



IRC Section 382

- IRS wants the NOL's to stay only with the company that lost the money
 - In most ownership changes, NOL's of a loss company are limited
- Section 382 limitation
 - Following a "more than 50%" ownership change, corporations ability to deduct pre-ownership change NOL's is limited, annually, to fair market value of equity (one month prior to ownership change) times the Section 382 rate.
 - Special rules may mitigate the limitation in bankruptcy

2001 Bankruptcy Rules Part 2

Daniela Niemeyer



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