

Tax Reduction Letter

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Internal Revenue Code Section 274(I)(1)(B)(iii)

Disallowance of certain entertainment, etc., expenses.

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- (1) Additional limitations on entertainment tickets.
 - (1) Entertainment tickets.
 - (A) In general. In determining the amount allowable as a deduction under this chapter for any ticket for any activity or facility described in subsection (d)(2), the amount taken into account shall not exceed the face value of such ticket.



- (B) Exception for certain charitable sports events. Subparagraph (A) shall not apply to any ticket for any sports event--
- (i) which is organized for the primary purpose of benefiting an organization which is described in section 501(c)(3) and exempt from tax under section 501(a),
 - (ii) all of the net proceeds of which are contributed to such organization, and
- (iii) which utilizes volunteers for substantially all of the work performed in carrying out such event.
- (2) Skyboxes, etc. In the case of a skybox or other private luxury box leased for more than 1 event, the amount allowable as a deduction under this chapter with respect to such events shall not exceed the sum of the face value of non-luxury box seat tickets for the seats in such box covered by the lease. For purposes of the preceding sentence, 2 or more related leases shall be treated as 1 lease.

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