
<tr>
<td>§ 3</td>
<td>4-60</td>
</tr>
</tbody>
</table>
### State Codes

#### Alaska
Alaska Stat.
- § 13.41.005 (Uniform Disposition Act) ......................... 4-41
- § 34.77.030 ........................................................................ 4-18

#### Arizona
- § 14-1201 ........................................................................ 4-23
- § 25-214 .......................................................................... 4-27, 4-28
- § 25-214(b) ....................................................................... 4-26
- § 25-215 ........................................................................... 4-28
- § 25-318 ........................................................................... 4-41
- § 33-431 ........................................................................... 4-23

#### Arkansas
- § 28-12-101–113 (Uniform Disposition Act) ..................... 4-41

#### California
Cal. Civ. Code
- § 4800.2 ........................................................................... 4-66
- § 125 .............................................................................. 4-40
- § 1100 ............................................................................. 4-28
- § 2581 ............................................................................. 4-31
Cal. Prob. Code
- § 100 .............................................................................. 4-29

#### Colorado
- § 15-20-101–111 (Uniform Disposition Act) ..................... 4-41

#### Connecticut
- § 45a-449 ......................................................................... 7-35
- § 45a-458–45a-466 (Uniform Disposition Act) ............... 4-41
- § 47-58 ............................................................................. 7-35

#### Delaware
- tit. 8, § 388 ........................................................................ 5-94
- tit. 8, § 389 ........................................................................ 5-94
## Table of Authorities

### Florida
- § 731.106 .................................................................................. 1-32, 1-41
- § 732.216–.228 [Uniform Disposition Act] ............................... 4-41

### Hawaii
- § 510-21–510-30 [Uniform Disposition Act] ............................. 4-41

### Idaho
Idaho Code
- § 15-2-201 .................................................................................. 4-40
- § 15-6-201 .................................................................................. 4-23
- § 32-912 .................................................................................... 4-26, 4-28

### Illinois
- § 5/7-1 ....................................................................................... 1-27
- § 5/7-6 ....................................................................................... 1-41
Ill. Prob. Act
- § 89(b) ....................................................................................... 1-32

### Kentucky
- § 391.210–.260 [Uniform Disposition Act] ............................. 4-41

### Louisiana
- art. 2334 et seq. ........................................................................ 1-36
- art. 2340 ................................................................................... 4-33
- art. 2344 ................................................................................... 4-24
- art. 2346 ................................................................................... 4-26
- art. 2347 ................................................................................... 4-33
- art. 2400 et seq. ...................................................................... 1-36

### Michigan
- § 557.261–.271 [Uniform Disposition Act] ............................. 4-41

### Montana
**Nevada**

§ 111.064 ............................................................................. 4-23
§ 111.064(2) ......................................................................... 4-23
§ 123.230 ............................................................................. 4-26
§ 123.250 ............................................................................. 4-29

**New Mexico**

§ 40-3-14 ............................................................................. 4-26

**New York**

1936 N.Y. Laws ch. 917

§ 877(b) ................................................................................ 5-15

1981 N.Y. Laws ch. 187
generally ............................................................................... 4-42

N.Y. Banking Law

§ 675 .................................................................................... 4-15

N.Y. C.P.L.R.

308 ....................................................................................... 5-15

N.Y. Comp. Codes R. & Regs.

§ 102.2(d)(2) ........................................................................... 1-4

N.Y. Dec. Est. Law

§ 47 .................................................................................... 1-33, 1-36, 1-37, 1-38
§ 47d .................................................................................... 1-39

N.Y. Dom. Rel. Law

§ 236 .................................................................................... 4-34
§ 236[B][5][c] ........................................................................ 4-34

