

## **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"

John Richardson - Toronto, Canada

Stephen Kish - Toronto, Canada

[citizenshiptaxation@gmail.com](mailto:citizenshiptaxation@gmail.com)

## **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
<b>Net worth</b>	\$ 2,322,811	\$ 2,322,811	\$ 2,322,811	\$ 2,322,811	\$ 1,000,000,000
<b>Income</b>					
<b>Capital gains</b>	270,447	NIL	270,447	270,447	NIL
<b>Pension</b>	860,144	45,271	860,144	45,271	
<b>Total Income</b>	\$ 1,130,591	\$ 45,271	\$ 1,130,591	\$ 315,718	
<b>Std Deduction</b>	Disallowed	Disallowed	Disallowed	Disallowed	
<b>Exemption</b>	Disallowed	(3,950)	Disallowed	Disallowed	(3,950)
<b>TAX</b>	368,082	6,188	368,082	52,088	
<b>AMT</b>	–	–	–	9,358	
<b>FTC/1116</b>	(20,825)	(6,188)	(20,825)	NIL	
<b>Obamacare Tax</b>	10,277	NIL	10,277	7,247	
<b>Penalty</b>	6,420	NIL	6,420	1,233	
<b>Exit Tax</b>	\$ 363,954	<b>NIL</b>	\$ 363,954	\$ 69,926	<b>NIL</b>

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 champagne (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
<b>Net worth</b>	\$ 2,322,811	\$ 2,322,811	\$ 2,322,811	\$ 2,322,811	\$ 1,000,000,000
<b>Income</b>					
<b>Capital gains</b>	270,447	NIL	270,447	270,447	NIL
<b>Pension</b>	860,144	45,271	860,144	45,271	
<b>Total Income</b>	\$ 1,130,591	\$ 45,271	\$ 1,130,591	\$ 315,718	
<b>Std Deduction</b>	Disallowed	Disallowed	Disallowed	Disallowed	
<b>Exemption</b>	Disallowed	(3,950)	Disallowed	Disallowed	(3,950)
<b>TAX</b>	368,082	6,188	368,082	52,088	
<b>AMT</b>	-	-	-	9,358	
<b>FTC/1116</b>	(20,825)	(6,188)	(20,825)	NIL	
<b>Obamacare Tax</b>	10,277	NIL	10,277	7,247	
<b>Penalty</b>	6,420	NIL	6,420	1,233	
<b>Exit Tax</b>	\$ 363,954	<b>NIL</b>	\$ 363,954	\$ 69,926	<b>NIL</b>

and more

	<b>Assets as of renunciation date</b>		
	CAD	USD	
Univ of Toronto pension	900,000	804,074	
Principal residence	1,200,000	1,072,099	
RRSP	500,000	446,708	
<b>TOTAL</b>	<b>2,600,000</b>	<b>2,322,881</b>	
<b>Tax liability</b>			<b>As a % of assets</b>
1 Born US lives Canada	404,575	361,454	<b>16%</b>
2 Born US eligible pension	77,916	69,611	<b>3%</b>
3 Born dual lives Canada	0	0	<b>0%</b>
4 Born dual lives UK	404,575	361,454	<b>16%</b>
5 US Kid	0	0	<b>0%</b>

## **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

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.

▼ Detach Here and Mail With Your Payment and Return ▼

Department of the Treasury  
Internal Revenue Service (99)

**2014**

**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.'
- ▶ Write your social security number (SSN) on your check or money order.

Enter the amount of your payment . . . . . ▶	<b>363,954.</b>
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REV 10/16/14 PRO 1555

FORMER CITIZEN

BORN IN THE US WITH US CITIZENSHIP  
LIVES IN CANADA  
CANADA  
ONTARIO M5G 1S4

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

000000000 AA CITI 30 0 201412 610

For the year Jan. 1–Dec. 31, 2014, or other tax year beginning

01/01, 2014, ending

10/30, 2014

See separate instructions.

Your first name and initial

Last name

Your social security number

FORMER

CITIZEN

000-00-0000

If a joint return, spouse's first name and initial

Last name

Spouse's social security number

NRA

Home address (number and street). If you have a P.O. box, see instructions.

Apt. no.

Make sure the SSN(s) above and on line 6c are correct.

BORN IN THE US WITH US CITIZENSHIP ONLY

City, town or post office, state, and ZIP code. If you have a foreign address, also complete spaces below (see instructions).

LIVES IN CANADA

Presidential Election Campaign

Check here if you, or your spouse if filing jointly, want \$3 to go to this fund. Checking a box below will not change your tax or refund. You Spouse

Foreign country name

Foreign province/state/county

Foreign postal code

Canada

ONTARIO

M5G 1S4

Filing Status

1 Single

2 Married filing jointly (even if only one had income)

3 Married filing separately. Enter spouse's SSN above and full name here. CANADIAN CITIZEN

4 Head of household (with qualifying person). (See instructions.) If the qualifying person is a child but not your dependent, enter this child's name here.

5 Qualifying widow(er) with dependent child

Check only one box.

Exemptions

6a Yourself. If someone can claim you as a dependent, do not check box 6a. b Spouse

Table with 4 columns: (1) First name, Last name, (2) Dependent's social security number, (3) Dependent's relationship to you, (4) if child under age 17 qualifying for child tax credit (see instructions)

If more than four dependents, see instructions and check here

Boxes checked on 6a and 6b: 1. No. of children on 6c who: lived with you, did not live with you due to divorce or separation. Dependents on 6c not entered above. Add numbers on lines above: 1

d Total number of exemptions claimed

Income

Table with 2 columns: Description (lines 7-22) and Amount. Line 13: 270,447. Line 16b: 860,144. Line 22: 1,130,591.

Attach Form(s) W-2 here. Also attach Forms W-2G and 1099-R if tax was withheld.

If you did not get a W-2, see instructions.

Adjusted Gross Income

Table with 2 columns: Description (lines 23-37) and Amount. Line 37: 1,130,591.





**SCHEDULE D  
(Form 1040)**

**Capital Gains and Losses**

OMB No. 1545-0074

Department of the Treasury  
Internal Revenue Service (99)

▶ **Attach to Form 1040 or Form 1040NR.**  
▶ **Information about Schedule D and its separate instructions is at [www.irs.gov/scheduled](http://www.irs.gov/scheduled).**  
▶ **Use Form 8949 to list your transactions for lines 1b, 2, 3, 8b, 9, and 10.**

**2014**  
Attachment  
Sequence No. **12**

Name(s) shown on return  
FORMER CITIZEN

Your social security number  
000-00-0000

**Part I Short-Term Capital Gains and Losses—Assets Held One Year or Less**

See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you round off cents to whole dollars.	(d) Proceeds (sales price)	(e) Cost (or other basis)	(g) Adjustments to gain or loss from Form(s) 8949, Part I, line 2, column (g)	(h) Gain or (loss) Subtract column (e) from column (d) and combine the result with column (g)
<b>1a</b> 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 .				
<b>1b</b> Totals for all transactions reported on Form(s) 8949 with <b>Box A</b> checked . . . . .				
<b>2</b> Totals for all transactions reported on Form(s) 8949 with <b>Box B</b> checked . . . . .				
<b>3</b> Totals for all transactions reported on Form(s) 8949 with <b>Box C</b> checked . . . . .	0 .	680,000 .		-680,000 .
<b>4</b> Short-term gain from Form 6252 and short-term gain or (loss) from Forms 4684, 6781, and 8824 . . . . .				<b>4</b>
<b>5</b> Net short-term gain or (loss) from partnerships, S corporations, estates, and trusts from Schedule(s) K-1 . . . . .				<b>5</b>
<b>6</b> Short-term capital loss carryover. Enter the amount, if any, from line 8 of your <b>Capital Loss Carryover Worksheet</b> in the instructions . . . . .				<b>6</b> ( )
<b>7 Net short-term capital gain or (loss).</b> Combine lines 1a through 6 in column (h). If you have any long-term capital gains or losses, go to Part II below. Otherwise, go to Part III on the back . . . . .				<b>7</b> -680,000 .

**Part II Long-Term Capital Gains and Losses—Assets Held More Than One Year**

See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you round off cents to whole dollars.	(d) Proceeds (sales price)	(e) Cost (or other basis)	(g) Adjustments to gain or loss from Form(s) 8949, Part II, line 2, column (g)	(h) Gain or (loss) Subtract column (e) from column (d) and combine the result with column (g)
<b>8a</b> 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 .				
<b>8b</b> Totals for all transactions reported on Form(s) 8949 with <b>Box D</b> checked . . . . .				
<b>9</b> Totals for all transactions reported on Form(s) 8949 with <b>Box E</b> checked . . . . .				
<b>10</b> Totals for all transactions reported on Form(s) 8949 with <b>Box F</b> checked . . . . .	1,539,797 .	339,350 .	-250,000 .	950,447 .
<b>11</b> Gain from Form 4797, Part I; long-term gain from Forms 2439 and 6252; and long-term gain or (loss) from Forms 4684, 6781, and 8824 . . . . .				<b>11</b>
<b>12</b> Net long-term gain or (loss) from partnerships, S corporations, estates, and trusts from Schedule(s) K-1 . . . . .				<b>12</b>
<b>13</b> Capital gain distributions. See the instructions . . . . .				<b>13</b>
<b>14</b> Long-term capital loss carryover. Enter the amount, if any, from line 13 of your <b>Capital Loss Carryover Worksheet</b> in the instructions . . . . .				<b>14</b> ( )
<b>15 Net long-term capital gain or (loss).</b> Combine lines 8a through 14 in column (h). Then go to Part III on the back . . . . .				<b>15</b> 950,447 .

**Part III Summary**

<b>16</b>	Combine lines 7 and 15 and enter the result . . . . .	<b>16</b>	270,447.
	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>		
<b>17</b>	Are lines 15 and 16 <b>both</b> gains? <input checked="" type="checkbox"/> <b>Yes.</b> Go to line 18. <input type="checkbox"/> <b>No.</b> Skip lines 18 through 21, and go to line 22.		
<b>18</b>	Enter the amount, if any, from line 7 of the <b>28% Rate Gain Worksheet</b> in the instructions . . . ▶	<b>18</b>	
<b>19</b>	Enter the amount, if any, from line 18 of the <b>Unrecaptured Section 1250 Gain Worksheet</b> in the instructions . . . . . ▶	<b>19</b>	
<b>20</b>	Are lines 18 and 19 <b>both</b> zero or blank? <input checked="" type="checkbox"/> <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). <b>Do not</b> complete lines 21 and 22 below.  <input type="checkbox"/> <b>No.</b> Complete the <b>Schedule D Tax Worksheet</b> in the instructions. <b>Do not</b> complete lines 21 and 22 below.		
<b>21</b>	If line 16 is a loss, enter here and on Form 1040, line 13, or Form 1040NR, line 14, the <b>smaller</b> of: <ul style="list-style-type: none"> <li>• The loss on line 16 or</li> <li>• (\$3,000), or if married filing separately, (\$1,500) } . . . . .</li> </ul> <p><b>Note.</b> When figuring which amount is smaller, treat both amounts as positive numbers.</p>	<b>21</b>	( )
<b>22</b>	Do you have qualified dividends on Form 1040, line 9b, or Form 1040NR, line 10b?  <input type="checkbox"/> <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).  <input type="checkbox"/> <b>No.</b> Complete the rest of Form 1040 or Form 1040NR.		





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
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*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

1	(a) Description of property (Example: 100 sh. XYZ Co.)	(b) Date acquired (Mo., day, yr.)	(c) Date sold or disposed (Mo., day, yr.)	(d) Proceeds (sales price) (see instructions)	(e) Cost or other basis. See the <b>Note</b> below and see <i>Column (e)</i> in the separate instructions	Adjustment, if any, to gain or loss. If you enter an amount in column (g), enter a code in column (f). <b>See the separate instructions.</b>		(h) <b>Gain or (loss).</b> Subtract column (e) from column (d) and combine the result with column (g)
						(f) Code(s) from instructions	(g) Amount of adjustment	
	PRINCIPAL RESIDENCE AT 360 UNIVERSITY AVENUE - TORONTO, ON M5G 1S4	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
<b>2 Totals.</b> Add the amounts in columns (d), (e), (g), and (h) (subtract negative amounts). Enter each total here and include on your Schedule D, <b>line 8b</b> (if <b>Box D</b> above is checked), <b>line 9</b> (if <b>Box E</b> above is checked), or <b>line 10</b> (if <b>Box F</b> above is checked) ▶				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**

Department of the Treasury  
Internal Revenue Service (99)

(Individual, Estate, or Trust)

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

▶ Information about Form 1116 and its separate instructions is at [www.irs.gov/form1116](http://www.irs.gov/form1116).

