Deemed Transfer to a Foreign Trust: Guarantee of U.S. Lender's Loan

A is a U.S. resident and FT is a foreign trust. X, a U.S. person that is not a related person, loans 1000X of cash to FT in exchange for FT's obligation to repay the loan. A guarantees the repayment of 600X of FT's obligation. A is treated as having transferred 600X to FT.

means a trust

HUNDREDS of additional charts at www.andrewmitchel.com