# Richardson Kish Submissions to the Senate Finance Committee - April 15, 2015 7 Related Submissions

- (1) "Richardson Kish Main Citizenship Taxation April 15 2015 International Tax"
- (2) "Richardson Kish Video Testimonials of Americans Abroad April 15,2015 International Tax"
- (3) "Richardson Kish Comments of Americans Abroad on Citizenship Taxation April 15, 2015 International Tax"
- (4) "Richardson Kish The S. 877A Exit Tax April 15, 2015 International Tax"
- (5) "Richardson Kish Revenue Raising Measures April 15, 2015 International Tax"
- (6) Richardson Kish Mutual Fund Comparison: Canada vs. United States April 15, 2015 International Tax
- (7) Richardson Kish 2014 Complaint to United Nations Re: United States Citizenship Taxation International Tax

This is submission (4) - "The S. 877A Exit Tax"

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### Richardson Kish - The S. 877A Exit Tax - April 15, 2015 - International Tax

There are many countries, including Canada that have a "Departure Tax".

The Canadian "Departure Tax" is triggered by an actual change in residence from Canada. i.e. on moving from Canada. As a result, the Canadian Departure Tax applies to the increase in value of assets during the time that the taxpayer lived in Canada. The Canadian "Departure Tax" does NOT apply to the increase in value of assets AFTER a person has ceased to reside in Canada.

The U.S. S. 877A "Tax responsibilities on expatriation" rules are triggered by a "relinquishment of United States citizenship". They are NOT (except in the case of Green Card Holders) triggered by ceasing to reside in the United States. Virtually all people who relinquish U.S. citizenship do so when they are no longer living in the United States. There are three reasons for this:

- 1. The requirements to "relinquish U.S. citizenship" are found in S. 349(a) of the Immigration and Nationality Act. Renunciation is the most common form of "relinquishment". A renunciation takes place outside the United States;
- 2. From a practical point of view, people must have another citizenship if they renounce U.S. citizenship. (Few people are prepared to become "Stateless".)
- 3. The combined effect of (1) and (2) above is that most people who renounce U.S. citizenship live outside the United States and have assets outside the United States.

The U.S. S. 877A "Exit Tax" rules apply to all of the assets owned by an individual when he relinquishes U.S. citizenship.

Therefore, the U.S. S. 877A "Exit Tax" rules operate to impose taxes on assets that are both:

- Located outside the United States:
- In most cases on assets acquired after the person has moved from the United States;
- On the increase in value of assets AFTER a person has moved from the United States.

To put it simply, the primary effect of the U.S. S. 877A Exit Tax rules is to "confiscate" assets that are located outside the United States and that were accumulated after the person left the United States.

This is in sharp contrast to Canada's "Departure Tax" which applies only to assets owned by a person while he was resident of Canada.

To put it simply:

The U.S. S. 877A "Exit Tax" operates MOST punitively on the assets of Americans abroad and primarily to the increase in value of the assets after the person has ceased to reside in the United States. This is demonstrated in the following scenarios.

Please note that the actual tax returns are included at the bottom of this submission.

# The "Exit Tax" in action – 5 actual scenarios and 5 actual tax returns

	US only in Canada	Dual in Canada	Dual in UK	Dual in Canada w/US pension	Wealthy USC before 18-1/2
Net worth	\$ 2,322,811	\$ 2,322,811	\$ 2,322,811	\$ 2,322,811	\$ 1,000,000,000
Income					
Capital gains	270,447	NIL	270,447	270,447	NIL
Pension	860,144	45,271	860,144	45,271	
Total Income	\$ 1,130,591	\$ 45,271	\$ 1,130,591	\$ 315,718	
Std Deduction	Disallowed	Disallowed	Disallowed	Disallowed	
Exemption	Disallowed	(3,950)	Disallowed	Disallowed	(3,950)
TAX	368,082	6,188	368,082	52,088	
АМТ	-	-	-	9,358	
FTC/III6	(20,825)	(6,188)	(20,825)	NIL	
Obamacare Tax	10,277	NIL	10,277	7,247	
Penalty	6,420	NIL	6,420	1,233	
Exit Tax	\$ 363,954	NIL	\$ 363,954	\$ 69,926	NIL

In order to see the graphic and **brutal confiscatory effects of the U.S. Exit Tax** in action we asked a licensed U.S. CPA who specializes in International Tax to consider the following scenario:

**Relinquishment date:** A person who renounced U.S. citizenship on November 1, 2014.

**Profile:** He was a "middle class" person who was completely **tax compliant in his country of residence**. He was a **saver and investor**. He had **worked hard** for this money.

The CPA was asked to calculate the Exit Tax based on the following scenario. Note that the persons assets do exceed the \$2,000,000 dollar U.S. threshold. Notice also that this example is representative of a "middle class" person.

#### Financial Facts – All amounts were in Canadian dollars.

- pension income from Canadian sources of \$50,000
- principal residence bought in 1985 for \$100,000 with a fair market value on November 1, 2014 of \$1,200,000. The CPA calculated the taxes under the assumption that the relinquisher WOULD be entitled to the \$250,000 capital gains deduction that would normally be available under S. 121 of the Internal Revenue Code. It is NOT clear that he would be entitled to this deduction under the S. 877A rules. Note that if the S. 121 deduction does NOT apply the taxes owing will be significantly higher.
- pension from the University of Toronto with a present value of \$900,000
- RRSP with a value of \$500,000
- 500 shares of Telus common shares with a deemed sale on November 1, 2014 and a cost basis of half that. In other words the shares doubled.

Note that this person clearly exceeds the \$2,000,000 U.S. threshold and is therefore subject to the Exit Tax. The CPA graciously calculated the amounts to go on the Form 8854 and calculated the Exit Tax.

We further asked him to run different scenarios based on whether the relinquisher had a a pension from a U.S. University (Eligible pension) and whether the person had the pension from the University of Toronto (ineligible pension). Hang on to your seats. You will be shocked at the result. Absolutely shocked.

In each case the CPA provided a completed 1040 and Form 8854.

The Results – How the Exit Tax is likely to affect Americans abroad – Five scenarios

Scenario 1: Person born in the U.S. without Canadian citizenship

Final U.S. Tax Return: Total U.S tax owing: \$363,954 USD

Scenario 2: Person born in the U.S. as a dual Canada U.S. citizen or born in Canada to a U.S. citizen parent (making the person a dual citizen from birth).

Final U.S. Tax Return: Total U.S. tax owing: \$0 USD

Scenario 3: Person born in the U.S. as a dual Canada U.S. citizen or born in Canada to a U.S. citizen parent (making the person a dual citizen from birth). But, rather than living in Canada when he relinquished he was living in the U.K. (meaning he was NOT living in the country of dual citizenship from birth)

Final U.S. Tax Return: Total U.S. tax owing: \$363.954 USD

Scenario 4: Same as either Scenario 1 or Scenario 3 with only one difference – the pension instead of being from the University of Toronto (ineligible) was from the University of California (eligible).

Final U.S. Tax Return: Total U.S. tax owing: \$69,926 USD

Scenario 5: I then asked the same CPA to run a final tax return for a VERY WEALTHY U.S. citizen who relinquishes U.S. citizenship prior to the age of 18 1/2.

I changed the facts to reflect the fact that this individual does NOT have the benefits of a lifetime of hard work and savings. When the "Exit Tax" was enacted Senator Kennedy claimed that the "Exit Tax" was really a "billionaires amendment".

Therefore, I thought it would be appropriate to postulate a situation of a billionaire and see what kind of "Exit Tax" he would be subjected to.

I hypothesized the following facts about this young man:

Net worth of one billion dollars. The one billion dollars is composed of the following:

- Real Estate owned around the world 250 million USD
- Expensive cars and yachts equipped with champaign (I don't even know how to spell it) 250 million USD
- Controlled foreign corporation (probably triggering an additional reporting requirement)
   politicians (lots of Subpart F income and undeclared cash 250 million USD
- Family trust of which he is the beneficiary 250 million USD

This person is the opposite of the "hard working", "tax compliant", "saver and investor" described above.

#### Total 1 billion dollars of assets

Let's assume that he achieved five years of U.S. tax compliance prior to June 2014.

Final U.S. Tax Return: Total U.S tax owing: \$0

# Summary – A picture is worth a thousand words – the charts

	US only in Canada	Dual in Canada	Dual in UK	Dual in Canada w/US pension	Wealthy USC before 18-1/2
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Exit Tax	\$ 363,954	NIL	\$ 363,954	\$ 69,926	NIL

## and more

### Assets as of renunciation

		date	
	CAD	USD	
Univ of Toronto pension	900,000	804,074	
Principal residence	1,200,000	1,072,099	
RRSP	500,000	446,708	
TOTAL	2,600,000	2,322,881	

Tax liability			As a % of assets
1 Born US lives Canada	404,575	361,454	16%
2 Born US eligible pension	77,916	69,611	3%
3 Born dual lives Canada	0	0	0%
4 Born dual lives UK	404,575	361,454	16%
5 US Kid	0	0	0%

### Do you think this is punitive? It's WORSE than you think

The university professor, who has lived most of his life in Canada, with the Canadian University pension, and all of his assets in Canada is required to pay \$363,954 U.S. dollars as an Exit Tax.

Professional advisers need to consider MORE than the amount of the tax payable. They need to consider:

#### Where does the money come from to pay the Exit Tax?

If you look at his/her composition of assets, you will see that he has no cash. Since this is a tax that is payable on a "pretend realization" and not an "actual realization", there is no cash to pay the tax. Where does the money come from to pay the tax?

### Possibility 1 – Sell Assets

Pension – No access to this pool of capital

**Telus Shares** – Not worth enough to generate the required cash. But, in addition the sale of the Telus shares WILL generate a significant capital gains tax in Canada.

**RRSP** – If he "collapses" all or part of his RRSP, it will be taxed as ordinary income in Canada.

**House** – If he sells the house, the sale will NOT be taxable in Canada.

The cash can be generated ONLY by selling his/her house.

### Possibility 2 – Borrow the \$363,954 USD (approx \$455,000 Cdn based on an 80 cent dollar)

#### In other words:

In order to "relinquish U.S. citizenship", this life long Canadian resident, who was NOT lucky enough to be born as a Canadian citizen must choose between:

- selling his home at a time when he's trying to retire; or
- borrowing \$455,000 CDN at a time when he's trying to retire.

### Final thoughts ...

We hear people talking about the U.S. "Exit Tax". We are convinced that they don't understand the complexity, the incredible unfairness or the punitive application.

Assuming that the U.S. has "Exit Taxes" at all, do you believe a person with this financial asset profile, should pay such different amounts of tax based on questions like:

Were you born both a U.S. citizen and a dual citizen?

If you were born a dual citizen, should the tax payable depend on whether you are living in the country of second citizenship?

Should the fact that the University of Toronto pension is in Canada instead of from the University of California in the United States mean that the pension should "in effect be confiscated"?

What about the young man renouncing prior to the age of 18 1/2? He was after all a billionaire. Yet he escapes the "Billionaire's Amendment".

#### Conclusion ...

There are many laws that are unfair and punitive. Some are "known" to be unfair and punitive". Some exist as unfair and punitive laws, that simply lie in wait, to "snare the unsuspecting". We have never seen an article or post about the "Exit Tax" that demonstrates the profound injustice in its application to Americans abroad. I wonder, why not?

The S. 877A rules are complicated, convoluted and therefore difficult to understand. The best way to hide "Evil" in the legislative process is to:

- 1. Enact legislation in very technical language that is difficult to understand; and then
- 2. Bury it in the Internal Revenue Code (which is almost impossible to understand).

Make no mistake about it. The Internal Revenue Code of the United States is a perfect place to hide discriminatory and profoundly unjust legislative intention.

I wonder if this law would exist if it were described as follows:

Many "middle class" U.S. citizens abroad, who worked and saved a lifetime for retirement, by investing in retirement assets outside the United States, who then relinquish U.S. citizenship will have to pay the United States a tax based on:

- 1. The increase in the value of their principal residence located outside the United States which was purchased after they left the United States and;
- 2. The increase in value in other assets they have anywhere in the world including outside the United States:
- 3. A tax based on treating the present value of their pension earned outside the US and located outside the United States as ordinary income (resulting in the severe erosion of the pension)
- 4. A tax based on treating their RRSP located outside the United States as ordinary income.

The result could be the "effective confiscation" of between 15 and 50% of their retirement assets LOCATED OUTSIDE THE UNITED STATES. Furthermore, the tax will be based NOT on the actual realization of income, but based on a "pretend realization" of income (meaning that there is no cash to pay the tax).

As the price of relinquishment, the person is now forced to either sell his house or to go deeply into debt.

That's what the S. 877A rules REALLY MEAN in APPLICATION.

The S. 877A "Exit Tax" rules are, in themselves, an argument to repeal "citizenship taxation".

If the United States is to retain an "Exit Tax" then, we respectfully submit that AT A MINIMUM:

- it must be triggered based on a CHANGE IN ACTUAL RESIDENCE and NOT on a relinquishment of U.S. citizenship
- it cannot apply to the assets accumulated by Americans abroad during their time living outside the United States

# **SCENARIO 1**

MIDDLE CLASS - BORN IN THE US, MOVED TO CANADA

2014

IF you live in	THEN use this address to send in your payment
Florida, Louisiana, Mississippi, Texas	Internal Revenue Service P.O. Box 1214 Charlotte, NC 28201-1214
Alaska, Arizona, California, Colorado, Hawaii, Idaho, Nevada, New Mexico, Oregon, Utah, Washington, Wyoming	Internal Revenue Service P.O. Box 7704 San Francisco, CA 94120-7704
Arkansas, Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Montana, Nebraska, North Dakota, Ohio, Oklahoma, South Dakota, Wisconsin	Internal Revenue Service P.O. Box 802501 Cincinnati, OH 45280-2501
Alabama, Georgia, Kentucky, New Jersey, North Carolina, South Carolina, Tennessee, Virginia	Internal Revenue Service P.O. Box 931000 Louisville, KY 40293-1000
Connecticut, Delaware, District of Columbia, Maine, Maryland, Massachusetts, Missouri, New Hampshire, New York, Pennsylvania, Rhode Island, Vermont, West Virginia	Internal Revenue Service P.O. Box 37008 Hartford, CT 06176-7008
A foreign country, American Samoa, or Puerto Rico (or are excluding income under Internal Revenue Code 933), or use an APO or FPO address, or file Form 2555, 2555-EZ, or 4563, or are a dual-status alien or nonpermanent resident of Guam or the U.S. Virgin Islands.	Internal Revenue Service P.O. Box 1303 Charlotte, NC 28201-1303

MAIL FORM 1040-V TO THE INTERNAL REVENUE SERVICE CENTER AT THE ADDRESS LISTED BELOW.

Form 1040-V (2014)

▼ Detach Here and Mail With Your Payment and Return ▼

Department of the Treasury Internal Revenue Service

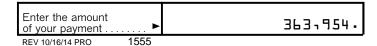
(99) **201**4

- ► Use this voucher when making a payment with Form 1040.
- Do not staple this voucher or your payment to Form 1040.
   Make your check or money order payable to the 'United States Treasury.'
- ▶ Write your social security number (SSN) on your check or money order.

FORMER CITIZEN

BORN IN THE US WITH US CITIZ LIVES IN CANADA CANADA ONTARIO M5G 154

Form 1040-V Payment Voucher



INTERNAL REVENUE SERVICE
P.O. BOX 1303
CHARLOTTE, NC 28201-1303 USA

<b>1040</b>		nent of the Treasury—Internal Ro		, ,	2014	1						
For the year len 1 D		4, or other tax year beginning	ne ra		1 2014 and					_	o not write or staple in the e separate instruct	
Your first name and		4, or other tax year beginning	Last nam	01/0	1 , 2014, end	ng	10/	30 ,2	0 14		ur social security nu	
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FORMER  If a joint return, spo	use's first	name and initial	CITI2								0 0 - 0 0 - 0 0 0 0 Duse's social security (	number
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Home address (nur	mber and	street). If you have a P.O. b	ox, see inst	tructions.					Apt. no.	INIX	Make sure the SSN(	s) abovo
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LIVES IN										Chec	k here if you, or your spous	e if filing
Foreign country na		· <del>-</del>		Foreign pro	vince/state/cour	nty		Foreign p	ostal code		y, want \$3 to go to this fund t below will not change you	
Canada				ONTARI	0			M5G	1S4	refun		Spouse
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Filing Status	2	☐ Married filing jointly	(even if o	nly one had in	come)						not your dependent, e	
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If more than four dependents, see											(see instructions)	
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check here ▶□											Add numbers on	
	d	Total number of exem	ptions cla	imed							lines above >	1
Income	7	Wages, salaries, tips,	etc. Attac	h Form(s) W-2	!					7		
	8a	Taxable interest. Atta	ch Sched	ule B if require	ed <sub>,</sub> .					8a		
Attach Form(s)	b	Tax-exempt interest.			-	8b						
Attach Form(s) W-2 here. Also	9a	Ordinary dividends. A	tach Sch	edule B if requ	iired					9a		
attach Forms	b	Qualified dividends				9b						
W-2G and	10	Taxable refunds, credits, or offsets of state and local income taxes								10		
1099-R if tax was withheld.	11	Alimony received								11		
wao mamoiai	12	Business income or (loss). Attach Schedule C or C-EZ							· 🚣 🖡	12		
If you did not	13	Capital gain or (loss).			quired. If not re	quired, c	heck he	ere 🕨	$\sqcup$	13	270,	447.
get a W-2,	14	Other gains or (losses		orm 4797 .		_ :.			• •	14		
see instructions.	15a	IRA distributions .	15a			Taxable				15b	0.50	7.4.4
	16a	Pensions and annuities				Taxable			·. <u>-</u>	16b	860,	144.
	17	Rental real estate, roy	· · ·			,			-	17		
	18	Farm income or (loss).								18		
	19	Unemployment composite Social security benefits	1 1		1	 Taxable			-	19 20b		
	20a 21	011		ount .						21		-
	22	Combine the amounts in	the far rig	ht column for lir		This is v	our total	incom		22	1,130,	591
	23	Educator expenses				23					1,130,	JJ I .
Adjusted	24	Certain business expens			<del>_</del>	20						
Gross		fee-basis government of				24						
Income	25	Health savings accour			<del>_</del>	25						
	26	Moving expenses. Att			- <del>-</del>	26						
	27	Deductible part of self-e										
	28	Self-employed SEP, S				28						
	29	Self-employed health										
	30	Penalty on early withd										
	31a	Alimony paid b Recip		-	_	31a						
	32	IRA deduction				32						
	33	Student loan interest	deduction		[	33						
	34	Tuition and fees. Attac	ch Form 8	917	[	34						
	35	Domestic production ac	tivities ded	duction. Attach	Form 8903	35						
	36	Add lines 23 through 3	35						[	36		
	37	Subtract line 36 from	ine 22. Th	nis is vour <b>adi</b> u	usted aross in	come			. ▶	37	1.130.	591.

Form 1040 (2014) Page 2 1,130,591. Amount from line 37 (adjusted gross income) . . . . . . . . 38 ☐ Blind. **Total boxes** You were born before January 2, 1950, 39a Check Tax and ☐ Blind. | checked ► 39a if: Spouse was born before January 2, 1950, **Credits** If your spouse itemizes on a separate return or you were a dual-status alien, check here▶ 39bX b 0. Itemized deductions (from Schedule A) or your standard deduction (see left margin) . 40 40 Standard Deduction 1,130,591. 41 for-0. 42 Exemptions. If line 38 is \$152,525 or less, multiply \$3,950 by the number on line 6d. Otherwise, see instructions 42 • People who check any box on line 1,130,591. 43 **Taxable income.** Subtract line 42 from line 41. If line 42 is more than line 41, enter -0- . . . 43 39a or 39b or 44 Tax (see instructions). Check if any from: a Form(s) 8814 b Form 4972 c 44 368,082. who can be 45 45 claimed as a dependent, 46 Excess advance premium tax credit repayment. Attach Form 8962 . 46 see instructions. 47 Add lines 44, 45, and 46 . . . . . . . . . . . 47 368,082. • All others: 20,825. 48 Foreign tax credit. Attach Form 1116 if required . . . . Single or Married filing 49 Credit for child and dependent care expenses. Attach Form 2441 49 separately, 50 Education credits from Form 8863, line 19 . . . . . 50 \$6,200 Married filing Retirement savings contributions credit. Attach Form 8880 51 51 jointly or Qualifying 52 Child tax credit. Attach Schedule 8812, if required . . . 52 widow(er), \$12,400 Residential energy credits. Attach Form 5695 h \$ C P lf q R Г S T D ŀ

\$12,400	55	nesidential energy credits. Attach 1 of 1 of 2 of 2 of 2 of 2 of 2 of 2 of	- !	
Head of	54	Other credits from Form: a 3800 b 8801 c 54		
household, \$9,100	55	Add lines 48 through 54. These are your <b>total credits</b>	55	20,825.
	56	Subtract line 55 from line 47. If line 55 is more than line 47, enter -0	56	347,257.
	57	Self-employment tax. Attach Schedule SE	57	
Other	58	Unreported social security and Medicare tax from Form: <b>a</b> $\square$ 4137 <b>b</b> $\square$ 8919	58	1
Taxes	59	Additional tax on IRAs, other qualified retirement plans, etc. Attach Form 5329 if required	59	1
Idaes	60a	Household employment taxes from Schedule H	60a	
	b	First-time homebuyer credit repayment. Attach Form 5405 if required	60b	
	61	Health care: individual responsibility (see instructions) Full-year coverage	61	1
	62	Taxes from: a Form 8959 b Form 8960 c Instructions; enter code(s)	62	10,277.
	63	Add lines 56 through 62. This is your <b>total tax</b>	63	357,534.
Payments	64	Federal income tax withheld from Forms W-2 and 1099 64		1
	65	2014 estimated tax payments and amount applied from 2013 return 65		1
If you have a	66a	Earned income credit (EIC) 66a		1
qualifying child, attach	b	Nontaxable combat pay election 66b		1
Schedule EIC.	67	Additional child tax credit. Attach Schedule 8812 67		1
	68	American opportunity credit from Form 8863, line 8 68		1
	69	Net premium tax credit. Attach Form 8962 69		1
	70	Amount paid with request for extension to file		1
	71	Excess social security and tier 1 RRTA tax withheld 71		1
	72	Credit for federal tax on fuels. Attach Form 4136		1
	73	Credits from Form: a 2439 b Reserved c Reserved d 73		1
	74	Add lines 64, 65, 66a, and 67 through 73. These are your total payments	74	1
Refund	75	If line 74 is more than line 63, subtract line 63 from line 74. This is the amount you overpaid	75	
	76a	Amount of line 75 you want <b>refunded to you.</b> If Form 8888 is attached, check here . •	76a	
Direct deposit?	▶ b	Routing number		
•	▶ d	Account number X X X X X X X X X X X X X X X X X X X		1
instructions.	77	Amount of line 75 you want <b>applied to your 2015 estimated tax ▶</b> 77		1
Amount	78	Amount you owe. Subtract line 74 from line 63. For details on how to pay, see instructions	78	363,954.
You Owe	79	Estimated tax penalty (see instructions)		
Third Party	Do	you want to allow another person to discuss this return with the IRS (see instructions)?	. Com	plete below. X No
Designee		signee's Phone Personal ider		. —
		me ► no. ► number (PIN)		
Sign		der penalties of perjury, I declare that I have examined this return and accompanying schedules and statements, and to t y are true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which prepa		
Here		ur signature Date Your occupation	1	me phone number
Joint return? See instructions.		UNIVERSITY PROFESSOR		
Keep a copy for	Sp	ouse's signature. If a joint return, <b>both</b> must sign. Date Spouse's occupation	If the IF	RS sent you an Identity Protection
your records.	•		PIN, en	nter it
D-:-I	Pri	nt/Type preparer's name Preparer's signature Non-Paid Preparer Date	i -	PTIN
Paid			Check self-e	k ∐ if mployed
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www.irs.gov/for	m1040	RI	EV 03/04	<b>115 PRO</b> Form <b>1040</b> (201

#### **SCHEDULE B**

(Form 1040A or 1040)

Department of the Treasury Internal Revenue Service (99)

# **Interest and Ordinary Dividends**

► Attach to Form 1040A or 1040.
► Information about Schedule B and its instructions is at www.irs.gov/scheduleb.

OMB No. 1545-0074

2014

Attachment Sequence No. **08** 

Name(s) shown on r	eturn		Your	social secur	ity numl	ber
FORMER CIT	IZEN		000	0-00-00	00	
Part I Interest	1	List name of payer. If any interest is from a seller-financed mortgage and the buyer used the property as a personal residence, see instructions on back and list this interest first. Also, show that buyer's social security number and address ▶		Am	ount	
(See instructions on back and the instructions for Form 1040A, or Form 1040, line 8a.)			1			
Note. If you received a Form 1099-INT, Form 1099-OID, or substitute statement from a brokerage firm, list the firm's						
name as the payer and enter	2	Add the amounts on line 1	2			
the total interest	3	Excludable interest on series EE and I U.S. savings bonds issued after 1989.	3			
shown on that form.	4	Attach Form 8815	4			
	Note.	If line 4 is over \$1,500, you must complete Part III.		Am	ount	
Part II	5	List name of payer ▶				
Ordinary Dividends (See instructions on back and the instructions for Form 1040A, or Form 1040, line 9a.)			5			
Note. If you received a Form 1099-DIV or substitute statement from a brokerage firm, list the firm's name as the payer and enter the ordinary dividends shown on that form.	6 Note	Add the amounts on line 5. Enter the total here and on Form 1040A, or Form 1040, line 9a	6			
		ust complete this part if you (a) had over \$1,500 of taxable interest or ordinary dividends; (	b) had	l a		
		n account; or (c) received a distribution from, or were a grantor of, or a transferor to, a foreign			Yes	No
Part III Foreign Accounts and Trusts (See instructions on	7a	At any time during 2014, did you have a financial interest in or signature authority ovaccount (such as a bank account, securities account, or brokerage account) located country? See instructions	rer a fi I in a f · · · ancial I Forn	nancial foreign	×	
back.)	b 8	If you are required to file FinCEN Form 114, enter the name of the foreign country when financial account is located ▶ CA Canada  During 2014, did you receive a distribution from, or were you the grantor of, or transforeign trust? If "Yes," you may have to file Form 3520. See instructions on back.	feror t	o, a		×

#### **SCHEDULE D** (Form 1040)

# **Capital Gains and Losses**

► Attach to Form 1040 or Form 1040NR.

OMB No. 1545-0074

Department of the Treasury Internal Revenue Service (99) ▶ Information about Schedule D and its separate instructions is at www.irs.gov/scheduled. ▶ Use Form 8949 to list your transactions for lines 1b, 2, 3, 8b, 9, and 10.

