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Entity Classification Prior to 1997 (slide 2 of 2)

- If entity has a majority of the following relevant corporate characteristics it is treated as a corporation:
 - Continuity of life
 - Centralized management
 - Limited liability to owners
 - Free transferability of ownership interests

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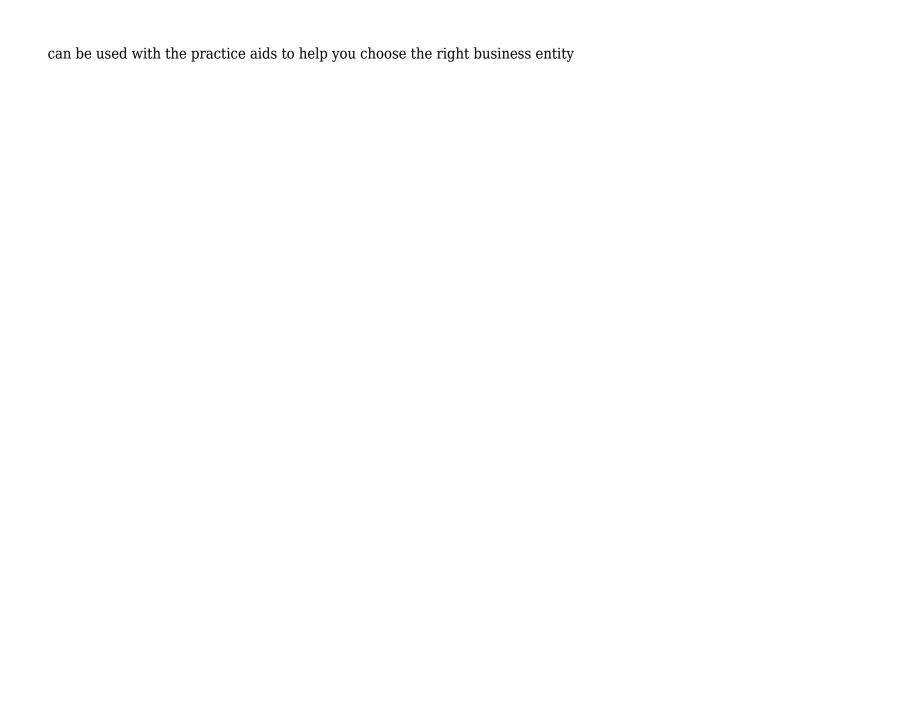
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