

1 Act, as amended (8 U.S.C. 1101 (a) (15) (F) or (J)),
 2 shall be treated as a nonresident alien individual engaged in
 3 trade or business within the United States, and any income
 4 described in section 1441 (b) (1) or (2) which is received
 5 by such individual shall, to the extent derived from sources
 6 within the United States, be treated as effectively connected
 7 with the conduct of a trade or business within the United
 8 States.

9 “(d) ELECTION TO TREAT REAL PROPERTY INCOME
 10 AS INCOME CONNECTED WITH UNITED STATES BUSI-
 11 NESS.—

12 “(1) IN GENERAL.—A nonresident alien individ-
 13 ual who during the taxable year derives any income—

14 “(A) from real property *held for the produc-*
 15 *tion of income and* located in the United States,
 16 or from any interest in such real property, in-
 17 cluding (1) gains from the sale or exchange of *such*
 18 real property or an interest therein, (ii) rents or
 19 royalties from mines, wells, or other natural deposits,
 20 and (iii) gains described in section 631 (b) or (c),
 21 and

22 “(B) which, but for this subsection, would not
 23 be treated as income which is effectively connected