Sequence No. 12

Name(s) shown on return FORMER CITIZEN Your social security number 000-00-0000

Pa	rt I Short-Term Capital Gains and Losses—As	sets Held One `	Year or Less				
lines	instructions for how to figure the amounts to enter on the below.  form may be easier to complete if you round off cents to	(d) Proceeds (sales price)	(e) Cost (or other basis)	(g) Adjustmer to gain or loss Form(s) 8949,	s from	(h) Gain or (loss) Subtract column (e) from column (d) and combine the result with	
	e dollars.	(sales price)	(or other basis)	line 2, colum		column (g)	
1a	Totals for all short-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 1b.						
1b	Totals for all transactions reported on Form(s) 8949 with <b>Box A</b> checked						
2	Totals for all transactions reported on Form(s) 8949 with <b>Box B</b> checked						
3	Totals for all transactions reported on Form(s) 8949 with <b>Box C</b> checked	0.	680,000.			-680,000.	
4	Short-term gain from Form 6252 and short-term gain or (I	loss) from Forms 4	1684, 6781, and 88	824 .	4		
5	Net short-term gain or (loss) from partnerships, Schedule(s) K-1	S corporations,	estates, and t		5		
6	Short-term capital loss carryover. Enter the amount, if ar <b>Worksheet</b> in the instructions	ny, from line 8 of y		Carryover	6	( )	
7	Net short-term capital gain or (loss). Combine lines 1a term capital gains or losses, go to Part II below. Otherwis				7	-680,000.	
Pa	t II Long-Term Capital Gains and Losses—Ass	sets Held More	Than One Year			I	
See	instructions for how to figure the amounts to enter on the			(g)		(h) Gain or (loss)	
This	below.  form may be easier to complete if you round off cents to le dollars.	(d) Proceeds (sales price)	(e) Cost (or other basis)	Adjustmer to gain or loss Form(s) 8949, line 2, colum	s from Part II,	Subtract column (e) from column (d) and combine the result with column (g)	
8a	Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b.						
8b	Totals for all transactions reported on Form(s) 8949 with <b>Box D</b> checked						
9	Totals for all transactions reported on Form(s) 8949 with <b>Box E</b> checked						
10	Totals for all transactions reported on Form(s) 8949 with <b>Box F</b> checked	1,539,797.	339,350.	-250,0	00.	950,447.	
11	Gain from Form 4797, Part I; long-term gain from Forms from Forms 4684, 6781, and 8824				11		
12	Net long-term gain or (loss) from partnerships, S corporat	tions, estates, and	trusts from Schee	dule(s) K-1	12		
13	Capital gain distributions. See the instructions				13		
14	Long-term capital loss carryover. Enter the amount, if any <b>Worksheet</b> in the instructions		-		14	( )	
15	15 Net long-term capital gain or (loss). Combine lines 8a through 14 in column (h). Then go to Part III on the back						

Schedule D (Form 1040) 2014 Page **2** 

art	III Summary		
16	Combine lines 7 and 15 and enter the result	16	270,447.
	• If line 16 is a <b>gain,</b> enter the amount from line 16 on Form 1040, line 13, or Form 1040NR, line 14. Then go to line 17 below.		
	• If line 16 is a <b>loss</b> , skip lines 17 through 20 below. Then go to line 21. Also be sure to complete line 22.		
	• If line 16 is <b>zero</b> , skip lines 17 through 21 below and enter -0- on Form 1040, line 13, or Form 1040NR, line 14. Then go to line 22.		
17	Are lines 15 and 16 <b>both</b> gains?  Yes. Go to line 18.		
	No. Skip lines 18 through 21, and go to line 22.		
18	Enter the amount, if any, from line 7 of the 28% Rate Gain Worksheet in the instructions ▶	18	
19	Enter the amount, if any, from line 18 of the <b>Unrecaptured Section 1250 Gain Worksheet</b> in the instructions	19	
20	Are lines 18 and 19 <b>both</b> zero or blank?  ▼ Yes. Complete the Qualified Dividends and Capital Gain Tax Worksheet in the instructions for Form 1040, line 44 (or in the instructions for Form 1040NR, line 42). Do not complete lines 21 and 22 below.		
	No. Complete the Schedule D Tax Worksheet in the instructions. Do not complete lines 21 and 22 below.		
21	If line 16 is a loss, enter here and on Form 1040, line 13, or Form 1040NR, line 14, the <b>smaller</b> of:		
	• The loss on line 16 or • (\$3,000), or if married filing separately, (\$1,500)	21	)
	Note. When figuring which amount is smaller, treat both amounts as positive numbers.		
22	Do you have qualified dividends on Form 1040, line 9b, or Form 1040NR, line 10b?		
	☐ <b>Yes.</b> Complete the <b>Qualified Dividends and Capital Gain Tax Worksheet</b> in the instructions for Form 1040, line 44 (or in the instructions for Form 1040NR, line 42).		
	■ No. Complete the rest of Form 1040 or Form 1040NR.		

# 8949

Department of the Treasury Internal Revenue Service

## **Sales and Other Dispositions of Capital Assets** ▶ Information about Form 8949 and its separate instructions is at www.irs.gov/form8949.

▶ File with your Schedule D to list your transactions for lines 1b, 2, 3, 8b, 9, and 10 of Schedule D.

Attachment

OMB No. 1545-0074

Sequence No. 12A

Name(s) shown on return FORMER CITIZEN Social security number or taxpayer identification number 000 - 00 - 000

Before you check Box A, B, or C below, see whether you received any Form(s) 1099-B or substitute statement(s) from your broker. A substitute

statement will have the same information as Form 1099-B. Either may show your basis (usually your cost) even if your broker did not report it to the IRS. Brokers must report basis to the IRS for most stock you bought in 2011 or later (and for certain debt instruments you bought in 2014 or later). Short-Term. Transactions involving capital assets you held 1 year or less are short term. For long-term Part I transactions, see page 2. Note. You may aggregate all short-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS and for which no adjustments or codes are required. Enter the total directly on Schedule D, line 1a; you are not required to report these transactions on Form 8949 (see instructions). You must check Box A, B, or C below. Check only one box. If more than one box applies for your short-term transactions, complete a separate Form 8949, page 1, for each applicable box. If you have more short-term transactions than will fit on this page for one or more of the boxes, complete as many forms with the same box checked as you need. (A) Short-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS (see Note above) (B) Short-term transactions reported on Form(s) 1099-B showing basis was not reported to the IRS (C) Short-term transactions not reported to you on Form 1099-B Adjustment, if any, to gain or loss.

(a) Description of property	(b) Date sold or		tte sold or Proceeds See		Adjustment, if If you enter an a enter a co See the sepa	(h) Gain or (loss). Subtract column (e)	
(Example: 100 sh. XYZ Co.)	(Mo., day, yr.)	disposed (Mo., day, yr.)	(sales price) (see instructions)	and see Column (e) in the separate instructions	(f) Code(s) from instructions	<b>(g)</b> Amount of adjustment	from column (d) and combine the result with column (g)
EXCLUSION UNDER Section 877A(a)(3)(A)	10/30/14	10/30/14	0	680000			-680000
OTANIA Addition	(-1) (-) ()	1 (1-) (-, 1 !					
2 Totals. Add the amounts in columns negative amounts). Enter each tota Schedule D, line 1b (if Box A above above is checked), or line 3 (if Box C	I here and inc is checked), <b>lir</b>	lude on your ne 2 (if Box B	0	680000			-680000

Note. If you checked Box A above but the basis reported to the IRS was incorrect, enter in column (e) the basis as reported to the IRS, and enter an adjustment in column (g) to correct the basis. See Column (g) in the separate instructions for how to figure the amount of the adjustment.

Form 8949 (2014) Attachment Sequence No. **12A** Page **2** 

Name(s) shown on return. Name and SSN or taxpayer identification no. not required if shown on other side  $FORMER \ CITIZEN$ 

Social security number or taxpayer identification number 000-00-0000

Before you check Box D, E, or F below, see whether you received any Form(s) 1099-B or substitute statement(s) from your broker. A substitute statement will have the same information as Form 1099-B. Either may show your basis (usually your cost) even if your broker did not report it to the IRS. Brokers must report basis to the IRS for most stock you bought in 2011 or later (and for certain debt instruments you bought in 2014 or later).

#### Part II

**Long-Term.** Transactions involving capital assets you held more than 1 year are long term. For short-term transactions, see page 1.

**Note.** You may aggregate all long-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS and for which no adjustments or codes are required. Enter the total directly on Schedule D, line 8a; you are not required to report these transactions on Form 8949 (see instructions).

You *must* check Box D, E, *or* F below. Check only one box. If more than one box applies for your long-term transactions, complete a separate Form 8949, page 2, for each applicable box. If you have more long-term transactions than will fit on this page for one or more of the boxes, complete as many forms with the same box checked as you need.

- (D) Long-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS (see Note above)
- [ (E) Long-term transactions reported on Form(s) 1099-B showing basis was not reported to the IRS
- (F) Long-term transactions not reported to you on Form 1099-B

(i) Long-term transactions	Tot reported	TO you on re	T 1033-B		Adlanton and M			
(a) Description of property	(b) Date acquired	(c) Date sold or	(d) Proceeds	(e) Cost or other basis. See the <b>Note</b> below	Adjustment, if If you enter an a enter a co See the sepa	(h) Gain or (loss). Subtract column (e)		
(Example: 100 sh. XYZ Co.)	(Mo., day, yr.)	disposed (Mo., day, yr.)	(sales price) (see instructions)	and see Column (e) in the separate instructions	(f) Code(s) from instructions	<b>(g)</b> Amount of adjustment	from column (d) and combine the result with column (g)	
PRINCIPAL RESIDENCE AT 360 UNIVERSITY AVENUE - TORONTO, ON MSG 1SA	10/30/85	10/30/14	1072099	100000		-250000	722099	
500 SH OF TELUS CORP.	04/12/10	10/30/14	20990	10495			10495	
RRSP	06/30/06	10/30/14	446708	228855			217853	
2 Totals. Add the amounts in columns negative amounts). Enter each total Schedule D, line 8b (if Box D above above is checked). or line 10 (if Box	here and includ is checked), <b>lin</b>	e on your e 9 (if Box E	1539797	339350		-250000	950447	

**Note.** If you checked Box D above but the basis reported to the IRS was incorrect, enter in column (e) the basis as reported to the IRS, and enter an adjustment in column (g) to correct the basis. See *Column* (g) in the separate instructions for how to figure the amount of the adjustment.

# **Foreign Tax Credit**

(Individual, Estate, or Trust)
▶ Attach to Form 1040, 1040NR, 1041, or 990-T. CANADA GENERAL OMB No. 1545-0121 Attachment Sequence No. **19** 

Department of the Treasury Internal Revenue Service (99)

▶ Information about Form 1116 and its separate instructions is at www.irs.gov/form1116.

Name	)								-		on pag	ge 1 of your tax return		
	RMER CITIZEN								-00-0000					
	a separate Form 1116 f 11116. Report all amou							ome in the ir	nstructions. (	Check c	nly on	e box on each		
а□	Passive category incor	me	<b>c</b> ☐ Sect	tion 901(j) in	come			e□ Lum	p-sum distri	butions				
	General category incor				re-sourced b	y treaty	<b>y</b>							
	0 ,						,							
f Re	esident of (name of co	ountry) 🕨	Canada											
Note	e: If you paid taxes to	only one t	oreign count	ry or U.S. p	possession,	use c	olumn	A in Part I	and line A	in Part i	II. If yo	ou paid taxes to		
mor	<b>e than one</b> foreign c	ountry or L	J.S. possessi	on, use a s	separate co	lumn a	and line	e for each o	country or p	ossess	ion.			
Pa	rt I Taxable Inco	ome or Lo	ss From S	ources O	utside the	e Unit	ted St	ates (for	Category	Category Checked Above)				
	<u> </u>				Fo	reign (	Country	or U.S. Po	ssession			Total		
g	Enter the name of	of the fore	ian country	or U.S.	Α			В	С		(Add	cols. A, B, and C.)		
	possession		_	I	Canada									
18	-													
	above and of the													
	instructions):													
	PENSTON													
					860,1	44.					1a	860,144.		
ŀ	Check if line 1a is	compensa	tion for perso	onal										
	services as an	ı employe	ee, your t	otal										
	compensation from													
	more, and you us determine its source													
Ded	uctions and losses (Ca													
2	Expenses definite			on line										
	1a (attach stateme	-		I .										
3	Pro rata share of													
	related:													
á	Certain itemized de	eductions o	r standard de	duction										
	(see instructions) .					0.								
ŀ	Other deductions (	attach state	ement)											
(	Add lines 3a and 3	b				0.								
(	Gross foreign sour	ce income (	see instructio	ns)	860,1	44.								
•	Gross income from	all sources	s (see instruct	ions) .	1,810,5	91.								
f	Divide line 3d by lir	ne 3e (see ir	nstructions) .		0.4	751								
ç						0.								
4	Pro rata share of int	terest exper	nse (see instru	ctions):										
á	Home mortgage in													
	Home Mortgage In													
_ t	•													
5	Losses from foreign					_						_		
6	Add lines 2, 3g, 4a Subtract line 6 from				n line 15 no	0.					6	860,144.		
7 Da	rt II Foreign Tax					ige z					7	000,144.		
-т а 	Credit is claimed	oo i ala o	. Accided	1000 111311	•									
_	for taxes Foreign taxes paid or accrued													
Ę.	(h) Paid		In foreign	currency					In U.S. de	ollars				
Country	(i) X Accrued	Taxes	withheld at sou		(n) Other		Taxes wi	ithheld at sou		(r) Ot	her	(s) Total foreign		
ပ	(j) Date paid		(I) Rents		foreign taxes			(p) Rents		foreign		taxes paid or		
	or accrued	(k) Dividends	and royalties	(m) Interest	paid or accrued	( <b>o)</b> Div	vidends	and royalties	(q) Interest	paid accru		accrued (add cols. (o) through (r))		
Α	12/31/2014									20,8	25.	20,825.		
В														
С														
8	Add lines A through	gh C, colun	nn (s). Enter	the total he	ere and on I	line 9,	page 2			. ▶	8	20,825.		

Page 2 Form 1116 (2014)

Part	III Figuring the Credit				
9	Enter the amount from line 8. These are your total foreign taxes paid or accrued for the category of income checked above Part I	9	20,825.		
10	Carryback or carryover (attach detailed computation)	10			
11	Add lines 9 and 10	11	20,825.		
12	Reduction in foreign taxes (see instructions)	12	( )		
13	Taxes reclassified under high tax kickout (see instructions)	13			
14	Combine lines 11, 12, and 13. This is the total amount of foreign taxes	able for credit	14	20,825.	
15	Enter the amount from line 7. This is your taxable income or (loss) from sources outside the United States (before adjustments) for the category of income checked above Part I (see instructions)	15	860,144.		
16	Adjustments to line 15 (see instructions)	16	000,111.		
17	Combine the amounts on lines 15 and 16. This is your net foreign source taxable income. (If the result is zero or less, you have no foreign tax credit for the category of income you checked above Part I. Skip lines 18 through 22. However, if you are filing more than one Form 1116, you must complete line 20.)	17	860,144.		
18	Individuals: Enter the amount from Form 1040, line 41, or Form 1040NR, line 39. Estates and trusts: Enter your taxable income without the deduction for your exemption	18	996,747.		
	<b>Caution:</b> If you figured your tax using the lower rates on qualified constructions.	livider	nds or capital gains, see		
19	Divide line 17 by line 18. If line 17 is more than line 18, enter "1"			19	0.8630
20	Individuals: Enter the amounts from Form 1040, lines 44 and 46. I enter the amounts from Form 1040NR, lines 42 and 44. <b>Estates and</b> Form 1041, Schedule G, line 1a, or the total of Form 990-T, lines 36 ar	trusts		20	368,082.
	Caution: If you are completing line 20 for separate category e instructions.			20	300,002.
21	Multiply line 20 by line 19 (maximum amount of credit)			21	317,655.
22	Enter the <b>smaller</b> of line 14 or line 21. If this is the only Form 111 through 27 and enter this amount on line 28. Otherwise, complete the	appro	priate line in Part IV (see		
	instructions)			22	20,825.
	Summary of Credits From Separate Parts III (see instr		ns)		
23 24	Credit for taxes on passive category income	23			
25	Credit for taxes on certain income re-sourced by treaty	25			
26	Credit for taxes on lump-sum distributions	26		-	
27	Add lines 23 through 26			27	
28				28	20,825.
29	Reduction of credit for international boycott operations. See instruction	ns for	line 12	29	
30	Subtract line 29 from line 28. This is your foreign tax credit. Enter he	ere an	d on Form 1040, line 48;		
	Form 1040NR, line 46; Form 1041, Schedule G, line 2a; or Form 990-T	, line 4	40a ▶	30	20,825.
	REV 01.	RO		Form <b>1116</b> (2014)	

Department of the Treasury

Internal Revenue Service (99)

### **Net Investment Income Tax— Individuals, Estates, and Trusts**

► Attach to your tax return.

▶ Information about Form 8960 and its separate instructions is at www.irs.gov/form8960.

OMB No. 1545-2227 Attachment Sequence No. 72

Name(s) shown on your tax return Your social security number or EIN FORMER CITIZEN 000 - 00 - 000Part I Investment Income Section 6013(g) election (see instructions) ☐ Section 6013(h) election (see instructions) Regulations section 1.1411-10(g) election (see instructions) 1 2 3 Rental real estate, royalties, partnerships, S corporations, trusts, 4a Adjustment for net income or loss derived in the ordinary course of a non-section 1411 trade or business (see instructions) . . . . 4b 270,447. 5a Net gain or loss from disposition of property (see instructions) . 5a Net gain or loss from disposition of property that is not subject to 5b net investment income tax (see instructions) . . . . . . . . . . . . Adjustment from disposition of partnership interest or S corporation 5c d 5d 270,447. 6 Adjustments to investment income for certain CFCs and PFICs (see instructions) . . . . . 6 7 7 Total investment income. Combine lines 1, 2, 3, 4c, 5d, 6, and 7. 8 270,447. Part II Investment Expenses Allocable to Investment Income and Modifications 9a Investment interest expenses (see instructions) . . . . . . State, local, and foreign income tax (see instructions) . . . . 9b Miscellaneous investment expenses (see instructions) . . . . 9d 10 11 Total deductions and modifications. Add lines 9d and 10 . . . . 11 Part III Tax Computation Net investment income. Subtract Part II, line 11 from Part I, line 8. Individuals complete lines 13-17. Estates and trusts complete lines 18a-21. If zero or less, enter -0- . . . . . . . . . . . . . 12 270,447. Individuals: 1,130,591. 13 Modified adjusted gross income (see instructions) . . . . . 13 125,000. Threshold based on filing status (see instructions) . . . . . 14 15 15 Subtract line 14 from line 13. If zero or less, enter -0- . . . . 1,005,591. 16 270,447. Net investment income tax for individuals. Multiply line 16 by 3.8% (.038). Enter here and 17 17 10,277. **Estates and Trusts:** Net investment income (line 12 above) . . . . . . . . . . . . 18a Deductions for distributions of net investment income and deductions under section 642(c) (see instructions) . . . . . 18b c Undistributed net investment income. Subtract line 18b from 18a (see 18c **19a** Adjusted gross income (see instructions) . . . . . . . . . 19a Highest tax bracket for estates and trusts for the year (see 19b **c** Subtract line 19b from line 19a. If zero or less, enter -0- . . . 19c 20 Net investment income tax for estates and trusts. Multiply line 20 by 3.8% (.038). Enter here and include on your tax return (see instructions) . . . . . . 21

# Form **8965**

Department of the Treasury

Internal Revenue Service

**Health Coverage Exemptions** 

► Attach to Form 1040, Form 1040A, or Form 1040EZ.

▶ Information about Form 8965 and its separate instructions is at www.irs.gov/form8965.

OMB No. 1545-0074

2014

Attachment Sequence No. 75

Name as shown on return
FORMER CITIZEN

Your social security number 000-00-0000

Complete this form if you have a Marketplace-granted coverage exemption or you are claiming a coverage exemption on your return.

Part	Marketplace-Granted have an exemption granted							you a	ınd/o	ram	emb	er of	your	tax r	iouse	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
	a Name of I	1	•		b SSN Exemption								c ertifica	ıte Nur	nber	
1																
2																
3																
4																
_																
5																
6																
Part l	Coverage Exemption	s for Your Hou	usehold C	laim	ed o	n Yo	ur Re	eturn	:							
7a	Are you claiming an exemption	because your hou	sehold inco	me is	belov	v the f	iling t	hresh	old?.					Yes	X	No
b	Are you claiming a hardship exe	emption because y	our gross i	ncom	e is be	low tl	ne filin	g thre	sholc	? .				Yes	X	No
Part I	Coverage Exemption household are claiming								u and	d/or a	a mer	nber	of yo	our ta	ιX	
	a Name of Individual	b SSN	c Exemption Type	d Full Year	e Jan	f Feb	g Mar	h Apr	i May	j June	k July	l Aug	m Sept	n Oct	o Nov	р
																Dec
																Dec
8	FORMER CITIZEN	000-00-0000	С	×												Dec
	FORMER CITIZEN	000-00-0000	С	×												Dec
9	FORMER CITIZEN	000-00-0000	С	×												Dec
	FORMER CITIZEN	000-00-0000	С	×												Dec
9	FORMER CITIZEN	000-00-0000	С	×												Dec
9	FORMER CITIZEN	000-00-0000	С	×												Dec
9 10 11	FORMER CITIZEN	000-00-0000	С	×												Dec
9	FORMER CITIZEN	000-00-0000	C	×												Dec

Department of the Treasury Internal Revenue Service

## **Initial and Annual Expatriation Statement**

For calendar year 2014 or other tax year beginning , 2014, and ending

► Information about Form 8854 and its separate instructions is at www.irs.gov/form8854.

► Please print or type.

OMB No. 1545-0074

Name

, 20 Attachment Sequence No. **112** Identifying number (see instructions) 000-00-0000

F	FORMER CITIZEN 000-00-0000
Par	General Information. For all filers.
1	Mailing address and telephone number where you can be reached after expatriation
_	BORN IN THE US WITH US CITIZENSHIP ONLY - LIVES IN CANADA, ON M5G 1S4 - CANADA
2	Address of principal foreign residence (if different from line 1)
3	Country of tax residence (if different from line 2) CANADA
3	Country of tax residence (if different from line 2) CANADA
4	Expatriation date. Check the box that applies (see instructions).
	<ul> <li>June 4, 2004 – June 16, 2008. Complete Parts II and V</li> <li>June 17, 2008 – December 31, 2013. Complete Part III if:         <ul> <li>You made an election to defer the payment of tax on a prior year Form 8854,</li> <li>You have an item of eligible deferred compensation, or</li> <li>You have an interest in a nongrantor trust.</li> <li>Otherwise, you do not need to file Form 8854.</li> <li>✓ January 1, 2014 – December 31, 2014. Complete Parts IV and V</li> </ul> </li> </ul>
5	Date of notification of expatriating act, termination of residency, or claim of treaty benefits (see instructions).
	<ul> <li>☑ Citizen. Date notification given to Department of State 11/01/2014</li> <li>☐ Long-term resident. Date notification given to Department of Homeland Security</li> <li>☐ Long-term resident with dual residency in a treaty country. Date commencing to be treated, for tax purposes, as resident of the treaty country</li> </ul>
6	Number of days you were physically present in the United States in the current year 3
7	List all countries (other than the United States) of which you are a citizen.
а	Name of country CANADA
b	Date you became a citizen of each country listed in line 7a 01/01/1947
8	How you became a U.S. citizen   ☑ By birth   ☐ By naturalization
Part	For Persons Who Expatriated After June 3, 2004, and Before June 17, 2008
1	Did you complete Form 8854 for any period after June 3, 2004, and before June 17, 2008?  No. If you expatriated for immigration purposes after June 3, 2004, and before June 17, 2008, but have not previously filed a Form 8854, you continue to be treated as a U.S. citizen or U.S. lawful permanent resident for U.S. income ta purposes until the day that you file this form. Because you did not file Form 8854 for the year of expatriation for immigration purposes, you are subject to the alternative tax in section 877(b) for the 10-year period beginning on the dat that you file this form (see instructions).
	☐ <b>Yes.</b> Tax year for which Form 8854 first filed Go to line 2.
2	Were you physically present in the United States for more than 30 days but not more than 60 days during the tax year?
а	If you checked " <b>Yes</b> " to line 2, were you performing services for an unrelated employer?
b	If you checked " <b>Yes</b> " to line 2a, 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?

Form 8854 (2014) Page **2** 

#### Part III For Persons Who Expatriated After June 16, 2008, and Before January 1, 2014

- 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 have an interest in a nongrantor trust, complete line 3.

2

3

1	Complete columns (a), (b for any property you disp	o), and (c) for all proper	ty on whicl			Form 8854.	Complete column (d
	(a) Description of property	(b) Amount of mark-to-mar (loss) reported on pr Form 8854			(c) deferred on prior year orm 8854	Date of	<b>(d)</b> disposition (if any)
2	Did you receive any distr If "Yes," Amount of distri	•	rred compe		for 2014? unt withheld at sourc	e, if any:	☐ Yes ☐ No
3	Did you receive any distr If "Yes," Amount of distri	•	ntor trust fo		unt withheld at sourc	e, if any:	☐ Yes ☐ No
Part	V For Persons Who	Expatriated During	2014				
	ion A Expatriation Inf		<u>,                                     </u>				
1	Enter your U.S. income to 1st Year Before Expatriation	ax liability (after foreign 2nd Year Before Expatriation	3	for the 5 tax yerd Year Expatriation	years ending before t 4th Year Before Expatriation		xpatriation. 5th Year Before Expatriation
	\$ <u>0</u>	\$_0	\$ 0		\$ <u>0</u>	\$_C	

Enter your net worth on the date of your expatriation for tax purposes . . . . . . . . . . . . . . .

Did you become at birth a U.S. citizen and a citizen of another country, and do you continue to be a citizen

If you answered "Yes" to question 3, have you been a resident of the United States for not more than 10 of

Were you under age 181/2 on the date you expatriated and have you been a U.S. resident for not more than

\$ 2,322,881

Page 3 Form 8854 (2014) Section B **Property Owned on Date of Expatriation** Do not complete Section B if: • Your average net income tax liability for the 5 tax years immediately before expatriation (see line 1 in Section A) was not more than \$157,000, your net worth (see line 2 in Section A) was under \$2 million, and you checked "Yes" on line 6 in • In Section A, you checked "Yes" on lines 3, 4, and 6; or • In Section A, you checked "Yes" on lines 5 and 6. 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 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 ✓ 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 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). Recognition of gain or loss on the deemed sale of mark-to-market property. Caution. Do not include in column (a) any property described on line 7a, 7b, 7c, or 7d. Complete column (g) only if you are deferring tax on gain from any property listed in column (a). (e) (c) (g) Gain after Amount of tax Description of property Fair market value Cost or other Gain or (loss). Form or Schedule allocation of the on day before date basis\* Subtract (c) on which gain deferred (attach exclusion amount of expatriation from (b) (see instructions) or loss is reported computations)

9	Total. Add the amounts	in column (d) and colu	mn (e)			
	Total tax deferred. Add					
	and on line 15					
+>/				 7774(1)(0) 11 1:5 "(	1)(0) 11 T1 : 1 : 1 : 1	1.1

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.

Form 8854 (2014) Page **4** 

Sect	ion C Deferral of Tax		
	<b>Election to defer tax.</b> You can defer tax only if you have provided adequate security. Adequin the instructions.	uate security	is described
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 that would prevent assessment or collection of any tax imposed because of section 877A.		′es □ 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 63, 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)	15	
	• If you are filing Form 1040, enter this amount in brackets to the left of the entry space for line 63. Identify as "EXP."		
	• If you are filing Form 1040NR, enter this amount in brackets to the left of the entry space for line 61. Identify as "EXP."		

Form **8854** (2014)

## Part V Balance Sheet and Income Statement

#### Schedule A Balance Sheet

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 following date.

- Part II filers the end of the tax year for which you are filing the form
- Part IV filers your expatriation date

For more details, see the separate instructions.

