

April 8, 2015

Honorable Orrin Hatch
Chairman
Senate Committee on Finance
Washington, DC 20510

Dear Mr. Chairman,

I am writing in response to your request for public input on tax reform. In this regard the United States presently has laws that result in systematic discrimination against its expatriate citizens. For U.S. expatriates this discrimination results in unequal and often injurious treatment that dramatically impacts their ability to live as normal and ordinary persons.

Below are five examples of this very real discrimination:

1. Employment opportunities: Hiring and or promotion is limited as U.S. expatriates require the company to consider and adhere to two tax and regulatory systems that can be in conflict and expose the company to substantial risks that it would not otherwise be subject . Consequently U.S. expatriates are comparatively more expensive and difficult to employ than non-US citizens and understandably rejected by local employers. Simply put, it is just easier, cheaper, and less risky to not hire an American citizen.
2. Basic financial services: Companies often do not provide banking and insurance services to U. S. expatriates because they do not want to assume the risk or expense of servicing them.
3. Housing: With limited or no financial services, U.S. expatriates are severely limited in ability to pursue housing options. For example, few people can purchase a house if no financial institution will provide a mortgage to finance the purchase.
4. Saving for retirement: Saving mechanisms are not available due to conflicting tax rules, regulations and retirement savings laws. These conflicts can in some cases be so extreme that U.S. expatriates lack a way to effectively save for retirement.
5. Estates: While not specific to expatriates it is often particularly relevant to them. As you are likely aware the current U.S. law stipulates that a family where a U.S. citizen is married to a non-U.S. citizen or has children who are not U.S. citizens that family is denied the estate transfer rights provided to all other Americans. Simply put, U.S. citizens are effectively punished for having a non-U.S. citizen spouse, children or family and are severely limited in the estate options available to them.

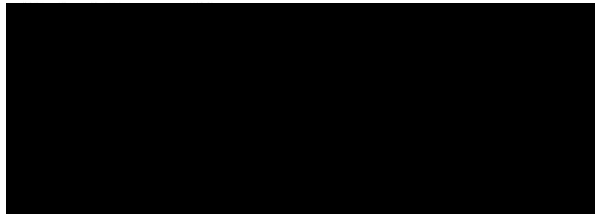
(I reference the 40% tax on estates over USD 60 thousand left to non-U.S. citizens rather than the more than USD 5 million tax free estate transfer currently afforded to U.S. citizen spouses, children and family. Note that some countries do not permit dual citizenship).

I urge you to consider the improvement of U.S. laws so that they do not result in discrimination against its expatriate citizens.

Thank you for your consideration.

With best regards,


Marcus A. Forte



Please note, I am a registered voter in Florida.

cc: The Honorable Ron Wyden, Ranking Member of the Senate Committee on Finance
cc: The Honorable Rob Portman, co-chair of the Senate Committee on Finance International Tax Reform Working Group
cc: The Honorable Charles E. Schumer, co-chair of the Senate Committee on Finance International Tax Reform Working Group
cc: The Honorable Bill Nelson, member of the Senate Committee on Finance