**2014**  
Attachment  
Sequence No. **19**

Name: **FORMER CITIZEN** Identifying number as shown on page 1 of your tax return: **000-00-0000**

Use a separate Form 1116 for each category of income listed below. See **Categories of Income** in the instructions. Check only one box on each Form 1116. Report all amounts in U.S. dollars except where specified in Part II below.

- a** Passive category income
- b** General category income
- c** Section 901(j) income
- d** Certain income re-sourced by treaty
- e** Lump-sum distributions

**f** Resident of (name of country) ▶ **Canada**

**Note:** If you paid taxes to only one foreign country or U.S. possession, use column A in Part I and line A in Part II. If you paid taxes to more than one foreign country or U.S. possession, use a separate column and line for each country or possession.

**Part I Taxable Income or Loss From Sources Outside the United States (for Category Checked Above)**

g Enter the name of the foreign country or U.S. possession . . . . . ▶	Foreign Country or U.S. Possession			Total (Add cols. A, B, and C.)
	A	B	C	
Canada				
1a Gross income from sources within country shown above and of the type checked above (see instructions): <u>DEFINED BENEFIT PENSION</u>				
	860,144.			1a 860,144.
b Check if line 1a is compensation for personal services as an employee, your total compensation from all sources is \$250,000 or more, and you used an alternative basis to determine its source (see instructions) . . . ▶ <input type="checkbox"/>				
<b>Deductions and losses (Caution: See instructions):</b>				
2 Expenses <b>definitely related</b> to the income on line 1a (attach statement) . . . . .				
3 Pro rata share of other deductions <b>not definitely related:</b>				
a Certain itemized deductions or standard deduction (see instructions) . . . . .	0.			
b Other deductions (attach statement) . . . . .				
c Add lines 3a and 3b . . . . .	0.			
d Gross foreign source income (see instructions) . . . . .	860,144.			
e Gross income from all sources (see instructions) . . . . .	1,810,591.			
f Divide line 3d by line 3e (see instructions) . . . . .	0.4751			
g Multiply line 3c by line 3f . . . . .	0.			
4 <b>Pro rata share of interest expense (see instructions):</b>				
a Home mortgage interest (use the Worksheet for Home Mortgage Interest in the instructions) . . . . .				
b Other interest expense . . . . .				
5 Losses from foreign sources . . . . .				
6 Add lines 2, 3g, 4a, 4b, and 5 . . . . .	0.			6 0.
7 Subtract line 6 from line 1a. Enter the result here and on line 15, page 2 . . . . . ▶				7 860,144.

**Part II Foreign Taxes Paid or Accrued (see instructions)**

Country	Credit is claimed for taxes (you must check one) (h) <input type="checkbox"/> Paid (i) <input checked="" type="checkbox"/> Accrued	Foreign taxes paid or accrued								
		In foreign currency				In U.S. dollars				
		Taxes withheld at source on:			(n) Other foreign taxes paid or accrued	Taxes withheld at source on:			(r) Other foreign taxes paid or accrued	(s) Total foreign taxes paid or accrued (add cols. (o) through (r))
(j) Date paid or accrued	(k) Dividends	(l) Rents and royalties	(m) Interest	(o) Dividends		(p) Rents and royalties	(q) Interest			
A	12/31/2014								20,825.	20,825.
B										
C										
8 Add lines A through C, column (s). Enter the total here and on line 9, page 2 . . . . . ▶									8	20,825.

**Part III Figuring the Credit**

<b>9</b>	Enter the amount from line 8. These are your total foreign taxes paid or accrued for the category of income checked above Part I . . . . .	<b>9</b>	20,825.	
<b>10</b>	Carryback or carryover (attach detailed computation) . . . . .	<b>10</b>		
<b>11</b>	Add lines 9 and 10 . . . . .	<b>11</b>	20,825.	
<b>12</b>	Reduction in foreign taxes (see instructions) . . . . .	<b>12</b>	( )	
<b>13</b>	Taxes reclassified under high tax kickout (see instructions) . . . . .	<b>13</b>		
<b>14</b>	Combine lines 11, 12, and 13. This is the total amount of foreign taxes available for credit . . . . .	<b>14</b>		20,825.
<b>15</b>	<b>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) . . . . .</b>	<b>15</b>	860,144.	
<b>16</b>	Adjustments to line 15 (see instructions) . . . . .	<b>16</b>		
<b>17</b>	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.) . . . . .	<b>17</b>	860,144.	
<b>18</b>	<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 . . . . .	<b>18</b>	996,747.	
	<i>Caution: If you figured your tax using the lower rates on qualified dividends or capital gains, see instructions.</i>			
<b>19</b>	Divide line 17 by line 18. If line 17 is more than line 18, enter "1" . . . . .	<b>19</b>		0.8630
<b>20</b>	<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 . . . . .	<b>20</b>		368,082.
	<i>Caution: If you are completing line 20 for separate category e (lump-sum distributions), see instructions.</i>			
<b>21</b>	Multiply line 20 by line 19 (maximum amount of credit) . . . . .	<b>21</b>		317,655.
<b>22</b>	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 instructions) . . . . . ▶	<b>22</b>		20,825.

**Part IV Summary of Credits From Separate Parts III (see instructions)**

<b>23</b>	Credit for taxes on passive category income . . . . .	<b>23</b>		
<b>24</b>	Credit for taxes on general category income . . . . .	<b>24</b>		
<b>25</b>	Credit for taxes on certain income re-sourced by treaty . . . . .	<b>25</b>		
<b>26</b>	Credit for taxes on lump-sum distributions . . . . .	<b>26</b>		
<b>27</b>	Add lines 23 through 26 . . . . .	<b>27</b>		
<b>28</b>	Enter the <b>smaller</b> of line 20 or line 27 . . . . .	<b>28</b>		20,825.
<b>29</b>	Reduction of credit for international boycott operations. See instructions for line 12 . . . . .	<b>29</b>		
<b>30</b>	Subtract line 29 from line 28. This is your <b>foreign tax credit</b> . Enter here and on Form 1040, line 48; Form 1040NR, line 46; Form 1041, Schedule G, line 2a; or Form 990-T, line 40a . . . . . ▶	<b>30</b>		20,825.

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

Department of the Treasury  
Internal Revenue Service (99)

▶ Attach to your tax return.

▶ Information about Form 8960 and its separate instructions is at [www.irs.gov/form8960](http://www.irs.gov/form8960).

Attachment  
Sequence No. **72**

Name(s) shown on your tax return

Your social security number or EIN

FORMER CITIZEN

000-00-0000

- Part I Investment Income**
- Section 6013(g) election (see instructions)
  - Section 6013(h) election (see instructions)
  - Regulations section 1.1411-10(g) election (see instructions)

<b>1</b>	Taxable interest (see instructions)		<b>1</b>	
<b>2</b>	Ordinary dividends (see instructions)		<b>2</b>	
<b>3</b>	Annuities (see instructions)		<b>3</b>	
<b>4a</b>	Rental real estate, royalties, partnerships, S corporations, trusts, etc. (see instructions)	<b>4a</b>		
<b>b</b>	Adjustment for net income or loss derived in the ordinary course of a non-section 1411 trade or business (see instructions)	<b>4b</b>		
<b>c</b>	Combine lines 4a and 4b		<b>4c</b>	
<b>5a</b>	Net gain or loss from disposition of property (see instructions)	<b>5a</b>	270,447.	
<b>b</b>	Net gain or loss from disposition of property that is not subject to net investment income tax (see instructions)	<b>5b</b>		
<b>c</b>	Adjustment from disposition of partnership interest or S corporation stock (see instructions)	<b>5c</b>		
<b>d</b>	Combine lines 5a through 5c		<b>5d</b>	270,447.
<b>6</b>	Adjustments to investment income for certain CFCs and PFICs (see instructions)		<b>6</b>	
<b>7</b>	Other modifications to investment income (see instructions)		<b>7</b>	
<b>8</b>	Total investment income. Combine lines 1, 2, 3, 4c, 5d, 6, and 7		<b>8</b>	270,447.

**Part II Investment Expenses Allocable to Investment Income and Modifications**

<b>9a</b>	Investment interest expenses (see instructions)	<b>9a</b>		
<b>b</b>	State, local, and foreign income tax (see instructions)	<b>9b</b>		
<b>c</b>	Miscellaneous investment expenses (see instructions)	<b>9c</b>		
<b>d</b>	Add lines 9a, 9b, and 9c		<b>9d</b>	
<b>10</b>	Additional modifications (see instructions)		<b>10</b>	
<b>11</b>	Total deductions and modifications. Add lines 9d and 10		<b>11</b>	

**Part III Tax Computation**

<b>12</b>	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-		<b>12</b>	270,447.
<b>Individuals:</b>				
<b>13</b>	Modified adjusted gross income (see instructions)	<b>13</b>	1,130,591.	
<b>14</b>	Threshold based on filing status (see instructions)	<b>14</b>	125,000.	
<b>15</b>	Subtract line 14 from line 13. If zero or less, enter -0-	<b>15</b>	1,005,591.	
<b>16</b>	Enter the smaller of line 12 or line 15		<b>16</b>	270,447.
<b>17</b>	Net investment income tax for individuals. Multiply line 16 by 3.8% (.038). Enter here and include on your tax return (see instructions)		<b>17</b>	10,277.
<b>Estates and Trusts:</b>				
<b>18a</b>	Net investment income (line 12 above)	<b>18a</b>		
<b>b</b>	Deductions for distributions of net investment income and deductions under section 642(c) (see instructions)	<b>18b</b>		
<b>c</b>	Undistributed net investment income. Subtract line 18b from 18a (see instructions). If zero or less, enter -0-	<b>18c</b>		
<b>19a</b>	Adjusted gross income (see instructions)	<b>19a</b>		
<b>b</b>	Highest tax bracket for estates and trusts for the year (see instructions)	<b>19b</b>		
<b>c</b>	Subtract line 19b from line 19a. If zero or less, enter -0-	<b>19c</b>		
<b>20</b>	Enter the smaller of line 18c or line 19c		<b>20</b>	
<b>21</b>	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)		<b>21</b>	

### 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](http://www.irs.gov/form8965).

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 I Marketplace-Granted Coverage Exemptions for Individuals:** If you and/or a member of your tax household have an exemption granted by the Marketplace, complete Part I.

	a Name of Individual	b SSN	c Exemption Certificate Number
1			
2			
3			
4			
5			
6			

**Part II Coverage Exemptions for Your Household Claimed on Your Return:**

7a Are you claiming an exemption because your household income is below the filing threshold? . . . . .  Yes  No

b Are you claiming a hardship exemption because your gross income is below the filing threshold? . . . . .  Yes  No

**Part III Coverage Exemptions for Individuals Claimed on Your Return:** If you and/or a member of your tax household are claiming an exemption on your return, complete Part III.

	a Name of Individual	b SSN	c Exemption Type	d Full Year	e	f	g	h	i	j	k	l	m	n	o	p
					Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
8	FORMER CITIZEN	000-00-0000	C	X												
9																
10																
11																
12																
13																

**Initial and Annual Expatriation Statement**

Department of the Treasury  
Internal Revenue Service

For calendar year 2014 or other tax year beginning \_\_\_\_\_, 2014, and ending \_\_\_\_\_, 20\_\_\_\_  
▶ Information about Form 8854 and its separate instructions is at [www.irs.gov/form8854](http://www.irs.gov/form8854).  
▶ Please print or type.

**2014**  
Attachment  
Sequence No. **112**

Name **FORMER CITIZEN** Identifying number (see instructions) **000-00-0000**

**Part I 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

4 **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

5 Date of notification of expatriating act, termination of residency, or claim of treaty benefits (see instructions).

- Citizen. Date notification given to Department of State 11/01/2014
- 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 \_\_\_\_\_

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.

a 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 II 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 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.

2 Were you physically present in the United States for more than 30 days but not more than 60 days during the tax year?  **Yes**  **No**

a If you checked "Yes" to line 2, were you performing services for an unrelated employer?  **Yes**  **No**

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**

Next: Go to Part V.

