

Part I

Section 61.—Gross Income

26 CFR 1.61-22: Taxation of split-dollar life insurance arrangements.
(Also: §§ 83; 301; 316; 2503; 2511; 2512; 7805; 7872; 1.83-3; 1.83-6; 1.301-1; 1.316-1; 25.2503-1; 25.2511-1; 25.2512-6; 301.7805-1; 1.7872-15.)

Rev. Rul. 2003-105

Treasury Decision 9092 provides comprehensive final regulations (under §§ 1.61-22, 1.83-3(e), 1.83-6(a)(5), 1.301-1(q), and 1.7872-15 of the Income Tax Regulations) regarding the federal income, gift, and employment taxation of split-dollar life insurance arrangements (as defined in § 1.61-22(b)(1) or (2)). These regulations apply to any split-dollar life insurance arrangement that is entered into after September 17, 2003 and to any split-dollar life insurance arrangement entered into on or before September 17, 2003 that is materially modified after September 17, 2003. See § 1.61-22(j).

The revenue rulings listed below are obsolete to the extent described below.

Rev. Rul. 79-50, 1979-1 C.B. 139

Rev. Rul. 78-420, 1978-2 C.B. 67

Rev. Rul. 66-110, 1966-1 C.B. 12 (except as provided in Section III, Paragraph 3 of Notice 2002-8, 2002-1 C.B. 398, and Notice 2002-59, 2002-36 I.R.B. 481)

Rev. Rul. 64-328, 1964-2 C.B. 11.

In the case of any split-dollar life insurance arrangement entered into on or before September 17, 2003, taxpayers may continue to rely on these revenue rulings to the extent described in Notice 2002-8, but only if the arrangement is not materially modified after September 17, 2003.

DRAFTING INFORMATION

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