

MEMO# 1165

March 2, 1989

JUNE 1 MEETING ON SECTION 851(B)(4) ISSUES

March 2, 1989 TO: TAX COMMITTEE NO. 7-89 OPTIONS AND FUTURES TASK FORCE NO. 3-89
RE: JUNE 1 MEETING ON SECTION 851(b)(4) ISSUES

The Internal Revenue Service is presently reconsidering a variety of section 851(b)(4) issues, including such questions as who is the issuer of an option or a futures contract on a security and what is the value of such an instrument for diversification purposes. A meeting to discuss these issues will be held at the Institute on Thursday, June 1 at 10:00 a.m. Lunch will be served following the meeting. Please let Wynetta Culbreath at the Institute (202/955-3525) know by Tuesday, May 30 if you plan to attend the meeting on June 1. Keith D. Lawson Assistant General Counsel

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