**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.

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

**2** Did you receive any distributions of eligible deferred compensation items for 2014?  Yes  No  
 If "Yes," Amount of distribution: \_\_\_\_\_ Amount withheld at source, if any: \_\_\_\_\_

**3** Did you receive any distributions from a nongrantor trust for 2014?  Yes  No  
 If "Yes," Amount of distribution: \_\_\_\_\_ Amount withheld at source, if any: \_\_\_\_\_

**Part IV For Persons Who Expatriated During 2014**

**Section A Expatriation Information**

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

1st Year Before Expatriation	2nd Year Before Expatriation	3rd Year Before Expatriation	4th Year Before Expatriation	5th Year Before Expatriation
\$ 0	\$ 0	\$ 0	\$ 0	\$ 0

**2** Enter your net worth on the date of your expatriation for tax purposes . . . . . \$ 2,322,881

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

**4** If you answered "Yes" to question 3, have you been a resident of the United States for not more than 10 of the last 15 tax years? . . . . .  Yes  No

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

**6** Do you certify under penalties of perjury that you have complied with all of your tax obligations for the 5 preceding tax years (see instructions)? . . . . .  Yes  No



**Section B** | **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 Section A;
- In Section A, you checked “Yes” on lines 3, 4, and 6; or
- In Section A, you checked “Yes” on lines 5 and 6.

- 7a** Do you have any **eligible deferred compensation items**? Checking the “Yes” box is an irrevocable waiver of any right to claim any reduction in withholding for such eligible deferred compensation item under any treaty with the United States . . . . .  Yes  No
- b** Do you have any **ineligible deferred compensation items**? If “Yes,” you must include in income the present value of your account on the day before your expatriation date . . . . .  Yes  No
- c** Do you have any **specified tax deferred accounts**? If “Yes,” you must include in income the entire account balance on the day before your expatriation date . . . . .  Yes  No
- d** Do you have an interest in a **nongrantor trust**? Checking the “Yes” box is a waiver of any right to claim any reduction in withholding on any distribution from such trust under any treaty with the United States unless you make the election below . . . . .  Yes  No
- Check this box to elect under section 877A(f)(4)(B) to be treated as having received the value of your entire interest in the trust (as determined for purposes of section 877A) as of the day before your expatriation date. Attach a copy of your valuation letter ruling issued by the IRS (see instructions).

**8** 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).

(a) Description of property	(b) Fair market value on day before date of expatriation	(c) Cost or other basis*	(d) Gain or (loss). Subtract (c) from (b)	(e) Gain after allocation of the exclusion amount (see instructions)	(f) Form or Schedule on which gain or loss is reported	(g) Amount of tax deferred (attach computations)
<b>9 Total.</b> Add the amounts in column (d) and column (e) . . . . .						
<b>10 Total tax deferred.</b> Add the amounts in column (g). Enter here and on line 15 . . . . .						

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

**Section C** | **Deferral of Tax**

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

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

If you checked the "Yes" box, continue to line 12. Otherwise, do not complete lines 12 through 15.

<b>12</b>	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 . . . . .	<b>12</b>	
<b>13</b>	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 . . . . .	<b>13</b>	
<b>14</b>	Subtract line 13 from line 12. <b>This is the amount of tax eligible for deferral</b> . . . . .	<b>14</b>	
<b>15</b>	Enter the total tax deferred from line 10, column (g) . . . . .	<b>15</b>	
	<ul style="list-style-type: none"> <li>• If you are filing Form 1040, enter this amount in brackets to the left of the entry space for line 63. Identify as "EXP."</li> <li>• If you are filing Form 1040NR, enter this amount in brackets to the left of the entry space for line 61. Identify as "EXP."</li> </ul>		

**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.

<b>Assets</b>	<b>(a) Fair market value (FMV)</b>	<b>(b) U.S. adjusted basis</b>	<b>(c) Gain or (loss). Subtract column (b) from column (a)</b>	<b>(d) FMV on beginning date of U.S. residency (optional, for long-term residents only)</b>
<b>1</b> Cash, including bank deposits . . . . .				
<b>2</b> Marketable stock and securities issued by U.S. companies . . . . .				
<b>3</b> Marketable stock and securities issued by foreign companies . . . . .	20,990	10,495	8,274	
<b>4</b> Nonmarketable stock and securities issued by U.S. companies . . . . .				
<b>5</b> Nonmarketable stock and securities issued by foreign companies . . . . .				
<b>a</b> 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>b Provide the name, address, and EIN, if any, of any such company</b> _____				
<b>6</b> Pensions from services performed in the United States . . . . .				
<b>7</b> Pensions from services performed outside the United States . . . . .	804,074	0	804,074	
<b>8</b> Partnership interests (see instructions) . . . . .				
<b>9</b> Assets held by trusts you own under sections 671 through 679 (see instructions)				
<b>10</b> Beneficial interests in nongrantor trusts (see instructions) . . . . .				
<b>11</b> Intangibles used in the United States . . . . .				
<b>12</b> Intangibles used outside the United States . . . . .				
<b>13</b> Loans to U.S. persons . . . . .				
<b>14</b> Loans to foreign persons . . . . .				
<b>15</b> Real property located in the United States . . . . .				
<b>16 Real property located outside the United States</b> . . . . .	1,072,099	100,000	972,099	
<b>17</b> Business property located in the United States . . . . .				
<b>18</b> Business property located outside the United States . . . . .				
<b>19 Other assets (see instructions) RRSP</b> . . . . .	446,708	217,852	228,855	
<b>20</b> 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	
<b>Liabilities</b>	<b>Amount</b>			
<b>21</b> Installment obligations . . . . .				
<b>22</b> Mortgages, etc. . . . .				
<b>23</b> Other liabilities (see instructions) . . . . .				
<b>24</b> Total liabilities. Add lines 21 through 23 . . . . .	0			
<b>25 Net worth.</b> Subtract line 24 from line 20, column (a). . . . .	2,322,881			

**Schedule B 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 through 7.**

<b>1</b>	U.S. source gross income not effectively connected with the conduct of a U.S. trade or business.				
<b>a</b>	Interest . . . . .	<b>1a</b>	0	00	
<b>b</b>	Dividends . . . . .	<b>1b</b>	0	00	
<b>c</b>	Royalties . . . . .	<b>1c</b>	0	00	
<b>d</b>	Pension distributions . . . . .	<b>1d</b>	0	00	
<b>e</b>	Other . . . . .	<b>1e</b>	0	00	
<b>f</b>	<b>Total.</b> Add lines a through e . . . . .	<b>1f</b>		0	00
<b>2</b>	Gross income that is effectively connected with the conduct of a U.S. trade or business . . . . .	<b>2</b>		0	00
<b>3</b>	Income from the performance of services in the United States . . . . .	<b>3</b>		0	00
<b>4</b>	Gains from the sale or exchange of:				
<b>a</b>	Property (other than stock or debt obligations) located in the United States . . . . .	<b>4a</b>		0	00
<b>b</b>	Stock issued by a U.S. domestic corporation . . . . .	<b>4b</b>		0	00
<b>c</b>	Debt obligations of U.S. persons or of the United States, a state or political subdivision thereof, or the District of Columbia . . . . .	<b>4c</b>		0	00
<b>d</b>	<b>Total.</b> Add lines a through c . . . . .	<b>4d</b>		0	00
<b>5</b>	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) . . . . .	<b>5</b>		0	00
<b>6</b>	<b>Gains on certain exchanges of property that ordinarily would not be recognized (see instructions)</b>	<b>6</b>		0	00
<b>7</b>	Income received or accrued by certain foreign corporations (see instructions) . . . . .	<b>7</b>		0	00
<b>8</b>	Add lines 1f, 2, 3, 4d, 5, 6, and 7 . . . . .	<b>8</b>		0	00
<b>9</b>	Gross income from all other sources . . . . .	<b>9</b>		1,130,591	00
<b>10</b>	<b>Total.</b> Add lines 8 and 9 . . . . .	<b>10</b>		1,130,591	00

**Sign Here**

Under penalties of perjury, I declare that I have examined this form, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than filer) is based on all information of which preparer has any knowledge.

Your signature \_\_\_\_\_ Date \_\_\_\_\_

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶
	Firm's address ▶				Phone no.

# SCENARIO 2

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

For the year Jan. 1–Dec. 31, 2014, or other tax year beginning 01/01, 2014, ending 10/30, 2014 See separate instructions.

Your first name and initial FORMER Last name CITIZEN Your social security number 000-00-0000

If a joint return, spouse's first name and initial Last name Spouse's social security number NRA

Home address (number and street). If you have a P.O. box, see instructions. BORN WITH DUAL CITIZENSHIP (US & CANADA) Apt. no. Make sure the SSN(s) above and on line 6c are correct.

City, town or post office, state, and ZIP code. If you have a foreign address, also complete spaces below (see instructions). LIVES IN CANADA Presidential Election Campaign

Foreign country name Canada Foreign province/state/county ONTARIO Foreign postal code M5G 1S4 Check here if you, or your spouse if filing jointly, want \$3 to go to this fund. Checking a box below will not change your tax or refund.

Filing Status 1 Single 2 Married filing jointly 3 Married filing separately 4 Head of household 5 Qualifying widow(er) with dependent child

Exemptions 6a Yourself 6b Spouse 6c Dependents: (1) First name Last name (2) Dependent's social security number (3) Dependent's relationship to you (4) if child under age 17 qualifying for child tax credit

Income 7 Wages, salaries, tips, etc. 8a Taxable interest 8b Tax-exempt interest 9a Ordinary dividends 9b Qualified dividends 10 Taxable refunds, credits, or offsets of state and local income taxes 11 Alimony received 12 Business income or (loss) 13 Capital gain or (loss) 14 Other gains or (losses) 15a IRA distributions 15b Taxable amount 16a Pensions and annuities 16b Taxable amount 17 Rental real estate, royalties, partnerships, S corporations, trusts, etc. 18 Farm income or (loss) 19 Unemployment compensation 20a Social security benefits 20b Taxable amount 21 Other income. List type and amount 22 Combine the amounts in the far right column for lines 7 through 21. This is your total income

Adjusted Gross Income 23 Educator expenses 24 Certain business expenses of reservists, performing artists, and fee-basis government officials. Attach Form 2106 or 2106-EZ 25 Health savings account deduction. Attach Form 8889 26 Moving expenses. Attach Form 3903 27 Deductible part of self-employment tax. Attach Schedule SE 28 Self-employed SEP, SIMPLE, and qualified plans 29 Self-employed health insurance deduction 30 Penalty on early withdrawal of savings 31a Alimony paid b Recipient's SSN 32 IRA deduction 33 Student loan interest deduction 34 Tuition and fees. Attach Form 8917 35 Domestic production activities deduction. Attach Form 8903 36 Add lines 23 through 35 37 Subtract line 36 from line 22. This is your adjusted gross income







**Foreign Tax Credit**

Department of the Treasury  
Internal Revenue Service (99)

(Individual, Estate, or Trust)

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

▶ Information about Form 1116 and its separate instructions is at [www.irs.gov/form1116](http://www.irs.gov/form1116).

**2014**  
Attachment  
Sequence No. **19**

Name: **FORMER CITIZEN** Identifying number as shown on page 1 of your tax return: **000-00-0000**

Use a separate Form 1116 for each category of income listed below. See **Categories of Income** in the instructions. Check only one box on each Form 1116. Report all amounts in U.S. dollars except where specified in Part II below.

- a Passive category income
- b General category income
- c Section 901(j) income
- d Certain income re-sourced by treaty
- e Lump-sum distributions

f Resident of (name of country) ▶ **Canada**

**Note:** If you paid taxes to only one foreign country or U.S. possession, use column A in Part I and line A in Part II. If you paid taxes to more than one foreign country or U.S. possession, use a separate column and line for each country or possession.

**Part I Taxable Income or Loss From Sources Outside the United States (for Category Checked Above)**

g Enter the name of the foreign country or U.S. possession . . . . . ▶	Foreign Country or U.S. Possession			Total (Add cols. A, B, and C.)
	A	B	C	
Canada				
1a Gross income from sources within country shown above and of the type checked above (see instructions): <u>DEFINED BENEFIT PENSION</u>				
	45,271.			1a 45,271.
b Check if line 1a is compensation for personal services as an employee, your total compensation from all sources is \$250,000 or more, and you used an alternative basis to determine its source (see instructions) . . . ▶ <input type="checkbox"/>				
<b>Deductions and losses (Caution: See instructions):</b>				
2 Expenses <b>definitely related</b> to the income on line 1a (attach statement) . . . . .				
3 Pro rata share of other deductions <b>not definitely related:</b>				
a Certain itemized deductions or standard deduction (see instructions) . . . . .	0.			
b Other deductions (attach statement) . . . . .				
c Add lines 3a and 3b . . . . .	0.			
d Gross foreign source income (see instructions) . . . . .	45,271.			
e Gross income from all sources (see instructions) . . . . .	45,271.			
f Divide line 3d by line 3e (see instructions) . . . . .	1.0000			
g Multiply line 3c by line 3f . . . . .	0.			
4 <b>Pro rata share of interest expense (see instructions):</b>				
a Home mortgage interest (use the Worksheet for Home Mortgage Interest in the instructions) . . . . .				
b Other interest expense . . . . .				
5 Losses from foreign sources . . . . .				
6 Add lines 2, 3g, 4a, 4b, and 5 . . . . .	0.			6 0.
7 Subtract line 6 from line 1a. Enter the result here and on line 15, page 2 . . . . . ▶				7 45,271.

