

TITLE I—FOREIGN INVESTORS TAX ACT

Sec. 102. Source of income.

- (a) *Interest.*
- (b) *Dividends.*
- (c) *Personal services.*
- (d) *Definitions.*
- (e) *Effective dates.*

Sec. 103. Nonresident alien individuals.

- (a) *Tax on nonresident alien individuals.*
- (b) *Gross income.*
- (c) *Deductions.*
- (d) *Allowance of deductions and credits.*
- (e) *Beneficiaries of estates and trusts.*
- (f) *Expatriation to avoid tax.*
- (g) *Partial exclusion of dividends.*
- (h) *Withholding of tax on nonresident aliens.*
- (i) *Liability for withheld tax.*
- (j) *Declaration of estimated income tax by individuals.*
- (k) *Collection of income tax at source on wages.*
- (l) *Definitions of foreign estate or trust.*
- (m) *Conforming amendment.*
- (n) *Effective dates.*

Sec. 104. Foreign corporations.

- (a) *Tax on income not connected with United States business.*
- (b) *Tax on income connected with United States business.*
- (c) *Withholding of tax on foreign corporations.*
- (d) *Dividends received from certain foreign corporations.*
- (e) *Dividends received from certain wholly-owned foreign subsidiaries.*
- (f) *Distributions of certain foreign corporations.*
- (g) *Unrelated business taxable income.*
- (h) *Corporations subject to personal holding company tax.*
- (i) *Amendments with respect to foreign corporations carrying on insurance business in United States.*
- (j) *Subpart F income.*
- (k) *Gain from certain sales or exchanges of stock in certain foreign corporations.*
- (l) *Declaration of estimated income tax by corporations.*
- (m) *Technical amendments.*
- (n) *Effective dates.*

Sec. 105. Special tax provisions.

- (a) *Income affected by treaty.*
- (b) *Adjustment of tax because of burdensome or discriminatory foreign taxes.*
- (c) *Clerical amendments.*
- (d) *Effective date.*
- (e) *Elections by nonresident United States citizens who are subject to foreign community property laws.*
- (f) *Presumptive date of payment for tax withheld under chapter 3.*