For	more details, see the separate instructions.		1	1	1
	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 long-term residents only)
1 2	Cash, including bank deposits Marketable stock and securities issued by U.S. companies				
3	Marketable stock and securities issued by foreign companies	20,990	10,495	8,274	
4	Nonmarketable stock and securities issued by U.S. companies				
5	Nonmarketable stock and securities issued by foreign companies				
а	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	804,074	0	804,074	
8 9	Partnership interests (see instructions) Assets held by trusts you own under sections 671 through 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 .	1,072,099	100,000	972,099	
17	Business property located in the United States	, , , , , , , ,		, , , , , , , , , , , , , , , , , , , ,	
18	Business property located outside the United States				
19	Other assets (see instructions) RRSP	446,708	217,852	228,855	
20	Total assets. Add lines 1 through 5 and lines	•			
	6 through 19. Do not include amounts on line 5a in this total	2,322,881	317,852	2,005,029	
	Liabilities	Amount			
21	Installment obligations				
22	Mortgages, etc				
23	Other liabilities (see instructions)				
24	Total liabilities. Add lines 21 through 23	0			
25	Net worth. Subtract line 24 from line 20, column (a).	2,322,881			
	σσ.σ (ω) · · · · · · · · · · · · · · · · · · ·				

Page 5

Form 88	354 (2014)							F	age 6
Sche	dule B	Income Statement							
	Provide	e income information for the following	ng period.						
	<ul><li>Part</li></ul>	Il filers - the tax year for which you	are filing the form						
	• Part	IV filers - the part of the tax year tha	t ends with the day before you	r expatria	tion date; but ente	r -0- f	or lines 5 t	hrough 7	7.
1	U.S. sc	ource gross income not effectively o	connected with the conduct of	a U.S. tr	ade or business.				
а	Interes	t		1a	0 00				
b	Divider	nds		1b	0 00				
С	Royalti	es		1c	0 00				
d	Pensio	n distributions		1d	0 00				
е	Other			1e	0 00				
f	Total.	Add lines a through e				1f			00
2	Gross i	income that is effectively connected	d with the conduct of a U.S. tr	ade or bu	ısiness	2		0	00
3	Income	e from the performance of services	in the United States			3		0	00
4		rom the sale or exchange of:							
а	Proper	ty (other than stock or debt obligat	tions) located in the United		0 00				
	States			4a					
b		ssued by a U.S. domestic corporat		4b	0 00				
С	0100								
	politica	political subdivision thereof, or the District of Columbia 4c							
d						4d		0	00
5		e or gain derived from certain foreig							
	•	ofits earned or accumulated before	·		•	5			00
6		on certain exchanges of property that			•	6			00
7		e received or accrued by certain for	• •	•		7			00
8	Add lin	es 1f, 2, 3, 4d, 5, 6, and 7				8			00
9		income from all other sources				9		30,591	
10	Total.	Add lines 8 and 9				10	•	30,591	
O:	Hana	Under penalties of perjury, I declare best of my knowledge and belief, it is of which preparer has any knowledge	true, correct, and complete. Dec						
Sign	Here	Your signature			Date				
		, and the second							
Paid		Print/Type preparer's name	Preparer's signature		Date		k 🗆 if	PTIN	
Prep	arer						mployed		
Use (	Only	Firm's name					EIN ►		
		Firm's address ►				Phone	no.	0054	(0.04.4)

Form **8854** (2014)

# SCENARIO 2

MIDDLE CLASS - BORN WITH DUAL CITIZENSHIP (US & CANDA) - LIVES IN CANADA

<b>1040</b>		nent of the Treasury—Internal Re Individual Incom		, ,	20	14	OMB N	o. 1545-0	074 IRS U	se Only-D	o not write	or staple in th	nis space.
For the year Jan. 1-De	ec. 31, 201	4, or other tax year beginning		01/0	)1 ,2	014, ending		10/30	, 20	Se	e separa	ate instruct	ions.
Your first name and	l initial		Last na	me						Yo	ur social	security nu	ımber
FORMER			CITI	IZEN						0.0	00-00-	-0000	
If a joint return, spo	use's first	name and initial	Last na	me								cial security	number
										NE	AS		
,		street). If you have a P.O. be							Apt. n	D. 🛕		re the SSN( line 6c are	
		and ZIP code. If you have a for			spaces be	low (see inst	ructions).			Р	residentia	l Election Ca	mpaign
LIVES IN (	ים <i>א</i> וארי:	Λ		•	•	•						u, or your spou	
Foreign country nar		-7		Foreign pro	vince/st	ate/county		For	eign postal o	joint	ly, want \$3 to	o go to this fun not change vol	d. Checking
Canada				ONTARI	· O	,			5G 1S4	refur		You	Spouse
	1	Single		ONTAKI		4	П			ualifying	porcon) (	See instructi	
Filing Status	2	☐ Married filing jointly	(even if	only one had in	come)	-						lependent, e	
Check only one		Married filing separa	•	•	,	<b>10</b>		l's name l		orilla bat i	iot your a	оронасті, с	intoi tilio
box.	3	and full name here.	Leiy. Lii ► Can	iei spouse s oc iantan ctt	ידיק מטטע די די די די	5			dow(er) wi	h depen	dent chil	d	
	6a	X Yourself. If some								)		checked	
Exemptions	b	Spouse	nie Cari	ciaiiii you as a	depend	ient, do ne	CHECK	OUX UA		}		and 6b	1
	с	c Dependents: (2) Dependent's (3) Dependent's (4) ✓ if child under age								<u></u> je 17	No. of on 6c	children who:	
	(1) First	•		social security nun		relationship		qualifyin	g for child tax e instructions)	credit	<ul><li>lived</li></ul>	with you	
	(1) 11130	name Last name						(30			you du	ot live with e to divorce	
If more than four									$\dashv$		or sepa	aration structions)	
dependents, see									$\exists$			dents on 6c	
instructions and check here ▶☐									$\dashv$		not ent	tered above	
Check here	d	d Total number of exemptions claimed										umbers on bove ▶	1
	7	Wages, salaries, tips,	7		DOVE P								
Income	, 8а	Taxable interest. Atta		. ,						8a			
	b					8b				Oa			
Attach Form(s)		Tax-exempt interest.		- 00	1								
W-2 here. Also	9a	Ordinary dividends. At		9a									
attach Forms	b	Qualified dividends	10	1									
W-2G and 1099-R if tax	10	Taxable refunds, credits, or offsets of state and local income taxes											
was withheld.	11	Alimony received									<del>                                     </del>		
	12									12			
If you did not	13	Capital gain or (loss). An Other gains or (losses)			quirea.	ii not requ	irea, crie	eck nere		13			-
get a W-2,	14	• ,	1	FOIII 4797 . 		   <sub>b</sub>	 axable a			14			
see instructions.	15a	IRA distributions .	15a							15b		/ F	271
	16a	Pensions and annuities					axable a			16b		45,	271.
	17	Rental real estate, roy			•	•	•			17	<del>                                     </del>		
	18	Farm income or (loss).								18			
	19	Unemployment compe	1	1	• •	1				19	<del>                                     </del>		
	20a	Social security benefits				D 18	axable a	mount		20b	<del>                                     </del>		
	21 22	Other income. List typ  Combine the amounts in					olo io voi	r total in		. 21			271
				_				ii totai iii	COIIIE	22		45,	271.
Adjusted	23	Educator expenses					•						
Gross	24	Certain business expens			•	1							
Income	05	fee-basis government off								_			
	25	Health savings accour								-			
	26	Moving expenses. Atta								_			
	27	Deductible part of self-en											
	28	Self-employed SEP, S											
	29	Self-employed health											
	30	Penalty on early withd		_									
	31a	Alimony paid b Recip											
	32	IRA deduction											
	33	Student loan interest of											
	34	Tuition and fees. Attac											
	35	Domestic production ac									4		
	36	Add lines 23 through 3								36			
	37	Subtract line 36 from I	ine 22 -	This is vour <b>adi</b> i	usted a	ross inco	me			37	I	4 ⊏	271

Form 1040 (2014) Page 2 45,271 Amount from line 37 (adjusted gross income) 38 You were born before January 2, 1950, Blind. Total boxes 39a Check Tax and if: Spouse was born before January 2, 1950, ☐ Blind. J checked ► 39a **Credits** If your spouse itemizes on a separate return or you were a dual-status alien, check here ▶ b 0. Itemized deductions (from Schedule A) or your standard deduction (see left margin) 40 Standard 40 Deduction 45,271. Subtract line 40 from line 38 41 for-3,950. 42 Exemptions. If line 38 is \$152,525 or less, multiply \$3,950 by the number on line 6d. Otherwise, see instructions 42 • People who check any box on line 41,321. 43 **Taxable income.** Subtract line 42 from line 41. If line 42 is more than line 41, enter -0- . . . 43 39a or 39b or Tax (see instructions). Check if any from: a Form(s) 8814 b Form 4972 c 6,188. 44 44 who can be 45 Alternative minimum tax (see instructions), Attach Form 6251 . . . . . . . . 45 claimed as a dependent, 46 Excess advance premium tax credit repayment. Attach Form 8962 46 instructions. 47 47 6,188. Add lines 44, 45, and 46 · All others: 48 Foreign tax credit. Attach Form 1116 if required . . . . Single or Married filing 49 Credit for child and dependent care expenses. Attach Form 2441 49 separately, 50 Education credits from Form 8863, line 19 . . . . \$6,200 Married filing Retirement savings contributions credit. Attach Form 8880 51 51 jointly or Qualifying 52 Child tax credit. Attach Schedule 8812, if required . . . widow(er) 53 Residential energy credits. Attach Form 5695 \$12,400 Other credits from Form: a 3800 b 8801 с 🗌 54 Head of household. 6,188. 55 Add lines 48 through 54. These are your total credits . 55 \$9,100 Subtract line 55 from line 47. If line 55 is more than line 47, enter -0-56 56 0. 57 Self-employment tax. Attach Schedule SE . . . . . 57 58 Unreported social security and Medicare tax from Form: **a** 4137 **b** 8919 58 **Other** 59 Additional tax on IRAs, other qualified retirement plans, etc. Attach Form 5329 if required **Taxes** 60a Household employment taxes from Schedule H . . . . . . . . 60a b First-time homebuyer credit repayment. Attach Form 5405 if required . 60b 61 Health care: individual responsibility (see instructions) Full-year coverage 61 62 Taxes from: a Form 8959 b Form 8960 c Instructions; enter code(s) 62 63 0. Add lines 56 through 62. This is your total tax 63 64 Federal income tax withheld from Forms W-2 and 1099 . . . **Payments** 65 2014 estimated tax payments and amount applied from 2013 return 65 If you have a 66a Earned income credit (EIC) . 66a qualifying b Nontaxable combat pay election 66b child, attach Schedule EIC. 67 Additional child tax credit. Attach Schedule 8812 . . . . . 67 68 American opportunity credit from Form 8863, line 8 . 69 Net premium tax credit. Attach Form 8962 . . . . 69 70 Amount paid with request for extension to file 70 71 Excess social security and tier 1 RRTA tax withheld . 71 72 Credit for federal tax on fuels. Attach Form 4136 73 Credits from Form: a 2439 b Reserved c Reserved d Add lines 64, 65, 66a, and 67 through 73. These are your total payments . 74 74 Refund 75 If line 74 is more than line 63, subtract line 63 from line 74. This is the amount you overpaid 75 76a Amount of line 75 you want **refunded to you.** If Form 8888 is attached, check here . 76a X X X X X X X X X X X X D c Type: ☐ Checking ☐ Savings b Routing number Direct deposit? d Account number Х X X X X X X X X x | x | x | x | x | x | x | x | instructions. 77 Amount of line 75 you want applied to your 2015 estimated tax ▶ Amount 0. Amount you owe. Subtract line 74 from line 63. For details on how to pay, see instructions 78 You Owe 79 Estimated tax penalty (see instructions) . Do you want to allow another person to discuss this return with the IRS (see instructions)? Yes. Complete below. X No **Third Party** Designee's Phone Personal identification **Designee** number (PIN) name > no. Under penalties of periury. I declare that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and belief. Sign they are true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge. Here Date Your occupation Daytime phone number Joint return? See UNIVERSITY PROFESSOR instructions. If the IRS sent you an Identity Protection Spouse's signature. If a joint return, both must sign. Spouse's occupation Keep a copy for your records. here (see inst.)

Print/Type preparer's name Preparer's signature Non-Paid Preparer Check if self-employed Firm's EIN ▶ Firm's name ▶ Firm's address ▶ Phone no.

**Paid** 

**Preparer** 

Use Only

#### **SCHEDULE B**

(Form 1040A or 1040)

Department of the Treasury Internal Revenue Service (99)

# **Interest and Ordinary Dividends**

► Attach to Form 1040A or 1040.
► Information about Schedule B and its instructions is at www.irs.gov/scheduleb.

OMB No. 1545-0074

2014

Attachment Sequence No. **08** 

Name(s) shown on r	eturn		Your	social secur	ity numl	ber
FORMER CIT	IZEN		000	0-00-00	00	
Part I Interest	1	List name of payer. If any interest is from a seller-financed mortgage and the buyer used the property as a personal residence, see instructions on back and list this interest first. Also, show that buyer's social security number and address ▶		Am	ount	
(See instructions on back and the instructions for Form 1040A, or Form 1040, line 8a.)			1			
Note. If you received a Form 1099-INT, Form 1099-OID, or substitute statement from a brokerage firm, list the firm's						
name as the payer and enter	2	Add the amounts on line 1	2			
the total interest	3	Excludable interest on series EE and I U.S. savings bonds issued after 1989.	3			
shown on that form.	4	Attach Form 8815	4			
	Note.	If line 4 is over \$1,500, you must complete Part III.		Am	ount	
Part II	5	List name of payer ▶				
Ordinary Dividends (See instructions on back and the instructions for Form 1040A, or Form 1040, line 9a.)			5			
Note. If you received a Form 1099-DIV or substitute statement from a brokerage firm, list the firm's name as the payer and enter the ordinary dividends shown on that form.	6 Note	Add the amounts on line 5. Enter the total here and on Form 1040A, or Form 1040, line 9a	6			
		ust complete this part if you (a) had over \$1,500 of taxable interest or ordinary dividends; (	b) had	l a		
		n account; or (c) received a distribution from, or were a grantor of, or a transferor to, a foreign			Yes	No
Part III Foreign Accounts and Trusts (See instructions on	7a	At any time during 2014, did you have a financial interest in or signature authority ovaccount (such as a bank account, securities account, or brokerage account) located country? See instructions	rer a fi I in a f · · · ancial I Forn	nancial foreign	×	
back.)	b 8	If you are required to file FinCEN Form 114, enter the name of the foreign country when financial account is located ▶ CA Canada  During 2014, did you receive a distribution from, or were you the grantor of, or transforeign trust? If "Yes," you may have to file Form 3520. See instructions on back.	feror t	o, a		×

# **Foreign Tax Credit**

(Individual, Estate, or Trust)
▶ Attach to Form 1040, 1040NR, 1041, or 990-T. CANADA GENERAL OMB No. 1545-0121 Attachment Sequence No. **19** 

Department of the Treasury Internal Revenue Service (99)

▶ Information about Form 1116 and its separate instructions is at www.irs.gov/form1116.

Name								1	•		on pag	ge 1 of your tax return		
	RMER CITIZEN							000-00-0000						
	a separate Form 1116 f 1116. Report all amou						f Income	in the in	structions. (	Check o	nly on	e box on each		
а□	Passive category incor	me	<b>c</b> ☐ Sect	ion 901(j) in	come		е	Lum	p-sum distri	butions				
bΧ	General category inco	me	<b>d</b> □ Cert	ain income i	re-sourced b	y treaty								
f Re	sident of (name of c	ountry) >	Canada											
	: If you paid taxes to		foreign count	ry or U.S. p	oossession,	use col	umn A i	n Part I	and line A	in Part i	II. If yo	ou paid taxes to		
	<b>e than one</b> foreign c											,		
Pa	rt I Taxable Inco	ome or Lo	oss From S	ources O	utside the	Unite	d State	es (for (	Category	Checl	ked A	Above)		
									session			Total		
g	Enter the name of	of the fore	ian country	or II S	Α		В		С		(Add	cols. A, B, and C.)		
9	possession				Canada									
1a	•				carrada							1		
10	Gross income fron above and of the											1		
	instructions):											1		
	PENSION											1		
	1 11/01/01/		45,2	71					1a	45,271.				
b	Check if line 1a is		tion for norm	on ol	13,2	7					Id			
~	services as ar											1		
	compensation from	n all source	es is \$250,000	or								1		
	more, and you us determine its source	sed an alte	ernative basis	to _								1		
Dodu	ections and losses (Ca											1		
				an line								1		
2	Expenses definite	I								1				
•	1a (attach stateme									1				
3	Pro rata share of	efinitely								1				
	related:											1		
а				I		0.						1		
	(see instructions) .					0.						1		
b	,		,	_								1		
C				<del>-</del>	45.0	0.						1		
d	0				45,2							1		
e					45,2							1		
f	Divide line 3d by lin			_	1.0	000						1		
9				_		0.						1		
4	Pro rata share of in	•	•									1		
а	Home mortgage i Home Mortgage In											1		
I.			,	_								1		
5	Losses from foreig			-								1		
6	Add lines 2, 3g, 4a			_		0.					6	0.		
7	Subtract line 6 from				n line 15. pa					. •	7	45,271.		
Par						.90					•			
	Credit is claimed			(000	,									
_	for taxes (you must check one)				Fo	reign taxes	s paid or	accrued						
Ę	(h) Paid		In foreign	currency					In U.S. do	ollars				
Country	(i) X Accrued	Taxes	withheld at sour	ce on:	(n) Other	Tax	xes withhe	eld at sour	ce on:	(r) Ot	her	(s) Total foreign		
ŏ⊨	(j) Date paid		(I) Rents		foreign taxes		. (r	o) Rents		foreign		taxes paid or		
	or accrued	(k) Dividends	and royalties	(m) Interest	paid or accrued	(o) Divide		d royalties	(q) Interest	paid accru		accrued (add cols. (o) through (r))		
Α	12/31/2014									20,8		20,825.		
В	· , ·									,,,				
С														
8	Add lines A through	ah C. colun	nn (s). Enter t	the total he	ere and on	ine 9. pa	ige 2 .			. ▶	8	20,825.		

Form 1116 (2014) Page **2** 

Part	III Figuring the Credit				
9	Enter the amount from line 8. These are your total foreign taxes paid				
	or accrued for the category of income checked above Part I	9	20,825.		
10	Carryback or carryover (attach detailed computation)	10		-	
11	Add lines 9 and 10	11	20,825.	-	
12	Reduction in foreign taxes (see instructions)	12	( )		
13	Taxes reclassified under high tax kickout (see instructions)	13			
14	Combine lines 11, 12, and 13. This is the total amount of foreign taxes	availa	able for credit	14	20,825.
15	Enter the amount from line 7. This is your taxable income or (loss) from sources outside the United States (before adjustments) for the category of income checked above Part I (see instructions)	15	45,271.		
16	Adjustments to line 15 (see instructions)	16	1372721	-	
17	Combine the amounts on lines 15 and 16. This is your net foreign source taxable income. (If the result is zero or less, you have no foreign tax credit for the category of income you checked above Part I. Skip lines 18 through 22. However, if you are filing more than one Form 1116, you must complete line 20.)	17	45,271.		
18	<b>Individuals:</b> Enter the amount from Form 1040, line 41, or Form 1040NR, line 39. <b>Estates and trusts:</b> Enter your taxable income without the deduction for your exemption	18	45,271.		
	<b>Caution:</b> If you figured your tax using the lower rates on qualified a instructions.	lividei	nds or capital gains, see		
19 20	Divide line 17 by line 18. If line 17 is more than line 18, enter "1" Individuals: Enter the amounts from Form 1040, lines 44 and 46. If enter the amounts from Form 1040NR, lines 42 and 44. Estates and Form 1041, Schedule G, line 1a, or the total of Form 990-T, lines 36 and	f you <b>trust</b> :	are a nonresident alien,	19	1.0000
	Caution: If you are completing line 20 for separate category e instructions.	(lump	-sum distributions), see		3,233
21	Multiply line 20 by line 19 (maximum amount of credit)			21	6,188.
22	Enter the <b>smaller</b> of line 14 or line 21. If this is the only Form 111 through 27 and enter this amount on line 28. Otherwise, complete the				
	instructions)			22	6,188.
Part	IV Summary of Credits From Separate Parts III (see instru	uctio	ns)		
23	Credit for taxes on passive category income	23			
24	Credit for taxes on general category income	24			
25	Credit for taxes on certain income re-sourced by treaty	25			
26	Credit for taxes on lump-sum distributions	26			
27	Add lines 23 through 26			27	( 100
28	Enter the <b>smaller</b> of line 20 or line 27	٠,٠		28	6,188.
29	Reduction of credit for international boycott operations. See instruction			29	
30	Subtract line 29 from line 28. This is your <b>foreign tax credit.</b> Enter he			00	C 100
	Form 1040NR, line 46; Form 1041, Schedule G, line 2a; or Form 990-T	, iine	4∪a	30	6,188.

# 6251

#### Alternative Minimum Tax—Individuals

OMB No. 1545-0074

Attachment

Department of the Treasury Internal Revenue Service (99)

Name(s) shown on Form 1040 or Form 1040NR

▶ Information about Form 6251 and its separate instructions is at www.irs.gov/form6251. ► Attach to Form 1040 or Form 1040NR.

Sequence No. 32 Your social security number

FORMER CITIZEN 000-00-000 Part I Alternative Minimum Taxable Income (See instructions for how to complete each line.) 1 If filing Schedule A (Form 1040), enter the amount from Form 1040, line 41, and go to line 2. Otherwise, enter the amount from Form 1040, line 38, and go to line 7. (If less than zero, enter as a negative amount.) 45,271. 1 Medical and dental. If you or your spouse was 65 or older, enter the smaller of Schedule A (Form 1040), 2 3 Taxes from Schedule A (Form 1040), line 9 . . . . . . . . . . . . . . . . . 3 Enter the home mortgage interest adjustment, if any, from line 6 of the worksheet in the instructions for this line 4 5 5 If Form 1040, line 38, is \$152,525 or less, enter -0-. Otherwise, see instructions . . . 6 0. 7 7 Investment interest expense (difference between regular tax and AMT). . . . . . . . . . . . . 8 9 Net operating loss deduction from Form 1040, line 21. Enter as a positive amount . 10 10 11 11 12 Interest from specified private activity bonds exempt from the regular tax 12 13 Qualified small business stock (7% of gain excluded under section 1202) . . . 13 0. 14 Exercise of incentive stock options (excess of AMT income over regular tax income) . . . . 14 Estates and trusts (amount from Schedule K-1 (Form 1041), box 12, code A) 15 Electing large partnerships (amount from Schedule K-1 (Form 1065-B), box 6) . 16 16 Disposition of property (difference between AMT and regular tax gain or loss) 17 Depreciation on assets placed in service after 1986 (difference between regular tax and AMT) 18 18 Passive activities (difference between AMT and regular tax income or loss) . . . . . . . . 19 Loss limitations (difference between AMT and regular tax income or loss) . . . 20 20 21 Circulation costs (difference between regular tax and AMT) . . . . . . . 21 22 Long-term contracts (difference between AMT and regular tax income) . . . . . . 22 23 23 24 Research and experimental costs (difference between regular tax and AMT) . . . 24 25 Income from certain installment sales before January 1, 1987 . . . . . . . 25 26 26 27 Other adjustments, including income-based related adjustments . . . 27 Alternative minimum taxable income. Combine lines 1 through 27. (If married filing separately and line 28 is more than \$242,450, see instructions.) . 45,271. Part II Alternative Minimum Tax (AMT) 29 Exemption. (If you were under age 24 at the end of 2014, see instructions.) IF your filing status is . . . AND line 28 is not over . . . THEN enter on line 29 . . . Single or head of household . . . \$117,300 \$52,800 Married filing jointly or qualifying widow(er) 156.500 82.100 29 41,050. Married filing separately. . . . . . 78,250 41.050 If line 28 is **over** the amount shown above for your filing status, see instructions. Subtract line 29 from line 28. If more than zero, go to line 31. If zero or less, enter -0- here and on lines 31, 33, 4,221. 30 • If you are filing Form 2555 or 2555-EZ, see instructions for the amount to enter. If you reported capital gain distributions directly on Form 1040, line 13; you reported gualified dividends on Form 1040, line 9b; or you had a gain on both lines 15 and 16 of Schedule D (Form 1040) (as refigured 1,097. 31 for the AMT, if necessary), complete Part III on the back and enter the amount from line 64 here. All others: If line 30 is \$182,500 or less (\$91,250 or less if married filing separately), multiply line 30 by 26% (.26). Otherwise, multiply line 30 by 28% (.28) and subtract \$3,650 (\$1,825 if married filing separately) from the result. 1,097. 32 0. 33 Tentative minimum tax. Subtract line 32 from line 31 . . . . . . . . . . . 33 34 Add Form 1040, line 44 (minus any tax from Form 4972), and Form 1040, line 46. Subtract from the result any foreign tax credit from Form 1040, line 48. If you used Schedule J to figure your tax on Form 1040, line 44, 0. refigure that tax without using Schedule J before completing this line (see instructions) . . . . . . . . . . . . . . . 34 0. AMT. Subtract line 34 from line 33. If zero or less, enter -0-. Enter here and on Form 1040, line 45. 35

Form 6251 (2014) Page **2** 

# Part III Tax Computation Using Maximum Capital Gains Rates

	Complete Part III only if you are required to do so by line 31 or by the Foreign Earned Income Tax Work	sheet	in the instructions.
36	Enter the amount from Form 6251, line 30. If you are filing Form 2555 or 2555-EZ, enter the amount from line 3 of the worksheet in the instructions for line 31	36	
37	Enter the amount from line 6 of the Qualified Dividends and Capital Gain Tax Worksheet in the instructions for Form 1040, line 44, or the amount from line 13 of the Schedule D Tax Worksheet in the instructions for Schedule D (Form 1040), whichever applies (as refigured for the AMT, if necessary) (see instructions). If you are filing Form 2555 or 2555-EZ, see instructions for the amount to enter	37	
38	Enter the amount from Schedule D (Form 1040), line 19 (as refigured for the AMT, if necessary) (see instructions). If you are filing Form 2555 or 2555-EZ, see instructions for the amount to enter	38	
39	If you did not complete a Schedule D Tax Worksheet for the regular tax or the AMT, enter the amount from line 37. Otherwise, add lines 37 and 38, and enter the <b>smaller</b> of that result or the amount from line 10 of the Schedule D Tax Worksheet (as refigured for the AMT, if necessary). If you are filing Form 2555 or 2555-EZ, see instructions for the amount to enter	39	
40	Enter the <b>smaller</b> of line 36 or line 39	40	
41	Subtract line 40 from line 36	41	•
42	If line 41 is \$182,500 or less (\$91,250 or less if married filing separately), multiply line 41 by 26% (.26). Otherwise, multiply line 41 by 28% (.28) and subtract \$3,650 (\$1,825 if married filing separately) from the result ▶	42	
43	Enter:		
	• \$73,800 if married filing jointly or qualifying widow(er),		
	• \$36,900 if single or married filing separately, or	43	
	• \$49,400 if head of household.		
44	Enter the amount from line 7 of the Qualified Dividends and Capital Gain Tax Worksheet in the instructions for Form 1040, line 44, or the amount from line 14 of the Schedule D Tax Worksheet in the instructions for Schedule D (Form 1040), whichever applies (as figured for the regular tax). If you did not complete either		
	worksheet for the regular tax, enter the amount from Form 1040, line 43; if zero or less, enter -0 If you are filing Form 2555 or 2555-EZ, see instructions for the amount to enter	44	
4E		44	
	Subtract line 44 from line 43. If zero or less, enter -0	45	
	Enter the <b>smaller</b> of line 36 or line 37	46 47	
47 48	Subtract line 47 from line 46	48	
	Enter:	40	
43	• \$406,750 if single		
	• \$228,800 if married filing separately	49	
	• \$457,600 if married filing jointly or qualifying widow(er)	-10	
	• \$432,200 if head of household		
50	Enter the amount from line 45	50	
51	Enter the amount from line 7 of the Qualified Dividends and Capital Gain Tax Worksheet in the instructions for Form 1040, line 44, or the amount from line 19 of the Schedule D Tax Worksheet, whichever applies (as figured for the regular tax). If you did not complete either worksheet for the regular tax, enter the amount from Form 1040, line 43; if zero or less, enter -0 If you are filing Form 2555 or Form 2555-EZ,		
	see instructions for the amount to enter	51	
52	Add line 50 and line 51	52	
53	Subtract line 52 from line 49. If zero or less, enter -0	53	,
54	Enter the smaller of line 48 or line 53	54	
55	Multiply line 54 by 15% (.15)	55	
56	Add lines 47 and 54	56	
	If lines 56 and 36 are the same, skip lines 57 through 61 and go to line 62. Otherwise, go to line 57.		
57	Subtract line 56 from line 46	57	
58	Multiply line 57 by 20% (.20)	58	
	If line 38 is zero or blank, skip lines 59 through 61 and go to line 62. Otherwise, go to line 59.		
	Add lines 41, 56, and 57	59	
60	Subtract line 59 from line 36	60	
61	Multiply line 60 by 25% (.25)	61	
	Add lines 42, 55, 58, and 61	62	
	If line 36 is \$182,500 or less (\$91,250 or less if married filing separately), multiply line 36 by 26% (.26). Otherwise, multiply line 36 by 28% (.28) and subtract \$3,650 (\$1,825 if married filing separately) from the result	63	
64	Enter the <b>smaller</b> of line 62 or line 63 here and on line 31. If you are filing Form 2555 or 2555-EZ, do not enter this amount on line 31. Instead, enter it on line 4 of the worksheet in the instructions for line 31.	64	

## Alt Min Tax

## **Foreign Tax Credit**

(Individual, Estate, or Trust)

CANADA GENERAL ► Attach to Form 1040, 1040NR, 1041, or 990-T.

