

UNITED STATES TAXES “U.S. PERSONS” ON THEIR WORLDWIDE INCOME

(IRC §61(A))

Under IRC §7701(a)(30) U.S. Persons include the following:

(1) U.S. Citizens;

(2) Resident Alien Individuals

(Green Card Test; Substantial Presence Test,
(IRC §7701(b)(1)(A));

(3) Domestic Corporations

(Corporations created under the laws of one of the 50 states) –
location of corporate headquarters is irrelevant,
(IRC §7701(a)(4) and (a)(9));

(4) Domestic Partnerships

(Partnerships created under the laws of one of the 50 states –
(IRC §7701(a)(4) and (a)(9));

(5) Any Estate other than a Foreign Estate

An estate is foreign if its foreign-source income is not subject to
U.S. taxation (other than any income effectively connected with a
U.S. trade or business (IRC §7701(a)(30)(D), (a)(31)(A));

(6) Any Trust

If a U.S. court is able to exercise primary supervision over the
administration of the trust and one or more U.S. persons have the
authority to control all substantial decisions of the trust
(IRC §7701(a) (30) (E)).