**Part II Foreign Taxes Paid or Accrued (see instructions)**

Country	Credit is claimed for taxes (you must check one) (h) <input type="checkbox"/> Paid (i) <input checked="" type="checkbox"/> Accrued	Foreign taxes paid or accrued								
		In foreign currency				In U.S. dollars				
		Taxes withheld at source on:			(n) Other foreign taxes paid or accrued	Taxes withheld at source on:			(r) Other foreign taxes paid or accrued	(s) Total foreign taxes paid or accrued (add cols. (o) through (r))
(j) Date paid or accrued	(k) Dividends	(l) Rents and royalties	(m) Interest	(o) Dividends		(p) Rents and royalties	(q) Interest			
A	12/31/2014								20,825.	20,825.
B										
C										
8 Add lines A through C, column (s). Enter the total here and on line 9, page 2 . . . . . ▶									8	20,825.

**Part III Figuring the Credit**

<b>9</b>	Enter the amount from line 8. These are your total foreign taxes paid or accrued for the category of income checked above Part I . . .	<b>9</b>	20,825.	
<b>10</b>	Carryback or carryover (attach detailed computation) . . . . .	<b>10</b>		
<b>11</b>	Add lines 9 and 10 . . . . .	<b>11</b>	20,825.	
<b>12</b>	Reduction in foreign taxes (see instructions) . . . . .	<b>12</b>	( )	
<b>13</b>	Taxes reclassified under high tax kickout (see instructions) . . .	<b>13</b>		
<b>14</b>	Combine lines 11, 12, and 13. This is the total amount of foreign taxes available for credit . . .	<b>14</b>		20,825.
<b>15</b>	<b>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) . . . . .</b>	<b>15</b>	45,271.	
<b>16</b>	Adjustments to line 15 (see instructions) . . . . .	<b>16</b>		
<b>17</b>	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.) . . . . .	<b>17</b>	45,271.	
<b>18</b>	<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 . . . . .	<b>18</b>	45,271.	
	<i>Caution: If you figured your tax using the lower rates on qualified dividends or capital gains, see instructions.</i>			
<b>19</b>	Divide line 17 by line 18. If line 17 is more than line 18, enter "1" . . . . .	<b>19</b>		1.0000
<b>20</b>	<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 . . . . .	<b>20</b>		6,188.
	<i>Caution: If you are completing line 20 for separate category e (lump-sum distributions), see instructions.</i>			
<b>21</b>	Multiply line 20 by line 19 (maximum amount of credit) . . . . .	<b>21</b>		6,188.
<b>22</b>	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 instructions) . . . . . ▶	<b>22</b>		6,188.

**Part IV Summary of Credits From Separate Parts III (see instructions)**

<b>23</b>	Credit for taxes on passive category income . . . . .	<b>23</b>		
<b>24</b>	Credit for taxes on general category income . . . . .	<b>24</b>		
<b>25</b>	Credit for taxes on certain income re-sourced by treaty . . . . .	<b>25</b>		
<b>26</b>	Credit for taxes on lump-sum distributions . . . . .	<b>26</b>		
<b>27</b>	Add lines 23 through 26 . . . . .	<b>27</b>		
<b>28</b>	Enter the <b>smaller</b> of line 20 or line 27 . . . . .	<b>28</b>		6,188.
<b>29</b>	Reduction of credit for international boycott operations. See instructions for line 12 . . . . .	<b>29</b>		
<b>30</b>	Subtract line 29 from line 28. This is your <b>foreign tax credit</b> . Enter here and on Form 1040, line 48; Form 1040NR, line 46; Form 1041, Schedule G, line 2a; or Form 990-T, line 40a . . . . . ▶	<b>30</b>		6,188.

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

Your social security number

FORMER CITIZEN

000-00-0000

**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.)	1	45,271.
2	Medical and dental. If you or your spouse was 65 or older, enter the <b>smaller</b> of Schedule A (Form 1040), line 4, or 2.5% (.025) of Form 1040, line 38. If zero or less, enter -0-	2	
3	Taxes from Schedule A (Form 1040), line 9	3	
4	<b>Enter the home mortgage interest adjustment, if any, from line 6 of the worksheet in the instructions for this line</b>	4	
5	Miscellaneous deductions from Schedule A (Form 1040), line 27.	5	
6	If Form 1040, line 38, is \$152,525 or less, enter -0-. Otherwise, see instructions	6	( 0. )
7	Tax refund from Form 1040, line 10 or line 21	7	( )
8	Investment interest expense (difference between regular tax and AMT).	8	
9	Depletion (difference between regular tax and AMT)	9	
10	Net operating loss deduction from Form 1040, line 21. Enter as a positive amount	10	
11	Alternative tax net operating loss deduction	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	
15	Estates and trusts (amount from Schedule K-1 (Form 1041), box 12, code A)	15	
16	Electing large partnerships (amount from Schedule K-1 (Form 1065-B), box 6)	16	
17	Disposition of property (difference between AMT and regular tax gain or loss)	17	
18	Depreciation on assets placed in service after 1986 (difference between regular tax and AMT)	18	
19	Passive activities (difference between AMT and regular tax income or loss)	19	
20	Loss limitations (difference between AMT and regular tax income or loss)	20	
21	Circulation costs (difference between regular tax and AMT)	21	
22	Long-term contracts (difference between AMT and regular tax income)	22	
23	Mining costs (difference between regular tax and AMT)	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	Intangible drilling costs preference	26	
27	Other adjustments, including income-based related adjustments	27	
28	<b>Alternative minimum taxable income.</b> Combine lines 1 through 27. (If married filing separately and line 28 is more than \$242,450, see instructions.)	28	45,271.

**Part II Alternative Minimum Tax (AMT)**

29	Exemption. (If you were under age 24 at the end of 2014, see instructions.) <b>IF your filing status is . . . AND line 28 is not over . . . THEN enter on line 29 . . .</b> Single or head of household . . . . . \$117,300 . . . . . \$52,800 <b>Married filing jointly or qualifying widow(er)</b> 156,500 . . . . . 82,100 Married filing separately . . . . . 78,250 . . . . . 41,050 If line 28 is <b>over</b> the amount shown above for your filing status, see instructions.	29	41,050.
30	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, and 35, and go to line 34	30	4,221.
31	• If you are filing Form 2555 or 2555-EZ, see instructions for the amount to enter. • <b>If you reported capital gain distributions directly on Form 1040, line 13; you reported qualified dividends on Form 1040, line 9b; or you had a gain on both lines 15 and 16 of Schedule D (Form 1040) (as refigured for the AMT, if necessary), complete Part III on the back and enter the amount from line 64 here.</b> • <b>All others:</b> 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.	31	1,097.
32	Alternative minimum tax foreign tax credit (see instructions)	32	1,097.
33	Tentative minimum tax. Subtract line 32 from line 31	33	0.
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, refigure that tax without using Schedule J before completing this line (see instructions)	34	0.
35	<b>AMT.</b> Subtract line 34 from line 33. If zero or less, enter -0-. Enter here and on Form 1040, line 45	35	0.

**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.

<b>36</b>	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 . . . . .	<b>36</b>	
<b>37</b>	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 . . . . .	<b>37</b>	
<b>38</b>	<b>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 . . . . .</b>	<b>38</b>	
<b>39</b>	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 . . . . .	<b>39</b>	
<b>40</b>	Enter the <b>smaller</b> of line 36 or line 39 . . . . .	<b>40</b>	
<b>41</b>	Subtract line 40 from line 36 . . . . .	<b>41</b>	
<b>42</b>	<b>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 . . . ▶</b>	<b>42</b>	
<b>43</b>	Enter: <ul style="list-style-type: none"> <li>• \$73,800 if married filing jointly or qualifying widow(er),</li> <li>• \$36,900 if single or married filing separately, or</li> <li>• \$49,400 if head of household.</li> </ul>	<b>43</b>	
<b>44</b>	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 . . . . .	<b>44</b>	
<b>45</b>	Subtract line 44 from line 43. If zero or less, enter -0- . . . . .	<b>45</b>	
<b>46</b>	Enter the <b>smaller</b> of line 36 or line 37 . . . . .	<b>46</b>	
<b>47</b>	Enter the <b>smaller</b> of line 45 or line 46. This amount is taxed at 0% . . . . .	<b>47</b>	
<b>48</b>	Subtract line 47 from line 46 . . . . .	<b>48</b>	
<b>49</b>	Enter: <ul style="list-style-type: none"> <li>• \$406,750 if single</li> <li>• \$228,800 if married filing separately</li> <li>• \$457,600 if married filing jointly or qualifying widow(er)</li> <li>• \$432,200 if head of household</li> </ul>	<b>49</b>	
<b>50</b>	Enter the amount from line 45 . . . . .	<b>50</b>	
<b>51</b>	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 . . . . .	<b>51</b>	
<b>52</b>	Add line 50 and line 51 . . . . .	<b>52</b>	
<b>53</b>	Subtract line 52 from line 49. If zero or less, enter -0- . . . . .	<b>53</b>	
<b>54</b>	Enter the smaller of line 48 or line 53 . . . . .	<b>54</b>	
<b>55</b>	Multiply line 54 by 15% (.15) . . . . . ▶	<b>55</b>	
<b>56</b>	Add lines 47 and 54 . . . . .	<b>56</b>	
	<b>If lines 56 and 36 are the same, skip lines 57 through 61 and go to line 62. Otherwise, go to line 57.</b>		
<b>57</b>	Subtract line 56 from line 46 . . . . .	<b>57</b>	
<b>58</b>	Multiply line 57 by 20% (.20) . . . . . ▶	<b>58</b>	
	<b>If line 38 is zero or blank, skip lines 59 through 61 and go to line 62. Otherwise, go to line 59.</b>		
<b>59</b>	Add lines 41, 56, and 57 . . . . .	<b>59</b>	
<b>60</b>	Subtract line 59 from line 36 . . . . .	<b>60</b>	
<b>61</b>	Multiply line 60 by 25% (.25) . . . . . ▶	<b>61</b>	
<b>62</b>	Add lines 42, 55, 58, and 61 . . . . .	<b>62</b>	
<b>63</b>	<b>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</b>	<b>63</b>	
<b>64</b>	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 . . . . .	<b>64</b>	

Alt Min Tax  
**Foreign Tax Credit**

Department of the Treasury  
Internal Revenue Service (99)

(Individual, Estate, or Trust)  
▶ Attach to Form 1040, 1040NR, 1041, or 990-T. **CANADA GENERAL**

**2014**  
Attachment  
Sequence No. **19**

▶ Information about Form 1116 and its separate instructions is at [www.irs.gov/form1116](http://www.irs.gov/form1116).

Name: **FORMER CITIZEN** Identifying number as shown on page 1 of your tax return: **000-00-0000**

Use a separate Form 1116 for each category of income listed below. See **Categories of Income** in the instructions. Check only one box on each Form 1116. Report all amounts in U.S. dollars except where specified in Part II below.

- a** Passive category income
- b** General category income
- c** Section 901(j) income
- d** Certain income re-sourced by treaty
- e** Lump-sum distributions

**f** Resident of (name of country) ▶ **Canada**

**Note:** If you paid taxes to only one foreign country or U.S. possession, use column A in Part I and line A in Part II. If you paid taxes to more than one foreign country or U.S. possession, use a separate column and line for each country or possession.