OMB No. 1545-0121 Attachment

Department of the Treasury

ntern	al Revenue Service (99)	Informati	on about Fori	m 1116 and	its separate	e instri	uctions	is at www.	rs.gov/form	11116.		Sequence No. 19
Nam	, ,							Identify	ing number	as shown	on pag	ge 1 of your tax return
FO	RMER CITIZEN							000-	-00-0000			
	a separate Form 1116 f	or each cate	gory of income	e listed belo	w. See <b>Cate</b>	gories	of Inco				nlv on	ne box on each
	n 1116. Report all amou										,	
	Passive category incor		o □ Cood	ion 001/i\ in				<b>a</b> □ 1	n auma diatri	hutiana		
				ion 901(j) in				e    Lum	p-sum distri	butions		
<u> </u>	General category incor	me	<b>a</b> ∟ Cert	ain income i	e-sourced b	y treat	У					
- D	esident of (name of co	ountry)	Canada									
	e: If you paid taxes to			ny or IIS r	nesession	1180.0	olumn	Δ in Part I	and line A	in Part I	II If v	ou naid tavas to
	<b>re than one</b> foreign c	,	•	,							_	ou paru taxes to
	art I Taxable Inco		-		-							Abovo)
Г	Taxable IIICC	Jille Of EC	33 1 10111 3	Uui Ces O				or U.S. Pos		Officer	leu r	Total
_					Α	leight	oouriu y	В	C		(Add	l cols. A, B, and C.)
9	Enter the name of		-						0		(, , , , ,	1
	possession				Canada							
1	a Gross income fron											
	above and of the											
	instructions):	DEF.T	NED BENE									
	PENSION											45 054
					45,2	171.					1a	45,271.
	b Check if line 1a is											
	services as an compensation from	n all source	e, your i	otal O or								
	more, and you us	sed an alte	ernative basis	s to								
	determine its source	ce (see instr	uctions)									
Ded	uctions and losses (Ca	aution: See	instructions):									
2												
	1a (attach stateme	nt)										
3	Pro rata share of	other dedu	ctions <b>not de</b>	efinitely								
	related:											
	a Certain itemized de	eductions o	r standard de	duction								
	(see instructions) .											
	<b>b</b> Other deductions (a	attach state	ment)									
	c Add lines 3a and 3	b										
	d Gross foreign sour	ce income (	see instructio	ns) .	45,2	71.						
	e Gross income from	all sources	s (see instructi	ions) .	45,2	71.						
	f Divide line 3d by lir	ne 3e (see ir	nstructions) .	[	1.0	000						
	g Multiply line 3c by	line 3f .		[								
4	Pro rata share of inf	terest expen	se (see instru	ctions):								
	a Home mortgage i											
	Home Mortgage In	•										
	<b>b</b> Other interest expe	ense		[								
5												
6	•			_							6	1
7	Subtract line 6 from	n line 1a. Er	nter the result	here and o	n line 15, pa	age 2				. ▶	7	45,271.
Pa	rt II Foreign Tax	es Paid o	r Accrued	(see instr	uctions)							•
	Credit is claimed				r	rojan t-	V00 no:-	l or accessed				
ا ح	for taxes (you must check one)				FO	reign ta	xes paid	l or accrued				
Country	(h) Paid		In foreign	currency					In U.S. do	ollars		
no l	(i) X Accrued	Taxes	withheld at sour	rce on:	(n) Other		Taxes wi	ithheld at sour	ce on:	(r) Ot		(s) Total foreign
ŭ	(j) Date paid	# N P: : :	(I) Rents	(ma) la l	foreign taxes paid or	(-) D:	data a 1	(p) Rents	(3)	foreign paid		taxes paid or accrued (add cols.
	or accrued	(k) Dividends	and royalties	(m) Interest	accrued	( <b>o)</b> Div	vidends	and royalties	(q) Interest	accru		(o) through (r))
Α	12/31/2014									20,8		20,825.
В	,,,,								1	23,0		20,023.
5												

8

Add lines A through C, column (s). Enter the total here and on line 9, page 2 . . .

Part	III Figuring the Credit		
9	Enter the amount from line 8. These are your total foreign taxes paid		
	or accrued for the category of income checked above Part I 9 20,825.	_	
10	Carryback or carryover (attach detailed computation)		
11	Add lines 9 and 10		
12	Reduction in foreign taxes (see instructions)	)	
13	Taxes reclassified under high tax kickout (see instructions) 13		
14	Combine lines 11, 12, and 13. This is the total amount of foreign taxes available for credit	14	20,825.
15	Enter the amount from line 7. This is your taxable income or (loss) from sources outside the United States (before adjustments) for the category		
16	of income checked above Part I (see instructions)	_	
16	Adjustments to line 15 (see instructions)	+	
17	Combine the amounts on lines 15 and 16. This is your net foreign source taxable income. (If the result is zero or less, you have no foreign tax credit for the category of income you checked above Part I. Skip lines 18 through 22. However, if you are filing more than one Form 1116, you must complete line 20.)		
18	Individuals: Enter the amount from Form 1040, line 41, or Form 1040NR, line 39. Estates and trusts: Enter your taxable income without the deduction for your exemption		
	<b>Caution:</b> If you figured your tax using the lower rates on qualified dividends or capital gains, see instructions.		
19	Divide line 17 by line 18. If line 17 is more than line 18, enter "1"	19	1.0000
20	<b>Individuals:</b> Enter the amounts from Form 1040, lines 44 and 46. If you are a nonresident alien, enter the amounts from Form 1040NR, lines 42 and 44. <b>Estates and trusts:</b> Enter the amount from Form 1041, Schedule G, line 1a, or the total of Form 990-T, lines 36 and 37	20	1,097.
	Caution: If you are completing line 20 for separate category e (lump-sum distributions), see	20	1,057.
	instructions.		
21	Multiply line 20 by line 19 (maximum amount of credit)	21	1,097.
22	Enter the <b>smaller</b> of line 14 or line 21. If this is the only Form 1116 you are filing, skip lines 23 through 27 and enter this amount on line 28. Otherwise, complete the appropriate line in Part IV (see		
Dt	instructions)	22	1,097.
	Summary of Credits From Separate Parts III (see instructions)		
23	Credit for taxes on passive category income	-	
24 25	Credit for taxes on general category income		
25 26	Credit for taxes on certain income re-sourced by treaty		
26 27	Add lines 23 through 26	27	
28	Enter the <b>smaller</b> of line 20 or line 27	28	1,097.
20 29	Reduction of credit for international boycott operations. See instructions for line 12	29	1,007.
30	Subtract line 29 from line 28. This is your <b>foreign tax credit.</b> Enter here and on Form 1040, line 48;	29	
50	Form 1040NR, line 46; Form 1041, Schedule G, line 2a; or Form 990-T, line 40a	30	1,097.
	. , , , , , , , , , , , , , , , , , , ,		

# Form **8965**

Department of the Treasury

Internal Revenue Service

**Health Coverage Exemptions** 

► Attach to Form 1040, Form 1040A, or Form 1040EZ.

▶ Information about Form 8965 and its separate instructions is at www.irs.gov/form8965.

OMB No. 1545-0074

2014

Attachment Sequence No. 75

Name as shown on return FORMER CITIZEN

Your social security number 000-00-0000

Complete this form if you have a Marketplace-granted coverage exemption or you are claiming a coverage exemption on your return.

	a Name of I						o SN				Exemp	otion C	c ertifica	nte Nur	nber	
1				_												
2				+												
3																
4																
5				+					_							
6 Part	Coverage Exemption	s for Your Hou	usehold C	laim	ed o	n Yo	ur Re	eturn	:							
7a	Are you claiming an exemption I	because vour hou	sehold inco	me is	belov	v the f	ilina t	hresh	old?.					Yes	X	No
		-														
	Are you claiming a hardship exe  Coverage Exemption	inplion because y	Jour gross i			1014 +1	aa filir	a thro	schole	12				Vaa	Y	No
Part I				d on	You	r Re	turn:	If yo	eshold u and	1? . d/or a	a mer	nber		<b>Yes</b> our ta		No
Part I	household are claiming	g an exemptior		d on	You n, cor	r Re	turn: e Pa	If yo rt III.	u and	d/or a	a mer		of yo	our ta	ıx	
Parti			on your r	ed on eturr	You	r Re	turn:	If yo	i May	i? . d/or a j June		nber I Aug		our ta		p Dec
Part	household are claiming	g an exemption	on your r	ed on eturr d Full	You n, cor e	r Re	turn: e Pa	If yort III.	u and	d/or a	a mer	ı	of yo	our ta	o o	р
Part 1	household are claiming	g an exemption	on your r	ed on eturr d Full	You n, cor e	r Re	turn: e Pa	If yort III.	u and	d/or a	a mer	ı	of yo	our ta	o o	р
	household are claiming a Name of Individual	g an exemption  b  ssn	c Exemption Type	ed on eturr d Full Year	You n, cor e	r Re	turn: e Pa	If yort III.	u and	d/or a	a mer	ı	of yo	our ta	o o	р
	household are claiming a Name of Individual	g an exemption  b  ssn	c Exemption Type	ed on eturr d Full Year	You n, cor e	r Re	turn: e Pa	If yort III.	u and	d/or a	a mer	ı	of yo	our ta	o o	р
8	household are claiming a Name of Individual	g an exemption  b  ssn	c Exemption Type	ed on eturr d Full Year	You n, cor e	r Re	turn: e Pa	If yort III.	u and	d/or a	a mer	ı	of yo	our ta	o o	р
8	household are claiming a Name of Individual	g an exemption  b  ssn	c Exemption Type	ed on eturr d Full Year	You n, cor e	r Re	turn: e Pa	If yort III.	u and	d/or a	a mer	ı	of yo	our ta	o o	р
9	household are claiming a Name of Individual	g an exemption  b  ssn	c Exemption Type	ed on eturr d Full Year	You n, cor e	r Re	turn: e Pa	If yort III.	u and	d/or a	a mer	ı	of yo	our ta	o o	р
8	household are claiming a Name of Individual	g an exemption  b  ssn	c Exemption Type	ed on eturr d Full Year	You n, cor e	r Re	turn: e Pa	If yort III.	u and	d/or a	a mer	ı	of yo	our ta	o o	р
9	household are claiming a Name of Individual	g an exemption  b  ssn	c Exemption Type	ed on eturr d Full Year	You n, cor e	r Re	turn: e Pa	If yort III.	u and	d/or a	a mer	ı	of yo	our ta	o o	р
8 9 10	household are claiming a Name of Individual	g an exemption  b  ssn	c Exemption Type	ed on eturr d Full Year	You n, cor e	r Re	turn: e Pa	If yort III.	u and	d/or a	a mer	ı	of yo	our ta	o o	р

## Department of the Treasury

Name

**Initial and Annual Expatriation Statement** 

For calendar year 2014 or other tax year beginning

Attachment

Identifying number (see instructions)

OMB No. 1545-0074

▶ Information about Form 8854 and its separate instructions is at www.irs.gov/form8854. ► Please print or type.

Sequence No. 112

FORMER CITIZEN 000-00-0000 Part I **General Information.** For all filers. Mailing address and telephone number where you can be reached after expatriation BORN DUAL CITIZEN (US & CANADA) - LIVES IN CANADA, ON M5G 1S4 - CANADA Address of principal foreign residence (if different from line 1) 2 -----Country of tax residence (if different from line 2) 3 CANADA **Expatriation date.** Check the box that applies (see instructions). June 4, 2004 – June 16, 2008. Complete Parts II and V June 17, 2008 – December 31, 2013. Complete Part III if: • You made an election to defer the payment of tax on a prior year Form 8854, • You have an item of eligible deferred compensation, or • You have an interest in a nongrantor trust. Otherwise, you do not need to file Form 8854. January 1, 2014 - December 31, 2014. Complete Parts IV and V Date of notification of expatriating act, termination of residency, or claim of treaty benefits (see instructions). 11/01/2014 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 Number of days you were physically present in the United States in the current year 3 6 List all countries (other than the United States) of which you are a citizen. 7 CANADA Name of country Date you became a citizen of each country listed in line 7a 01/01/1947 How you became a U.S. citizen By birth ☐ By naturalization For Persons Who Expatriated After June 3, 2004, and Before June 17, 2008

	Yes. Tax year for which Form 8854 first filed	. Go to line 2.
	<b>No.</b> If you expatriated for immigration purposes filed a Form 8854, you continue to be treated a purposes until the day that you file this form.	after June 3, 2004, and before June 17, 2008, but have not previously as a U.S. citizen or U.S. lawful permanent resident for U.S. income tax Because you did not file Form 8854 for the year of expatriation for rnative tax in section 877(b) for the 10-year period beginning on the date
Dia y	you complete Form 8854 for any period after June	3, 2004, and before June 17, 2008?

	during the tax year:	•	•	•	•	•	•	•	•	•	•	•	•	٠	•	•	•	•	•	•	•	•	•	•		•	•	•	•	□ 103	ш	110
а	If you checked "Yes"	to	line	e 2,	we	ere	yoı	ı pe	erfo	orm	ing	j se	ervi	ces	s fo	r aı	า น	nre	late	ed	eı	mp	olo	ye	r?					☐ Yes		No

Were you physically present in the United States for more than 30 days but not more than 60 days

b	If you checked "Yes" to line 2a, 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

during the tay year?

Page 2 Form 8854 (2014)

#### For Persons Who Expatriated After June 16, 2008, and Before January 1, 2014 Part III

- 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.

(a)	(b)		(c)		(d)
Description of property	Amount of mark-to-mark (loss) reported on pric Form 8854		deferred on prior year orm 8854	Date of c	(d) lisposition (if any)
2 Did you receive any dist If "Yes," Amount of distr	ributions of eligible defer		for 2014? unt withheld at sourc	e. if anv:	☐ Yes ☐ No
	ributions from a nongran	tor trust for 2014?	unt withheld at sourc	<b>-</b> -	☐ Yes ☐ No
art IV For Persons Wh	o Expatriated During	2014			
ection A Expatriation In					
1 Enter your U.S. income	tax liability (after foreign t	ax credits) for the 5 tax	years ending before t	he date of ex	patriation.
1st Year	2nd Year	3rd Year	4th Year		5th Year
Before Expatriation	Refore Expatriation	Before Expatriation	Refore Evpetriation	n I	Before Expatriation

Did you become at birth a U.S. citizen and a citizen of another country, and do you continue to be a citizen

If you answered "Yes" to question 3, have you been a resident of the United States for not more than 10 of 

Were you under age 181/2 on the date you expatriated and have you been a U.S. resident for not more than 

Do you certify under penalties of perjury that you have complied with all of your tax obligations for the 5

✓ Yes □ No

☐ Yes **☑** No

Page 3 Form 8854 (2014) Section B **Property Owned on Date of Expatriation** Do not complete Section B if: • Your average net income tax liability for the 5 tax years immediately before expatriation (see line 1 in Section A) was not more than \$157,000, your net worth (see line 2 in Section A) was under \$2 million, and you checked "Yes" on line 6 in • In Section A, you checked "Yes" on lines 3, 4, and 6; or • In Section A, you checked "Yes" on lines 5 and 6. 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 b Do you have any ineligible deferred compensation items? If "Yes," you must include in income the ☐ Yes ☐ No c Do you have any specified tax deferred accounts? If "Yes," you must include in income the entire 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  $\ldots \ldots \ldots \ldots \ldots \ldots$  Yes  $\square$  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). Recognition of gain or loss on the deemed sale of mark-to-market property. Caution. Do not include in column (a) any property described on line 7a, 7b, 7c, or 7d. Complete column (g) only if you are deferring tax on gain from any property listed in column (a). (e) (c) (g) Gain after Cost or other Form or Schedule Amount of tax Description of property Fair market value Gain or (loss). allocation of the on day before date basis\* Subtract (c) on which gain deferred (attach exclusion amount of expatriation from (b) (see instructions) or loss is reported computations)

9	Total. Add the amounts	in column (d) and colu	mn (e)				
10	<b>Total tax deferred.</b> Add and on line 15						
*Voi	ı must designate any property	y for which you are cleeting	na to figure basis with	hout regard to section 8	277Δ(h)(2) Identify as "(	h)(2) " This election is irrev	(ocable

Form 8854 (2014) Page **4** 

Sect	ion C Deferral of Tax		
	<b>Election to defer tax.</b> You can defer tax only if you have provided adequate security. Adequin the instructions.	uate security	is described
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 that would prevent assessment or collection of any tax imposed because of section 877A.		′es □ 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 63, 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)	15	
	• If you are filing Form 1040, enter this amount in brackets to the left of the entry space for line 63. Identify as "EXP."		
	• If you are filing Form 1040NR, enter this amount in brackets to the left of the entry space for line 61. Identify as "EXP."		

Form **8854** (2014)

## Part V Balance Sheet and Income Statement

### Schedule A Balance Sheet

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 following date.

- Part II filers the end of the tax year for which you are filing the form
- Part IV filers your expatriation date

For more details, see the separate instructions.

For	more details, see the separate instructions.		1	1	1
	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 long-term residents only)
1 2	Cash, including bank deposits Marketable stock and securities issued by U.S. companies				
3	Marketable stock and securities issued by foreign companies	20,990	10,495	8,274	
4	Nonmarketable stock and securities issued by U.S. companies				
5	Nonmarketable stock and securities issued by foreign companies				
а	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	804,074	0	804,074	
8 9	Partnership interests (see instructions) Assets held by trusts you own under sections 671 through 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 .	1,072,099	100,000	972,099	
17	Business property located in the United States	, , , , , , , ,		, , , , , , , , , , , , , , , , , , , ,	
18	Business property located outside the United States				
19	Other assets (see instructions) RRSP	446,708	217,852	228,855	
20	Total assets. Add lines 1 through 5 and lines	•			
	6 through 19. Do not include amounts on line 5a in this total	2,322,881	317,852	2,005,029	
	Liabilities	Amount			
21	Installment obligations				
22	Mortgages, etc				
23	Other liabilities (see instructions)				
24	Total liabilities. Add lines 21 through 23	0			
25	Net worth. Subtract line 24 from line 20, column (a).	2,322,881			
	σσ.σ (ω) · · · · · · · · · · · · · · · · · · ·				

Page 5

Form 88	54 (2014)						Page	6
Sche	dule B	Income Statement						_
	Provide	e income information for the following	period.					_
	<ul><li>Part</li></ul>	Il filers - the tax year for which you are	filing the form					
	• Part	IV filers - the part of the tax year that en	ds with the day before you	r expatriat	tion date; but ente	r -0- fc	or lines 5 through 7.	
1	U.S. sc	ource gross income not effectively conr	nected with the conduct of	a U.S. tra	ade or business.			
а	Interes	t		1a	0 00			
b	Divider	nds		1b	0 00			
С	Royalti	es		1c	0 00			
d	Pensio	n distributions		1d	0 00			
е	Other			1e	0 00			
f	Total.	Add lines a through e				1f	0 00	
2	Gross i	ncome that is effectively connected wi	th the conduct of a U.S. tr	ade or bu	siness	2	0 00	
3	Income	e from the performance of services in the	ne United States			3	0 00	
4		rom the sale or exchange of:						
а		ty (other than stock or debt obligation	•		0 00			
	States			4a				
b		ssued by a U.S. domestic corporation		4b	0 00			
С		bligations of U.S. persons or of the U			0 00			
	politica	I subdivision thereof, or the District of	Columbia	4c	0 00			
d		3				4d	0 00	
5		e or gain derived from certain foreign o	•	•	•			
	and pro	ofits earned or accumulated before the	date of expatriation (see i	nstruction	ıs)	5	0 00	
6		n certain exchanges of property that or		•		6	0 00	
7	Income	received or accrued by certain foreign	n corporations (see instruc	tions) .		7	0 00	_
8		es 1f, 2, 3, 4d, 5, 6, and 7				8	0 00	_
9		ncome from all other sources				9	45,271 00	_
10	Total.	Add lines 8 and 9				10	45,271 00	_
Cian	Here	Under penalties of perjury, I declare that best of my knowledge and belief, it is true of which preparer has any knowledge.						
Sigii	пеге	Your signature			Date			
Paid		Print/Type preparer's name	Preparer's signature		Date	Check	☐ if PTIN	_
Prep	arer					self-en	nployed	_
Use (		Firm's name ►				Firm's	EIN►	_
		Firm's address ►				Phone	no.	_

Form **8854** (2014)

# **SCENARIO 3**

MIDDLE CLASS - BORN WITH DUAL CITIZENSHIP (US & CANDA) - LIVES IN THE UNITED KINGDOM

2014

IF you live in	THEN use this address to send in your payment
Florida, Louisiana, Mississippi, Texas	Internal Revenue Service P.O. Box 1214 Charlotte, NC 28201-1214
Alaska, Arizona, California, Colorado, Hawaii, Idaho, Nevada, New Mexico, Oregon, Utah, Washington, Wyoming	Internal Revenue Service P.O. Box 7704 San Francisco, CA 94120-7704
Arkansas, Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Montana, Nebraska, North Dakota, Ohio, Oklahoma, South Dakota, Wisconsin	Internal Revenue Service P.O. Box 802501 Cincinnati, OH 45280-2501
Alabama, Georgia, Kentucky, New Jersey, North Carolina, South Carolina, Tennessee, Virginia	Internal Revenue Service P.O. Box 931000 Louisville, KY 40293-1000
Connecticut, Delaware, District of Columbia, Maine, Maryland, Massachusetts, Missouri, New Hampshire, New York, Pennsylvania, Rhode Island, Vermont, West Virginia	Internal Revenue Service P.O. Box 37008 Hartford, CT 06176-7008
A foreign country, American Samoa, or Puerto Rico (or are excluding income under Internal Revenue Code 933), or use an APO or FPO address, or file Form 2555, 2555-EZ, or 4563, or are a dual-status alien or nonpermanent resident of Guam or the U.S. Virgin Islands.	Internal Revenue Service P.O. Box 1303 Charlotte, NC 28201-1303

MAIL FORM 1040-V TO THE INTERNAL REVENUE SERVICE CENTER AT THE ADDRESS LISTED BELOW.

Form 1040-V (2014)

▼ Detach Here and Mail With Your Payment and Return ▼

Department of the Treasury Internal Revenue Service

(99) **201**4

# Form 1040-V Payment Voucher

- ► Use this voucher when making a payment with Form 1040.
- ► Do not staple this voucher or your payment to Form 1040.
- ► Make your check or money order payable to the 'United States Treasury.'
- $\,\blacktriangleright\,$  Write your social security number (SSN) on your check or money order.

FORMER CITIZEN

BORN WITH DUAL CITIZENSHIP (
LIVES IN THE UNITED KINGDOM
UNITED KINGDOM (ENGLAND, N IRELAND

INTERNAL REVENUE SERVICE
P.O. BOX 1303
CHARLOTTE, NC 28201-1303 USA

<b>1040</b>	Departm	nent of the Treasury—Internal Re	evenue Servi	ce (99)	201	14	MB No. 154	5-0074 IBS I	Jse Onlv−F	On not write	or staple in th	is space
For the year Jan. 1-De		4, or other tax year beginning	110 147	01/0	1 .2014.	ending		30 ,20 14			ate instruct	
Your first name and		·, · · · · · · · · · · · · · · · · · ·	Last name	- , -			107	30 7 11			security nu	
FORMER			CITIZ	ZEN						00-00	_0000	
If a joint return, spo	use's first	name and initial	Last name								cial security (	number
									l NI	RA		
,		street). If you have a P.O. bo						Apt. r		Make su	re the SSN(	
		CITIZENSHIP (U and ZIP code. If you have a for			paces below	see instruct	tions).		-	regidentis	l Election Ca	mnaian
•		NITED KINGDOM		.,							u, or your spous	
Foreign country nar		NITED KINGDOM		Foreign pro	vince/state/	county		Foreign postal	joint	ly, want \$3 t	o go to this fund	d. Checking
		l, N Ireland, Scotland	and Walos					<b>G F</b>	refu		not change you	Spouse
	\ <u>\text{\text{Eligrano}}{1}</u>	Single	alia Mates	7		4	l lland of ba	ماخندیا امام مام ما	au raliferina			
Filing Status	2	☐ Married filing jointly	(oven if or	alv one had inc	nomo)	4 🗆		usehold (with ng person is a				
Check only one		<ul><li>Married filing separa</li></ul>	•	•	,		child's nan	٠.	Crilla bat	not your c	ieperiderit, ei	inter triis
box.	3	and full name here.	itely. ⊑ille ► ⊘anta	TAM CTT	IN ADOVE	5 🗆		widow(er) w	ith dener	dent chil	d	
	6a	X Yourself. If some							1		checked	
Exemptions	b	Spouse	one can ci	iaiiii you as a c	лерепаеті	, do not c	SHECK DOX	oa	}	on 6a	and 6b	1
	С	Dependents:	· · ·	(2) Dependent's		3) Dependent		· · · · · · · · · · · · · · · · · · ·	 age 17	No. of on 6c	children who:	
	(1) First	-		social security num		ationship to	l duali	ying for child tax	credit	<ul> <li>lived</li> </ul>	with you	
	(1) 11131	name Last name						(see instructions	<u>)                                    </u>	you du	ot live with e to divorce	
If more than four											aration structions)	
dependents, see										Depen	dents on 6c	
instructions and										not en	tered above	
check here ►	d	Total number of exem	ntions cla	imed							umbers on bove ▶	1 1
		<u> </u>				• •			7	illies a	ibove P	
Income	7	Wages, salaries, tips,		. ,								
	8a	Taxable interest. Attac		•					8a			
Attach Form(s)	b	Tax-exempt interest.				8b						
W-2 here. Also	9a	Ordinary dividends. At							9a			
attach Forms	b	Qualified dividends				9b			- 10			
W-2G and 1099-R if tax	10	Taxable refunds, credi	-						10			
was withheld.	11	Alimony received .							11			
	12	Business income or (lo						_	12		0.00	4.45
If you did not	13	Capital gain or (loss).			juirea. It no	t required	a, cneck n	ere 🕨 ∟	13		270,	447.
get a W-2,	14	Other gains or (losses)	1 1	orm 4/9/ .		 			14			
see instructions.	15a	IRA distributions .	15a				ble amount		15b		0.60	111
	16a	Pensions and annuities				•	ble amount		16b		860,	144.
	17	Rental real estate, roya	· · ·		'							
	18	Farm income or (loss).							18			
	19	Unemployment compe	1 1			I			19			
	20a	Social security benefits				j b laxa	ible amoun		20b			
	21 22	Other income. List typ  Combine the amounts in				h 21 Thio	io vour teto	linoomo N	21		1 120	F 0 1
							is your <b>tota</b>	IIICOIIIE P	22		1,130,	591.
Adjusted	23	Educator expenses							_			
Gross	24	Certain business expense				i i						
Income	05	fee-basis government off				24			-			
	25	Health savings accour							-			
	26	Moving expenses. Atta							_			
	27	Deductible part of self-er							_			
	28	Self-employed SEP, S										
	29	Self-employed health i							_			
	30	Penalty on early withd		-					_			
	31a	Alimony paid b Recip				31a						
	32	IRA deduction										
	33	Student loan interest of										
	34	Tuition and fees. Attac										
	35	Domestic production ac										
	36	Add lines 23 through 3							36			
	37	Subtract line 36 from I	ine 22 Th	is is vour <b>adi</b> u	isted ares	s income	2		27	1	1 130	501

Form 1040 (2014) Page 2 1,130,591. Amount from line 37 (adjusted gross income) . . . . . . . . 38 ☐ Blind. **Total boxes** You were born before January 2, 1950, 39a Check Tax and ☐ Blind. | checked ► 39a if: Spouse was born before January 2, 1950, **Credits** If your spouse itemizes on a separate return or you were a dual-status alien, check here▶ 39bX b 0. Itemized deductions (from Schedule A) or your standard deduction (see left margin) . 40 40 Standard Deduction 1,130,591. 41 for-0. 42 Exemptions. If line 38 is \$152,525 or less, multiply \$3,950 by the number on line 6d. Otherwise, see instructions 42 • People who check any box on line 1,130,591. 43 **Taxable income.** Subtract line 42 from line 41. If line 42 is more than line 41, enter -0- . . . 43 39a or 39b or 44 Tax (see instructions). Check if any from: a Form(s) 8814 b Form 4972 c 44 368,082. who can be 45 45 claimed as a dependent, 46 Excess advance premium tax credit repayment. Attach Form 8962 . 46 see instructions. 47 Add lines 44, 45, and 46 . . . . . . . . . . . 47 368,082. • All others: 20,825. 48 Foreign tax credit. Attach Form 1116 if required . . . . Single or Married filing 49 Credit for child and dependent care expenses. Attach Form 2441 49 separately, 50 Education credits from Form 8863, line 19 . . . . . 50 \$6,200 Married filing Retirement savings contributions credit. Attach Form 8880 51 51 jointly or Qualifying 52 Child tax credit. Attach Schedule 8812, if required . . . 52 widow(er), \$12,400 Residential energy credits. Attach Form 5695 h \$ C P lf q R Г S T D ŀ