N.Y. Est. Powers & Trusts Law

§ 3-5.1 .................................................................................... 1-22, 1-27, 1-33
§ 3-5.1[a][1] ........................................................................... 1-19, 7-3
§ 3-5.1[a][2] ........................................................................... 1-19
§ 3-5.1[a][3] ........................................................................... 7-8
§ 3-5.1[a][4] ........................................................................... 7-9
§ 3-5.1[a][5] ........................................................................... 7-10
§ 3-5.1[a][6] ........................................................................... 7-10
§ 3-5.1[b] ........................................................................... 1-37, 1-38, 7-3, 7-8
§ 3-5.1[b][1] ........................................................................... 1-19
§ 3-5.1[c] ........................................................................... 1-29
§ 3-5.1[h] ........................................................................... 1-29, 1-32, 1-36, 1-38, 1-39
§ 4-1.1 .................................................................................... 7-3
§ 4-1.5 .................................................................................... 7-5, 7-6
§ 5-1.1 .................................................................................... 1-36, 4-15, 4-17
§ 5-1.1-A ................................................................................ 1-36, 4-15, 4-17
Table of Authorities

| § 5-3.1 | ................................................................. | 4-18 |
| § 6-2.2 | ................................................................. | 4-10 |
| § 6-2.2[a] | ........................................................... | 4-7 |
| § 6-6.1–7 (Uniform Disposition Act) | .......................... | 4-41, 4-42, 4-44 |
| § 7-1.1 | ................................................................. | 6-8 |
| § 11-1.7 | ................................................................. | 7-22 |
| § 11-2.3 | ................................................................. | 7-21 |
| § 11-2.4 | ................................................................. | 7-21 |
| N.Y. Gen. Oblig. Law | | |
| § 5-703 | ................................................................. | 6-8 |
| § 5-1107 | ................................................................. | 5-92 |
| N.Y. Penal Law | | |
| § 20.00 | ................................................................. | 6-38 |
| § 105.00 | ................................................................. | 6-38 |
| § 105.05 | ................................................................. | 6-38 |
| § 103(15) | ................................................................. | 1-4, 1-9 |
| § 707(1)(c) | ............................................................... | 7-30 |
| § 710(4) | ................................................................. | 7-24 |
| § 711 | ................................................................. | 7-24 |
| § 1001 | ................................................................. | 7-6 |
| § 1404 | ................................................................. | 7-11 |
| § 1605 | ................................................................. | 1-16 |
| § 1605(1) | ............................................................... | 1-14 |
| § 1605(2) | ............................................................... | 1-16 |
| § 1605(2)(a) | ............................................................ | 1-16, 7-23 |
| § 1605–09 | ................................................................. | 7-30 |
| § 1606 | ................................................................. | 7-11 |
| § 1716(4) | ................................................................. | 7-30 |
| N.Y. Tax Law | | |
| § 960 | ................................................................. | 1-7 |

**North Carolina**


§ 31C-1–31C-112 (Uniform Disposition Act) ...................... 4-41

**Oklahoma**


tit. 60, § 122 ................................................................. 7-35

**Oregon**


§ 112.705–.775 (Uniform Disposition Act) ...................... 4-41

(Lawrence, Rel. #17, 11/14) T–55
Texas
Tex. Const.
  art. XVI ................................................................. 4-49
  art. XVI, § 15 ........................................... 4-21, 4-22, 4-23, 4-58
  § 3.001 ................................................................. 4-24
  § 3.003 ................................................................. 4-31
  § 3.102 ................................................................. 4-26
  § 3.102[a] ............................................................ 4-26
  § 3.202 ................................................................. 4-27
  § 4.202 ................................................................. 4-22
  § 5.001 ................................................................. 4-26
  § 7.001 ................................................................. 4-20
  § 7.002 ................................................................. 4-20
  § 7.003 ................................................................. 4-20
  § 7.004 ................................................................. 4-20
  § 38 ................................................................. 4-29
  § 46 ................................................................. 4-58
  § 451–62 ............................................................ 4-23, 4-58
  § 452 ................................................................. 4-23

Virginia
  § 64.1-19.2 ............................................................. 4-16
  § 64.1-197–64.1-206 ............................................. 4-41

Washington
  § 11.04.015[1] ...................................................... 4-29
  § 26.16.030 .......................................................... 4-26, 4-27, 4-28
  § 26.16.050 .......................................................... 4-21
  § 26.16.120 .......................................................... 4-23
  § 26.16.220 .......................................................... 4-40

