

# Tax Treatment of Foreign Grantor Trust

- *Grantor* is treated as owner of all trust income
- If grantor is U.S. person, grantor is taxed on all trust income from all sources
- If grantor is nonresident alien or foreign corporation:
  - ◆ U.S. source investment income (but not capital gains, except real estate) taxed at flat 30%
  - ◆ Income effectively connected with a U.S. trade or business at regular U.S. rates up to 35%
  - ◆ Treaty relief available based on grantor's residence
    - Limitation on benefits provision may apply if grantor not taxed on trust income in home jurisdiction
  - ◆ See Rev. Rul. 69-70, 1969-1 C.B. 182

# Federal Taxation Of Trusts Grantors And Beneficiaries

**Sabine Zange**

A decorative graphic element consisting of a light blue horizontal bar with a rounded right end, and a red circular shape partially visible behind it.

## **Federal Taxation Of Trusts Grantors And Beneficiaries:**

## Reviewing **Federal Taxation Of Trusts Grantors And Beneficiaries**: Unlocking the Spellbinding Force of Linguistics

In a fast-paced world fueled by information and interconnectivity, the spellbinding force of linguistics has acquired newfound prominence. Its capacity to evoke emotions, stimulate contemplation, and stimulate metamorphosis is truly astonishing. Within the pages of "**Federal Taxation Of Trusts Grantors And Beneficiaries**," an enthralling opus penned by a highly acclaimed wordsmith, readers attempt an immersive expedition to unravel the intricate significance of language and its indelible imprint on our lives. Throughout this assessment, we shall delve in to the book is central motifs, appraise its distinctive narrative style, and gauge its overarching influence on the minds of its readers.

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## Federal Taxation Of Trusts Grantors And Beneficiaries Introduction

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