**Part I Taxable Income or Loss From Sources Outside the United States (for Category Checked Above)**

g Enter the name of the foreign country or U.S. possession . . . . . ▶	Foreign Country or U.S. Possession			Total (Add cols. A, B, and C.)
	A	B	C	
Canada				
1a Gross income from sources within country shown above and of the type checked above (see instructions): <u>DEFINED BENEFIT PENSION</u>				
	45,271.			1a 45,271.
b Check if line 1a is compensation for personal services as an employee, your total compensation from all sources is \$250,000 or more, and you used an alternative basis to determine its source (see instructions) . . . ▶ <input type="checkbox"/>				
<b>Deductions and losses (Caution: See instructions):</b>				
2 Expenses <b>definitely related</b> to the income on line 1a (attach statement) . . . . .				
3 Pro rata share of other deductions <b>not definitely related:</b>				
a Certain itemized deductions or standard deduction (see instructions) . . . . .				
b Other deductions (attach statement) . . . . .				
c Add lines 3a and 3b . . . . .				
d Gross foreign source income (see instructions) . . . . .	45,271.			
e Gross income from all sources (see instructions) . . . . .	45,271.			
f Divide line 3d by line 3e (see instructions) . . . . .	1.0000			
g Multiply line 3c by line 3f . . . . .				
4 <b>Pro rata share of interest expense (see instructions):</b>				
a Home mortgage interest (use the Worksheet for Home Mortgage Interest in the instructions) . . . . .				
b Other interest expense . . . . .				
5 Losses from foreign sources . . . . .				
6 Add lines 2, 3g, 4a, 4b, and 5 . . . . .				6
7 Subtract line 6 from line 1a. Enter the result here and on line 15, page 2 . . . . . ▶				7 45,271.

**Part II Foreign Taxes Paid or Accrued (see instructions)**

Country	Credit is claimed for taxes (you must check one) (h) <input type="checkbox"/> Paid (i) <input checked="" type="checkbox"/> Accrued	Foreign taxes paid or accrued								
		In foreign currency				In U.S. dollars				
		Taxes withheld at source on:			(n) Other foreign taxes paid or accrued	Taxes withheld at source on:			(r) Other foreign taxes paid or accrued	(s) Total foreign taxes paid or accrued (add cols. (o) through (r))
(j) Date paid or accrued	(k) Dividends	(l) Rents and royalties	(m) Interest	(o) Dividends		(p) Rents and royalties	(q) Interest			
A	12/31/2014								20,825.	20,825.
B										
C										
8 Add lines A through C, column (s). Enter the total here and on line 9, page 2 . . . . . ▶									8	20,825.

**Part III Figuring the Credit**

<b>9</b>	Enter the amount from line 8. These are your total foreign taxes paid or accrued for the category of income checked above Part I . . . . .	<b>9</b>	20,825.	
<b>10</b>	Carryback or carryover (attach detailed computation) . . . . .	<b>10</b>		
<b>11</b>	Add lines 9 and 10 . . . . .	<b>11</b>	20,825.	
<b>12</b>	Reduction in foreign taxes (see instructions) . . . . .	<b>12</b>	( )	
<b>13</b>	Taxes reclassified under high tax kickout (see instructions) . . . . .	<b>13</b>		
<b>14</b>	Combine lines 11, 12, and 13. This is the total amount of foreign taxes available for credit . . . . .	<b>14</b>		20,825.
<b>15</b>	<b>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) . . . . .</b>	<b>15</b>	45,271.	
<b>16</b>	Adjustments to line 15 (see instructions) . . . . .	<b>16</b>		
<b>17</b>	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.) . . . . .	<b>17</b>	45,271.	
<b>18</b>	<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 . . . . .	<b>18</b>	45,271.	
	<i>Caution: If you figured your tax using the lower rates on qualified dividends or capital gains, see instructions.</i>			
<b>19</b>	Divide line 17 by line 18. If line 17 is more than line 18, enter "1" . . . . .	<b>19</b>		1.0000
<b>20</b>	<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 . . . . .	<b>20</b>		1,097.
	<i>Caution: If you are completing line 20 for separate category e (lump-sum distributions), see instructions.</i>			
<b>21</b>	Multiply line 20 by line 19 (maximum amount of credit) . . . . .	<b>21</b>		1,097.
<b>22</b>	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 instructions) . . . . . ▶	<b>22</b>		1,097.

**Part IV Summary of Credits From Separate Parts III (see instructions)**

<b>23</b>	Credit for taxes on passive category income . . . . .	<b>23</b>		
<b>24</b>	Credit for taxes on general category income . . . . .	<b>24</b>		
<b>25</b>	Credit for taxes on certain income re-sourced by treaty . . . . .	<b>25</b>		
<b>26</b>	Credit for taxes on lump-sum distributions . . . . .	<b>26</b>		
<b>27</b>	Add lines 23 through 26 . . . . .	<b>27</b>		
<b>28</b>	Enter the <b>smaller</b> of line 20 or line 27 . . . . .	<b>28</b>		1,097.
<b>29</b>	Reduction of credit for international boycott operations. See instructions for line 12 . . . . .	<b>29</b>		
<b>30</b>	Subtract line 29 from line 28. This is your <b>foreign tax credit</b> . Enter here and on Form 1040, line 48; Form 1040NR, line 46; Form 1041, Schedule G, line 2a; or Form 990-T, line 40a . . . . . ▶	<b>30</b>		1,097.



### 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](http://www.irs.gov/form8965).

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 I Marketplace-Granted Coverage Exemptions for Individuals:** If you and/or a member of your tax household have an exemption granted by the Marketplace, complete Part I.

	a Name of Individual	b SSN	c Exemption Certificate Number
1			
2			
3			
4			
5			
6			

**Part II Coverage Exemptions for Your Household Claimed on Your Return:**

7a Are you claiming an exemption because your household income is below the filing threshold? . . . . .  Yes  No

b Are you claiming a hardship exemption because your gross income is below the filing threshold? . . . . .  Yes  No

**Part III Coverage Exemptions for Individuals Claimed on Your Return:** If you and/or a member of your tax household are claiming an exemption on your return, complete Part III.

	a Name of Individual	b SSN	c Exemption Type	d Full Year	e	f	g	h	i	j	k	l	m	n	o	p
					Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
8	FORMER CITIZEN	000-00-0000	C	X												
9																
10																
11																
12																
13																

**Initial and Annual Expatriation Statement**

Department of the Treasury  
Internal Revenue Service

For calendar year 2014 or other tax year beginning \_\_\_\_\_, 2014, and ending \_\_\_\_\_, 20\_\_\_\_  
▶ Information about Form 8854 and its separate instructions is at [www.irs.gov/form8854](http://www.irs.gov/form8854).  
▶ Please print or type.

**2014**  
Attachment  
Sequence No. **112**

Name **FORMER CITIZEN** Identifying number (see instructions) **000-00-0000**

**Part I General Information.** For all filers.

1 Mailing address and telephone number where you can be reached after expatriation  
**BORN DUAL CITIZEN (US & CANADA) - 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**

4 **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

5 Date of notification of expatriating act, termination of residency, or claim of treaty benefits (see instructions).

- Citizen. Date notification given to Department of State **11/01/2014**
- 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 \_\_\_\_\_

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.

a 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 II 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 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.

2 Were you physically present in the United States for more than 30 days but not more than 60 days during the tax year?  **Yes**  **No**

a If you checked "Yes" to line 2, were you performing services for an unrelated employer?  **Yes**  **No**

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**

Next: Go to Part V.



**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.

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

**2** Did you receive any distributions of eligible deferred compensation items for 2014?  Yes  No  
 If "Yes," Amount of distribution: \_\_\_\_\_ Amount withheld at source, if any: \_\_\_\_\_

**3** Did you receive any distributions from a nongrantor trust for 2014?  Yes  No  
 If "Yes," Amount of distribution: \_\_\_\_\_ Amount withheld at source, if any: \_\_\_\_\_

**Part IV For Persons Who Expatriated During 2014**

**Section A Expatriation Information**

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

1st Year Before Expatriation	2nd Year Before Expatriation	3rd Year Before Expatriation	4th Year Before Expatriation	5th Year Before Expatriation
\$ 0	\$ 0	\$ 0	\$ 0	\$ 0

**2** Enter your net worth on the date of your expatriation for tax purposes . . . . . \$ 2,322,881

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

**4** If you answered "Yes" to question 3, have you been a resident of the United States for not more than 10 of the last 15 tax years? . . . . .  Yes  No

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

**6** Do you certify under penalties of perjury that you have complied with all of your tax obligations for the 5 preceding tax years (see instructions)? . . . . .  Yes  No

**Section B** | **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 Section A;
- In Section A, you checked “Yes” on lines 3, 4, and 6; or
- In Section A, you checked “Yes” on lines 5 and 6.

- 7a** Do you have any **eligible deferred compensation items**? Checking the “Yes” box is an irrevocable waiver of any right to claim any reduction in withholding for such eligible deferred compensation item under any treaty with the United States . . . . .  **Yes**  **No**
- b** Do you have any **ineligible deferred compensation items**? If “Yes,” you must include in income the present value of your account on the day before your expatriation date . . . . .  **Yes**  **No**
- c** Do you have any **specified tax deferred accounts**? If “Yes,” you must include in income the entire account balance on the day before your expatriation date . . . . .  **Yes**  **No**
- d** Do you have an interest in a **nongrantor trust**? Checking the “Yes” box is a waiver of any right to claim any reduction in withholding on any distribution from such trust under any treaty with the United States unless you make the election below . . . . .  **Yes**  **No**
- Check this box to elect under section 877A(f)(4)(B) to be treated as having received the value of your entire interest in the trust (as determined for purposes of section 877A) as of the day before your expatriation date. Attach a copy of your valuation letter ruling issued by the IRS (see instructions).

**8** 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).

(a) Description of property	(b) Fair market value on day before date of expatriation	(c) Cost or other basis*	(d) Gain or (loss). Subtract (c) from (b)	(e) Gain after allocation of the exclusion amount (see instructions)	(f) Form or Schedule on which gain or loss is reported	(g) Amount of tax deferred (attach computations)
<b>9 Total.</b> Add the amounts in column (d) and column (e) . . . . .						
<b>10 Total tax deferred.</b> Add the amounts in column (g). Enter here and on line 15 . . . . .						

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

**Section C**    **Deferral of Tax**

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

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

If you checked the "Yes" box, continue to line 12. Otherwise, do not complete lines 12 through 15.

<b>12</b>	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 . . . . .	<b>12</b>	
<b>13</b>	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 . . . . .	<b>13</b>	
<b>14</b>	Subtract line 13 from line 12. <b>This is the amount of tax eligible for deferral</b> . . . . .	<b>14</b>	
<b>15</b>	Enter the total tax deferred from line 10, column (g) . . . . .	<b>15</b>	
	<ul style="list-style-type: none"> <li>• If you are filing Form 1040, enter this amount in brackets to the left of the entry space for line 63. Identify as "EXP."</li> <li>• If you are filing Form 1040NR, enter this amount in brackets to the left of the entry space for line 61. Identify as "EXP."</li> </ul>		

**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.

<b>Assets</b>	<b>(a) Fair market value (FMV)</b>	<b>(b) U.S. adjusted basis</b>	<b>(c) Gain or (loss). Subtract column (b) from column (a)</b>	<b>(d) FMV on beginning date of U.S. residency (optional, for long-term residents only)</b>
<b>1</b> Cash, including bank deposits . . . . .				
<b>2</b> Marketable stock and securities issued by U.S. companies . . . . .				
<b>3</b> Marketable stock and securities issued by foreign companies . . . . .	20,990	10,495	8,274	
<b>4</b> Nonmarketable stock and securities issued by U.S. companies . . . . .				
<b>5</b> Nonmarketable stock and securities issued by foreign companies . . . . .				
<b>a</b> 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>b</b> <b>Provide the name, address, and EIN, if any, of any such company</b> _____				
<b>6</b> Pensions from services performed in the United States . . . . .				
<b>7</b> Pensions from services performed outside the United States . . . . .	804,074	0	804,074	
<b>8</b> Partnership interests (see instructions) . . . . .				
<b>9</b> Assets held by trusts you own under sections 671 through 679 (see instructions)				
<b>10</b> Beneficial interests in nongrantor trusts (see instructions) . . . . .				
<b>11</b> Intangibles used in the United States . . . . .				
<b>12</b> Intangibles used outside the United States . . . . .				
<b>13</b> Loans to U.S. persons . . . . .				
<b>14</b> Loans to foreign persons . . . . .				
<b>15</b> Real property located in the United States . . . . .				
<b>16</b> <b>Real property located outside the United States</b> . . . . .	1,072,099	100,000	972,099	
<b>17</b> Business property located in the United States . . . . .				
<b>18</b> Business property located outside the United States . . . . .				
<b>19</b> <b>Other assets (see instructions)</b> RRSP . . . . .	446,708	217,852	228,855	
<b>20</b> 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	
<b>Liabilities</b>	<b>Amount</b>			
<b>21</b> Installment obligations . . . . .				
<b>22</b> Mortgages, etc. . . . .				
<b>23</b> Other liabilities (see instructions) . . . . .				
<b>24</b> Total liabilities. Add lines 21 through 23 . . . . .	0			
<b>25</b> <b>Net worth.</b> Subtract line 24 from line 20, column (a). . . . .	2,322,881			

