

1           *gain or loss from the sale or exchange of stock*  
2           *or notes, bonds, or other evidences of indebted-*  
3           *ness, and either is derived in the active conduct*  
4           *of a banking, financing, or similar business*  
5           *within the United States or is received by a*  
6           *corporation the principal business of which is*  
7           *trading in stocks or securities for its own ac-*  
8           *count; or*

9           “(iii) *is derived from the sale (without*  
10          *the United States) through such office or other*  
11          *fixed place of business of personal property de-*  
12          *scribed in section 1221(1), except that this*  
13          *clause shall not apply if the property is sold for*  
14          *use, consumption, or disposition outside the*  
15          *United States and an office or other fixed place of*  
16          *business of the taxpayer outside the United States*  
17          *participated materially in such sale.*

18          “(C) *In the case of a foreign corporation tax-*  
19          *able under part I of subchapter L, any income from*  
20          *sources without the United States which is attrib-*  
21          *utable to its United States business shall be treated*  
22          *as effectively connected with the conduct of a trade*  
23          *or business within the United States.*

24          “(D) *No income from sources without the*