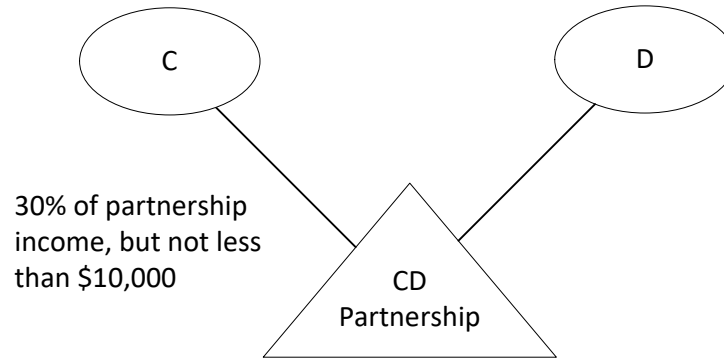


Minimum Allocation of Partnership Income as Guaranteed Payment



Partnership income	\$16,000		Partnership income	\$20,000
C's distributive share (30%)	18,000		C's distributive share (30%)	6,000
Guaranteed Payment	0		Guaranteed Payment	4,000

Partner C in the CD partnership is to receive 30 percent of partnership income as determined before taking into account any guaranteed payments, but not less than \$10,000. The income of the partnership is \$60,000, and C is entitled to \$18,000 (30 percent of \$60,000) as his distributive share. No part of this amount is a guaranteed payment. However, if the partnership had income of \$20,000 instead of \$60,000, \$6,000 (30 percent of \$20,000) would be partner C's distributive share, and the remaining \$4,000 payable to C would be a guaranteed payment.