

Expatriation Information Statement

Department of the Treasury
Internal Revenue Service

▶ See separate instructions. ▶ Please print or type.
▶ Section references on this form are to the Internal Revenue Code.

2008
Attachment
Sequence No. **112**

Name _____	Date of birth (mo., day, yr.) _____	Tax Year _____
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General Information. For all filers.

- A** Identifying number. (See instructions.) _____
- B** Mailing address and telephone number where you can be reached after expatriation _____
- C** Address of principal foreign residence (if different from line B) _____
- D** Country of tax residence (if different from line C) _____
- E Expatriation date.** Check the box that applies. (See instructions.)
 - Before June 17, 2008. Complete Part A.
 - After June 16, 2008. Complete Part B.
- F** Date of notification of expatriating act, termination of residency, or claim of treaty benefits. (See instructions.)
 - Citizen. Date notification given to Department of State _____
 - Long-term resident. Date notification given to Department of Homeland Security _____
 - 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 _____

Part A For Persons Who Expatriated Before June 17, 2008

Check the box that applies.

- Initial Information Statement.
- Annual Information Statement. Do not complete Section I.

Section I Initial Information Statement

- 1** Enter your U.S. income tax liability (after foreign tax credits) for the 5 tax years ending before the date of expatriation.
- | 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 that other country? **Yes** **No**
- 4** Do you have substantial contacts with the United States? (See instructions.) **Yes** **No**
- 5** Are you a minor described in section 877(c)(3)? (See instructions.) **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 II Annual Information Statement Under Section 6039G

Do not complete Section II if:

- Your average annual net income tax liability for the 5 tax years immediately before expatriation (see line 1) was not more than the limit listed under *Taxation Under Section 877* on page 1 of the instructions, your net worth on line 2 was under \$2 million, and you checked "Yes" to line 6;
- You checked "Yes" to line 3, "No" to line 4, and "Yes" to line 6; or
- You checked "Yes" to line 5 and "Yes" to line 6.

- 7** List all countries (other than the United States) of which you are a citizen.
- a** Name of country _____
 - b** How you became a U.S. citizen _____
 - c** Date you became a citizen of each country listed in 7a _____
- 8** Number of days you were physically present in the United States during the current year. If you were present in the United States more than 60 days, skip line 9 _____
- 9** Were you physically present in the United States for more than 30 days but not more than 60 days during the tax year? **Yes** **No**
- a** Were you performing services for an unrelated employer? **Yes** **No**
 - b** If you checked "Yes" to line 9a, are you a citizen or resident, fully liable for income tax, in the country in which you were born, your spouse was born, or either of your parents was born? **Yes** **No**

Schedule A Balance Sheet

- If this is an initial information statement, list in U.S. dollars the fair market value (column (a)) and the U.S. adjusted basis (column (b)) of your assets and liabilities as of the date of your expatriation for tax purposes.
 - If this is an annual information statement, list in U.S. dollars the fair market value (column (a)) and the U.S. adjusted basis (column (b)) of your assets and liabilities as of the end of the tax year for which you are filing this form.
- For more details, see the separate instructions.

Assets	(a) Fair market value (FMV)	(b) U.S. adjusted basis	(c) Gain or (loss). Subtract column (b) from column (a)	(d) FMV on beginning date of U.S. residency (optional, for LTRs only)
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 from services performed in the United States				
7 Pensions from services performed outside the United States				
8 Partnership interests (see instructions)				
9 Assets held by trusts you own under sections 671–679 (see instructions)				
10 Beneficial interests in nongrantor trusts (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. Do not 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)				

Schedule B | **Income Statement**

- If this is an initial information statement, provide income information for that part of the tax year that ends on the date of your expatriation for tax purposes.
- If this is an annual information statement, provide income information for the tax year for which you are filing the form.

1	U.S. source gross income not effectively connected with the conduct of a U.S. trade or business.			
a	Interest	1a		
b	Dividends	1b		
c	Royalties	1c		
d	Pension distributions	1d		
e	Other	1e		
f	Total. Add lines a through e		1f	
2	Gross income that is effectively connected with the conduct of a U.S. trade or business		2	
3	Income from the performance of services in the United States		3	
4	Gains from the sale or exchange of:			
a	Property (other than stock or debt obligations) located in the United States	4a		
b	Stock issued by a U.S. domestic corporation	4b		
c	Debt obligations of U.S. persons or of the United States, a state or political subdivision thereof, or the District of Columbia	4c		
d	Total. Add lines a through c		4d	
5	Income or gain derived from certain foreign corporations to the extent of your share of earnings and profits earned or accumulated before the date of expatriation. (See instructions.)		5	
6	Gains on certain exchanges of property that ordinarily would not be recognized. (See instructions.)		6	
7	Income received or accrued by certain foreign corporations. (See instructions.)		7	
8	Add lines 1f, 2, 3, 4d, 5, 6, and 7		8	
9	Gross income from all other sources		9	
10	Total. Add lines 8 and 9		10	

Part B For Persons Who Expatriated After June 16, 2008

Section I Expatriation Information

- 1** Enter your U.S. income tax liability (after foreign tax credits) for the 5 tax years ending before the date of expatriation.
- | | | | | | |
|--|---------------------------------|---------------------------------|---------------------------------|---------------------------------|---------------------------------|
| | 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 U.S. for not more than 10 of the last 15 tax years? **Yes** **No**
- 5** Were you under age 18½ on the date you expatriated and have you been a U.S. resident for more than 10 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**
- 7a** 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 any **specified tax deferred accounts**? If "Yes," you must include in income the entire account balance on the day before your expatriation date **Yes** **No**
- d** Do you have an interest in a **nongrantor trust**? Checking the "Yes" box is a waiver of any right to claim any reduction in withholding on any distribution from such trust under any treaty with the United States unless you make the election below **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.)

Section II Recognition of Gain or Loss on the Deemed Sale of Mark-To-Market Property						
Complete column (g) only if you are deferring tax on gain from any property listed in column (a).						
(a) Description of property	(b) Fair market value 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 asset is reported	(g) Amount of tax deferred (attach computations)
8						
9 Total. Add the amounts in column (d) and column (e) .						
10 Total Tax Deferred. Add the amounts in column (g). Enter here and on line 15						

*You must designate any property for which you are electing to figure basis without regard to section 877A(h)(2). Identify as "(h)(2)." This election is irrevocable.

Section III Deferral of Tax

Election To Defer Tax. *You can defer tax only if you have provided adequate security. Adequate security is described on page 8 of the instructions.*

11 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 12. Otherwise, do not complete lines 12 through 15.

12	Enter the total tax you would have reported on Form 1040, line 61, for the part of the year including the day before the expatriation date absent the deferral election	12	
13	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	13	
14	Subtract line 13 from line 12. This is the amount of tax eligible for deferral	14	
15	Enter the total tax deferred from line 10, column (g) <ul style="list-style-type: none"> ● If you are filing Form 1040, enter this amount in brackets to the left of the entry space for line 61. Identify as "EXP." Subtract that amount from the total of lines 56 through 60, and replace the previous entry on line 61 with this difference. ● If you are filing Form 1040NR, enter this amount in brackets to the left of the entry space for line 57. Identify as "EXP." Subtract that amount from the total of lines 51 through 56, and replace the previous entry on line 57 with this difference. 	15	

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.

Sign Here

Your signature	Date
Preparer's signature	Date