**Schedule B 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 through 7.**

<b>1</b>	U.S. source gross income not effectively connected with the conduct of a U.S. trade or business.				
<b>a</b>	Interest . . . . .	<b>1a</b>	0	00	
<b>b</b>	Dividends . . . . .	<b>1b</b>	0	00	
<b>c</b>	Royalties . . . . .	<b>1c</b>	0	00	
<b>d</b>	Pension distributions . . . . .	<b>1d</b>	0	00	
<b>e</b>	Other . . . . .	<b>1e</b>	0	00	
<b>f</b>	<b>Total.</b> Add lines a through e . . . . .	<b>1f</b>		0	00
<b>2</b>	Gross income that is effectively connected with the conduct of a U.S. trade or business . . . . .	<b>2</b>		0	00
<b>3</b>	Income from the performance of services in the United States . . . . .	<b>3</b>		0	00
<b>4</b>	Gains from the sale or exchange of:				
<b>a</b>	Property (other than stock or debt obligations) located in the United States . . . . .	<b>4a</b>		0	00
<b>b</b>	Stock issued by a U.S. domestic corporation . . . . .	<b>4b</b>		0	00
<b>c</b>	Debt obligations of U.S. persons or of the United States, a state or political subdivision thereof, or the District of Columbia . . . . .	<b>4c</b>		0	00
<b>d</b>	<b>Total.</b> Add lines a through c . . . . .	<b>4d</b>		0	00
<b>5</b>	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) . . . . .	<b>5</b>		0	00
<b>6</b>	<b>Gains on certain exchanges of property that ordinarily would not be recognized (see instructions)</b>	<b>6</b>		0	00
<b>7</b>	Income received or accrued by certain foreign corporations (see instructions) . . . . .	<b>7</b>		0	00
<b>8</b>	Add lines 1f, 2, 3, 4d, 5, 6, and 7 . . . . .	<b>8</b>		0	00
<b>9</b>	Gross income from all other sources . . . . .	<b>9</b>		45,271	00
<b>10</b>	<b>Total.</b> Add lines 8 and 9 . . . . .	<b>10</b>		45,271	00

**Sign Here**

Under penalties of perjury, I declare that I have examined this form, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than filer) is based on all information of which preparer has any knowledge.

Your signature \_\_\_\_\_ Date \_\_\_\_\_

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶
	Firm's address ▶				Phone no.

# SCENARIO 3

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

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.

▼ Detach Here and Mail With Your Payment and Return ▼

Department of the Treasury  
Internal Revenue Service (99)

**2014**

**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.'
- ▶ Write your social security number (SSN) on your check or money order.

Enter the amount of your payment . . . . . ▶	<b>363,954.</b>
--	-----------------

REV 10/16/14 PRO 1555

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

For the year Jan. 1–Dec. 31, 2014, or other tax year beginning 01/01, 2014, ending 10/30, 2014 See separate instructions.

Your first name and initial FORMER Last name CITIZEN Your social security number 000-00-0000

If a joint return, spouse's first name and initial Last name Spouse's social security number NRA

Home address (number and street). If you have a P.O. box, see instructions. BORN WITH DUAL CITIZENSHIP (US & CANADA) Apt. no. Make sure the SSN(s) above and on line 6c are correct.

City, town or post office, state, and ZIP code. If you have a foreign address, also complete spaces below (see instructions). LIVES IN THE UNITED KINGDOM Presidential Election Campaign

Foreign country name United Kingdom (England, N Ireland, Scotland and Wales) Foreign province/state/county Foreign postal code Check here if you, or your spouse if filing jointly, want \$3 to go to this fund. Checking a box below will not change your tax or refund.

Filing Status 1 Single 2 Married filing jointly 3 Married filing separately 4 Head of household 5 Qualifying widow(er) with dependent child

Exemptions 6a Yourself 6b Spouse c Dependents: (1) First name Last name (2) Dependent's social security number (3) Dependent's relationship to you (4) if child under age 17 qualifying for child tax credit

Income 7 Wages, salaries, tips, etc. 8a Taxable interest 8b Tax-exempt interest 9a Ordinary dividends 9b Qualified dividends 10 Taxable refunds, credits, or offsets of state and local income taxes 11 Alimony received 12 Business income or (loss) 13 Capital gain or (loss) 14 Other gains or (losses) 15a IRA distributions 15b Taxable amount 16a Pensions and annuities 16b Taxable amount 17 Rental real estate, royalties, partnerships, S corporations, trusts, etc. 18 Farm income or (loss) 19 Unemployment compensation 20a Social security benefits 20b Taxable amount 21 Other income 22 Combine the amounts in the far right column for lines 7 through 21. This is your total income

Adjusted Gross Income 23 Educator expenses 24 Certain business expenses of reservists, performing artists, and fee-basis government officials 25 Health savings account deduction 26 Moving expenses 27 Deductible part of self-employment tax 28 Self-employed SEP, SIMPLE, and qualified plans 29 Self-employed health insurance deduction 30 Penalty on early withdrawal of savings 31a Alimony paid 31b Recipient's SSN 32 IRA deduction 33 Student loan interest deduction 34 Tuition and fees 35 Domestic production activities deduction 36 Add lines 23 through 35 37 Subtract line 36 from line 22. This is your adjusted gross income





**SCHEDULE B**  
**(Form 1040A or 1040)**

**Interest and Ordinary Dividends**

OMB No. 1545-0074

**2014**  
Attachment  
Sequence No. **08**

Department of the Treasury  
Internal Revenue Service (99)

► Attach to Form 1040A or 1040.

► Information about Schedule B and its instructions is at [www.irs.gov/scheduleb](http://www.irs.gov/scheduleb).

Name(s) shown on return

FORMER CITIZEN

Your social security number

000-00-0000

**Part I**  
**Interest**

(See instructions on back and the instructions for Form 1040A, or Form 1040, 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 payer and enter the total interest shown on that form.

**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 ►

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**2** Add the amounts on line 1 . . . . .

**3** Excludable interest on series EE and I U.S. savings bonds issued after 1989. Attach Form 8815 . . . . .

**4** Subtract line 3 from line 2. Enter the result here and on Form 1040A, or Form 1040, line 8a . . . . . ►

**Note.** If line 4 is over \$1,500, you must complete Part III.

**Part II**  
**Ordinary Dividends**

(See instructions on back and the instructions for Form 1040A, or Form 1040, 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 on that form.

**5** List name of payer ► .....

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**6** Add the amounts on line 5. Enter the total here and on Form 1040A, or Form 1040, line 9a . . . . . ►

**Note.** If line 6 is over \$1,500, you must complete Part III.

**Part III**  
**Foreign Accounts and Trusts**

(See instructions on back.)

You must complete this part if you **(a)** had over \$1,500 of taxable interest or ordinary dividends; **(b)** had a foreign account; or **(c)** received a distribution from, or were a grantor of, or a transferor to, a foreign trust.

**7a** At any time during 2014, did you have a financial interest in or signature authority over a financial account (such as a bank account, securities account, or brokerage account) located in a foreign country? See instructions . . . . .

If "Yes," are you required to file FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR), to report that financial interest or signature authority? See FinCEN Form 114 and its instructions for filing requirements and exceptions to those requirements . . . . .

**b** If you are required to file FinCEN Form 114, enter the name of the foreign country where the financial account is located ► CA Canada

**8** During 2014, did you receive a distribution from, or were you the grantor of, or transferor to, a foreign trust? If "Yes," you may have to file Form 3520. See instructions on back . . . . .

	Yes	No
7a	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**SCHEDULE D  
(Form 1040)**

**Capital Gains and Losses**

OMB No. 1545-0074

Department of the Treasury  
Internal Revenue Service (99)

▶ **Attach to Form 1040 or Form 1040NR.**  
▶ **Information about Schedule D and its separate instructions is at [www.irs.gov/scheduled](http://www.irs.gov/scheduled).**  
▶ **Use Form 8949 to list your transactions for lines 1b, 2, 3, 8b, 9, and 10.**

**2014**  
Attachment  
Sequence No. **12**

Name(s) shown on return  
FORMER CITIZEN

Your social security number  
000-00-0000

**Part I Short-Term Capital Gains and Losses—Assets Held One Year or Less**

See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you round off cents to whole dollars.	(d) Proceeds (sales price)	(e) Cost (or other basis)	(g) Adjustments to gain or loss from Form(s) 8949, Part I, line 2, column (g)	(h) Gain or (loss) Subtract column (e) from column (d) and combine the result with column (g)
<b>1a</b> 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 .				
<b>1b</b> Totals for all transactions reported on Form(s) 8949 with <b>Box A</b> checked . . . . .				
<b>2</b> Totals for all transactions reported on Form(s) 8949 with <b>Box B</b> checked . . . . .				
<b>3</b> Totals for all transactions reported on Form(s) 8949 with <b>Box C</b> checked . . . . .	0 .	680,000 .		-680,000 .
<b>4</b> Short-term gain from Form 6252 and short-term gain or (loss) from Forms 4684, 6781, and 8824 .				<b>4</b>
<b>5</b> Net short-term gain or (loss) from partnerships, S corporations, estates, and trusts from Schedule(s) K-1 . . . . .				<b>5</b>
<b>6</b> Short-term capital loss carryover. Enter the amount, if any, from line 8 of your <b>Capital Loss Carryover Worksheet</b> in the instructions . . . . .				<b>6</b> ( )
<b>7 Net short-term capital gain or (loss).</b> Combine lines 1a through 6 in column (h). If you have any long-term capital gains or losses, go to Part II below. Otherwise, go to Part III on the back . . . . .				<b>7</b> -680,000 .

**Part II Long-Term Capital Gains and Losses—Assets Held More Than One Year**

See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you round off cents to whole dollars.	(d) Proceeds (sales price)	(e) Cost (or other basis)	(g) Adjustments to gain or loss from Form(s) 8949, Part II, line 2, column (g)	(h) Gain or (loss) Subtract column (e) from column (d) and combine the result with column (g)
<b>8a</b> 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 .				
<b>8b</b> Totals for all transactions reported on Form(s) 8949 with <b>Box D</b> checked . . . . .				
<b>9</b> Totals for all transactions reported on Form(s) 8949 with <b>Box E</b> checked . . . . .				
<b>10</b> Totals for all transactions reported on Form(s) 8949 with <b>Box F</b> checked . . . . .	1,539,797 .	339,350 .	-250,000 .	950,447 .
<b>11</b> Gain from Form 4797, Part I; long-term gain from Forms 2439 and 6252; and long-term gain or (loss) from Forms 4684, 6781, and 8824 . . . . .				<b>11</b>
<b>12</b> Net long-term gain or (loss) from partnerships, S corporations, estates, and trusts from Schedule(s) K-1				<b>12</b>
<b>13</b> Capital gain distributions. See the instructions . . . . .				<b>13</b>
<b>14</b> Long-term capital loss carryover. Enter the amount, if any, from line 13 of your <b>Capital Loss Carryover Worksheet</b> in the instructions . . . . .				<b>14</b> ( )
<b>15 Net long-term capital gain or (loss).</b> Combine lines 8a through 14 in column (h). Then go to Part III on the back . . . . .				<b>15</b> 950,447 .

**Part III Summary**

<b>16</b>	Combine lines 7 and 15 and enter the result . . . . .	<b>16</b>	270,447.
	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>		
<b>17</b>	Are lines 15 and 16 <b>both</b> gains? <input checked="" type="checkbox"/> <b>Yes.</b> Go to line 18. <input type="checkbox"/> <b>No.</b> Skip lines 18 through 21, and go to line 22.		
<b>18</b>	Enter the amount, if any, from line 7 of the <b>28% Rate Gain Worksheet</b> in the instructions . . . ▶	<b>18</b>	
<b>19</b>	Enter the amount, if any, from line 18 of the <b>Unrecaptured Section 1250 Gain Worksheet</b> in the instructions . . . . . ▶	<b>19</b>	
<b>20</b>	Are lines 18 and 19 <b>both</b> zero or blank? <input checked="" type="checkbox"/> <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). <b>Do not</b> complete lines 21 and 22 below.  <input type="checkbox"/> <b>No.</b> Complete the <b>Schedule D Tax Worksheet</b> in the instructions. <b>Do not</b> complete lines 21 and 22 below.		
<b>21</b>	If line 16 is a loss, enter here and on Form 1040, line 13, or Form 1040NR, line 14, the <b>smaller</b> of: <ul style="list-style-type: none"> <li>• The loss on line 16 or</li> <li>• (\$3,000), or if married filing separately, (\$1,500) } . . . . .</li> </ul> <p><b>Note.</b> When figuring which amount is smaller, treat both amounts as positive numbers.</p>	<b>21</b>	( )
<b>22</b>	Do you have qualified dividends on Form 1040, line 9b, or Form 1040NR, line 10b?  <input type="checkbox"/> <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).  <input type="checkbox"/> <b>No.</b> Complete the rest of Form 1040 or Form 1040NR.		

