

Form 8854

Department of the Treasury
Internal Revenue Service

Initial and Annual Expatriation Statement

For calendar year 2023 or other tax year beginning ,_____ 2023, and ending ,_____ 20

► Go to www.irs.gov/Form8854 for instructions and the latest information.

OMB No. 1545-0074

2023
Attachment
Sequence No. **112**



This page is intentionally left blank

Initial and Annual Expatriation Statement
For calendar year 2023 or other tax year beginning _____, 2023, and ending _____, 20_____
Go to *www.irs.gov/Form8854* for instructions and the latest information.
Please print or type.

Name _____ Identifying number (see instructions) _____

Part I General Information. For all filers.

- 1** Mailing address and telephone number where you can be reached after expatriation _____
- 2** Address of principal foreign residence (if different from line 1) _____
- 3** Country of tax residence (if different from line 2) _____
- 4** Check the box that applies. See instructions.
- ☐ Initial expatriation statement for persons who expatriated in 2023. Complete Part II.
- ☐ Annual expatriation statement for persons who expatriated before 2023. Complete Part III.
- 5** Date of expatriation under section 877A(g)(3) for expatriating citizens and long-term residents (see instructions).
- ☐ Citizen _____
- ☐ Long-term resident _____
- ☐ Long-term resident with dual residency in a treaty country. Date commencing to be treated, for tax purposes, as a resident of the treaty country _____
- 6** List all countries (including the United States) of which you are a citizen. See instructions.
- a** Name of country _____
- b** Date you became a citizen of each country listed in line 6a (see instructions) _____

7 How you became a U.S. citizen ☐ By birth ☐ By naturalization

8a Date you became a U.S. lawful permanent resident _____

b Date your U.S. lawful permanent resident status was revoked or abandoned (see instructions) _____

c Date you relinquished your permanent resident card (see instructions) _____

Part II Initial Expatriation Statement for Persons Who Expatriated in 2023

Section A Expatriation Information

1 Enter your U.S. income tax liability (after foreign tax credits) for the 5 tax years ending before the date of your expatriation.

Caution: These amounts are not your balance due. See instructions.

1st Year Before Expatriation	2nd Year Before Expatriation	3rd Year Before Expatriation	4th Year Before Expatriation	5th Year Before Expatriation
\$ _____	\$ _____	\$ _____	\$ _____	\$ _____

2 Enter your net worth on the date of your expatriation for tax purposes \$ _____

3 Did you become at birth a U.S. citizen and a citizen of another country, and do you continue to be a citizen of, and taxed as a resident of, that other country? ☐ Yes ☐ No

4 If you answered “Yes” to question 3, have you been a resident of the United States for not more than 10 of the last 15 tax years (including the year of your expatriation)? ☐ Yes ☐ No

5 Were you under age 18½ on the date you expatriated and have you been a U.S. resident for not more than 10 tax years? ☐ Yes ☐ No

6 Do you certify under penalties of perjury that you have complied with all of your tax obligations for the 5 preceding tax years? See instructions ☐ Yes ☐ No

Section B	Balance Sheet
------------------	----------------------

List in U.S. dollars the fair market value (FMV) and the U.S. adjusted basis of your assets and liabilities as of your expatriation date. For lines 6 and 7, list in U.S. dollars the present value of your pensions and deferred compensation interests as of your expatriation date. For more details, see the instructions.

Assets		(a) FMV	(b) U.S. adjusted basis
1	Cash, including bank deposits		
2	Marketable stock and securities issued by U.S. companies .		
3	Marketable stock and securities issued by foreign companies		
4	Nonmarketable stock and securities issued by U.S. companies		
5	Nonmarketable stock and securities issued by foreign companies		
a	Separately state stock issued by foreign companies that would be controlled foreign corporations if you were still a U.S. citizen or permanent resident. See instructions		
b	Provide the name, address, and EIN, if any, of any such company		
6	Pensions or similar retirement arrangements (both U.S. and foreign) (see instructions)		

7	Deferred compensation (including stock options) (see instructions)		
8	Partnership interests (see instructions)		
9	Assets held in trust (see instructions)		
10	Beneficial interests in trusts not included in line 9 (see instructions)		
11	Intangibles used in the United States		
12	Intangibles used outside the United States		
13	Loans to U.S. persons		
14	Loans to foreign persons		
15	Real property located in the United States		
16	Real property located outside the United States		
17	Business property located in the United States.		
18	Business property located outside the United States.		
19	Other assets (see instructions)		
20	Total assets. Add lines 1 through 5 and lines 6 through 19. Don't include amounts on line 5a in this total		
Liabilities		Amount	
21	Installment obligations.		
22	Mortgages, etc.		
23	Other liabilities (see instructions)		
24	Total liabilities. Add lines 21 through 23		
25	Net worth. Subtract line 24 from line 20, column (a)		

Section C	Property Owned on Date of Expatriation
------------------	---

Don't complete Section C if:

- Your average net income tax liability for the 5 tax years immediately before expatriation (see line 1 in Section A) wasn't more than \$190,000, your net worth on the date of your expatriation (see line 2 in Section A) was under \$2 million, and you checked "**Yes**" on line 6 in Section A;
- In Section A, you checked "**Yes**" on lines 3, 4, and 6; or
- In Section A, you checked "**Yes**" on lines 5 and 6.