\$12,400	55	nesidential energy credits. Attach 1 of 1 of 2 of 2 of 2 of 2 of 2 of 2 of	- !	
Head of	54	Other credits from Form: a 3800 b 8801 c 54		
household, \$9,100	55	Add lines 48 through 54. These are your <b>total credits</b>	55	20,825.
	56	Subtract line 55 from line 47. If line 55 is more than line 47, enter -0	56	347,257.
	57	Self-employment tax. Attach Schedule SE	57	
Other	58	Unreported social security and Medicare tax from Form: <b>a</b> 4137 <b>b</b> 8919	58	1
Taxes	59	Additional tax on IRAs, other qualified retirement plans, etc. Attach Form 5329 if required	59	1
Idaes	60a	Household employment taxes from Schedule H	60a	
	b	First-time homebuyer credit repayment. Attach Form 5405 if required	60b	
	61	Health care: individual responsibility (see instructions) Full-year coverage	61	1
	62	Taxes from: a Form 8959 b Form 8960 c Instructions; enter code(s)	62	10,277.
	63	Add lines 56 through 62. This is your <b>total tax</b>	63	357,534.
Payments	64	Federal income tax withheld from Forms W-2 and 1099 64		1
	65	2014 estimated tax payments and amount applied from 2013 return 65		1
If you have a	66a	Earned income credit (EIC) 66a		1
qualifying child, attach	b	Nontaxable combat pay election 66b		1
Schedule EIC.	67	Additional child tax credit. Attach Schedule 8812 67		1
	68	American opportunity credit from Form 8863, line 8 68		1
	69	Net premium tax credit. Attach Form 8962 69		1
	70	Amount paid with request for extension to file		1
	71	Excess social security and tier 1 RRTA tax withheld 71		1
	72	Credit for federal tax on fuels. Attach Form 4136		1
	73	Credits from Form: a 2439 b Reserved c Reserved d 73		1
	74	Add lines 64, 65, 66a, and 67 through 73. These are your total payments	74	1
Refund	75	If line 74 is more than line 63, subtract line 63 from line 74. This is the amount you overpaid	75	
	76a	Amount of line 75 you want <b>refunded to you.</b> If Form 8888 is attached, check here . •	76a	
Direct deposit?	▶ b	Routing number		
•	▶ d	Account number X X X X X X X X X X X X X X X X X X X		1
instructions.	77	Amount of line 75 you want <b>applied to your 2015 estimated tax ▶</b> 77		1
Amount	78	Amount you owe. Subtract line 74 from line 63. For details on how to pay, see instructions	78	363,954.
You Owe	79	Estimated tax penalty (see instructions)		
Third Party	Do	you want to allow another person to discuss this return with the IRS (see instructions)?	. Com	plete below. X No
Designee		signee's Phone Personal ider		. —
		me ► no. ► number (PIN)		
Sign		der penalties of perjury, I declare that I have examined this return and accompanying schedules and statements, and to t y are true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which prepa		
Here		ur signature Date Your occupation	1	me phone number
Joint return? See instructions.		UNIVERSITY PROFESSOR		
Keep a copy for	Sp	ouse's signature. If a joint return, <b>both</b> must sign. Date Spouse's occupation	If the IF	RS sent you an Identity Protection
your records.	•		PIN, en	nter it
D-:-I	Pri	nt/Type preparer's name Preparer's signature Non-Paid Preparer Date	i -	PTIN
Paid			Check self-e	k ∐ if mployed
Preparer	Fin	m's name ▶	Firm's	s EIN ▶
Use Only		n's address ►	Phone	
www.irs.gov/for				- 1010
www.irs.gov/for	m1040	RI	EV 03/04	<b>115 PRO</b> Form <b>1040</b> (201

#### **SCHEDULE B**

(Form 1040A or 1040)

Department of the Treasury Internal Revenue Service (99)

## **Interest and Ordinary Dividends**

► Attach to Form 1040A or 1040.
► Information about Schedule B and its instructions is at www.irs.gov/scheduleb.

OMB No. 1545-0074

2014

Attachment Sequence No. **08** 

Name(s) shown on r	eturn		Your	social secur	ity numl	ber
FORMER CIT	IZEN		000	0-00-00	00	
Part I Interest	1	List name of payer. If any interest is from a seller-financed mortgage and the buyer used the property as a personal residence, see instructions on back and list this interest first. Also, show that buyer's social security number and address ▶		Am	ount	
(See instructions on back and the instructions for Form 1040A, or Form 1040, line 8a.)			1			
Note. If you received a Form 1099-INT, Form 1099-OID, or substitute statement from a brokerage firm, list the firm's						
name as the payer and enter	2	Add the amounts on line 1	2			
the total interest	3	Excludable interest on series EE and I U.S. savings bonds issued after 1989.	3			
shown on that form.	4	Attach Form 8815	4			
	Note.	If line 4 is over \$1,500, you must complete Part III.		Am	ount	
Part II	5	List name of payer ▶				
Ordinary Dividends (See instructions on back and the instructions for Form 1040A, or Form 1040, line 9a.)			5			
Note. If you received a Form 1099-DIV or substitute statement from a brokerage firm, list the firm's name as the payer and enter the ordinary dividends shown on that form.	6 Note	Add the amounts on line 5. Enter the total here and on Form 1040A, or Form 1040, line 9a	6			
		ust complete this part if you (a) had over \$1,500 of taxable interest or ordinary dividends; (	b) had	l a		
		n account; or (c) received a distribution from, or were a grantor of, or a transferor to, a foreign			Yes	No
Part III Foreign Accounts and Trusts (See instructions on	7a	At any time during 2014, did you have a financial interest in or signature authority ovaccount (such as a bank account, securities account, or brokerage account) located country? See instructions	rer a fi I in a f · · · ancial I Forn	nancial foreign	×	
back.)	b 8	If you are required to file FinCEN Form 114, enter the name of the foreign country when financial account is located ▶ CA Canada  During 2014, did you receive a distribution from, or were you the grantor of, or transforeign trust? If "Yes," you may have to file Form 3520. See instructions on back.	feror t	o, a		×

### **SCHEDULE D** (Form 1040)

## **Capital Gains and Losses**

► Attach to Form 1040 or Form 1040NR.

OMB No. 1545-0074

Department of the Treasury Internal Revenue Service (99) ▶ Information about Schedule D and its separate instructions is at www.irs.gov/scheduled. ▶ Use Form 8949 to list your transactions for lines 1b, 2, 3, 8b, 9, and 10.

Sequence No. 12

Name(s) shown on return FORMER CITIZEN Your social security number 000-00-0000

Pa	rt I Short-Term Capital Gains and Losses – As	sets Held One `	Year or Less			
lines	instructions for how to figure the amounts to enter on the below.  form may be easier to complete if you round off cents to	(d) Proceeds (sales price)	(e) Cost (or other basis)	(g) Adjustmer to gain or loss Form(s) 8949,	s from	(h) Gain or (loss) Subtract column (e) from column (d) and combine the result with
	e dollars.	(sales price)	(or other basis)	line 2, colum		column (g)
1a	Totals for all short-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 1b.					
1b	Totals for all transactions reported on Form(s) 8949 with <b>Box A</b> checked					
2	Totals for all transactions reported on Form(s) 8949 with <b>Box B</b> checked					
3	Totals for all transactions reported on Form(s) 8949 with <b>Box C</b> checked	0.	680,000.			-680,000.
4	Short-term gain from Form 6252 and short-term gain or (I	loss) from Forms 4	1684, 6781, and 88	824 .	4	
5	Net short-term gain or (loss) from partnerships, Schedule(s) K-1	S corporations,	estates, and t		5	
6	Short-term capital loss carryover. Enter the amount, if ar <b>Worksheet</b> in the instructions	ny, from line 8 of y		Carryover	6	( )
7	Net short-term capital gain or (loss). Combine lines 1a term capital gains or losses, go to Part II below. Otherwis				7	-680,000.
Pa	t II Long-Term Capital Gains and Losses—Ass	sets Held More	Than One Year			I
See	instructions for how to figure the amounts to enter on the			(g)		(h) Gain or (loss)
This	below.  form may be easier to complete if you round off cents to le dollars.	(d) Proceeds (sales price)	(e) Cost (or other basis)	Adjustmer to gain or loss Form(s) 8949, line 2, colum	s from Part II,	Subtract column (e) from column (d) and combine the result with column (g)
8a	Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b.					
8b	Totals for all transactions reported on Form(s) 8949 with <b>Box D</b> checked					
9	Totals for all transactions reported on Form(s) 8949 with <b>Box E</b> checked					
10	Totals for all transactions reported on Form(s) 8949 with <b>Box F</b> checked	1,539,797.	339,350.	-250,0	00.	950,447.
11	Gain from Form 4797, Part I; long-term gain from Forms from Forms 4684, 6781, and 8824				11	
12	Net long-term gain or (loss) from partnerships, S corporat	tions, estates, and	trusts from Schee	dule(s) K-1	12	
13	Capital gain distributions. See the instructions				13	
14	Long-term capital loss carryover. Enter the amount, if any <b>Worksheet</b> in the instructions		-		14	( )
15	Net long-term capital gain or (loss). Combine lines 8a the back	through 14 in colu	ımn (h). Then go t	o Part III on	15	950.447

Schedule D (Form 1040) 2014 Page **2** 

art	III Summary		
16	Combine lines 7 and 15 and enter the result	16	270,447.
	• If line 16 is a <b>gain,</b> enter the amount from line 16 on Form 1040, line 13, or Form 1040NR, line 14. Then go to line 17 below.		
	• If line 16 is a <b>loss</b> , skip lines 17 through 20 below. Then go to line 21. Also be sure to complete line 22.		
	• If line 16 is <b>zero</b> , skip lines 17 through 21 below and enter -0- on Form 1040, line 13, or Form 1040NR, line 14. Then go to line 22.		
17	Are lines 15 and 16 <b>both</b> gains?  Yes. Go to line 18.		
	No. Skip lines 18 through 21, and go to line 22.		
18	Enter the amount, if any, from line 7 of the 28% Rate Gain Worksheet in the instructions ▶	18	
19	Enter the amount, if any, from line 18 of the <b>Unrecaptured Section 1250 Gain Worksheet</b> in the instructions	19	
20	Are lines 18 and 19 <b>both</b> zero or blank?  ▼ Yes. Complete the Qualified Dividends and Capital Gain Tax Worksheet in the instructions for Form 1040, line 44 (or in the instructions for Form 1040NR, line 42). Do not complete lines 21 and 22 below.		
	No. Complete the Schedule D Tax Worksheet in the instructions. Do not complete lines 21 and 22 below.		
21	If line 16 is a loss, enter here and on Form 1040, line 13, or Form 1040NR, line 14, the <b>smaller</b> of:		
	• The loss on line 16 or • (\$3,000), or if married filing separately, (\$1,500)	21	)
	Note. When figuring which amount is smaller, treat both amounts as positive numbers.		
22	Do you have qualified dividends on Form 1040, line 9b, or Form 1040NR, line 10b?		
	☐ <b>Yes.</b> Complete the <b>Qualified Dividends and Capital Gain Tax Worksheet</b> in the instructions for Form 1040, line 44 (or in the instructions for Form 1040NR, line 42).		
	■ No. Complete the rest of Form 1040 or Form 1040NR.		

## 8949

Department of the Treasury Internal Revenue Service

## **Sales and Other Dispositions of Capital Assets** ▶ Information about Form 8949 and its separate instructions is at www.irs.gov/form8949.

▶ File with your Schedule D to list your transactions for lines 1b, 2, 3, 8b, 9, and 10 of Schedule D.

Attachment

OMB No. 1545-0074

Sequence No. 12A

Name(s) shown on return FORMER CITIZEN Social security number or taxpayer identification number 000 - 00 - 000

Before you check Box A, B, or C below, see whether you received any Form(s) 1099-B or substitute statement(s) from your broker. A substitute

statement will have the same information as Form 1099-B. Either may show your basis (usually your cost) even if your broker did not report it to the IRS. Brokers must report basis to the IRS for most stock you bought in 2011 or later (and for certain debt instruments you bought in 2014 or later). Short-Term. Transactions involving capital assets you held 1 year or less are short term. For long-term Part I transactions, see page 2. Note. You may aggregate all short-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS and for which no adjustments or codes are required. Enter the total directly on Schedule D, line 1a; you are not required to report these transactions on Form 8949 (see instructions). You must check Box A, B, or C below. Check only one box. If more than one box applies for your short-term transactions, complete a separate Form 8949, page 1, for each applicable box. If you have more short-term transactions than will fit on this page for one or more of the boxes, complete as many forms with the same box checked as you need. (A) Short-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS (see Note above) (B) Short-term transactions reported on Form(s) 1099-B showing basis was not reported to the IRS (C) Short-term transactions not reported to you on Form 1099-B Adjustment, if any, to gain or loss.

(a) Description of property	(b) Date acquired	(c) Date sold or	(d) Proceeds	(e) Cost or other basis. See the <b>Note</b> below	If you enter an a enter a co	any, to gain or loss. amount in column (g), de in column (f). arate instructions.	(h) Gain or (loss). Subtract column (e)
(Example: 100 sh. XYZ Co.)	(Mo., day, yr.)	disposed (Mo., day, yr.)	(sales price) (see instructions)	and see Column (e) in the separate instructions	(f) Code(s) from instructions	<b>(g)</b> Amount of adjustment	from column (d) and combine the result with column (g)
EXCLUSION UNDER Section 877A(a)(3)(A)	10/30/14	10/30/14	0	680000			-680000
OTANIA Addition	(-1) (-) ()	1 (1-) (-, 1 !					
2 Totals. Add the amounts in columns negative amounts). Enter each tota Schedule D, line 1b (if Box A above above is checked), or line 3 (if Box C	I here and inc is checked), <b>lir</b>	lude on your ne 2 (if Box B	0	680000			-680000

Note. If you checked Box A above but the basis reported to the IRS was incorrect, enter in column (e) the basis as reported to the IRS, and enter an adjustment in column (g) to correct the basis. See Column (g) in the separate instructions for how to figure the amount of the adjustment.

Form 8949 (2014) Attachment Sequence No. **12A** Page **2** 

Name(s) shown on return. Name and SSN or taxpayer identification no. not required if shown on other side  $FORMER \ CITIZEN$ 

Social security number or taxpayer identification number 000-00-0000

Before you check Box D, E, or F below, see whether you received any Form(s) 1099-B or substitute statement(s) from your broker. A substitute statement will have the same information as Form 1099-B. Either may show your basis (usually your cost) even if your broker did not report it to the IRS. Brokers must report basis to the IRS for most stock you bought in 2011 or later (and for certain debt instruments you bought in 2014 or later).

#### Part II

**Long-Term.** Transactions involving capital assets you held more than 1 year are long term. For short-term transactions, see page 1.

**Note.** You may aggregate all long-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS and for which no adjustments or codes are required. Enter the total directly on Schedule D, line 8a; you are not required to report these transactions on Form 8949 (see instructions).

You *must* check Box D, E, *or* F below. Check only one box. If more than one box applies for your long-term transactions, complete a separate Form 8949, page 2, for each applicable box. If you have more long-term transactions than will fit on this page for one or more of the boxes, complete as many forms with the same box checked as you need.

- (D) Long-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS (see Note above)
- [ (E) Long-term transactions reported on Form(s) 1099-B showing basis was not reported to the IRS
- (F) Long-term transactions not reported to you on Form 1099-B

(i) Long-term transactions	Tot reported	TO you on re	T 1033-B		Adlanton and M	anu ta nala antana	
(a) Description of property	(b) Date acquired	(c) Date sold or	(d) Proceeds	(e) Cost or other basis. See the <b>Note</b> below	If you enter an a	any, to gain or loss. amount in column (g), de in column (f). arate instructions.	(h) Gain or (loss). Subtract column (e)
(Example: 100 sh. XYZ Co.)	(Mo., day, yr.)	disposed (Mo., day, yr.)	(sales price) (see instructions)	and see Column (e) in the separate instructions	(f) Code(s) from instructions	<b>(g)</b> Amount of adjustment	from column (d) and combine the result with column (g)
PRINCIPAL RESIDENCE AT 360 UNIVERSITY AVENUE - TORONTO, ON MSG 1SA	10/30/85	10/30/14	1072099	100000		-250000	722099
500 SH OF TELUS CORP.	04/12/10	10/30/14	20990	10495			10495
RRSP	06/30/06	10/30/14	446708	228855			217853
2 Totals. Add the amounts in columns negative amounts). Enter each total Schedule D, line 8b (if Box D above above is checked). or line 10 (if Box	here and includ is checked), <b>lin</b>	e on your e 9 (if Box E	1539797	339350		-250000	950447

**Note.** If you checked Box D above but the basis reported to the IRS was incorrect, enter in column (e) the basis as reported to the IRS, and enter an adjustment in column (g) to correct the basis. See *Column* (g) in the separate instructions for how to figure the amount of the adjustment.

## **Foreign Tax Credit**

(Individual, Estate, or Trust)

CANADA GENERAL ► Attach to Form 1040, 1040NR, 1041, or 990-T.

Attachment Sequence No. **19** 

OMB No. 1545-0121

Department of the Treasury Internal Revenue Service (99)

▶ Information about Form 1116 and its separate instructions is at www.irs.gov/form1116.

Name	)							Identify	ing number a	as shown	on pag	e 1 of your tax return
FO	RMER CITIZEN							000-	-00-000	1		
	a separate Form 1116 f n 1116. Report all amou						ncom	<b>e</b> in the in	structions. (	Check o	nly on	e box on each
а□	Passive category incor	me	<b>c</b> ☐ Sect	ion 901(j) ir	ncome		•	e Lum	p-sum distri	butions		
	General category incom				re-sourced b	y treaty						
f Re	esident of (name of co	ountry) ►	United	Kingdo	m (Engla	nd, N	Irel	and, S	Scotland	and	Wale	es)
	e: If you paid taxes to											ou paid taxes to
	<b>e than one</b> foreign c											
Pa	rt I Taxable Inco	ome or Lo	oss From S	ources C						Checl	ked A	
				_		reign Cou					(	Total
g	Enter the name of				A		В	3	С		(Add	cols. A, B, and C.)
	possession			. ▶	Canada							
1	aross moonis non											
	above and of the											
	instructions): PENSION	DEFI	NED BENEI	FIT								
					860,1	44.					1a	860,144.
k	Check if line 1a is services as an compensation fron more, and you us determine its source	n employe n all source sed an alte	ee, your t es is \$250,000 ernative basis	otal 0 or s to								
Dedu	uctions and losses (Ca											
2	Expenses definite	ly related t	to the income	on line								
	1a (attach stateme	nt)										
3	Pro rata share of	other dedu	ctions <b>not de</b>	efinitely								
	related:											
8												
_	(see instructions) .					0.						
k	,			_								
(					860,1	0.						
(					1,810,5							
f			•	· · ·		751						
ç		•	,		0.1	0.						
4	Pro rata share of int			_								
		•	•									
	Home Mortgage In											
k			,									
5	Losses from foreign	n sources		[								
6	Add lines 2, 3g, 4a	, 4b, and 5		[		0.					6	0.
_ 7	Subtract line 6 fron					age 2 .				. ▶	7	860,144.
Pa	rt II Foreign Tax	es Paid o	r Accrued	(see instr	ructions)							
>	Credit is claimed for taxes (you must check one)				Foi	reign taxes	paid or	accrued				
ıtı	(h) Paid		In foreign	currency					In U.S. do	ollars		
Country	(i) 🗙 Accrued	Taxes	withheld at sour	rce on:	(n) Other	Taxe	s withh	neld at sour	ce on:	(r) Ot		(s) Total foreign
Ö	(j) Date paid or accrued	(k) Dividends	(I) Rents and royalties	(m) Interest	foreign taxes paid or accrued	(o) Dividen		(p) Rents nd royalties	(q) Interest	foreign paid accru	or	taxes paid or accrued (add cols. (o) through (r))
Α	12/31/2014			20,825.					20,825.			
В												
С												
8	Add lines A through	gh C, colun	nn (s). Enter	the total h	ere and on l	ine 9, pag	je 2 .			. •	8	20,825.

Page 2 Form 1116 (2014)

Part	III Figuring the Credit				
9	Enter the amount from line 8. These are your total foreign taxes paid or accrued for the category of income checked above Part I	9	20,825.		
10	Carryback or carryover (attach detailed computation)	10			
11	Add lines 9 and 10	11	20,825.		
12	Reduction in foreign taxes (see instructions)	12	( )		
13	Taxes reclassified under high tax kickout (see instructions)	13			
14	Combine lines 11, 12, and 13. This is the total amount of foreign taxes	availa	able for credit	14	20,825.
15	Enter the amount from line 7. This is your taxable income or (loss) from sources outside the United States (before adjustments) for the category of income checked above Part I (see instructions)	15	860,144.		
16	Adjustments to line 15 (see instructions)	16	000,111.		
17	Combine the amounts on lines 15 and 16. This is your net foreign source taxable income. (If the result is zero or less, you have no foreign tax credit for the category of income you checked above Part I. Skip lines 18 through 22. However, if you are filing more than one Form 1116, you must complete line 20.)	17	860,144.		
18	Individuals: Enter the amount from Form 1040, line 41, or Form 1040NR, line 39. Estates and trusts: Enter your taxable income without the deduction for your exemption	18	996,747.		
	<b>Caution:</b> If you figured your tax using the lower rates on qualified constructions.	livider	nds or capital gains, see		
19	Divide line 17 by line 18. If line 17 is more than line 18, enter "1"			19	0.8630
20	Individuals: Enter the amounts from Form 1040, lines 44 and 46. I enter the amounts from Form 1040NR, lines 42 and 44. <b>Estates and</b> Form 1041, Schedule G, line 1a, or the total of Form 990-T, lines 36 ar	trusts		20	368,082.
	Caution: If you are completing line 20 for separate category e instructions.			20	300,002.
21	Multiply line 20 by line 19 (maximum amount of credit)			21	317,655.
22	Enter the <b>smaller</b> of line 14 or line 21. If this is the only Form 111 through 27 and enter this amount on line 28. Otherwise, complete the	appro	priate line in Part IV (see		
	instructions)			22	20,825.
	Summary of Credits From Separate Parts III (see instr		ns)		
23 24	Credit for taxes on passive category income	23			
25	Credit for taxes on certain income re-sourced by treaty	25			
26	Credit for taxes on lump-sum distributions	26		-	
27	Add lines 23 through 26			27	
28				28	20,825.
29	Reduction of credit for international boycott operations. See instruction	line 12	29		
30	Subtract line 29 from line 28. This is your foreign tax credit. Enter he	ere an	d on Form 1040, line 48;		
	Form 1040NR, line 46; Form 1041, Schedule G, line 2a; or Form 990-T	, line 4	40a ▶	30	20,825.
	REV 01.	RO		Form <b>1116</b> (2014)	

Department of the Treasury

Internal Revenue Service (99)

### **Net Investment Income Tax— Individuals, Estates, and Trusts**

► Attach to your tax return.

▶ Information about Form 8960 and its separate instructions is at www.irs.gov/form8960.

OMB No. 1545-2227 Attachment Sequence No. 72

Name(s) shown on your tax return Your social security number or EIN FORMER CITIZEN 000 - 00 - 000Part I Investment Income Section 6013(g) election (see instructions) ☐ Section 6013(h) election (see instructions) Regulations section 1.1411-10(g) election (see instructions) 1 2 3 Rental real estate, royalties, partnerships, S corporations, trusts, 4a Adjustment for net income or loss derived in the ordinary course of a non-section 1411 trade or business (see instructions) . . . . 4b 270,447. 5a Net gain or loss from disposition of property (see instructions) . 5a Net gain or loss from disposition of property that is not subject to 5b net investment income tax (see instructions) . . . . . . . . . Adjustment from disposition of partnership interest or S corporation 5c d 5d 270,447. 6 Adjustments to investment income for certain CFCs and PFICs (see instructions) . . . . . 6 7 7 Total investment income. Combine lines 1, 2, 3, 4c, 5d, 6, and 7. 8 270,447. Part II Investment Expenses Allocable to Investment Income and Modifications 9a Investment interest expenses (see instructions) . . . . . . State, local, and foreign income tax (see instructions) . . . . 9b Miscellaneous investment expenses (see instructions) . . . . 9d 10 11 Total deductions and modifications. Add lines 9d and 10 . . . . 11 Part III Tax Computation Net investment income. Subtract Part II, line 11 from Part I, line 8. Individuals complete lines 13-17. Estates and trusts complete lines 18a-21. If zero or less, enter -0- . . . . . . . . . . . . . 12 270,447. Individuals: 1,130,591. 13 Modified adjusted gross income (see instructions) . . . . . 13 125,000. Threshold based on filing status (see instructions) . . . . . 14 15 15 Subtract line 14 from line 13. If zero or less, enter -0- . . . . 1,005,591. 16 270,447. Net investment income tax for individuals. Multiply line 16 by 3.8% (.038). Enter here and 17 17 10,277. **Estates and Trusts:** Net investment income (line 12 above) . . . . . . . . . . . . 18a Deductions for distributions of net investment income and deductions under section 642(c) (see instructions) . . . . . 18b c Undistributed net investment income. Subtract line 18b from 18a (see 18c **19a** Adjusted gross income (see instructions) . . . . . . . . . 19a Highest tax bracket for estates and trusts for the year (see 19b **c** Subtract line 19b from line 19a. If zero or less, enter -0- . . . 19c 20 Net investment income tax for estates and trusts. Multiply line 20 by 3.8% (.038). Enter here and include on your tax return (see instructions) . . . . . . 21

# Form **8965**

Department of the Treasury

Internal Revenue Service

**Health Coverage Exemptions** 

► Attach to Form 1040, Form 1040A, or Form 1040EZ.

▶ Information about Form 8965 and its separate instructions is at www.irs.gov/form8965.

OMB No. 1545-0074

2014

Attachment Sequence No. 75

Name as shown on return
FORMER CITIZEN

Your social security number 000-00-0000

Complete this form if you have a Marketplace-granted coverage exemption or you are claiming a coverage exemption on your return.

Part	Marketplace-Granted have an exemption granted							you a	ınd/o	ram	emb	er of	your	tax r	iouse	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
	a Name of I	1	•	b SSN							Exemp	otion C	c ertifica	ıte Nur	nber	
1																
2																
3																
4																
_																
5																
6																
Part l	Coverage Exemption	s for Your Hou	usehold C	laim	ed o	n Yo	ur Re	eturn	:							
7a	Are you claiming an exemption	because your hou	sehold inco	me is	belov	v the f	iling t	hresh	old?.					Yes	X	No
b	Are you claiming a hardship exe	emption because y	our gross i	ncom	e is be	low tl	ne filin	g thre	sholc	? .				Yes	X	No
Part I	Coverage Exemption household are claiming								u and	d/or a	a mer	nber	of yo	our ta	ιX	
	a Name of Individual	b SSN	c Exemption Type	d Full Year	e Jan	f Feb	g Mar	h Apr	i May	j June	k July	l Aug	m Sept	n Oct	o Nov	р
																Dec
																Dec
8	FORMER CITIZEN	000-00-0000	С	×												Dec
	FORMER CITIZEN	000-00-0000	С	×												Dec
9	FORMER CITIZEN	000-00-0000	С	×												Dec
	FORMER CITIZEN	000-00-0000	С	×												Dec
9	FORMER CITIZEN	000-00-0000	С	×												Dec
9	FORMER CITIZEN	000-00-0000	С	×												Dec
9 10 11	FORMER CITIZEN	000-00-0000	С	×												Dec
9	FORMER CITIZEN	000-00-0000	С	×												Dec

# Department of the Treasury Internal Revenue Service

## **Initial and Annual Expatriation Statement**

For calendar year 2014 or other tax year beginning

, 2014, and ending

, 20

Name

► Information about Form 8854 and its separate instructions is at www.irs.gov/form8854.