**Sales and Other Dispositions of Capital Assets**

Department of the Treasury  
Internal Revenue Service

► Information about Form 8949 and its separate instructions is at [www.irs.gov/form8949](http://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.

Name(s) shown on return  
FORMER CITIZEN

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

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).

**Part I Short-Term.** Transactions involving capital assets you held 1 year or less are short term. For long-term 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

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

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
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**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

1	(a) Description of property (Example: 100 sh. XYZ Co.)	(b) Date acquired (Mo., day, yr.)	(c) Date sold or disposed (Mo., day, yr.)	(d) Proceeds (sales price) (see instructions)	(e) Cost or other basis. See the <b>Note</b> below and see <i>Column (e)</i> in the separate instructions	Adjustment, if any, to gain or loss. If you enter an amount in column (g), enter a code in column (f). <b>See the separate instructions.</b>		(h) <b>Gain or (loss).</b> Subtract column (e) from column (d) and combine the result with column (g)
						(f) Code(s) from instructions	(g) Amount of adjustment	
	PRINCIPAL RESIDENCE AT 360 UNIVERSITY AVENUE - TORONTO, ON M5G 1S4	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
<b>2 Totals.</b> Add the amounts in columns (d), (e), (g), and (h) (subtract negative amounts). Enter each total here and include on your Schedule D, <b>line 8b</b> (if <b>Box D</b> above is checked), <b>line 9</b> (if <b>Box E</b> above is checked), or <b>line 10</b> (if <b>Box F</b> above is checked) ▶				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**

Department of the Treasury  
Internal Revenue Service (99)

(Individual, Estate, or Trust)

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

▶ Information about Form 1116 and its separate instructions is at [www.irs.gov/form1116](http://www.irs.gov/form1116).

**2014**  
Attachment  
Sequence No. **19**

Name: **FORMER CITIZEN** Identifying number as shown on page 1 of your tax return: **000-00-0000**

Use a separate Form 1116 for each category of income listed below. See **Categories of Income** in the instructions. Check only one box on each Form 1116. Report all amounts in U.S. dollars except where specified in Part II below.

- a Passive category income
- b General category income
- c Section 901(j) income
- d Certain income re-sourced by treaty
- e Lump-sum distributions

f Resident of (name of country) ▶ **United Kingdom (England, N Ireland, Scotland and Wales)**

**Note:** If you paid taxes to only one foreign country or U.S. possession, use column A in Part I and line A in Part II. If you paid taxes to more than one foreign country or U.S. possession, use a separate column and line for each country or possession.

**Part I Taxable Income or Loss From Sources Outside the United States (for Category Checked Above)**

g Enter the name of the foreign country or U.S. possession . . . . . ▶	Foreign Country or U.S. Possession			Total (Add cols. A, B, and C.)
	A	B	C	
Canada				
1a Gross income from sources within country shown above and of the type checked above (see instructions): <u>DEFINED BENEFIT PENSION</u>				
	860,144.			1a 860,144.
b Check if line 1a is compensation for personal services as an employee, your total compensation from all sources is \$250,000 or more, and you used an alternative basis to determine its source (see instructions) . . . ▶ <input type="checkbox"/>				
<b>Deductions and losses (Caution: See instructions):</b>				
2 Expenses definitely related to the income on line 1a (attach statement) . . . . .				
3 Pro rata share of other deductions not definitely related:				
a Certain itemized deductions or standard deduction (see instructions) . . . . .	0.			
b Other deductions (attach statement) . . . . .				
c Add lines 3a and 3b . . . . .	0.			
d Gross foreign source income (see instructions) . . . . .	860,144.			
e Gross income from all sources (see instructions) . . . . .	1,810,591.			
f Divide line 3d by line 3e (see instructions) . . . . .	0.4751			
g Multiply line 3c by line 3f . . . . .	0.			
4 Pro rata share of interest expense (see instructions):				
a Home mortgage interest (use the Worksheet for Home Mortgage Interest in the instructions) . . . . .				
b Other interest expense . . . . .				
5 Losses from foreign sources . . . . .				
6 Add lines 2, 3g, 4a, 4b, and 5 . . . . .	0.			6 0.
7 Subtract line 6 from line 1a. Enter the result here and on line 15, page 2 . . . . . ▶				7 860,144.

**Part II Foreign Taxes Paid or Accrued (see instructions)**

Country	Credit is claimed for taxes (you must check one) (h) <input type="checkbox"/> Paid (i) <input checked="" type="checkbox"/> Accrued	Foreign taxes paid or accrued								
		In foreign currency				In U.S. dollars				
		Taxes withheld at source on:				Taxes withheld at source on:				
		(j) Date paid or accrued	(k) Dividends	(l) Rents and royalties	(m) Interest	(n) Other foreign taxes paid or accrued	(o) Dividends	(p) Rents and royalties	(q) Interest	(r) Other foreign taxes paid or accrued
A	12/31/2014								20,825.	20,825.
B										
C										
8 Add lines A through C, column (s). Enter the total here and on line 9, page 2 . . . . . ▶									8	20,825.

**Part III Figuring the Credit**

<b>9</b>	Enter the amount from line 8. These are your total foreign taxes paid or accrued for the category of income checked above Part I . . . . .	<b>9</b>	20,825.	
<b>10</b>	Carryback or carryover (attach detailed computation) . . . . .	<b>10</b>		
<b>11</b>	Add lines 9 and 10 . . . . .	<b>11</b>	20,825.	
<b>12</b>	Reduction in foreign taxes (see instructions) . . . . .	<b>12</b>	( )	
<b>13</b>	Taxes reclassified under high tax kickout (see instructions) . . . . .	<b>13</b>		
<b>14</b>	Combine lines 11, 12, and 13. This is the total amount of foreign taxes available for credit . . . . .	<b>14</b>		20,825.
<b>15</b>	<b>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) . . . . .</b>	<b>15</b>	860,144.	
<b>16</b>	Adjustments to line 15 (see instructions) . . . . .	<b>16</b>		
<b>17</b>	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.) . . . . .	<b>17</b>	860,144.	
<b>18</b>	<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 . . . . .	<b>18</b>	996,747.	
	<i>Caution: If you figured your tax using the lower rates on qualified dividends or capital gains, see instructions.</i>			
<b>19</b>	Divide line 17 by line 18. If line 17 is more than line 18, enter "1" . . . . .	<b>19</b>		0.8630
<b>20</b>	<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 . . . . .	<b>20</b>		368,082.
	<i>Caution: If you are completing line 20 for separate category e (lump-sum distributions), see instructions.</i>			
<b>21</b>	Multiply line 20 by line 19 (maximum amount of credit) . . . . .	<b>21</b>		317,655.
<b>22</b>	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 instructions) . . . . . ▶	<b>22</b>		20,825.

**Part IV Summary of Credits From Separate Parts III (see instructions)**

<b>23</b>	Credit for taxes on passive category income . . . . .	<b>23</b>		
<b>24</b>	Credit for taxes on general category income . . . . .	<b>24</b>		
<b>25</b>	Credit for taxes on certain income re-sourced by treaty . . . . .	<b>25</b>		
<b>26</b>	Credit for taxes on lump-sum distributions . . . . .	<b>26</b>		
<b>27</b>	Add lines 23 through 26 . . . . .	<b>27</b>		
<b>28</b>	Enter the <b>smaller</b> of line 20 or line 27 . . . . .	<b>28</b>		20,825.
<b>29</b>	Reduction of credit for international boycott operations. See instructions for line 12 . . . . .	<b>29</b>		
<b>30</b>	Subtract line 29 from line 28. This is your <b>foreign tax credit</b> . Enter here and on Form 1040, line 48; Form 1040NR, line 46; Form 1041, Schedule G, line 2a; or Form 990-T, line 40a . . . . . ▶	<b>30</b>		20,825.



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

Department of the Treasury  
Internal Revenue Service (99)

▶ Attach to your tax return.

▶ Information about Form 8960 and its separate instructions is at [www.irs.gov/form8960](http://www.irs.gov/form8960).

Attachment  
Sequence No. **72**

Name(s) shown on your tax return

Your social security number or EIN

FORMER CITIZEN

000-00-0000

- Part I Investment Income**  Section 6013(g) election (see instructions)  
 Section 6013(h) election (see instructions)  
 Regulations section 1.1411-10(g) election (see instructions)

<b>1</b>	Taxable interest (see instructions)		<b>1</b>	
<b>2</b>	Ordinary dividends (see instructions)		<b>2</b>	
<b>3</b>	Annuities (see instructions)		<b>3</b>	
<b>4a</b>	Rental real estate, royalties, partnerships, S corporations, trusts, etc. (see instructions)	<b>4a</b>		
<b>b</b>	Adjustment for net income or loss derived in the ordinary course of a non-section 1411 trade or business (see instructions)	<b>4b</b>		
<b>c</b>	Combine lines 4a and 4b		<b>4c</b>	
<b>5a</b>	Net gain or loss from disposition of property (see instructions)	<b>5a</b>	270,447.	
<b>b</b>	Net gain or loss from disposition of property that is not subject to net investment income tax (see instructions)	<b>5b</b>		
<b>c</b>	Adjustment from disposition of partnership interest or S corporation stock (see instructions)	<b>5c</b>		
<b>d</b>	Combine lines 5a through 5c		<b>5d</b>	270,447.
<b>6</b>	Adjustments to investment income for certain CFCs and PFICs (see instructions)		<b>6</b>	
<b>7</b>	Other modifications to investment income (see instructions)		<b>7</b>	
<b>8</b>	Total investment income. Combine lines 1, 2, 3, 4c, 5d, 6, and 7		<b>8</b>	270,447.

**Part II Investment Expenses Allocable to Investment Income and Modifications**

<b>9a</b>	Investment interest expenses (see instructions)	<b>9a</b>		
<b>b</b>	State, local, and foreign income tax (see instructions)	<b>9b</b>		
<b>c</b>	Miscellaneous investment expenses (see instructions)	<b>9c</b>		
<b>d</b>	Add lines 9a, 9b, and 9c		<b>9d</b>	
<b>10</b>	Additional modifications (see instructions)		<b>10</b>	
<b>11</b>	Total deductions and modifications. Add lines 9d and 10		<b>11</b>	

**Part III Tax Computation**

<b>12</b>	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-		<b>12</b>	270,447.
<b>Individuals:</b>				
<b>13</b>	Modified adjusted gross income (see instructions)	<b>13</b>	1,130,591.	
<b>14</b>	Threshold based on filing status (see instructions)	<b>14</b>	125,000.	
<b>15</b>	Subtract line 14 from line 13. If zero or less, enter -0-	<b>15</b>	1,005,591.	
<b>16</b>	Enter the smaller of line 12 or line 15		<b>16</b>	270,447.
<b>17</b>	Net investment income tax for individuals. Multiply line 16 by 3.8% (.038). Enter here and include on your tax return (see instructions)		<b>17</b>	10,277.
<b>Estates and Trusts:</b>				
<b>18a</b>	Net investment income (line 12 above)	<b>18a</b>		
<b>b</b>	Deductions for distributions of net investment income and deductions under section 642(c) (see instructions)	<b>18b</b>		
<b>c</b>	Undistributed net investment income. Subtract line 18b from 18a (see instructions). If zero or less, enter -0-	<b>18c</b>		
<b>19a</b>	Adjusted gross income (see instructions)	<b>19a</b>		
<b>b</b>	Highest tax bracket for estates and trusts for the year (see instructions)	<b>19b</b>		
<b>c</b>	Subtract line 19b from line 19a. If zero or less, enter -0-	<b>19c</b>		
<b>20</b>	Enter the smaller of line 18c or line 19c		<b>20</b>	
<b>21</b>	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)		<b>21</b>	

### 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](http://www.irs.gov/form8965).

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 I** **Marketplace-Granted Coverage Exemptions for Individuals:** If you and/or a member of your tax household have an exemption granted by the Marketplace, complete Part I.

	a Name of Individual	b SSN	c Exemption Certificate Number
1			
2			
3			
4			
5			
6			

**Part II** **Coverage Exemptions for Your Household Claimed on Your Return:**

7a Are you claiming an exemption because your household income is below the filing threshold? . . . . .  Yes  No

b Are you claiming a hardship exemption because your gross income is below the filing threshold? . . . . .  Yes  No

**Part III** **Coverage Exemptions for Individuals Claimed on Your Return:** If you and/or a member of your tax household are claiming an exemption on your return, complete Part III.

	a Name of Individual	b SSN	c Exemption Type	d Full Year	e	f	g	h	i	j	k	l	m	n	o	p
					Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
8	FORMER CITIZEN	000-00-0000	C	X												
9																
10																
11																
12																
13																

# Initial and Annual Expatriation Statement

For calendar year 2014 or other tax year beginning \_\_\_\_\_, 2014, and ending \_\_\_\_\_, 20\_\_\_\_  
▶ Information about Form 8854 and its separate instructions is at [www.irs.gov/form8854](http://www.irs.gov/form8854).  
▶ Please print or type.

