

1 “(1) PERFORMANCE OF PERSONAL SERVICES FOR
2 FOREIGN EMPLOYER.—The performance of personal
3 services—

4 “(A) for a nonresident alien individual, foreign
5 partnership, or foreign corporation, not engaged in
6 trade or business within the United States, or

7 “(B) for an office or place of business main-
8 tained in a foreign country or in a possession of the
9 United States by an individual who is a citizen or
10 resident of the United States or by a domestic
11 partnership or a domestic corporation,
12 by a nonresident alien individual temporarily present in
13 the United States for a period or periods not exceeding
14 a total of 90 days during the taxable year and whose
15 compensation for such services does not exceed in the
16 aggregate \$3,000.

17 “(2) TRADING IN SECURITIES OR COMMODITIES.—

18 “(A) STOCKS AND SECURITIES.—

19 “(i) Except in the case of a dealer in
20 stocks or securities, trading in stocks or secu-
21 rities for the taxpayer's own account, whether
22 by the taxpayer or his employees or through a
23 resident broker, commission agent, custodian,
24 or other agent, and whether or not any such
25 agent has discretionary authority to make de-