► Please print or type.

Attachment Sequence No. **112** Identifying number (see instructions)

OMB No. 1545-0074

F	FORMER CITIZEN	000-00-	0000	,
Part				
1	Mailing address and telephone number where you can be reached after expatriation BORN WITH DUAL CITIZENSHIP (US & CANADA) - LIVES IN THE UNITED KI			
_	BORN WITH DUAL CITIZENSHIP (US & CANADA) - LIVES IN THE UNITED KI	NGDOM		
2	Address of principal foreign residence (if different from line 1)			
3	Country of tax residence (if different from line 2) UNITED KINGDOM			
3	Country of tax residence (if different from line 2) <u>UNITED KINGDOM</u>			
4	Expatriation date. Check the box that applies (see instructions).			
	<ul> <li>June 4, 2004 – June 16, 2008. Complete Parts II and V</li> <li>June 17, 2008 – December 31, 2013. Complete Part III if:         <ul> <li>You made an election to defer the payment of tax on a prior year Form 8854,</li> <li>You have an item of eligible deferred compensation, or</li> <li>You have an interest in a nongrantor trust.</li> <li>Otherwise, you do not need to file Form 8854.</li> <li>✓ January 1, 2014 – December 31, 2014. Complete Parts IV and V</li> </ul> </li> </ul>			
5	Date of notification of expatriating act, termination of residency, or claim of treaty benefits	(see instructio	ns).	
	<ul> <li>☑ Citizen. Date notification given to Department of State 11/01/2014</li> <li>☐ Long-term resident. Date notification given to Department of Homeland Security</li> <li>☐ Long-term resident with dual residency in a treaty country. Date commencing to resident of the treaty country</li> </ul>	b be treated, f		
6	Number of days you were physically present in the United States in the current year 3			
7	List all countries (other than the United States) of which you are a citizen.			
а	Name of country CANADA			
b	Date you became a citizen of each country listed in line 7a 01/01/1947			
8	How you became a U.S. citizen    ☑ By birth ☐ By naturalization			
Part	For Persons Who Expatriated After June 3, 2004, and Before June 17, 20	008		
1	Did you complete Form 8854 for any period after June 3, 2004, and before June 17, 2008 No. If you expatriated for immigration purposes after June 3, 2004, and before Jufilled a Form 8854, you continue to be treated as a U.S. citizen or U.S. lawful per purposes until the day that you file this form. Because you did not file Form immigration purposes, you are subject to the alternative tax in section 877(b) for the that you file this form (see instructions).	ne 17, 2008, b manent reside 8854 for the y	nt for U.S. ear of exp	income ta
	☐ <b>Yes.</b> Tax year for which Form 8854 first filed Go to line 2.			
2	Were you physically present in the United States for more than 30 days but not more during the tax year?		☐ Yes	☐ No
а	If you checked "Yes" to line 2, were you performing services for an unrelated employer?		☐ Yes	☐ No
b	If you checked " <b>Yes</b> " to line 2a, are you a citizen or resident, fully liable for income tax, in which you were born, your spouse was born, or either of your parents was born? Next: Go to Part V.	=	☐ Yes	□ No

Form 8854 (2014) Page **2** 

### Part III For Persons Who Expatriated After June 16, 2008, and Before January 1, 2014

- 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 have an interest in a nongrantor trust, complete line 3.

2

3

1	Complete columns (a), (b for any property you disp	o), and (c) for all proper	ty on whicl			Form 8854.	Complete column (d
	(a) Description of property	(b) Amount of mark-to-mar (loss) reported on pr Form 8854			(c) deferred on prior year orm 8854	Date of	<b>(d)</b> disposition (if any)
2	Did you receive any distr If "Yes," Amount of distri	•	rred compe		for 2014? unt withheld at sourc	e, if any:	☐ Yes ☐ No
3	Did you receive any distr If "Yes," Amount of distri	•	ntor trust fo		unt withheld at sourc	e, if any:	☐ Yes ☐ No
Part	V For Persons Who	Expatriated During	2014				
	ion A Expatriation Inf		<u>,                                     </u>				
1	Enter your U.S. income to 1st Year Before Expatriation	ax liability (after foreign 2nd Year Before Expatriation	3	for the 5 tax york for the 5 tax	years ending before t 4th Year Before Expatriation		xpatriation. 5th Year Before Expatriation
	\$ <u>0</u>	\$_0	\$ 0		\$ <u>0</u>	\$_C	

Enter your net worth on the date of your expatriation for tax purposes . . . . . . . . . . . . . . .

Did you become at birth a U.S. citizen and a citizen of another country, and do you continue to be a citizen

If you answered "Yes" to question 3, have you been a resident of the United States for not more than 10 of

Were you under age 181/2 on the date you expatriated and have you been a U.S. resident for not more than

\$ 2,322,881

Page 3 Form 8854 (2014) Section B **Property Owned on Date of Expatriation** Do not complete Section B if: • Your average net income tax liability for the 5 tax years immediately before expatriation (see line 1 in Section A) was not more than \$157,000, your net worth (see line 2 in Section A) was under \$2 million, and you checked "Yes" on line 6 in • In Section A, you checked "Yes" on lines 3, 4, and 6; or • In Section A, you checked "Yes" on lines 5 and 6. 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 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 ✓ 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 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). Recognition of gain or loss on the deemed sale of mark-to-market property. Caution. Do not include in column (a) any property described on line 7a, 7b, 7c, or 7d. Complete column (g) only if you are deferring tax on gain from any property listed in column (a). (e) (c) (g) Gain after Amount of tax Description of property Fair market value Cost or other Gain or (loss). Form or Schedule allocation of the on day before date basis\* Subtract (c) on which gain deferred (attach exclusion amount of expatriation from (b) (see instructions) or loss is reported computations)

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					
***				 7774(1)(0) 11 1:5 "(	1)(0) 11 T1 : 1 : 1 : 1	1.1

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.

Form 8854 (2014) Page **4** 

Sect	ion C Deferral of Tax		
	<b>Election to defer tax.</b> You can defer tax only if you have provided adequate security. Adequin the instructions.	uate security	is described
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 that would prevent assessment or collection of any tax imposed because of section 877A.	I States □ <b>Y</b>	′es □ 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 63, 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)	15	
	• If you are filing Form 1040, enter this amount in brackets to the left of the entry space for line 63. Identify as "EXP."		
	• If you are filing Form 1040NR, enter this amount in brackets to the left of the entry space for line 61. Identify as "EXP."		

Form **8854** (2014)

## Part V Balance Sheet and Income Statement

### Schedule A Balance Sheet

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 following date.

- Part II filers the end of the tax year for which you are filing the form
- Part IV filers your expatriation date

For more details, see the separate instructions.

ror	more details, see the separate instructions.		1	1	1
	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 long-term residents only)
1 2	Cash, including bank deposits				
3	Marketable stock and securities issued by foreign companies	20,990	10,495	8,274	
4	Nonmarketable stock and securities issued by U.S. companies				
5	Nonmarketable stock and securities issued by foreign companies				
а	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	804,074	0	804,074	
8 9	Partnership interests (see instructions) Assets held by trusts you own under sections 671 through 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 .	1,072,099	100,000	972,099	
17	Business property located in the United States				
18	Business property located outside the United States				
19	Other assets (see instructions) RRSP	446,708	217,852	228,855	
20	Total assets. Add lines 1 through 5 and lines	·	,	,	
	6 through 19. Do not include amounts on line 5a in this total	2,322,881	317,852	2,005,029	
	Liabilities	Amount			
21	Installment obligations				
22	Mortgages, etc				
23	Other liabilities (see instructions)				
24	Total liabilities. Add lines 21 through 23	0			
25	Net worth. Subtract line 24 from line 20, column (a)	2,322,881			

Page 5

Form 88	354 (2014)							F	age 6
Sche	dule B	Income Statement							
	Provide	e income information for the following	ng period.						
	<ul><li>Part</li></ul>	Il filers - the tax year for which you	are filing the form						
	• Part	IV filers - the part of the tax year that	t ends with the day before you	r expatria	tion date; but ente	r -0- f	or lines 5 t	hrough 7	7.
1	U.S. sc	ource gross income not effectively c	connected with the conduct of	a U.S. tr	ade or business.				
а	Interes	t	0 00						
b	Divider	nds		1b	0 00				
С	Royalti	es		1c	0 00				
d	Pensio	n distributions		1d	0 00				
е	Other			1e	0 00				
f	Total.	Add lines a through e				1f			00
2	Gross i	income that is effectively connected	d with the conduct of a U.S. tr	ade or bu	ısiness	2		0	00
3	Income	e from the performance of services	in the United States			3		0	00
4		rom the sale or exchange of:							
а	Proper	ty (other than stock or debt obligat	tions) located in the United		0 00				
	States			4a					
b		ssued by a U.S. domestic corporati		4b	0 00				
С		bligations of U.S. persons or of the			0 00				
	politica	ll subdivision thereof, or the District	of Columbia	4c	0 00				
d						4d		0	00
5		e or gain derived from certain foreig							
	•	ofits earned or accumulated before	5			00			
6		on certain exchanges of property tha			•	6			00
7		e received or accrued by certain for	• •	•		7			00
8	Add lin	es 1f, 2, 3, 4d, 5, 6, and 7				8			00
9		income from all other sources				9		30,591	
10	Total.	Add lines 8 and 9				10	•	30,591	
O:	Hana	Under penalties of perjury, I declare best of my knowledge and belief, it is of which preparer has any knowledge	true, correct, and complete. Dec						
Sign	Here	Your signature			Date				
		, and the second							
Paid		Print/Type preparer's name	Preparer's signature		Date		k 🗆 if	PTIN	
Prep						mployed			
Use (	Only	Firm's name					EIN ►		
		Firm's address ►				Phone	no.	0054	(0.04.4)

Form **8854** (2014)

# **SCENARIO 4**

MIDDLE CLASS - BORN IN THE US, SAME AS SCENARIO 1
BUT WITH ELIGIBLE PENSION

2014

IF you live in	THEN use this address to send in your payment				
Florida, Louisiana, Mississippi, Texas	Internal Revenue Service P.O. Box 1214 Charlotte, NC 28201-1214				
Alaska, Arizona, California, Colorado, Hawaii, Idaho, Nevada, New Mexico, Oregon, Utah, Washington, Wyoming	Internal Revenue Service P.O. Box 7704 San Francisco, CA 94120-7704				
Arkansas, Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Montana, Nebraska, North Dakota, Ohio, Oklahoma, South Dakota, Wisconsin	Internal Revenue Service P.O. Box 802501 Cincinnati, OH 45280-2501				
Alabama, Georgia, Kentucky, New Jersey, North Carolina, South Carolina, Tennessee, Virginia	Internal Revenue Service P.O. Box 931000 Louisville, KY 40293-1000				
Connecticut, Delaware, District of Columbia, Maine, Maryland, Massachusetts, Missouri, New Hampshire, New York, Pennsylvania, Rhode Island, Vermont, West Virginia	Internal Revenue Service P.O. Box 37008 Hartford, CT 06176-7008				
A foreign country, American Samoa, or Puerto Rico (or are excluding income under Internal Revenue Code 933), or use an APO or FPO address, or file Form 2555, 2555-EZ, or 4563, or are a dual-status alien or nonpermanent resident of Guam or the U.S. Virgin Islands.	Internal Revenue Service P.O. Box 1303 Charlotte, NC 28201-1303				

MAIL FORM 1040-V TO THE INTERNAL REVENUE SERVICE CENTER AT THE ADDRESS LISTED BELOW.

Form 1040-V (2014)

▼ Detach Here and Mail With Your Payment and Return ▼

Department of the Treasury Internal Revenue Service

9) 2014

- ► Use this voucher when making a payment with Form 1040.
- Do not staple this voucher or your payment to Form 1040.
   Make your check or money order payable to the 'United States Treasury.'
- ▶ Write your social security number (SSN) on your check or money order.

FORMER CITIZEN

BORN IN THE US WITH US CITIZ
US "ELIGIBLE" PENSION
CANADA
ONTARIO M5G 1S4

Form 1040-V Payment Voucher

Enter the amount of your payment ...... ► L9,926.

REV 10/16/14 PRO 1555

INTERNAL REVENUE SERVICE
P.O. BOX 1303
CHARLOTTE, NC 28201-1303 USA

Department of the Treasury—Internal Revenue Service (99)
U.S. Individual Income Tax Return

2014 OMB No. 1545-0074 RS Use Only—Do not write or staple in this space.

	0.0.		<u> </u>			- OIVID		7-0074 1110 036	_	of flot write of staple in this space.
		l, or other tax year beginning		01/01	, 2014, end	ng	10/	30 <b>,20 14</b>		ee separate instructions.
Your first name and	I initial		Last na	me					Y	our social security number
FORMER		11.10.1	CITI							00-00-0000
If a joint return, spo	use's tirst	name and initial	Last na	me					Ι,	ouse's social security number
Homo addross (nun	nhor and a	street). If you have a P.O.	hov soo in	etructions				Apt. no.	N.	RA
,		, ,	ŕ					Apt. no.		Make sure the SSN(s) above and on line 6c are correct.
		WITH US CITIZ and ZIP code. If you have a f			s below (see	instruction:	s).			Presidential Election Campaign
•		•	o. o.g a.a.a	oo, aloo oop.o.o opaloo			<del>-</del> ,.			ck here if you, or your spouse if filing
US "ELIGII Foreign country nar		PENSTON		Foreign province	e/state/cour	ntv		Foreign postal coo	join	tly, want \$3 to go to this fund. Checking
Canada				ONTARIO		,		M5G 1S4	refu	ox below will not change your tax or nd. You Spouse
	1	Single		ONTARIO		<b>1</b> Пн			alifying	person). (See instructions.) If
Filing Status	2	_ ~	v (even if	only one had incom						not your dependent, enter this
Check only one	_		•	ter spouse's SSN at	,			ne here.		not your dopondoni, onto timo
box.	Ū			ADIAN CITIZE		5 🗆 Q	ualifying	widow(er) with	deper	ndent child
	6a	X Yourself. If som				not che	eck box	6a	. 1	Boxes checked
Exemptions	b	Spouse							. j	on 6a and 6b1_ No. of children
	С	Dependents:		(2) Dependent's	(3) De	pendent's		if child under age		on 6c who:
	(1) First	name Last nai	me	social security number	relation	ship to you		ying for child tax cre (see instructions)	eart	lived with you     did not live with
										you due to divorce or separation
If more than four										(see instructions)
dependents, see instructions and										Dependents on 6c not entered above
check here ▶□										Add numbers on
	d	Total number of exe	mptions c	laimed						lines above 1
Income	7	Wages, salaries, tips	s, etc. Atta	ch Form(s) W-2 .					7	
	8a	Taxable interest. At	tach Sche	dule B if required .					8a	
=	b	Tax-exempt interes	t. <b>Do not</b> i	include on line 8a .	[	8b				
Attach Form(s) W-2 here. Also	9a	Ordinary dividends.	Attach Sc	hedule B if required					9a	
attach Forms	h Ouglified dividends									
W-2G and	10	Taxable refunds, cre	dits, or of	fsets of state and lo	cal incom	e taxes			10	
1099-R if tax	11	Alimony received								
was withheld.	12	Business income or (loss). Attach Schedule C or C-EZ							12	
Marian all along t	13	Capital gain or (loss)	. Attach S	schedule D if require	d. If not re	quired, c	check he	ere 🕨 🔲	13	270,447.
If you did not get a W-2,	14	Other gains or (losse	es). Attach	Form 4797					14	
see instructions.	15a	IRA distributions .	15a		b	Taxable	amount		15b	
	16a	Pensions and annuiti	es 16a		b	Taxable	amount		16b	45,271.
	17	Rental real estate, ro	yalties, pa	artnerships, S corpo	rations, tr	usts, etc	. Attach	Schedule E	17	
	18	Farm income or (los	s). Attach	Schedule F					18	
	19	Unemployment com	pensation						19	
	20a	Social security benefit			b	Taxable	amount		20b	
	21	Other income. List ty							21	
	22	Combine the amounts		<del>-</del>	through 21		our <b>tota</b>	income -	22	315,718.
Adjusted	23	Educator expenses				23				
Gross	24	Certain business exper								
Income		fee-basis government				24				
IIICOIIIC	25	Health savings acco				25				
	26	Moving expenses. A				26				
	27	Deductible part of self				27				
	28	Self-employed SEP,				28				
	29	Self-employed healt				29				
	30	Penalty on early with		_		30				
	31a	Alimony paid b Red				31a				
	32	IRA deduction				32				
	33	Student loan interes				33				
	34	Tuition and fees. Att				34				
	35	Domestic production				35				
	36	Add lines 23 through							36	215 510
	37	Subtract line 36 from	ı iine 22.	ınıs is your <b>adjuste</b> (	u gross in	come		🟲	37	315,718.

Form 1040 (2014) Page 2 315,718 Amount from line 37 (adjusted gross income) 38 You were born before January 2, 1950, Blind. Total boxes 39a Check Tax and if: Spouse was born before January 2, 1950, ☐ Blind. J checked ► 39a **Credits** If your spouse itemizes on a separate return or you were a dual-status alien, check here ▶ b 0. Itemized deductions (from Schedule A) or your standard deduction (see left margin) 40 Standard 40 Deduction 315,718. 41 Subtract line 40 from line 38 41 for-0. 42 Exemptions. If line 38 is \$152,525 or less, multiply \$3,950 by the number on line 6d. Otherwise, see instructions 42 • People who check any box on line 315,718. 43 **Taxable income.** Subtract line 42 from line 41. If line 42 is more than line 41, enter -0- . . . 43 39a or 39b or Tax (see instructions). Check if any from: a Form(s) 8814 b Form 4972 c 52,088. 44 44 who can be 9,358. 45 Alternative minimum tax (see instructions), Attach Form 6251 . . . 45 claimed as a dependent, 46 Excess advance premium tax credit repayment. Attach Form 8962 46 instructions. 47 47 61,446. Add lines 44, 45, and 46 · All others: 48 Foreign tax credit. Attach Form 1116 if required . . . . Single or Married filing 49 Credit for child and dependent care expenses. Attach Form 2441 49 separately, 50 Education credits from Form 8863, line 19 . . . . 50 \$6,200 Married filing Retirement savings contributions credit. Attach Form 8880 51 51 jointly or Qualifying 52 Child tax credit. Attach Schedule 8812, if required . . . 52 widow(er) 53 Residential energy credits. Attach Form 5695 53 \$12,400 Other credits from Form: a 3800 b 8801 с 🗌 54 Head of household. 55 Add lines 48 through 54. These are your total credits . 55 \$9,100 Subtract line 55 from line 47. If line 55 is more than line 47, enter -0-61,446. 56 56 57 Self-employment tax. Attach Schedule SE 57 58 Unreported social security and Medicare tax from Form: **a** 4137 **b** 8919 58 **Other** 59 Additional tax on IRAs, other qualified retirement plans, etc. Attach Form 5329 if required **Taxes** 60a Household employment taxes from Schedule H . . . . . . . . 60a b First-time homebuyer credit repayment. Attach Form 5405 if required . 60b 61 Health care: individual responsibility (see instructions) Full-year coverage 61 62 Taxes from: a Form 8959 b Form 8960 c Instructions; enter code(s) 62 7,247. 63 68,693. Add lines 56 through 62. This is your total tax 63 64 Federal income tax withheld from Forms W-2 and 1099 **Payments** 65 2014 estimated tax payments and amount applied from 2013 return 65 If you have a 66a Earned income credit (EIC) 66a qualifying b Nontaxable combat pay election 66b child, attach Schedule EIC. 67 Additional child tax credit. Attach Schedule 8812 . . . . . 67 68 American opportunity credit from Form 8863, line 8 . 69 Net premium tax credit. Attach Form 8962 . . . . 69 70 Amount paid with request for extension to file 70 71 Excess social security and tier 1 RRTA tax withheld . 71 72 Credit for federal tax on fuels. Attach Form 4136 73 Credits from Form: a 2439 b Reserved c Reserved d Add lines 64, 65, 66a, and 67 through 73. These are your total payments . 74 74 Refund 75 If line 74 is more than line 63, subtract line 63 from line 74. This is the amount you overpaid 75 76a Amount of line 75 you want **refunded to you.** If Form 8888 is attached, check here . 76a X X X X X X X X X X X X D c Type: ☐ Checking ☐ Savings b Routing number Direct deposit? d Account number Х X X X Χ XX ХХ x | x | x | x | x | x | x | x | instructions. 77 Amount of line 75 you want **applied to your 2015 estimated tax** ▶ Amount 69,926. Amount you owe. Subtract line 74 from line 63. For details on how to pay, see instructions 78 You Owe 79 Estimated tax penalty (see instructions) 79 Do you want to allow another person to discuss this return with the IRS (see instructions)? Yes. Complete below. X No **Third Party** Designee's Phone Personal identification **Designee** number (PIN) name > no. Under penalties of periury. I declare that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and belief. Sign they are true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge. Here Your signature Date Your occupation Daytime phone number Joint return? See UNIVERSITY PROFESSOR instructions. If the IRS sent you an Identity Protection Spouse's signature. If a joint return, both must sign. Spouse's occupation Keep a copy for PIN. enter it your records. here (see inst.)

Preparer
Use Only

Firm's name ►

Firm's address ►

Phone no.

Preparer's signature Non-Paid Preparer

**Paid** 

Print/Type preparer's name

Check if

self-employed

#### **SCHEDULE B**

(Form 1040A or 1040)

Department of the Treasury Internal Revenue Service (99)

## **Interest and Ordinary Dividends**

► Attach to Form 1040A or 1040.
► Information about Schedule B and its instructions is at www.irs.gov/scheduleb.

OMB No. 1545-0074

2014

Attachment Sequence No. **08** 

Name(s) shown on r	eturn		Your	social securi	ity numl	ber
FORMER CIT	IZEN		000	0-00-000	00	
Part I Interest	1	List name of payer. If any interest is from a seller-financed mortgage and the buyer used the property as a personal residence, see instructions on back and list this interest first. Also, show that buyer's social security number and address ▶		Am	ount	
(See instructions on back and the instructions for Form 1040A, or Form 1040, line 8a.)			1			
Note. If you received a Form 1099-INT, Form 1099-OID, or substitute statement from a brokerage firm, list the firm's						
name as the payer and enter	2	Add the amounts on line 1	2			
the total interest	3	Excludable interest on series EE and I U.S. savings bonds issued after 1989.	3			
shown on that form.	4	Attach Form 8815	4			
	Note.	If line 4 is over \$1,500, you must complete Part III.		Am	ount	
Part II	5	List name of payer ▶				
Ordinary Dividends (See instructions on back and the instructions for Form 1040A, or Form 1040, line 9a.)			5			
Note. If you received a Form 1099-DIV or substitute statement from a brokerage firm, list the firm's name as the payer and enter the ordinary dividends shown on that form.	6 Note	Add the amounts on line 5. Enter the total here and on Form 1040A, or Form 1040, line 9a	6			
		ust complete this part if you (a) had over \$1,500 of taxable interest or ordinary dividends; (	b) had			
		n account; or (c) received a distribution from, or were a grantor of, or a transferor to, a foreign			Yes	No
Part III Foreign Accounts and Trusts (See instructions on			l in a f · · · ancial I Forn · · ·	oreign  n 114 	×	
back.)	ь 8	If you are required to file FinCEN Form 114, enter the name of the foreign country when financial account is located ▶ CA Canada  During 2014, did you receive a distribution from, or were you the grantor of, or transforeign trust? If "Yes," you may have to file Form 3520. See instructions on back.	feror t	o, a		×

### **SCHEDULE D** (Form 1040)

## **Capital Gains and Losses**

► Attach to Form 1040 or Form 1040NR.

OMB No. 1545-0074

Department of the Treasury Internal Revenue Service (99) ▶ Information about Schedule D and its separate instructions is at www.irs.gov/scheduled. ▶ Use Form 8949 to list your transactions for lines 1b, 2, 3, 8b, 9, and 10.

Sequence No. 12

Name(s) shown on return FORMER CITIZEN Your social security number 000-00-0000

Pa	rt I Short-Term Capital Gains and Losses – As	sets Held One `	Year or Less			
lines	instructions for how to figure the amounts to enter on the below.  form may be easier to complete if you round off cents to	(d) Proceeds (sales price)	(e) Cost (or other basis)	(g) Adjustmento gain or loss Form(s) 8949,	s from	(h) Gain or (loss) Subtract column (e) from column (d) and combine the result with
	e dollars.	(sales price)	(or other basis)	line 2, colum		column (g)
1a	Totals for all short-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 1b.					
1b	Totals for all transactions reported on Form(s) 8949 with <b>Box A</b> checked					
2	Totals for all transactions reported on Form(s) 8949 with <b>Box B</b> checked					
3	Totals for all transactions reported on Form(s) 8949 with <b>Box C</b> checked	0.	680,000.			-680,000.
4	Short-term gain from Form 6252 and short-term gain or (I	loss) from Forms 4	1684, 6781, and 88	324 .	4	
5	Net short-term gain or (loss) from partnerships, Schedule(s) K-1	S corporations,	estates, and t		5	
6	Short-term capital loss carryover. Enter the amount, if ar <b>Worksheet</b> in the instructions	ny, from line 8 of y		Carryover	6	( )
7	Net short-term capital gain or (loss). Combine lines 1a term capital gains or losses, go to Part II below. Otherwis				7	-680,000.
Pa	t II Long-Term Capital Gains and Losses—Ass	sets Held More	Than One Year			I
See	instructions for how to figure the amounts to enter on the			(g)		(h) Gain or (loss)
This	below.  form may be easier to complete if you round off cents to le dollars.	(d) Proceeds (sales price)	(e) Cost (or other basis)	Adjustmen to gain or loss Form(s) 8949, line 2, colum	s from Part II,	Subtract column (e) from column (d) and combine the result with column (g)
8a	Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b.					
8b	Totals for all transactions reported on Form(s) 8949 with <b>Box D</b> checked					
9	Totals for all transactions reported on Form(s) 8949 with <b>Box E</b> checked					
10	Totals for all transactions reported on Form(s) 8949 with <b>Box F</b> checked	1,539,797.	339,350.	-250,0	00.	950,447.
11	Gain from Form 4797, Part I; long-term gain from Forms from Forms 4684, 6781, and 8824				11	
12	Net long-term gain or (loss) from partnerships, S corporat	tions, estates, and	trusts from Schee	dule(s) K-1	12	
13	Capital gain distributions. See the instructions				13	
14	Long-term capital loss carryover. Enter the amount, if any <b>Worksheet</b> in the instructions		-		14	( )
15	Net long-term capital gain or (loss). Combine lines 8a the back	o Part III on	15	950.447		

Schedule D (Form 1040) 2014 Page **2** 

art	III Summary		
16	Combine lines 7 and 15 and enter the result	16	270,447.
	• If line 16 is a <b>gain,</b> enter the amount from line 16 on Form 1040, line 13, or Form 1040NR, line 14. Then go to line 17 below.		
	• If line 16 is a <b>loss</b> , skip lines 17 through 20 below. Then go to line 21. Also be sure to complete line 22.		
	• If line 16 is <b>zero</b> , skip lines 17 through 21 below and enter -0- on Form 1040, line 13, or Form 1040NR, line 14. Then go to line 22.		
17	Are lines 15 and 16 <b>both</b> gains?  Yes. Go to line 18.		
	No. Skip lines 18 through 21, and go to line 22.		
18	Enter the amount, if any, from line 7 of the 28% Rate Gain Worksheet in the instructions ▶	18	
19	Enter the amount, if any, from line 18 of the <b>Unrecaptured Section 1250 Gain Worksheet</b> in the instructions	19	
20	Are lines 18 and 19 <b>both</b> zero or blank?  ▼ Yes. Complete the Qualified Dividends and Capital Gain Tax Worksheet in the instructions for Form 1040, line 44 (or in the instructions for Form 1040NR, line 42). Do not complete lines 21 and 22 below.		
	No. Complete the Schedule D Tax Worksheet in the instructions. Do not complete lines 21 and 22 below.		
21	If line 16 is a loss, enter here and on Form 1040, line 13, or Form 1040NR, line 14, the <b>smaller</b> of:		
	• The loss on line 16 or • (\$3,000), or if married filing separately, (\$1,500)	21	)
	Note. When figuring which amount is smaller, treat both amounts as positive numbers.		
22	Do you have qualified dividends on Form 1040, line 9b, or Form 1040NR, line 10b?		
	☐ <b>Yes.</b> Complete the <b>Qualified Dividends and Capital Gain Tax Worksheet</b> in the instructions for Form 1040, line 44 (or in the instructions for Form 1040NR, line 42).		
	■ No. Complete the rest of Form 1040 or Form 1040NR.		

