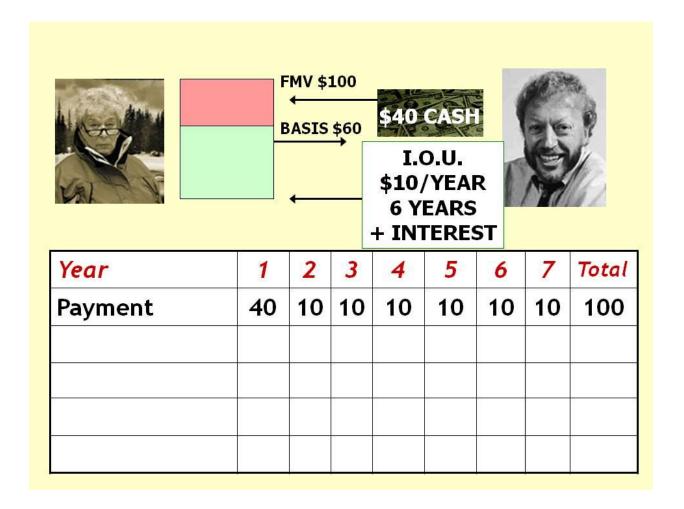
Installment Sales



IRC § 453

Gross Profit Ratio:

Payment × (Gross Profit / Total Contract Price) = Gain

- Default rule election *out* under Section 453(d)
- Dealers ineligible
- Sales of publicly traded stock ineligible Closed accrual for *all* taxpayers!
- Section 453A
 - Interest charge on deferred tax for large transactions
- Section 453B
 - Disposition of note triggers deferred gain