Wisconsin
  § 766.51 ............................................................. 4-26
  § 766.60(5)[a] ...................................................... 4-23

Wyoming
  § 2-7-720–2-7-729 ............................................. 4-41
# Table of Authorities

## Foreign Authorities

### Bahamas
- Fraudulent Dispositions Act of 1991 ........................................... 6-33

### Belgium

### British Virgin Islands
- International Business Companies  
  (Amendment) Act, No. 3 of 1988 ............................................. 5-97  
  Trustee Ordinance Amendment  
    § 86 ..................................................................................... 6-10

### Canada
- Canada Business Corporation Act 181 ...................................... 5-93  
- Civil Code of Quebec 75, 76 .................................................. 1-9  
- Foreign Resident Corporation Act of 1963 ................................ 5-93  
- R.S.O. ch. 53  
  § 180(1) ................................................................................ 5-93  
  § 181(1) ................................................................................ 5-93

### Cayman Islands
- Bank and Trust Companies Regulation Law,  
  Law No. 8 [1966] .................................................................... 5-31  
- Fraudulent Dispositions Law of 1989 ..................................... 6-33

### France
- French Civil Code ...................................................................... 4-4, 4-19

### Jersey
- Trusts Law, 1984 ................................................................. 6-30  
- Trusts (Amendment) Law, 1989, art. 8A ................................. 6-30

### Liechtenstein
- Law of Jan. 20, 1926 .............................................................. 5-93  
- Personen-und Gesellschaftsrecht (PGR)  
  (Personal Status and Company Law Act) art. 931 ............ 6-17

### Netherlands Antilles
- Landsverordening of Feb. 25, 1965 ......................................... 5-93

### New Hebrides
- Companies Regulations .......................................................... 5-93

---

(Lawrence, Rel. #17, 11/14) T-57
Panama
Código de Commercio, art. 60 .................................................... 5-93

Switzerland
Law of June 7, 1937 .............................................................. 5-93

Turks & Caicos Islands
Companies Ordinance of 1981, pt. IX .................................. 5-93

United Kingdom
Domicile & Matrimonial Proceedings Act § 1 (1973) .......... 1-6
Foreign Judgment Reciprocal Enforcement Act of 1933 ...... 6-28
State Immunity Act of 1978 ................................................. 5-79
Trustee Act of 1926, § 40 ..................................................... 6-51
Wills Act 1967, 11 & 12 Eliz. 2,044 .................................... 1-27

International Conventions
Convention Abolishing the Requirement of
Legalisation for Foreign Public Documents,
October 5, 1961 ................................................................. 7-36
art. 4, at 886, Annex, at 889 .............................................. 7-37

Convention on the Conflicts of
Law Relating to the Form of Testamentary Dispositions ..... 1-29
art. 1 ................................................................................ 1-28
art. 9 ............................................................................... 1-28

Hague Convention on the Law Applicable to
Succession to the Estate of Deceased Persons
art. 1(1) ........................................................................... 1-45
art. 3 ........................................................................ 1-43, 1-44
art. 4 ........................................................................ 1-44
art. 5 ........................................................................ 1-43, 1-44
art. 6 ........................................................................ 1-43, 1-44
art. 21 .......................................................................... 1-45
§ 105(g)(4) .................................................................... 1-44

Hague Convention on the Law Applicable to
Trusts and on Their Recognition, 15th Sess.,
Final Act (Oct. 20, 1984) .................................................. 6-23
art. 6 ............................................................................... 1-29
art. 7 ............................................................................... 1-29
art. 13 ......................................................................... 1-29
art. 15 ......................................................................... 1-29
art. 16 ......................................................................... 1-29
International Treaties

