



## SOI Tax Stats - Foreign Trusts Metadata

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### What are the Foreign Trust Information Returns?

There are two returns—Form 3520, Annual Return To Report Transactions With Foreign Trusts and Receipt of Certain Foreign Gifts and Form 3520-A, Annual Information Return of Foreign Trust With a U.S. Owner—used to report information about foreign trusts and gifts. Form 3520 must be filed by U.S. persons to report transfers to and distributions from foreign trusts, as well as the receipt of certain foreign gifts. Form 3520-A must be filed annually by all foreign trusts with at least one U.S. owner. Each Form 3520-A represents one unique foreign grantor trust, and provides beneficiary, income statement, and balance sheet information.

A Form 3520 must be filed by any U.S. person who: 1) transferred money or other property to a foreign trust after August 20, 1996; or 2) held a “qualified obligation” (note) from a foreign trust which was issued after August 20, 1996; or 3) was a U.S. owner of all or part of a foreign trust at any time during the tax year; or 4) received a distribution from a foreign trust; or 5) received a loan from a foreign trust after August 20, 1996; or 6) received certain gifts or inheritances from a foreign person after August 20, 1996. Forms 3520 filed by U.S. persons receiving certain gifts or bequests generally do not represent transactions with related foreign trusts. Since a foreign trust may have more than one U.S. owner and more than one U.S. beneficiary, multiple Forms 3520 may relate to one foreign trust (which, in turn, would file one Form 3520-A, if it had a U.S. owner).

U.S. taxpayers were also required to file Form 3520 if they received either: 1) more than \$100,000 from a nonresident alien individual or foreign estate that was treated as a gift or bequest, or 2) more than \$12,760 that was treated as a gift from a foreign corporation or partnership. Recipients of gifts or bequests were required to aggregate separate gifts from related foreign persons during 2006 in order to ascertain if the \$100,000 or \$12,760 threshold amounts had been met.

### Metadata by Year of Study

[2006](#) 2002 1998

Statistics are also available for [Split-Interest Trusts](#).

Please visit [Foreign Trust Statistics](#) for data tables and articles from this study.