

1 subsection (b), the following items of gross income shall
2 be treated as income from sources within the United States:

3 “(1) SALE OF PROPERTY.—Gains on the sale or
4 exchange of property (other than stock or debt obliga-
5 tions) located in the United States.

6 “(2) STOCK OR DEBT OBLIGATIONS.—Gains on the
7 sale or exchange of stock issued by a domestic corpora-
8 tion or debt obligations of United States persons or of
9 the United States, a State or political subdivision thereof,
10 or the District of Columbia.

11 “(d) EXCEPTION FOR LOSS OF CITIZENSHIP FOR CER-
12 TAIN CAUSES.—Subsection (a) shall not apply to a non-
13 resident alien individual whose loss of United States citizen-
14 ship resulted from the application of section 301(b), 350, or
15 355 of the Immigration and Nationality Act, as amended
16 (8 U.S.C. 1401(b), 1482, or 1487).

17 “(e) BURDEN OF PROOF.—If the Secretary or his dele-
18 gate establishes that it is reasonable to believe that an indi-
19 vidual's loss of United States citizenship would, but for this
20 section, result in a substantial reduction for the taxable year
21 in the taxes on his probable income for such year, the burden
22 of proving for such taxable year that such loss of citizen-
23 ship did not have for one of its principal purposes the
24 avoidance of taxes under this subtitle or subtitle B shall be
25 on such individual.”