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A Primer On Us. Taxation Of International Transactions ... IRC §§2501, 2503(b). II. Taxation Of Non-Resident Aliens ("NRAs") And Foreign Corporations Generally A. Income Tax 1. An NRA Is Subject To U.S. Income Tax Only On Certain Limited Categories Of Income: A. Income Effectively Connected With The Conduct Of A U.S. Trade Or Business ("ECI"). IRC §§ 871 5th, 2024.

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