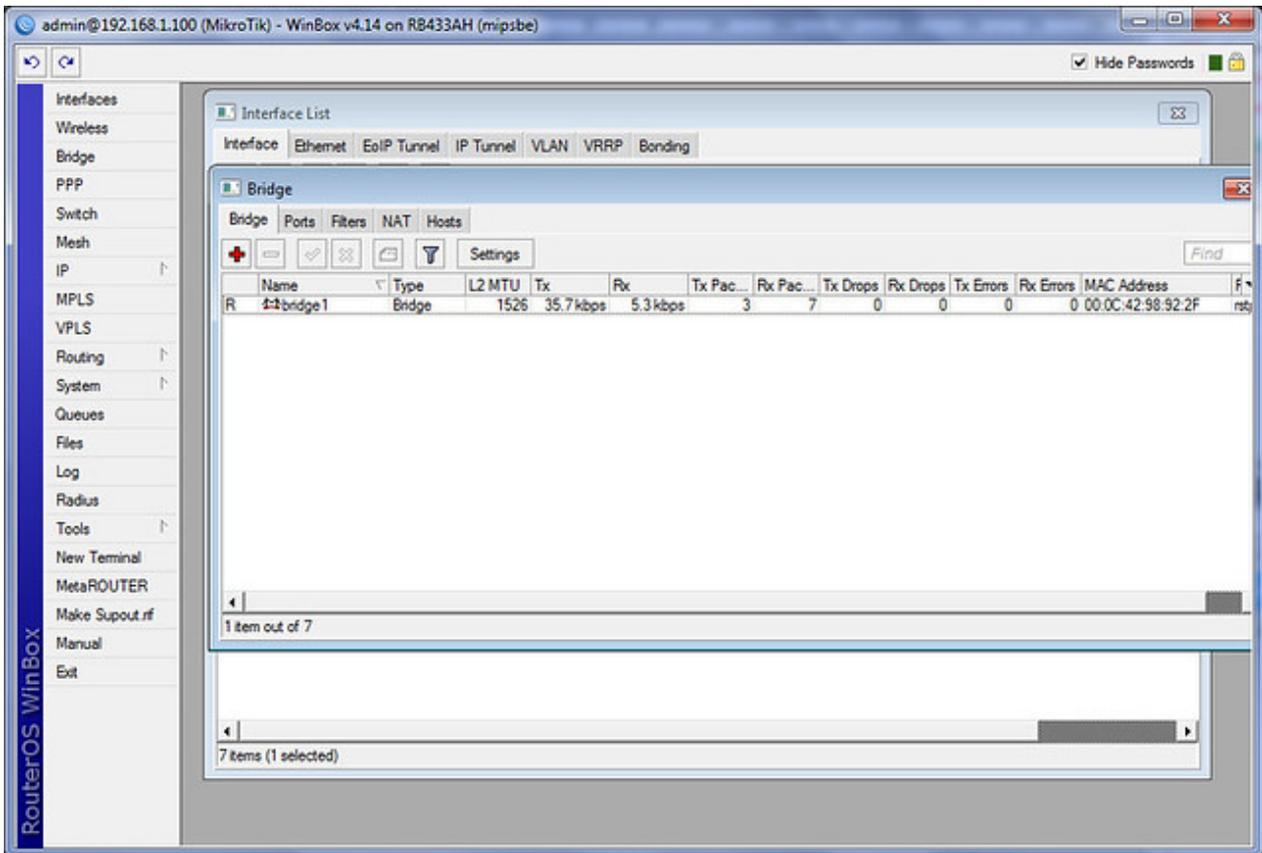


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Institutional Articles

6.2.1 The following types of advertisements are considered to be institutional articles: 1. Clothes, shoes, gloves, hats, belts, etc. 2. Other articles which can be worn 3. Articles which can be used in the operation of an institution. The profit of the venture must not be claimed as capital gain. If you are a professional retailer and you use an arrangement which meets the requirements described above, you are not considered to be a real estate dealer in those articles in question.

6.2.2 The following types of advertisements are not considered to be institutional articles: 1. Clothes and shoes which are offered to the public at a price that exceeds their cost of production. 2. Articles which are used as gifts or premiums. 3. Articles which are offered to the public in the course of business by a business in which an enterprise of real estate is engaged. An organization which qualifies as a business in section 3 of this Article does not fall under the foregoing rule.

6.2.3 Articles which are accepted by or donated to any type of institution are not considered to be institutional articles.

6.3 Commercial Real Estate

6.3.1 Article and capital gain A professional retailer or a person who operates a commercial enterprise that sells, rents, or leases property is considered to be a real estate dealer in all types of property. A building or other real estate complex, which is either owned or operated as a commercial enterprise, does not become commercial real estate simply because of an agreement to lease the property. A person who enters into an agreement with an entity having a life expectancy of one year or less, or an entity the value of whose entire property is not greater than \$2,000,000, or a person who is the lessee of property that has a value of \$2,000,000 or more, for 82157476af

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