Table of Contents

S Corporation Step-Up Basis Election 1

Qualified Stock Purchase (QSP) Election (§338) 2

Section 338 Transaction Effects 3

Form 8023 4

Example 6

7 asset classes under Reg. §1.338-6(b) 8

Form 8883 9

Section 338(h)(10) Checklist 11

Qualified Stock Disposition (QSD) Election [§336(e)] 12