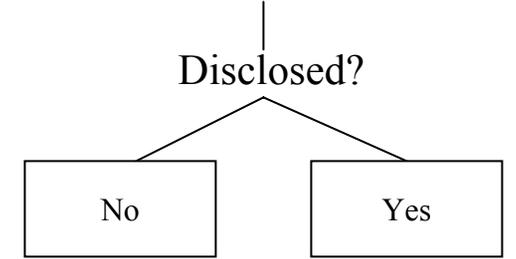


Reportable Listed Transactions



Disclosure Penalty

\$200,000 (Big TP)

\$100,000 (Small TP)

Strict Liability

SEC Reporting

Accuracy
Penalty

30%

Strict Liability

No Floors

No 6664
Defenses

SEC
Reporting

No Disclosure
Penalty

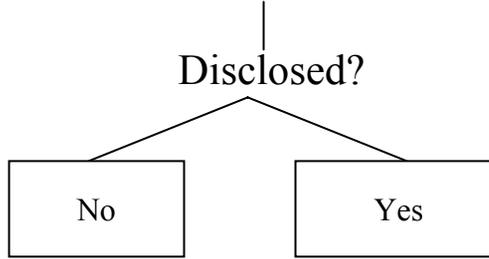
Accuracy
Penalty

20%

No Floors

Heightened
6664

Reportable Avoidance Transactions



Disclosure
Penalty

\$100,000 (Big
TP)

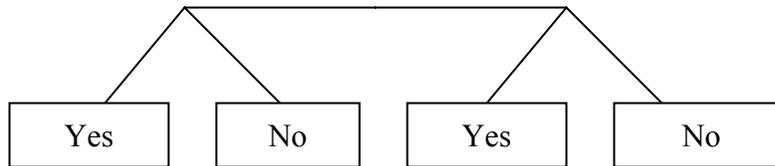
\$50,000 (Small
TP)

Strict Liability

No Disclosure
Penalty

Filter:

Significant purpose of
tax avoidance?



Accuracy
Penalty 25%

Strict Liability

No Floors

No 6664
Defenses

SEC
Reporting

Accuracy
Penalty 20%

MLTN

Floors Apply

6664
Applies

Accuracy
Penalty 20%

MLTN

No Floors

Heightened
6664

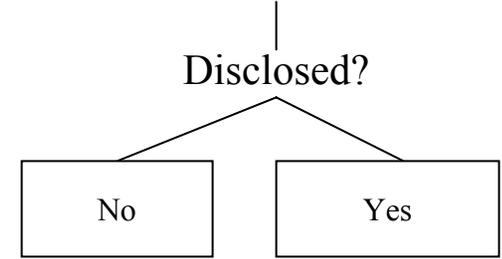
Accuracy
Penalty 20%

Reasonable
Basis

Floors Apply

6664 Applies

Other Transactions



MLTN

Floors

Apply

6664

Applies

Reasonable
Basis

Floors Apply

6664 Applies

Reportable Listed Transactions

Disclosed?

No

Disclosure Penalty

\$200,000 (Big TP)

\$100,000 (Small TP)

Strict Liability

SEC Reporting

Accuracy Penalty

30%

Strict Liability

No Floors

No 6664 Defenses

SEC Reporting

Yes

No Disclosure Penalty

Accuracy Penalty

20%

No Floors

Heightened 6664

Reportable Avoidance Transactions

Disclosed?

No

Yes

Disclosure Penalty

No Disclosure Penalty

\$100,000 (Big TP)
\$50,000 (Small TP)
Strict Liability

Filter:

Significant purpose of tax avoidance?

Yes

No

Yes

No

Accuracy Penalty
25%
Strict Liability
No Floors
No 6664 Defenses

Accuracy Penalty
20%
MLTN
Floors Apply
6664 Applies

Accuracy Penalty
20%
MLTN
No Floors
Heightened 6664

Accuracy Penalty
20%
Reasonable Basis
Floors Apply
6664 Applies

SEC Reporting

Other Transactions

Disclosed?

No

Yes

MLTN

Floors Apply

6664 Applies

Reasonable Basis

Floors Apply

6664 Applies

