



DEPARTMENT OF THE TREASURY  
INTERNAL REVENUE SERVICE  
WASHINGTON, D.C. 20224

OFFICE OF THE CHIEF COUNSEL

March 12, 2025

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**Via Regular Mail**



Dear [REDACTED]:

This letter responds to your letter dated December 17, 2024 (copy attached), in which you requested that the Internal Revenue Service (the "Service") confirm that the mark-to-market method of accounting applies to your renewed securities trading activities.

Generally, if an eligible taxpayer makes a valid election under section 475(f)(1) of the Internal Revenue Code ("Code") and properly changes the taxpayer's method of accounting to go on the mark-to-market method of accounting as a trader in securities, then the taxpayer remains on that accounting method for securities unless the taxpayer affirmatively revokes the election and properly changes to another method of accounting for the securities under the procedures for such a change (for example, properly changes to a realization method of accounting for recognizing any gain or loss from the sale or other disposition of any securities). This is the case even if the taxpayer ceases to engage in securities trading activities for a period of time. See section 2.02 of Rev. Proc. 2015-13, 2015-5 I.R.B. 419 (or any successor).

Unfortunately, the Service is unable to confirm your present method of accounting given the information provided. However, if you contact [REDACTED] of this office at his direct dial telephone number [REDACTED], he can discuss the matter

further with you. Because there was no telephone number listed in your correspondence, we were unable to call you directly.

Sincerely,

By: \_\_\_\_\_  
Andrea M. Hoffenson  
Senior Technician Reviewer, Branch 3  
Office of the Associate Chief Counsel  
(Financial Institutions & Products)

Enclosure:  
Copy of letter dated [REDACTED]