



Law in a Flash

Federal Income Taxation

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CPMGNS 24: FED INCOME TAXATION

Will T. Bee buys 100 shares of stock in the Bee Head Corp., a manufacturer of hair gel. The purchase is completed on January 1 of Year 1. On June 1 of Year 1 he buys another 100 shares. On May 1 of Year 2, he sells 50 shares of Bee Head for a \$2,000 gain. Is Will's gain long- or short-term?

Will's gain will be classified as long-term capital gain.

When a taxpayer owns multiple lots of a fungible asset, as in the case with Will's two blocks of stock in Bee Head Corp., the "first in, first out" rule applies for calculating the holding period. In other words, you can assume that the first shares bought were the first shares sold.

Here, Will bought his first 100 shares on January 1 of Year 1, he sold his first 50 shares in May of Year 2—more than one year later. Will's gain will be deemed long-term capital gain because he held the asset for more than one year before selling it.

Reg. §§1.1012-1(c)(1)(i); 1.1223-1(f); P.L. 96-245.

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Douglas A. Kahn



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