Articles of Agreement of the International Monetary Fund
art. VIII, § 2(b) ................................................................. 7-43
Convention with Sweden of Jan. 1, 1940, Article XVII ................ 7-44
Estate Tax Treaty with Canada Feb. 17, 1961, U.S.-Canada ........ 1-14
Estate Tax Treaty with the Netherlands,
July 15, 1969, U.S.-Netherlands
art. 4(2) ........................................................................ 1-8
Estate Tax Treaty with the United Kingdom and
Northern Ireland, Oct. 19, 1978 ........................................ 1-14
Estate Tax Treaty with the United Kingdom,
Apr. 16, 1945, U.S.-United Kingdom .................................. 1-14
European Convention on State Immunity ................................ 5-79
art. 1 ........................................................................ 5-79
art. 2 ........................................................................ 5-79
art. 3 ........................................................................ 5-79
art. 4 ........................................................................ 5-79
art. 5 ........................................................................ 5-79
art. 6 ........................................................................ 5-79
art. 7 ........................................................................ 5-79
art. 15 ..................................................................... 5-79
Model Estate and Gift Tax Treaty
art. 1 ........................................................................ 3-66
art. 1, para. 3 ................................................................ 3-55
art. 3 ........................................................................ 3-56
art. 4 ........................................................................ 1-8
art. 4, para. 1 ................................................................ 3-56
art. 4, para. 2 ................................................................ 3-57
art. 4, para. 3 ................................................................ 3-56
art. 5 ........................................................................ 3-6, 3-57, 3-58, 3-59, 3-60
art. 5, para. 1 ................................................................ 3-63
art. 5, para. 2 ................................................................ 3-60
art. 6 ........................................................................ 3-58, 3-60
art. 6, para. 1 ................................................................ 3-59, 3-63
art. 6, para. 3 ................................................................ 3-59
art. 6, para. 4 ................................................................ 3-59
art. 6, para. 5 ................................................................ 3-59
art. 6, para. 6 ................................................................ 3-60
art. 7 ........................................................................ 3-61
art. 7, para. 1 ................................................................ 3-59, 3-60
art. 7, para. 2 ................................................................ 3-60
art. 8 ........................................................................ 3-63
art. 8, para. 1 ................................................................ 3-61
art. 8, para. 2 .............................................................. 3-61
art. 8, para. 3 .............................................................. 3-61
art. 8, para. 4 .............................................................. 3-62
art. 9 ........................................................................... 3-63
art. 9, para. 1 .............................................................. 3-63
art. 9, para. 1(b) .......................................................... 3-63
art. 9, para. 2 .............................................................. 3-63
art. 9, para. 3 .............................................................. 3-63
art. 9, para. 4 .............................................................. 3-63
art. 9, para. 5 .............................................................. 3-63
art. 9, para. 7 .............................................................. 3-64
art. 10 ......................................................................... 3-65
art. 10, para. 1 ............................................................ 3-65
art. 10, para. 2 ............................................................ 3-65
art. 10, para. 3 ............................................................ 3-65
art. 10, para. 4 ............................................................ 3-65
art. 11 ......................................................................... 3-65
art. 11, para. 1 ............................................................ 3-65
art. 11, para. 2 ............................................................ 3-65
art. 11, para. 3 ............................................................ 3-65
art. 11, para. 4 ............................................................ 3-65
art. 11, para. 5 ............................................................ 3-65
art. 12 ......................................................................... 3-65
art. 12, para. 1 ............................................................ 3-66
art. 12, para. 2 ............................................................ 3-66
art. 12, para. 3 ............................................................ 3-66
art. 12, para. 4 ............................................................ 3-66
art. 13 ......................................................................... 3-66
art. 14 ......................................................................... 3-66
art. 15 ......................................................................... 3-66

Model income tax treaty ................................................. 6-81
art. 1, para. 4 .............................................................. 3-55
art. 6 ........................................................................... 6-81, 6-82

U.S.–Canada Estate Tax Treaty ..................................... 3-67
U.S.–Canada Income Tax Treaty ................................... 3-55
U.S.–Canada Tax Treaty ............................................... 5-33
U.S.–Ethiopia Treaty of Amity ....................................... 5-80
U.S.–France Estate Tax Convention, art. III, para. 2(a) .... 3-7
U.S.–Germany Treaty of Friendship 1923 ...................... 5-6
U.S.–Japan Income Tax Convention .............................. 3-13
U.S.–Polish Claims Settlement Agreement, July 16, 1960 ... 5-40
U.S.–Switzerland Income Tax Treaty ............................. 3-12, 3-22