1a Do you have any **eligible deferred compensation items**? Checking the "Yes" box is an irrevocable waiver of any right to claim any reduction in withholding for such eligible deferred compensation item under any treaty with the United States ☐ **Yes** ☐ **No**

b Do you have any **ineligible deferred compensation items**? If "Yes," you must include in income the present value of your account on the day before your expatriation date ☐ **Yes** ☐ **No**

c Do you have an interest in a **specified tax deferred account**? If "Yes," you must include in income the amount of your entire interest in the account on the day before your expatriation date ☐ **Yes** ☐ **No**

d Are you a beneficiary of a **nongrantor trust**? See instructions ☐ **Yes** ☐ **No**

☐ Check this box to elect under section 877A(f)(4)(B) to be treated as having received the value of your entire interest in the trust (as determined for purposes of section 877A) as of the day before your expatriation date. Attach a copy of your valuation letter ruling issued by the IRS. See instructions.

2 Recognition of gain or loss on the deemed sale of mark-to-market property. **Caution: Don't include in column (a) any property described on line 1a, 1b, 1c, or 1d.**

Complete column (g) only if you are deferring tax on gain from any property listed in column (a).

(a) Description of property	(b) FMV on day before date of expatriation	(c) Cost or other basis*	(d) Gain or (loss). Subtract (c) from (b)	(e) Gain after allocation of the exclusion amount (see instructions)	(f) Form or schedule on which gain or loss is reported	(g) Amount of tax deferred (attach computations)
3 Total. Add the amounts in column (d) and column (e)						
4 Total tax deferred. Add the amounts in column (g). Enter here and on Part II, Section D, line 5						

* You must identify as “(h)(2)” any property for which you are making the special basis election under section 877A(h)(2). This election is irrevocable. See the instructions for Part II, Section C, line 2, column (c).

Section D	Deferral of Tax
------------------	------------------------

Election to defer tax. You can defer tax only if you have provided adequate security. Adequate security is described in the instructions.

- 1
- Are you electing to defer tax under section 877A(b)?
Checking the “Yes” box is an irrevocable waiver of any right under any treaty of the United States that would prevent assessment or collection of any tax imposed because of section 877A ☐ **Yes** ☐ **No**

If you checked the “Yes” box, continue to line 2. Otherwise, don’t complete lines 2 through 5.

2	Enter the total tax you would have reported, absent the deferral election, on Form 1040 or 1040-SR, line 24, for the part of the year including the day before the expatriation date absent the deferral election	2	
3	Enter the total tax for the same part of the tax year determined without regard to the amounts attributable to section 877A(a). Attach computation	3	
4	Subtract line 3 from line 2. This is the amount of tax eligible for deferral	4	
5	Enter the total tax deferred from Part II, Section C, line 4, column (g)	5	
<ul style="list-style-type: none">• If you are filing Form 1040 or 1040-SR, enter this amount in brackets to the left of the entry space for line 24. Identify as “EXP.”• If you are filing Form 1040-NR, enter this amount in brackets to the left of the entry space for line 24. Identify as “EXP.”			

Part III Annual Expatriation Statement for Persons Who Expatriated Before 2023

- If you made an election to defer the payment of tax, complete line 1.
 - If you have an item of eligible deferred compensation, complete line 2.
 - If you are a beneficiary of a nongrantor trust, complete line 3.
- 1** Complete columns (a), (b), and (c) for all property on which you deferred tax on a prior year Form 8854. Complete column (d) for any property you disposed of in 2023 and see the instructions for Part III.

(a) Description of property	(b) Amount of mark-to-market gain or (loss) reported on prior year Form 8854	(c) Amount of tax deferred on prior year Form 8854	(d) Date of disposition (if any)

Part III Annual Expatriation Statement for Persons Who Expatriated Before 2023 *(continued)*

2 Did you receive any distributions of eligible deferred compensation items for 2023? ☐ **Yes** ☐ **No**
If “Yes,” enter the amount of distribution(s) and amount withheld at source, if any, below.

	Amount of distribution	Amount withheld at source, if any
1		
2		
3		

3 Did you receive any distributions from a nongrantor trust for 2023? ☐ **Yes** ☐ **No**
If “Yes,” enter the amount of distribution(s) and amount withheld at source, if any, below.

	Amount of distribution	Amount withheld at source, if any
1		
2		
3		

Sign Here	Under penalties of perjury, I declare that I have examined this form, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than filer) is based on all information of which preparer has any knowledge.				
	Your signature		Date		
Paid Preparer Use Only	Print/Type preparer’s name		Preparer’s signature		Date
	Firm’s name				Check <input type="checkbox"/> if self-employed
	Firm’s address				PTIN
				Firm’s EIN	
				Phone no.	

This page intentionally left blank