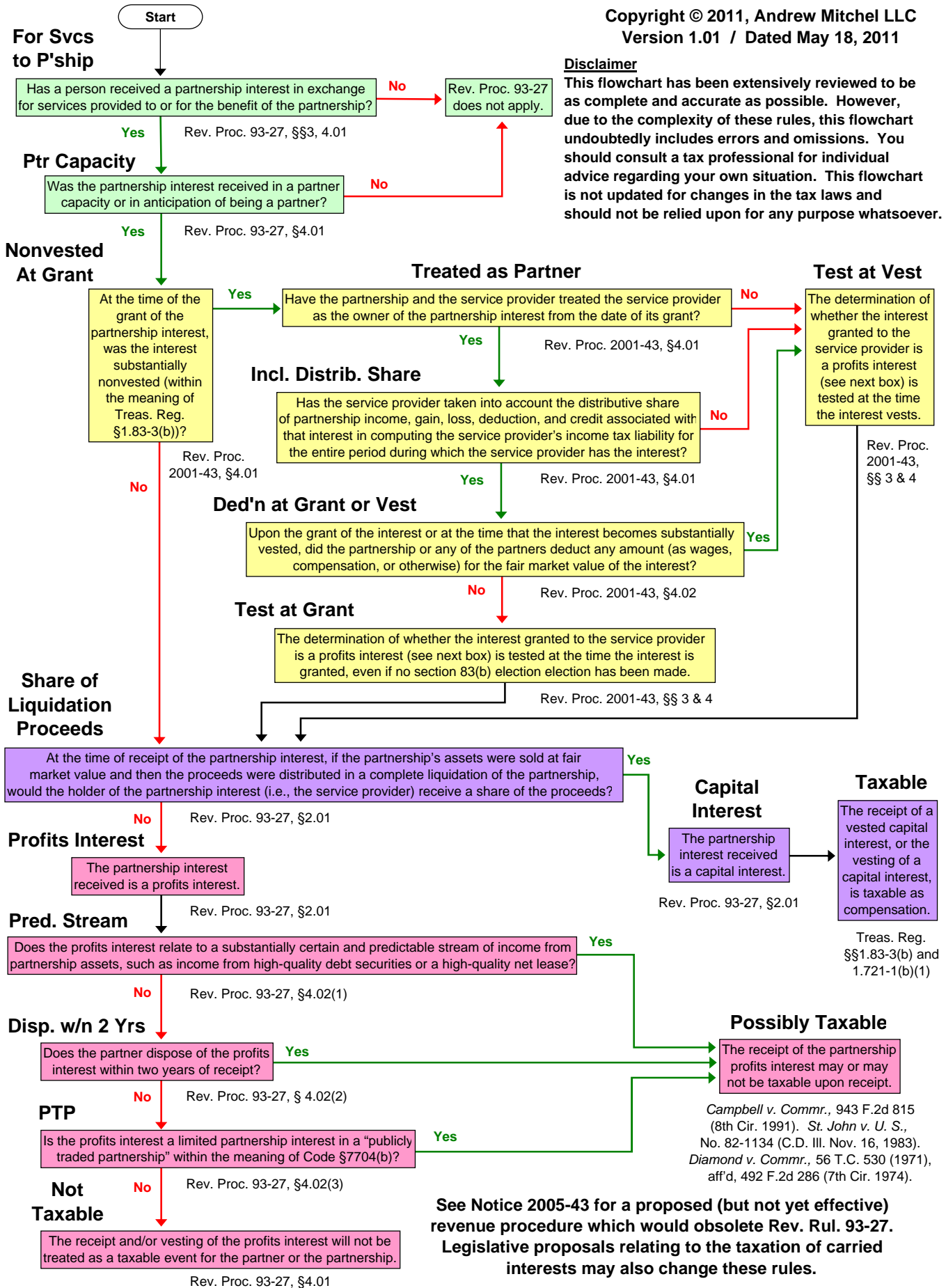


Rev. Proc. 93-27: Taxation of Profits Interests

Disclaimer

This flowchart has been extensively reviewed to be as complete and accurate as possible. However, due to the complexity of these rules, this flowchart undoubtedly includes errors and omissions. You should consult a tax professional for individual advice regarding your own situation. This flowchart is not updated for changes in the tax laws and should not be relied upon for any purpose whatsoever.



See Notice 2005-43 for a proposed (but not yet effective) revenue procedure which would obsolete Rev. Rul. 93-27. Legislative proposals relating to the taxation of carried interests may also change these rules.