## 8949

Department of the Treasury Internal Revenue Service

## **Sales and Other Dispositions of Capital Assets** ▶ Information about Form 8949 and its separate instructions is at www.irs.gov/form8949.

▶ File with your Schedule D to list your transactions for lines 1b, 2, 3, 8b, 9, and 10 of Schedule D.

Attachment

OMB No. 1545-0074

Sequence No. 12A

Name(s) shown on return FORMER CITIZEN Social security number or taxpayer identification number 000 - 00 - 000

Before you check Box A, B, or C below, see whether you received any Form(s) 1099-B or substitute statement(s) from your broker. A substitute

statement will have the same information as Form 1099-B. Either may show your basis (usually your cost) even if your broker did not report it to the IRS. Brokers must report basis to the IRS for most stock you bought in 2011 or later (and for certain debt instruments you bought in 2014 or later). Short-Term. Transactions involving capital assets you held 1 year or less are short term. For long-term Part I transactions, see page 2. Note. You may aggregate all short-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS and for which no adjustments or codes are required. Enter the total directly on Schedule D, line 1a; you are not required to report these transactions on Form 8949 (see instructions). You must check Box A, B, or C below. Check only one box. If more than one box applies for your short-term transactions, complete a separate Form 8949, page 1, for each applicable box. If you have more short-term transactions than will fit on this page for one or more of the boxes, complete as many forms with the same box checked as you need. (A) Short-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS (see Note above) (B) Short-term transactions reported on Form(s) 1099-B showing basis was not reported to the IRS (C) Short-term transactions not reported to you on Form 1099-B Adjustment, if any, to gain or loss.

(a) Description of property	(b) Date acquired	(c) Date sold or	(d) Proceeds	(e) Cost or other basis. See the <b>Note</b> below	Adjustment, if If you enter an a enter a co See the sepa	(h) Gain or (loss). Subtract column (e)	
(Example: 100 sh. XYZ Co.)	(Mo., day, yr.)	disposed (Mo., day, yr.)	(sales price) (see instructions)	and see Column (e) in the separate instructions	(f) Code(s) from instructions	<b>(g)</b> Amount of adjustment	from column (d) and combine the result with column (g)
EXCLUSION UNDER Section 877A(a)(3)(A)	10/30/14	10/30/14	0	680000			-680000
OTANIA Addition	(-1) (-) ()	1 (1-) (-, 1 !					
2 Totals. Add the amounts in columns negative amounts). Enter each tota Schedule D, line 1b (if Box A above above is checked), or line 3 (if Box C	I here and inc is checked), <b>lir</b>	lude on your ne 2 (if Box B	0	680000			-680000

Note. If you checked Box A above but the basis reported to the IRS was incorrect, enter in column (e) the basis as reported to the IRS, and enter an adjustment in column (g) to correct the basis. See Column (g) in the separate instructions for how to figure the amount of the adjustment.

Form 8949 (2014) Attachment Sequence No. **12A** Page **2** 

Name(s) shown on return. Name and SSN or taxpayer identification no. not required if shown on other side FORMER CITIZEN

Social security number or taxpayer identification number 000-00-0000

Before you check Box D, E, or F below, see whether you received any Form(s) 1099-B or substitute statement(s) from your broker. A substitute statement will have the same information as Form 1099-B. Either may show your basis (usually your cost) even if your broker did not report it to the IRS. Brokers must report basis to the IRS for most stock you bought in 2011 or later (and for certain debt instruments you bought in 2014 or later).

#### Part II

**Long-Term.** Transactions involving capital assets you held more than 1 year are long term. For short-term transactions, see page 1.

**Note.** You may aggregate all long-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS and for which no adjustments or codes are required. Enter the total directly on Schedule D, line 8a; you are not required to report these transactions on Form 8949 (see instructions).

You *must* check Box D, E, *or* F below. Check only one box. If more than one box applies for your long-term transactions, complete a separate Form 8949, page 2, for each applicable box. If you have more long-term transactions than will fit on this page for one or more of the boxes, complete as many forms with the same box checked as you need.

- (D) Long-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS (see Note above)
- [ (E) Long-term transactions reported on Form(s) 1099-B showing basis was not reported to the IRS
- ▼ (F) Long-term transactions not reported to you on Form 1099-B

(i ) Long-term transactions	not reported	to you on it	JIII 1033-D				
(a) Description of property	(b) Date acquired	(c) Date sold or	(d) Proceeds	(e) Cost or other basis. See the <b>Note</b> below	If you enter an a	any, to gain or loss. amount in column (g), de in column (f). arate instructions.	(h) Gain or (loss). Subtract column (e)
(Example: 100 sh. XYZ Co.)	(Mo., day, yr.)	disposed (Mo., day, yr.)	(sales price) (see instructions)	and see Column (e) in the separate instructions	(f) Code(s) from instructions	<b>(g)</b> Amount of adjustment	from column (d) and combine the result with column (g)
PRINCIPAL RESIDENCE AT 360 UNIVERSITY AVENUE - TORONTO, ON MSG 1SA	10/30/85	10/30/14	1072099	100000		-250000	722099
500 SH OF TELUS CORP.	04/12/10	10/30/14	20990	10495			10495
RRSP	06/30/05	10/30/14	446708	228855			217853
2 Totals. Add the amounts in columns negative amounts). Enter each total Schedule D, line 8b (if Box D above above is checked). or line 10 (if Box	here and includ is checked), <b>lin</b>	e on your e 9 (if Box E	1539797	339350		-250000	950447

**Note.** If you checked Box D above but the basis reported to the IRS was incorrect, enter in column (e) the basis as reported to the IRS, and enter an adjustment in column (g) to correct the basis. See *Column* (g) in the separate instructions for how to figure the amount of the adjustment.

# 6251

#### Alternative Minimum Tax—Individuals

OMB No. 1545-0074

Attachment

Department of the Treasury Internal Revenue Service (99)

Name(s) shown on Form 1040 or Form 1040NR

▶ Information about Form 6251 and its separate instructions is at www.irs.gov/form6251. ► Attach to Form 1040 or Form 1040NR.

Sequence No. 32 Your social security number

FORMER CITIZEN 000-00-000 Part I Alternative Minimum Taxable Income (See instructions for how to complete each line.) 1 If filing Schedule A (Form 1040), enter the amount from Form 1040, line 41, and go to line 2. Otherwise, enter the amount from Form 1040, line 38, and go to line 7. (If less than zero, enter as a negative amount.) 315,718. 1 Medical and dental. If you or your spouse was 65 or older, enter the smaller of Schedule A (Form 1040), 2 3 Taxes from Schedule A (Form 1040), line 9 . . . . . . . . . . . . . . . . 3 Enter the home mortgage interest adjustment, if any, from line 6 of the worksheet in the instructions for this line 4 5 5 If Form 1040, line 38, is \$152,525 or less, enter -0-. Otherwise, see instructions . . . 6 0. 7 7 Investment interest expense (difference between regular tax and AMT). . . . . . . . . . 8 Depletion (difference between regular tax and AMT) . . . . . . . . . . . . . . . 9 Net operating loss deduction from Form 1040, line 21. Enter as a positive amount . . . 10 10 11 11 12 12 13 Qualified small business stock (7% of gain excluded under section 1202) . . . 13 0. 14 Exercise of incentive stock options (excess of AMT income over regular tax income) . . . . 14 Estates and trusts (amount from Schedule K-1 (Form 1041), box 12, code A) 15 Electing large partnerships (amount from Schedule K-1 (Form 1065-B), box 6) . 16 Disposition of property (difference between AMT and regular tax gain or loss) 17 0. Depreciation on assets placed in service after 1986 (difference between regular tax and AMT) 18 18 Passive activities (difference between AMT and regular tax income or loss) . . . . . . . . 19 Loss limitations (difference between AMT and regular tax income or loss) . . . 20 20 21 Circulation costs (difference between regular tax and AMT) . . . . . . . 21 22 Long-term contracts (difference between AMT and regular tax income) . . . . . 22 23 23 24 Research and experimental costs (difference between regular tax and AMT) . . . 24 25 Income from certain installment sales before January 1, 1987 . . . . . . . 25 26 26 27 Other adjustments, including income-based related adjustments . . . . 27 Alternative minimum taxable income. Combine lines 1 through 27. (If married filing separately and line 28 is more than \$242,450, see instructions.) . 334,035. Part II Alternative Minimum Tax (AMT) 29 Exemption. (If you were under age 24 at the end of 2014, see instructions.) IF your filing status is . . . AND line 28 is not over . . . THEN enter on line 29 . . . Single or head of household . . . . \$117,300 \$52,800 Married filing jointly or qualifying widow(er) 156.500 82.100 Married filing separately. . . . . . 78,250 41.050 29 0. If line 28 is **over** the amount shown above for your filing status, see instructions. Subtract line 29 from line 28. If more than zero, go to line 31. If zero or less, enter -0- here and on lines 31, 33, 334,035. 30 • If you are filing Form 2555 or 2555-EZ, see instructions for the amount to enter. If you reported capital gain distributions directly on Form 1040, line 13; you reported gualified dividends on Form 1040, line 9b; or you had a gain on both lines 15 and 16 of Schedule D (Form 1040) (as refigured 61,446. 31 for the AMT, if necessary), complete Part III on the back and enter the amount from line 64 here. All others: If line 30 is \$182,500 or less (\$91,250 or less if married filing separately), multiply line 30 by 26% (.26). Otherwise, multiply line 30 by 28% (.28) and subtract \$3,650 (\$1,825 if married filing separately) from the result. 32 61,446. 33 34 Add Form 1040, line 44 (minus any tax from Form 4972), and Form 1040, line 46. Subtract from the result any foreign tax credit from Form 1040, line 48. If you used Schedule J to figure your tax on Form 1040, line 44, 52,088. refigure that tax without using Schedule J before completing this line (see instructions) . . . . . . . . . . . . . . . . 34 9,358. AMT. Subtract line 34 from line 33. If zero or less, enter -0-. Enter here and on Form 1040, line 45. 35

Form 6251 (2014) Page **2** 

#### Part III Tax Computation Using Maximum Capital Gains Rates

Complete Part III only if you are required to do so by line 31 or by the Foreign Earned Income Tax Worksheet in the instructions. 36 Enter the amount from Form 6251, line 30. If you are filing Form 2555 or 2555-EZ, enter the amount from 334,035. 36 37 Enter the amount from line 6 of the Qualified Dividends and Capital Gain Tax Worksheet in the instructions for Form 1040, line 44, or the amount from line 13 of the Schedule D Tax Worksheet in the instructions for Schedule D (Form 1040), whichever applies (as refigured for the AMT, if necessary) (see instructions). If 270,447. you are filing Form 2555 or 2555-EZ, see instructions for the amount to enter . . . . . . . . . . . . 37 38 Enter the amount from Schedule D (Form 1040), line 19 (as refigured for the AMT, if necessary) (see instructions). If you are filing Form 2555 or 2555-EZ, see instructions for the amount to enter . . . . . . 38 39 If you did not complete a Schedule D Tax Worksheet for the regular tax or the AMT, enter the amount from line 37. Otherwise, add lines 37 and 38, and enter the smaller of that result or the amount from line 10 of the Schedule D Tax Worksheet (as refigured for the AMT, if necessary). If you are filing Form 2555 or 270,447. 39 40 270,447. 41 63,588. 42 If line 41 is \$182,500 or less (\$91,250 or less if married filing separately), multiply line 41 by 26% (.26). Otherwise, multiply line 41 by 28% (.28) and subtract \$3,650 (\$1,825 if married filing separately) from the result . . . . ▶ 16,533. 43 Enter: • \$73.800 if married filing jointly or qualifying widow(er). 36,900. 43 • \$36,900 if single or married filing separately, or • \$49,400 if head of household. 44 Enter the amount from line 7 of the Qualified Dividends and Capital Gain Tax Worksheet in the instructions for Form 1040, line 44, or the amount from line 14 of the Schedule D Tax Worksheet in the instructions for Schedule D (Form 1040), whichever applies (as figured for the regular tax). If you did not complete either worksheet for the regular tax, enter the amount from Form 1040, line 43; if zero or less, enter -0-. If you 45,271. are filing Form 2555 or 2555-EZ, see instructions for the amount to enter . . . . . . . . . . . . . 44 **45** Subtract line 44 from line 43. If zero or less, enter -0- . . . . . . . . . . . . 45 0. **46** Enter the **smaller** of line 36 or line 37 . . . . . . . . . . . 270,447. 46 0. Enter the **smaller** of line 45 or line 46. This amount is taxed at 0%. 47 270,447. 49 Enter: • \$406.750 if single 49 228,800. • \$228,800 if married filing separately • \$457,600 if married filing jointly or qualifying widow(er) • \$432,200 if head of household **50** Enter the amount from line 45 50 0. Enter the amount from line 7 of the Qualified Dividends and Capital Gain Tax Worksheet in the instructions for Form 1040, line 44, or the amount from line 19 of the Schedule D Tax Worksheet, whichever applies (as figured for the regular tax). If you did not complete either worksheet for the regular tax, enter the amount from Form 1040, line 43; if zero or less, enter -0-. If you are filing Form 2555 or Form 2555-EZ, 51 45,271. 45,271. **52** Add line 50 and line 51 . . . . . 52 53 Subtract line 52 from line 49. If zero or less, enter -0- . . . . . 53 183,529. 183,529. 54 27,529. 55 56 183,529. If lines 56 and 36 are the same, skip lines 57 through 61 and go to line 62. Otherwise, go to line 57. 86,918. 57 17,384. 58 **58** Multiply line 57 by 20% (.20) . . . . . . . . . . . . . . . . . If line 38 is zero or blank, skip lines 59 through 61 and go to line 62. Otherwise, go to line 59. **59** Add lines 41, 56, and 57 59 60 **61** Multiply line 60 by 25% (.25) . 61 62 61,446. 63 If line 36 is \$182,500 or less (\$91,250 or less if married filing separately), multiply line 36 by 26% (.26). Otherwise, multiply line 36 by 28% (.28) and subtract \$3,650 (\$1,825 if married filing separately) from the result 91,705. 63 Enter the smaller of line 62 or line 63 here and on line 31. If you are filing Form 2555 or 2555-EZ, do not enter this amount on line 31. Instead, enter it on line 4 of the worksheet in the instructions for line 31 61,446. 64

Department of the Treasury Internal Revenue Service (99)

### Net Investment Income Tax— Individuals, Estates, and Trusts

► Attach to your tax return.

► Information about Form 8960 and its separate instructions is at www.irs.gov/form8960.

OMB No. 1545-2227

2014

Attachment
Sequence No. 72

Name(s)	shown on your tax return	You	r socia	al security number or EIN
FORM	MER CITIZEN	0.0	0 - 0	0-0000
Part	Investment Income Section 6013(g) election (see instructions)	•		
	☐ Section 6013(h) election (see instructions)			
	☐ Regulations section 1.1411-10(g) election (see instructions)			
1	Taxable interest (see instructions)		1	
2	Ordinary dividends (see instructions)	. [	2	
3	Annuities (see instructions)	. [	3	
4a	Rental real estate, royalties, partnerships, S corporations, trusts,			
	etc. (see instructions)			
b	Adjustment for net income or loss derived in the ordinary course of			
	a non-section 1411 trade or business (see instructions) 4b			
С	Combine lines 4a and 4b		4c	
5a	Net gain or loss from disposition of property (see instructions) . 5a 270, 4	47.		
b	Net gain or loss from disposition of property that is not subject to			
-	net investment income tax (see instructions)			
С	Adjustment from disposition of partnership interest or S corporation			
Ū	stock (see instructions)			
d	Combine lines 5a through 5c		5d	270,447.
6	Adjustments to investment income for certain CFCs and PFICs (see instructions)		6	
7	Other modifications to investment income (see instructions)	-	7	
8	Total investment income. Combine lines 1, 2, 3, 4c, 5d, 6, and 7	-	8	270,447.
Part				
9a	Investment interest expenses (see instructions) 9a			
b	State, local, and foreign income tax (see instructions) 9b			
С	Miscellaneous investment expenses (see instructions) 9c			
d	Add lines 9a, 9b, and 9c		9d	
10	Additional modifications (see instructions)	. [	10	
11	Total deductions and modifications. Add lines 9d and 10		11	
Part				
12	Net investment income. Subtract Part II, line 11 from Part I, line 8. Individuals complete lines	13-		
	17. Estates and trusts complete lines 18a–21. If zero or less, enter -0	I	12	270,447.
	Individuals:			
13	Modified adjusted gross income (see instructions)	18.		
14	Threshold based on filing status (see instructions)	00.		
15	Subtract line 14 from line 13. If zero or less, enter -0	18.		
16	Enter the smaller of line 12 or line 15		16	190,718.
17	Net investment income tax for individuals. Multiply line 16 by 3.8% (.038). Enter here	and		
	include on your tax return (see instructions)		17	7,247.
	Estates and Trusts:			
18a	Net investment income (line 12 above)			
b	Deductions for distributions of net investment income and			
	deductions under section 642(c) (see instructions)			
С	Undistributed net investment income. Subtract line 18b from 18a (see			
	instructions). If zero or less, enter -0			
19a	Adjusted gross income (see instructions)			
b	Highest tax bracket for estates and trusts for the year (see			
	instructions)			
С	Subtract line 19b from line 19a. If zero or less, enter -0			
20	Enter the smaller of line 18c or line 19c		20	
21	Net investment income tax for estates and trusts. Multiply line 20 by 3.8% (.038). Enter I	here		
	and include on your tax return (see instructions)		21	

Department of the Treasury

Internal Revenue Service

**Health Coverage Exemptions** 

► Attach to Form 1040, Form 1040A, or Form 1040EZ.

▶ Information about Form 8965 and its separate instructions is at www.irs.gov/form8965.

OMB No. 1545-0074

2014

Attachment Sequence No. 75

Name as shown on return FORMER CITIZEN

Your social security number 000-00-0000

Complete this form if you have a Marketplace-granted coverage exemption or you are claiming a coverage exemption on your return.

	a Name of I						o SN				Exemp	otion C	c ertifica	nte Nur	nber	
1				_												
2				+												
3																
4																
5				+					_							
6 Part	Coverage Exemption	s for Your Hou	usehold C	laim	ed o	n Yo	ur Re	eturn	:							
7a	Are you claiming an exemption I	because vour hou	sehold inco	me is	belov	v the f	ilina t	hresh	old?.					Yes	X	No
		-														
	Are you claiming a hardship exe  Coverage Exemption	inplion because y	Jour gross i			1014 +1	aa filir	a thro	schole	12				Vaa	Y	No
Part I				d on	You	r Re	turn:	If yo	eshold u and	1? . d/or a	a mer	nber		<b>Yes</b> our ta		No
Part I	household are claiming	g an exemption		d on	You n, cor	r Re	turn: e Pa	If yo rt III.	u and	d/or a	a mer		of yo	our ta	ıx	
Parti			on your r	ed on eturr	You	r Re	turn:	If yo	i May	i? . d/or a j June		nber I Aug		our ta		p Dec
Part	household are claiming	g an exemption	on your r	ed on eturr d Full	You n, cor e	r Re	turn: e Pa	If yort III.	u and	d/or a	a mer	ı	of yo	our ta	o o	р
Part 1	household are claiming	g an exemption	on your r	ed on eturr d Full	You n, cor e	r Re	turn: e Pa	If yort III.	u and	d/or a	a mer	ı	of yo	our ta	o o	р
	household are claiming a Name of Individual	g an exemption  b  ssn	c Exemption Type	ed on eturr d Full Year	You n, cor e	r Re	turn: e Pa	If yort III.	u and	d/or a	a mer	ı	of yo	our ta	o o	р
	household are claiming a Name of Individual	g an exemption  b  ssn	c Exemption Type	ed on eturr d Full Year	You n, cor e	r Re	turn: e Pa	If yort III.	u and	d/or a	a mer	ı	of yo	our ta	o o	р
8	household are claiming a Name of Individual	g an exemption  b  ssn	c Exemption Type	ed on eturr d Full Year	You n, cor e	r Re	turn: e Pa	If yort III.	u and	d/or a	a mer	ı	of yo	our ta	o o	р
8	household are claiming a Name of Individual	g an exemption  b  ssn	c Exemption Type	ed on eturr d Full Year	You n, cor e	r Re	turn: e Pa	If yort III.	u and	d/or a	a mer	ı	of yo	our ta	o o	р
9	household are claiming a Name of Individual	g an exemption  b  ssn	c Exemption Type	ed on eturr d Full Year	You n, cor e	r Re	turn: e Pa	If yort III.	u and	d/or a	a mer	ı	of yo	our ta	o o	р
8	household are claiming a Name of Individual	g an exemption  b  ssn	c Exemption Type	ed on eturr d Full Year	You n, cor e	r Re	turn: e Pa	If yort III.	u and	d/or a	a mer	ı	of yo	our ta	o o	р
9	household are claiming a Name of Individual	g an exemption  b  ssn	c Exemption Type	ed on eturr d Full Year	You n, cor e	r Re	turn: e Pa	If yort III.	u and	d/or a	a mer	ı	of yo	our ta	o o	р
8 9 10	household are claiming a Name of Individual	g an exemption  b  ssn	c Exemption Type	ed on eturr d Full Year	You n, cor e	r Re	turn: e Pa	If yort III.	u and	d/or a	a mer	ı	of yo	our ta	o o	р

Department of the Treasury Internal Revenue Service

### **Initial and Annual Expatriation Statement**

For calendar year 2014 or other tax year beginning

, 2014, and ending

► Information about Form 8854 and its separate instructions is at www.irs.gov/form8854.

► Please print or type.

2014 Attachment Sequence No. 112

OMB No. 1545-0074

Name

Sequence No. 112
Identifying number (see instructions)

, 20

F	FORMER CITIZEN	000-00-0000
Part	General Information. For all filers.	<u> </u>
1	Mailing address and telephone number where you can be reached after expatriation	
	BORN WITH US CITIZENSHIP ONLY - US "ELIGIBLE" PENSION, ON M50	G 1S4 - CANADA
2	Address of principal foreign residence (if different from line 1)	
_		
3	Country of tax residence (if different from line 2) <u>CANADA</u>	
4	Expatriation date. Check the box that applies (see instructions).	
	<ul> <li>June 4, 2004 – June 16, 2008. Complete Parts II and V</li> <li>June 17, 2008 – December 31, 2013. Complete Part III if:         <ul> <li>You made an election to defer the payment of tax on a prior year Form 8854</li> <li>You have an item of eligible deferred compensation, or</li> <li>You have an interest in a nongrantor trust.</li> </ul> </li> <li>Otherwise, you do not need to file Form 8854.</li> <li>✓ January 1, 2014 – December 31, 2014. Complete Parts IV and V</li> </ul>	;
5	Date of notification of expatriating act, termination of residency, or claim of treaty be	enefits (see instructions).
	<ul> <li>☑ Citizen. Date notification given to Department of State 11/01/2014</li> <li>☐ Long-term resident. Date notification given to Department of Homeland Secur</li> <li>☐ Long-term resident with dual residency in a treaty country. Date commend resident of the treaty country</li> </ul>	itycing to be treated, for tax purposes, as a
6	Number of days you were physically present in the United States in the current year	3
7	List all countries (other than the United States) of which you are a citizen.	
а	Name of country CANADA	
b	Date you became a citizen of each country listed in line 7a 01/01/1947	
8	How you became a U.S. citizen   ☑ By birth ☐ By naturalization	
oart	For Persons Who Expatriated After June 3, 2004, and Before June	17, 2008
1	Did you complete Form 8854 for any period after June 3, 2004, and before June 17.  No. If you expatriated for immigration purposes after June 3, 2004, and before June 17.  In the filed a Form 8854, you continue to be treated as a U.S. citizen or U.S. law purposes until the day that you file this form. Because you did not file I immigration purposes, you are subject to the alternative tax in section 877(b) that you file this form (see instructions).	ore June 17, 2008, but have not previously ful permanent resident for U.S. income tax Form 8854 for the year of expatriation for
	Yes. Tax year for which Form 8854 first filed Go to line	ne 2.
2	Were you physically present in the United States for more than 30 days but not during the tax year?	
а	If you checked "Yes" to line 2, were you performing services for an unrelated emplo	oyer? Yes No
b	If you checked " <b>Yes</b> " to line 2a, are you a citizen or resident, fully liable for income which you were born, your spouse was born, or either of your parents was born? . Next: Go to Part V.	

Form 8854 (2014) Page **2** 

#### Part III For Persons Who Expatriated After June 16, 2008, and Before January 1, 2014

- 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 have an interest in a nongrantor trust, complete line 3.

2

3

1	Complete columns (a), (b for any property you disp	o), and (c) for all proper	ty on whicl			Form 8854.	Complete column (d
	(a) Description of property	(b) Amount of mark-to-mar (loss) reported on pr Form 8854			(c) deferred on prior year orm 8854	Date of	<b>(d)</b> disposition (if any)
2	Did you receive any distr If "Yes," Amount of distri	•	rred compe		for 2014? unt withheld at sourc	e, if any:	☐ Yes ☐ No
3	Did you receive any distr If "Yes," Amount of distri	•	ntor trust fo		unt withheld at sourc	e, if any:	☐ Yes ☐ No
Part	V For Persons Who	Expatriated During	2014				
	ion A Expatriation Inf		<u>,                                     </u>				
1	Enter your U.S. income to 1st Year Before Expatriation	ax liability (after foreign 2nd Year Before Expatriation	3	for the 5 tax york for the 5 tax	years ending before t 4th Year Before Expatriation		xpatriation. 5th Year Before Expatriation
	\$ <u>0</u>	\$_0	\$ 0		\$ <u>0</u>	\$_C	

Enter your net worth on the date of your expatriation for tax purposes . . . . . . . . . . . . . . .

Did you become at birth a U.S. citizen and a citizen of another country, and do you continue to be a citizen

If you answered "Yes" to question 3, have you been a resident of the United States for not more than 10 of

Were you under age 181/2 on the date you expatriated and have you been a U.S. resident for not more than

\$ 2,322,881

Page 3 Form 8854 (2014) **Property Owned on Date of Expatriation** Section B Do not complete Section B if: • Your average net income tax liability for the 5 tax years immediately before expatriation (see line 1 in Section A) was not more than \$157,000, your net worth (see line 2 in Section A) was under \$2 million, and you checked "Yes" on line 6 in • In Section A, you checked "Yes" on lines 3, 4, and 6; or • In Section A, you checked "Yes" on lines 5 and 6. 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 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 V No c Do you have any specified tax deferred accounts? If "Yes," you must include in income the entire ✓ 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 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). Recognition of gain or loss on the deemed sale of mark-to-market property. Caution. Do not include in column (a) any property described on line 7a, 7b, 7c, or 7d. Complete column (g) only if you are deferring tax on gain from any property listed in column (a). (e) (c) (g) Gain after Cost or other Amount of tax Description of property Fair market value Gain or (loss). Form or Schedule allocation of the on day before date basis\* Subtract (c) on which gain deferred (attach exclusion amount (see instructions) of expatriation from (b) or loss is reported computations)

9 Total. Add the amounts	in column (d) and colu	mn (e)				
10 Total tax deferred. Add	the amounts in colum	n (g). Enter here				
and on line 15						
*You must designate any property	v for which you are electing	ng to figure basis with	nout regard to section 8	377A(h)(2). Identify as "(l	h)(2)." This election is irrev	ocable.

