



Taxation of Foreign Investment in U. S. Real Estate (Classic Reprint) (Paperback)

By Department of the Treasury

Forgotten Books, United States, 2015. Paperback. Book Condition: New. 229 x 152 mm. Language: English . Brand New Book ***** Print on Demand *****. Excerpt from Taxation of Foreign Investment in U. S. Real Estate Dear Mr. Chairman: Section 553 of Public Law No. 95-500, the Revenue Act of 1978, required the Treasury Department to conduct a study and analysis of the appropriate tax treatment of income from, or gain on the sale of, interest in United States property held by nonresident aliens and foreign corporations. The Secretary is required to transmit a report of the results of this study, together with the recommendations of the Department, within six months of the date of enactment of the Act. Pursuant to these provisions, I hereby submit a report entitled Taxation of Foreign Investment in U.S. Real Estate. Under present law, capital gains realized by nonresident aliens and foreign corporations are not subject to U.S. tax unless they are effectively connected with a U.S. trade or business. The Treasury Report finds that, while most real property holdings of foreign person is used in a U.S. trade or business, foreign persons rarely incur capital gains tax on the disposition of their U.S. property holdings....



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