Form 8854 (2014) Page **4** 

Sect	ion C Deferral of Tax		
	<b>Election to defer tax.</b> You can defer tax only if you have provided adequate security. Adequin the instructions.	uate security	is described
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 that would prevent assessment or collection of any tax imposed because of section 877A.		′es □ 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 63, 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)	15	
	• If you are filing Form 1040, enter this amount in brackets to the left of the entry space for line 63. Identify as "EXP."		
	• If you are filing Form 1040NR, enter this amount in brackets to the left of the entry space for line 61. Identify as "EXP."		

Form **8854** (2014)

#### Part V Balance Sheet and Income Statement

#### Schedule A Balance Sheet

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 following date.

- Part II filers the end of the tax year for which you are filing the form
- Part IV filers your expatriation date

For more details, see the separate instructions.

For	more details, see the separate instructions.		1	1	1
	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 long-term residents only)
1 2	Cash, including bank deposits				
3	Marketable stock and securities issued by foreign companies	20,990	10,495	8,274	
4	Nonmarketable stock and securities issued by U.S. companies				
5	Nonmarketable stock and securities issued by foreign companies				
а	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	804,074	0	804,074	
7	Pensions from services performed outside the United States				
8 9	Partnership interests (see instructions) Assets held by trusts you own under sections 671 through 679 (see instructions)				
10	Beneficial interests in nongrantor trusts (see instructions)				
11 12 13	Intangibles used in the United States Intangibles used outside the United States . 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 .	1,072,099	100,000	972,099	
17	Business property located in the United States	, ,		,	
18	Business property located outside the United States				
19	Other assets (see instructions) RRSP	446,708	217,852	228,855	
20	Total assets. Add lines 1 through 5 and lines 6 through 19. Do not include amounts on line 5a in this total	2,322,881	317,852	2,005,029	
	Liabilities	Amount			
21	Installment obligations				
22	Mortgages, etc				
23	Other liabilities (see instructions)				
24	Total liabilities. Add lines 21 through 23	0			
25	Net worth. Subtract line 24 from line 20, column (a)	2,322,881			
	• •				

Page 5

Form 88	54 (2014)						Page <b>6</b>
Sche	dule B	Income Statement					
	Provide	income information for the following	period.				
		Il filers - the tax year for which you are	•				
	• Part	IV filers - the part of the tax year that er	ds with the day before you	r expatriat	ion date; but ente	r -0- fo	or lines 5 through 7.
1	U.S. so	urce gross income not effectively con	nected with the conduct of	a U.S. tra	ade or business.		
а	Interes	t		1a	0 00		
b	Divider	nds		1b	0 00		
С	Royalti	es		1c	0 00		
d	Pensio	n distributions		1d	0 00		
е	Other			1e	0 00		
f	Total.	Add lines a through e				1f	0 00
2	Gross i	ncome that is effectively connected wi	th the conduct of a U.S. tr	ade or bu	siness	2	0 00
3	Income	from the performance of services in the	ne United States			3	0 00
4		rom the sale or exchange of:					
а	•	ty (other than stock or debt obligation	•		0 00		
	States			4a			
b		ssued by a U.S. domestic corporation		4b	0 00		
С		bligations of U.S. persons or of the U			0 00		
	politica	I subdivision thereof, or the District of	Columbia	4c	0 00		
d		3				4d	0 00
5		or gain derived from certain foreign o	•	•	_		
	and pro	ofits earned or accumulated before the	date of expatriation (see i	nstruction	s)	5	0 00
6		n certain exchanges of property that or		•	•	6	0 00
7	Income	received or accrued by certain foreign	n corporations (see instruc	tions) .		7	0 00
8		es 1f, 2, 3, 4d, 5, 6, and 7				8	0 00
9		ncome from all other sources				9	315,718 00
10	Total.	Add lines 8 and 9				10	315,718 00
Cian	Here	Under penalties of perjury, I declare that best of my knowledge and belief, it is true of which preparer has any knowledge.					
Sigii	пеге	Your signature			Date		
Paid		Print/Type preparer's name	Preparer's signature		Date	Check	☐ if PTIN
Prep	arer					self-en	nployed
Use (		Firm's name				Firm's	EIN ►
		Firm's address ►				Phone	no.

Form **8854** (2014)

# SCENARIO 5

EXPATRIATED UNDER THE AGE OF 18 1/2

DUAL-STATUS STATEMENT

<b>1040</b>		nent of the Treasury—Internal Ro		, ,	2014	L OMB N	4545.0074	l IDOUL O			
Earthe weer len 1 D		Individual incom	iie ia	01/0	1 , 2014, endi		01/01,		<del>-</del>	not write or staple in the separate instruct	
Your first name and		, or other tax year beginning	Last nam		1 , 2014, endi	ıy .	01/01,	20 14		r social security nu	
FORMER										-	
If a joint return, spo	ouse's first	name and initial	CITI2							0 - 0 0 - 0 0 0 0 Ise's social security r	number
									'	•	
Home address (nur	mber and	street). If you have a P.O. b	ox, see inst	tructions.				Apt. no.	A 1	Make sure the SSN(s	s) above
KID UNDER	18 1/	2 - LESS THAN	10 Y	IN THE US	5					and on line 6c are of	
City, town or post off	ice, state, a	nd ZIP code. If you have a for	eign addres:	s, also complete s	paces below (see i	nstructions).	'		Pre	sidential Election Ca	mpaign
LIVES IN	ST KI	TTS AND NEVIS								here if you, or your spous	
Foreign country na	me			Foreign pro	vince/state/coun	ty	Foreign	postal code		want \$3 to go to this fund below will not change you	
St. Kitts				BASSET	ERRE				refund.	You	Spouse
Filing Status	1	X Single			4	⊦ ☐ Hea	d of househole	d (with quali	fying pe	erson). (See instruction	ons.) If
3	2	Married filing jointly	(even if o	nly one had in	come)				but no	ot your dependent, er	nter this
Check only one	3		•	er spouse's SS			d's name here				
box.		and full name here.					alifying widov	` '	epend		
Exemptions	6a	X Yourself. If some			dependent, <b>do</b>	not checi	k box 6a.		• }	Boxes checked on 6a and 6b	1
	b	•					(4) ./ if child	under age 17	<u>.</u> ,	No. of children on 6c who:	
	C (1) First	Dependents: name Last name		(2) Dependent's social security num		endent's hip to you	qualifying for	child tax credi		<ul> <li>lived with you</li> </ul>	
	(1) 11151	name Last name	'				(566 1115	ructions)	_	<ul> <li>did not live with you due to divorce</li> </ul>	
If more than four								<del></del>	_	or separation (see instructions)	
dependents, see							Ī	<u> </u>	_	Dependents on 6c	
instructions and check here ▶□								]	_	not entered above	
	d	Total number of exem	ptions cla	imed						Add numbers on lines above ▶	1
Income	7	Wages, salaries, tips,	etc. Attac	h Form(s) W-2					7		
IIICOIIIC	8a	Taxable interest. Atta	ch Sched	ule B if require	ed			[	8a		
	b	Tax-exempt interest.	Do not in	clude on line 8	За	8b					
Attach Form(s) W-2 here. Also	9a	Ordinary dividends. A	ttach Sch	edule B if requ	ired				9a		
attach Forms	b	Qualified dividends				9b					
W-2G and	10	Taxable refunds, cred	its, or offs	ets of state ar	nd local income	taxes .			10		
1099-R if tax was withheld.	11	Alimony received .							11		
was withheld.	12	Business income or (lo	oss). Attac	ch Schedule C	or C-EZ			· <u>·</u>	12		
If you did not	13	Capital gain or (loss).			quired. If not re	quired, ch	eck here 🕨	$\sqcup$	13		
get a W-2,	14	Other gains or (losses	′ I I	Form 4797 .					14		
see instructions.	15a	IRA distributions .	15a			Taxable a		· · ·	15b		
	16a	Pensions and annuities				Taxable a		_	16b		
	17	Rental real estate, roy							17		
	18	Farm income or (loss). Unemployment comp							18		
	19 20a	Social security benefits	1 1		1		mount .	_	19 20b		
	21	Other transmission of the transmission		ount					21		
	22	Combine the amounts in	the far rig	ht column for lin	nes 7 through 21	. This is vo	ır total incon	ne ▶	22		
	23	Educator expenses				23					
Adjusted	24	Certain business expens			<del>-</del>						
Gross		fee-basis government of		-	- 1	24					
Income	25	Health savings accour	nt deducti	on. Attach For	m 8889 .	25					
	26	Moving expenses. Att	ach Form	3903	[	26					
	27	Deductible part of self-e	mploymen	t tax. Attach Scl	hedule SE .	27					
	28	Self-employed SEP, S	IMPLE, a	nd qualified pla	ans	28					
	29	Self-employed health	insurance	deduction	[	29					
	30	Penalty on early withd		-	_	30					
	31a	Alimony paid b Recip	oient's SS	Ν ▶	;	31a					
	32	IRA deduction				32					
	33	Student loan interest of			<del>-</del>	33					
	34	Tuition and fees. Attac				34					
	35	Domestic production ac				35			2.5		
	36 27	Add lines 23 through 3							36		
	37	Subtract line 36 from	ııı ı <del>u</del> 22. 11	iis is vour <b>adil</b>	asteu gross in	come .			37		

Form 1040 (2014) Page 2 Amount from line 37 (adjusted gross income) 38 38 You were born before January 2, 1950, Blind. Total boxes 39a Check Tax and if: Spouse was born before January 2, 1950, ☐ Blind. J checked ► 39a **Credits** If your spouse itemizes on a separate return or you were a dual-status alien, check here ▶ b 0. Itemized deductions (from Schedule A) or your standard deduction (see left margin) 40 Standard 40 Deduction 0. Subtract line 40 from line 38 41 for-3,950. 42 Exemptions. If line 38 is \$152,525 or less, multiply \$3,950 by the number on line 6d. Otherwise, see instructions 42 • People who check any box on line 43 **Taxable income.** Subtract line 42 from line 41. If line 42 is more than line 41, enter -0- . . . 43 0. 39a or 39b or 0. 44 Tax (see instructions). Check if any from: a Form(s) 8814 b Form 4972 c 44 who can be 45 Alternative minimum tax (see instructions). Attach Form 6251 . . . . . . . . . . 45 claimed as a dependent, 46 Excess advance premium tax credit repayment. Attach Form 8962 46 instructions. 47 47 0. Add lines 44, 45, and 46 · All others: 48 Foreign tax credit. Attach Form 1116 if required . . . . Single or Married filing 49 Credit for child and dependent care expenses. Attach Form 2441 49 separately, 50 Education credits from Form 8863, line 19 . . . . 50 \$6,200 Married filing Retirement savings contributions credit. Attach Form 8880 51 51 jointly or Qualifying 52 Child tax credit. Attach Schedule 8812, if required . . . widow(er) 53 Residential energy credits. Attach Form 5695 \$12,400 Other credits from Form: a 3800 b 8801 с 🗌 54 Head of household. 55 Add lines 48 through 54. These are your total credits . 55 \$9,100 Subtract line 55 from line 47. If line 55 is more than line 47, enter -0-56 56 0. 57 Self-employment tax. Attach Schedule SE . . . . . . 57 58 Unreported social security and Medicare tax from Form: **a** 4137 **b** 8919 58 **Other** 59 Additional tax on IRAs, other qualified retirement plans, etc. Attach Form 5329 if required **Taxes** 60a Household employment taxes from Schedule H . . . . . . . . 60a b First-time homebuyer credit repayment. Attach Form 5405 if required . 60b 61 Health care: individual responsibility (see instructions) Full-year coverage 61 62 Taxes from: a Form 8959 b Form 8960 c Instructions; enter code(s) 62 63 0. Add lines 56 through 62. This is your total tax . 63 64 Federal income tax withheld from Forms W-2 and 1099 . . . **Payments** 65 2014 estimated tax payments and amount applied from 2013 return 65 If you have a . . . No . . . . . . . 66a Earned income credit (EIC) 66a qualifying b Nontaxable combat pay election 66b child, attach Schedule EIC. 67 Additional child tax credit. Attach Schedule 8812 . . . . 67 68 American opportunity credit from Form 8863, line 8 . 69 Net premium tax credit. Attach Form 8962 . . . . 69 70 Amount paid with request for extension to file 70 71 Excess social security and tier 1 RRTA tax withheld . 71 72 Credit for federal tax on fuels. Attach Form 4136 73 Credits from Form: a 2439 b Reserved c Reserved d Add lines 64, 65, 66a, and 67 through 73. These are your total payments . 74 74 Refund 75 If line 74 is more than line 63, subtract line 63 from line 74. This is the amount you overpaid 75 76a Amount of line 75 you want **refunded to you.** If Form 8888 is attached, check here . 76a X X X X X X X X X X X X D C Type: ☐ Checking ☐ Savings b Routing number Direct deposit? d Account number Х X X X X X X X X | x | x | x | x | x | x | x | x | instructions. 77 Amount of line 75 you want **applied to your 2015 estimated tax** ▶ Amount 0. Amount you owe. Subtract line 74 from line 63. For details on how to pay, see instructions 78 You Owe 79 Estimated tax penalty (see instructions) . Do you want to allow another person to discuss this return with the IRS (see instructions)? Yes. Complete below. X No Third Party Designee's Phone Personal identification **Designee** number (PIN) name > no. Under penalties of periury. I declare that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and belief. Sign they are true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge. Here Your signature Date Your occupation Daytime phone number Joint return? See instructions. If the IRS sent you an Identity Protection Spouse's signature. If a joint return, both must sign. Keep a copy for Spouse's occupation your records. here (see inst.) Print/Type preparer's name Preparer's signature Non-Paid Preparer **Paid** Check L if self-employed **Preparer** 

Firm's EIN ▶

Phone no.

Use Only

Firm's name ▶

Firm's address ▶

#### **SCHEDULE B**

(Form 1040A or 1040)

Department of the Treasury Internal Revenue Service (99)

### **Interest and Ordinary Dividends**

OMB No. 1545-0074

► Attach to Form 1040A or 1040.
► Information about Schedule B and its instructions is at www.irs.gov/scheduleb.

Attachment Sequence No. **08** 

Name(s) snown on r	eturn			social secul		ber
FORMER CIT	'IZEN		000	0-00-00	00	
Part I	1	List name of payer. If any interest is from a seller-financed mortgage and the buyer used the property as a personal residence, see instructions on back and list		Am	nount	
Interest		this interest first. Also, show that buyer's social security number and address ▶				
(See instructions						
on back and the						
instructions for Form 1040A. or						
Form 1040,			1			
line 8a.)						
Note. If you						
received a Form						
1099-INT, Form 1099-OID, or						
substitute						
statement from						
a brokerage firm, list the firm's						
name as the	2	Add the amounts on line 1	2			
payer and enter the total interest	3	Excludable interest on series EE and I U.S. savings bonds issued after 1989.				
shown on that		Attach Form 8815	3			
form.	4	Subtract line 3 from line 2. Enter the result here and on Form 1040A, or Form				
		1040, line 8a	4			
		If line 4 is over \$1,500, you must complete Part III.		Am	nount	
Part II	5	List name of payer ►				
Ordinary						
Dividends						
(See instructions on back and the						
instructions for						
Form 1040A, or Form 1040,			5			
line 9a.)						
Note. If you						
received a Form 1099-DIV or						
substitute						
statement from a brokerage firm,						
list the firm's						
name as the payer and enter						
the ordinary dividends shown	6	Add the amounts on line 5. Enter the total here and on Form 1040A, or Form				
on that form.		1040, line 9a	6			
		If line 6 is over \$1,500, you must complete Part III.				
	foreigr	ust complete this part if you <b>(a)</b> had over \$1,500 of taxable interest or ordinary dividends; (in account; or <b>(c)</b> received a distribution from, or were a grantor of, or a transferor to, a foreign	gn trus	st.	Yes	No
Part III	7a	At any time during 2014, did you have a financial interest in or signature authority ov				
Foreign		account (such as a bank account, securities account, or brokerage account) located country? See instructions			×	
Accounts					^	
and Trusts		If "Yes," are you required to file FinCEN Form 114, Report of Foreign Bank and Financial interest or signature authority? See FinCEN		n 11 <i>4</i>		
(See		and its instructions for filing requirements and exceptions to those requirements .			×	
instructions on	b	If you are required to file FinCEN Form 114, enter the name of the foreign country when the fore				
back.)		financial account is located ► See Stmt				
	8	During 2014, did you receive a distribution from, or were you the grantor of, or trans-				
		foreign trust? If "Yes," you may have to file Form 3520. See instructions on back .			x	

**Health Coverage Exemptions** 

► Attach to Form 1040, Form 1040A, or Form 1040EZ.

▶ Information about Form 8965 and its separate instructions is at www.irs.gov/form8965.

OMB No. 1545-0074

2014

Attachment Sequence No. 75

Name as shown on return
FORMER CITIZEN

Department of the Treasury

Internal Revenue Service

Your social security number 000-00-0000

Complete this form if you have a Marketplace-granted coverage exemption or you are claiming a coverage exemption on your return.

Part	Marketplace-Granted have an exemption gra																
	a Name of I													c rtificate Number			
1																	
2																	
3																	
_																	
4																	
5																	
5																	
6																	
Part	Coverage Exemption	s for Your Ho	usehold C	laim	ed o	n Yo	ur Re	eturr	1:								
7a	Are you claiming an exemption	because your hou	sehold inco	me is	belov	v the f	filing t	hresh	old?.				X	Yes		No	
<b>L</b>	Are you claiming a hardship exe	mption books	volik akooo ji	2000	o io ba	slove ti	ha filin	a thr	abala	10			$\nabla$	Yes		No	
Part I	Coverage Exemption	s for Individua	als Claime	ed or	You	ır Re	turn:	If yo	u an	d/or a	a mer	nber	of yo	our ta		NO	
	household are claiming	g an exemptior	on your r	eturr d	n, cor	nplet	te Pa	rt III.									
	a Name of Individual	b SSN	Exemption Type	Full Year	e Jan	f Feb	g Mar	h Apr	i May	j June	k July	I Aug	m Sept	n Oct	o Nov	p Dec	
8	FORMER CITIZEN	000-00-0000	С	×													
9																	
10																	
11																	
12																	

FORMER CITIZEN 000-00-0000 1

### Additional information from your 2014 Federal Tax Return

### Schedule B: Interest and Dividend Income

### **Part III Fgn Accounts and Trusts**

### **Continuation Statement**

Fgn Cd	Fgn Country Name
SC	St. Kitts and Nevis
ВН	Belize
PM	Panama
CJ	Cayman Islands

Total

**Initial and Annual Expatriation Statement** For calendar year 2014 or other tax year beginning

OMB No. 1545-0074

Department of the Treasury

Name

▶ Information about Form 8854 and its separate instructions is at www.irs.gov/form8854. ► Please print or type.

Attachment Sequence No. 112

Identifying number (see instructions) FORMER CITIZEN 000-00-0000 **General Information.** For all filers. Part I Mailing address and telephone number where you can be reached after expatriation KID UNDER 18 1/2 - SPENT LESS THAN 10 YEARS IN THE US Address of principal foreign residence (if different from line 1) 2 -----3 Country of tax residence (if different from line 2) ST KITTS AND NEVIS **Expatriation date.** Check the box that applies (see instructions). June 4, 2004 – June 16, 2008. Complete Parts II and V June 17, 2008 – December 31, 2013. Complete Part III if: • You made an election to defer the payment of tax on a prior year Form 8854, • You have an item of eligible deferred compensation, or • You have an interest in a nongrantor trust. Otherwise, you do not need to file Form 8854. January 1, 2014 - December 31, 2014. Complete Parts IV and V Date of notification of expatriating act, termination of residency, or claim of treaty benefits (see instructions). 01/01/2014 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 Number of days you were physically present in the United States in the current year 358 6 List all countries (other than the United States) of which you are a citizen. 7 ST KITTS AND NEVIS Name of country Date you became a citizen of each country listed in line 7a 06/30/2013 How you became a U.S. citizen By birth By naturalization For Persons Who Expatriated After June 3, 2004, and Before June 17, 2008 Part II Did you complete Form 8854 for any period after June 3, 2004, and before June 17, 2008? No. If you expatriated for immigration purposes after June 3, 2004, and before June 17, 2008, but have not previously filed a Form 8854, you continue to be treated as a U.S. citizen or U.S. lawful permanent resident for U.S. income tax purposes until the day that you file this form. Because you did not file Form 8854 for the year of expatriation for immigration purposes, you are subject to the alternative tax in section 877(b) for the 10-year period beginning on the date that you file this form (see instructions). Yes. Tax year for which Form 8854 first filed \_\_\_\_\_. Go to line 2. Were you physically present in the United States for more than 30 days but not more than 60 days ☐ Yes ☐ No If you checked "Yes" to line 2, were you performing services for an unrelated employer? . . . . . ☐ No If you checked "Yes" to line 2a, 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 Next: Go to Part V.

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### Part III For Persons Who Expatriated After June 16, 2008, and Before January 1, 2014

- 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 have an interest in 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 2014 and see the instructions for Part III.

	for any property you disp	osed of in 2014 and se	e the instru	ictions for Par	t III.		
	(a) Description of property	(b) Amount of mark-to-mar (loss) reported on pr Form 8854	•		<b>(c)</b> deferred on prior year orm 8854	Date of c	<b>(d)</b> disposition (if any)
2	Did you receive any distr If "Yes," Amount of distri	_	=		for 2014? ount withheld at source	ce, if any:	☐ Yes ☐ No
3	Did you receive any distr If "Yes," Amount of distri	_	ntor trust fo		ount withheld at source	ce, if any:	☐ Yes ☐ No
Part	V For Persons Who	o Expatriated During	g 2014				
Sect	ion A Expatriation Inf						
1	Enter your U.S. income to	ax liability (after foreign	tax credits	) for the 5 tax	years ending before	the date of ex	cpatriation.
	1st Year Before Expatriation	2nd Year Before Expatriation		Brd Year Expatriation	4th Year Before Expatriati	on	5th Year Before Expatriation
	\$ <u>250,000</u>	\$ 250,000	\$ 250,0	00	\$ <u>250,000</u>	\$_25	50,000
2	Enter your net worth on t	he date of your expatric	ation for tax	c purposes .		\$ <u>1</u> ,	000,000,000
3	Did you become at birth of, and taxed as a reside	a U.S. citizen and a cit nt of, that other country	izen of ano y?	ther country, a	and do you continue	to be a citize	n .       Yes <b>☑  N</b> o
4	If you answered "Yes" to the last 15 tax years? .						
5	Were you under age 18 <sup>1</sup> /10 years?						
6	Do you certify under per preceding tax years (see						

Page 3 Form 8854 (2014) Section B **Property Owned on Date of Expatriation** Do not complete Section B if: • Your average net income tax liability for the 5 tax years immediately before expatriation (see line 1 in Section A) was not more than \$157,000, your net worth (see line 2 in Section A) was under \$2 million, and you checked "Yes" on line 6 in • In Section A, you checked "Yes" on lines 3, 4, and 6; or • In Section A, you checked "Yes" on lines 5 and 6. 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 b Do you have any ineligible deferred compensation items? If "Yes," you must include in income the ☐ Yes ☐ No c Do you have any specified tax deferred accounts? If "Yes," you must include in income the entire 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  $\ldots \ldots \ldots \ldots \ldots \ldots$  Yes  $\square$  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). Recognition of gain or loss on the deemed sale of mark-to-market property. Caution. Do not include in column (a) any property described on line 7a, 7b, 7c, or 7d. Complete column (g) only if you are deferring tax on gain from any property listed in column (a). (e) (c) (g) Gain after Cost or other Form or Schedule Amount of tax Description of property Fair market value Gain or (loss). allocation of the on day before date basis\* Subtract (c) on which gain deferred (attach exclusion amount of expatriation from (b) (see instructions) or loss is reported computations)

9	Total. Add the amounts	in column (d) and colu	mn (e)				
10	<b>Total tax deferred.</b> Add the amounts in column (g). Enter here and on line 15						
*V0I	(ou must designete any property for which you are electing to figure basis without regard to section 9.77\(\h\tau\). Identify as "(\h\tau\)? This election is irreversable						

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Sect	ion C Deferral of Tax		
	<b>Election to defer tax.</b> You can defer tax only if you have provided adequate security. Adequin the instructions.	uate security	is described
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 that would prevent assessment or collection of any tax imposed because of section 877A.		∕es □ 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 63, 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)	15	
	• If you are filing Form 1040, enter this amount in brackets to the left of the entry space for line 63. Identify as "EXP."		
	• If you are filing Form 1040NR, enter this amount in brackets to the left of the entry space for line 61. Identify as "EXP."		

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### Part V Balance Sheet and Income Statement

#### Schedule A Balance Sheet

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 following date.

- Part II filers the end of the tax year for which you are filing the form
- Part IV filers your expatriation date

For more details, see the separate instructions.

For	more details, see the separate instructions.				
	Assets	(a) Fair market value (FMV)	<b>(b)</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 long-term residents only)
1	Cash, including bank deposits				
2	Marketable stock and securities issued by				
2	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	250,000,000	50,000,000	200,000,000	
а	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)	250,000,000	50,000,000	200,000,000	
b	Provide the name, address, and EIN, if any,				
	of any such company FRIENDS AND POWER INC FLORAL PARK ROAD, BELMOPAN, BELIZE				
6	Pensions from services performed in the				
0	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 through 679 (see instructions)				
10	Beneficial interests in nongrantor trusts (see				
10	instructions)	250,000,000			
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 .	050 000 000	450,000,000	400 000 000	
16 17	Real property located outside the United States.  Business property located in the United	250,000,000	150,000,000	100,000,000	
	States				
18	Business property located outside the United States				
19	Other assets (see instructions) PERSONAL PROPERTY	250,000,000	250,000,000	250,000,000	
20	Total assets. Add lines 1 through 5 and lines	, ,	, ,	, ,	
	6 through 19. Do not include amounts on line 5a in this total	1,000,000,000	450,000,000	550,000,000	
	Liabilities	Amerint			
04		Amount			
21	Installment obligations				
22	Mortgages, etc				
23	Other liabilities (see instructions)				
24	Total liabilities. Add lines 21 through 23	0			
25	Net worth. Subtract line 24 from line 20, column (a)	1,000,000,000			
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Provide income Statement  Provide income information for the following period.  • Part II filers - the tax year for which you are filing the form  • Part IV filers - the part of the tax year that ends with the day before your expatriation date; but enter -0- for lines 5 to 1. U.S. source gross income not effectively connected with the conduct of a U.S. trade or business.  a Interest	hrough 7.
<ul> <li>Part II filers - the tax year for which you are filing the form</li> <li>Part IV filers - the part of the tax year that ends with the day before your expatriation date; but enter -0- for lines 5 t</li> <li>U.S. source gross income not effectively connected with the conduct of a U.S. trade or business.</li> <li>a Interest</li></ul>	hrough 7.
<ul> <li>Part IV filers - the part of the tax year that ends with the day before your expatriation date; but enter -0- for lines 5 t</li> <li>U.S. source gross income not effectively connected with the conduct of a U.S. trade or business.</li> <li>a Interest</li></ul>	hrough 7.
<ul> <li>1 U.S. source gross income not effectively connected with the conduct of a U.S. trade or business.</li> <li>a Interest</li></ul>	through 7.
<b>a</b> Interest	
<b>b</b> Dividends	
<b>c</b> Royalties	
<b>d</b> Pension distributions	
e Other	
f Total. Add lines a through e	0 00
2 Gross income that is effectively connected with the conduct of a U.S. trade or business 2	0 00
3 Income from the performance of services in the United States	0 00
4 Gains from the sale or exchange of:	
a Property (other than stock or debt obligations) located in the United	
States	
<b>b</b> Stock issued by a U.S. domestic corporation	
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	0 00
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	0 00
6 Gains on certain exchanges of property that ordinarily would not be recognized (see instructions)	0 00
7 Income received or accrued by certain foreign corporations (see instructions)	0 00
8 Add lines 1f, 2, 3, 4d, 5, 6, and 7	0 00
9 Gross income from all other sources	0 00
<b>10</b> Total. Add lines 8 and 9	0 00
Under penalties of perjury, I declare that I have examined this form, including accompanying schedules and statement best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than filer) is based on of which preparer has any knowledge.	
Sign Here Your signature Date	
Paid Print/Type preparer's name Preparer's signature Date Check if	PTIN
Preparer self-employed	
Use Only Firm's name ► Firm's EIN ►	
Firm's address ► Phone no.	0054

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