Name **FORMER CITIZEN** Identifying number (see instructions) **000-00-0000**

**Part I General Information.** For all filers.

- 1 Mailing address and telephone number where you can be reached after expatriation BORN WITH DUAL CITIZENSHIP (US & CANADA) - LIVES IN THE UNITED KINGDOM
- 2 Address of principal foreign residence (if different from line 1) \_\_\_\_\_
- 3 Country of tax residence (if different from line 2) UNITED KINGDOM
- 4 **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
- 5 Date of notification of expatriating act, termination of residency, or claim of treaty benefits (see instructions).
  - Citizen. Date notification given to Department of State 11/01/2014
  - 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 \_\_\_\_\_
- 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.
  - a 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 II 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 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.
- 2 Were you physically present in the United States for more than 30 days but not more than 60 days during the tax year?  **Yes**  **No**
  - a If you checked "Yes" to line 2, were you performing services for an unrelated employer?  **Yes**  **No**
  - 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**
 Next: Go to Part V.

**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.

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

**2** Did you receive any distributions of eligible deferred compensation items for 2014?  Yes  No  
 If "Yes," Amount of distribution: \_\_\_\_\_ Amount withheld at source, if any: \_\_\_\_\_

**3** Did you receive any distributions from a nongrantor trust for 2014?  Yes  No  
 If "Yes," Amount of distribution: \_\_\_\_\_ Amount withheld at source, if any: \_\_\_\_\_

**Part IV For Persons Who Expatriated During 2014**

**Section A Expatriation Information**

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

1st Year Before Expatriation	2nd Year Before Expatriation	3rd Year Before Expatriation	4th Year Before Expatriation	5th Year Before Expatriation
\$ 0	\$ 0	\$ 0	\$ 0	\$ 0

**2** Enter your net worth on the date of your expatriation for tax purposes . . . . . \$ 2,322,881

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

**4** If you answered "Yes" to question 3, have you been a resident of the United States for not more than 10 of the last 15 tax years? . . . . .  Yes  No

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

**6** Do you certify under penalties of perjury that you have complied with all of your tax obligations for the 5 preceding tax years (see instructions)? . . . . .  Yes  No

**Section B** | **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 Section A;
- In Section A, you checked “Yes” on lines 3, 4, and 6; or
- In Section A, you checked “Yes” on lines 5 and 6.

- 7a** Do you have any **eligible deferred compensation items**? Checking the “Yes” box is an irrevocable waiver of any right to claim any reduction in withholding for such eligible deferred compensation item under any treaty with the United States . . . . .  Yes  No
- b** Do you have any **ineligible deferred compensation items**? If “Yes,” you must include in income the present value of your account on the day before your expatriation date . . . . .  Yes  No
- c** Do you have any **specified tax deferred accounts**? If “Yes,” you must include in income the entire account balance on the day before your expatriation date . . . . .  Yes  No
- d** Do you have an interest in a **nongrantor trust**? Checking the “Yes” box is a waiver of any right to claim any reduction in withholding on any distribution from such trust under any treaty with the United States unless you make the election below . . . . .  Yes  No
- Check this box to elect under section 877A(f)(4)(B) to be treated as having received the value of your entire interest in the trust (as determined for purposes of section 877A) as of the day before your expatriation date. Attach a copy of your valuation letter ruling issued by the IRS (see instructions).

**8** 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).

(a) Description of property	(b) Fair market value on day before date of expatriation	(c) Cost or other basis*	(d) Gain or (loss). Subtract (c) from (b)	(e) Gain after allocation of the exclusion amount (see instructions)	(f) Form or Schedule on which gain or loss is reported	(g) Amount of tax deferred (attach computations)
<b>9 Total.</b> Add the amounts in column (d) and column (e) . . . . .						
<b>10 Total tax deferred.</b> Add the amounts in column (g). Enter here and on line 15 . . . . .						

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

**Section C** | **Deferral of Tax**

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

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

If you checked the "Yes" box, continue to line 12. Otherwise, do not complete lines 12 through 15.

<b>12</b>	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 . . . . .	<b>12</b>	
<b>13</b>	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 . . . . .	<b>13</b>	
<b>14</b>	Subtract line 13 from line 12. <b>This is the amount of tax eligible for deferral</b> . . . . .	<b>14</b>	
<b>15</b>	Enter the total tax deferred from line 10, column (g) . . . . .	<b>15</b>	
	<ul style="list-style-type: none"> <li>• If you are filing Form 1040, enter this amount in brackets to the left of the entry space for line 63. Identify as "EXP."</li> <li>• If you are filing Form 1040NR, enter this amount in brackets to the left of the entry space for line 61. Identify as "EXP."</li> </ul>		

**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.

<b>Assets</b>	<b>(a) Fair market value (FMV)</b>	<b>(b) U.S. adjusted basis</b>	<b>(c) Gain or (loss). Subtract column (b) from column (a)</b>	<b>(d) FMV on beginning date of U.S. residency (optional, for long-term residents only)</b>
<b>1</b> Cash, including bank deposits . . . . .				
<b>2</b> Marketable stock and securities issued by U.S. companies . . . . .				
<b>3</b> Marketable stock and securities issued by foreign companies . . . . .	20,990	10,495	8,274	
<b>4</b> Nonmarketable stock and securities issued by U.S. companies . . . . .				
<b>5</b> Nonmarketable stock and securities issued by foreign companies . . . . .				
<b>a</b> 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>b</b> <b>Provide the name, address, and EIN, if any, of any such company</b> _____				
<b>6</b> Pensions from services performed in the United States . . . . .				
<b>7</b> Pensions from services performed outside the United States . . . . .	804,074	0	804,074	
<b>8</b> Partnership interests (see instructions) . . . . .				
<b>9</b> Assets held by trusts you own under sections 671 through 679 (see instructions)				
<b>10</b> Beneficial interests in nongrantor trusts (see instructions) . . . . .				
<b>11</b> Intangibles used in the United States . . . . .				
<b>12</b> Intangibles used outside the United States . . . . .				
<b>13</b> Loans to U.S. persons . . . . .				
<b>14</b> Loans to foreign persons . . . . .				
<b>15</b> Real property located in the United States . . . . .				
<b>16</b> <b>Real property located outside the United States</b> . . . . .	1,072,099	100,000	972,099	
<b>17</b> Business property located in the United States . . . . .				
<b>18</b> Business property located outside the United States . . . . .				
<b>19</b> <b>Other assets (see instructions)</b> RRSP . . . . .	446,708	217,852	228,855	
<b>20</b> 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	
<b>Liabilities</b>	<b>Amount</b>			
<b>21</b> Installment obligations . . . . .				
<b>22</b> Mortgages, etc. . . . .				
<b>23</b> Other liabilities (see instructions) . . . . .				
<b>24</b> Total liabilities. Add lines 21 through 23 . . . . .	0			
<b>25</b> <b>Net worth.</b> Subtract line 24 from line 20, column (a). . . . .	2,322,881			

**Schedule B 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 through 7.**

<b>1</b>	U.S. source gross income not effectively connected with the conduct of a U.S. trade or business.				
<b>a</b>	Interest . . . . .	<b>1a</b>	0	00	
<b>b</b>	Dividends . . . . .	<b>1b</b>	0	00	
<b>c</b>	Royalties . . . . .	<b>1c</b>	0	00	
<b>d</b>	Pension distributions . . . . .	<b>1d</b>	0	00	
<b>e</b>	Other . . . . .	<b>1e</b>	0	00	
<b>f</b>	<b>Total.</b> Add lines a through e . . . . .	<b>1f</b>		0	00
<b>2</b>	Gross income that is effectively connected with the conduct of a U.S. trade or business . . . . .	<b>2</b>		0	00
<b>3</b>	Income from the performance of services in the United States . . . . .	<b>3</b>		0	00
<b>4</b>	Gains from the sale or exchange of:				
<b>a</b>	Property (other than stock or debt obligations) located in the United States . . . . .	<b>4a</b>		0	00
<b>b</b>	Stock issued by a U.S. domestic corporation . . . . .	<b>4b</b>		0	00
<b>c</b>	Debt obligations of U.S. persons or of the United States, a state or political subdivision thereof, or the District of Columbia . . . . .	<b>4c</b>		0	00
<b>d</b>	<b>Total.</b> Add lines a through c . . . . .	<b>4d</b>		0	00
<b>5</b>	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) . . . . .	<b>5</b>		0	00
<b>6</b>	<b>Gains on certain exchanges of property that ordinarily would not be recognized (see instructions)</b>	<b>6</b>		0	00
<b>7</b>	Income received or accrued by certain foreign corporations (see instructions) . . . . .	<b>7</b>		0	00
<b>8</b>	Add lines 1f, 2, 3, 4d, 5, 6, and 7 . . . . .	<b>8</b>		0	00
<b>9</b>	Gross income from all other sources . . . . .	<b>9</b>		1,130,591	00
<b>10</b>	<b>Total.</b> Add lines 8 and 9 . . . . .	<b>10</b>		1,130,591	00

**Sign Here**

Under penalties of perjury, I declare that I have examined this form, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than filer) is based on all information of which preparer has any knowledge.

Your signature \_\_\_\_\_ Date \_\_\_\_\_

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶
	Firm's address ▶				Phone no.



# SCENARIO 4

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

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.

▼ Detach Here and Mail With Your Payment and Return ▼

Department of the Treasury  
Internal Revenue Service (99)

**2014**

**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.'
- ▶ Write your social security number (SSN) on your check or money order.

Enter the amount of your payment . . . . . ▶	69,926.
--	---------

REV 10/16/14 PRO 1555

FORMER CITIZEN

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

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

000000000 AA CITI 30 0 201412 610

For the year Jan. 1–Dec. 31, 2014, or other tax year beginning 01/01, 2014, ending 10/30, 2014 See separate instructions.

Your first name and initial FORMER Last name CITIZEN Your social security number 000-00-0000

If a joint return, spouse's first name and initial Last name Spouse's social security number NRA

Home address (number and street). If you have a P.O. box, see instructions. BORN IN THE US WITH US CITIZENSHIP ONLY Apt. no. Make sure the SSN(s) above and on line 6c are correct.

City, town or post office, state, and ZIP code. If you have a foreign address, also complete spaces below (see instructions). US "ELIGIBLE" PENSION Presidential Election Campaign

Foreign country name Canada Foreign province/state/county ONTARIO Foreign postal code M5G 1S4 Check here if you, or your spouse if filing jointly, want \$3 to go to this fund. Checking a box below will not change your tax or refund.

Filing Status 1 Single 2 Married filing jointly 3 Married filing separately 4 Head of household 5 Qualifying widow(er) with dependent child

Exemptions 6a Yourself 6b Spouse c Dependents: (1) First name Last name (2) Dependent's social security number (3) Dependent's relationship to you (4) if child under age 17... Total number of exemptions claimed 1

Income 7 Wages, salaries, tips, etc. 8a Taxable interest 8b Tax-exempt interest 9a Ordinary dividends 9b Qualified dividends 10 Taxable refunds, credits, or offsets of state and local income taxes 11 Alimony received 12 Business income or (loss) 13 Capital gain or (loss) 14 Other gains or (losses) 15a IRA distributions 15b Taxable amount 16a Pensions and annuities 16b Taxable amount 17 Rental real estate, royalties, partnerships, S corporations, trusts, etc. 18 Farm income or (loss) 19 Unemployment compensation 20a Social security benefits 20b Taxable amount 21 Other income. List type and amount 22 Combine the amounts in the far right column for lines 7 through 21. This is your total income 315,718.

Adjusted Gross Income 23 Educator expenses 24 Certain business expenses of reservists, performing artists, and fee-basis government officials. Attach Form 2106 or 2106-EZ 25 Health savings account deduction. Attach Form 8889 26 Moving expenses. Attach Form 3903 27 Deductible part of self-employment tax. Attach Schedule SE 28 Self-employed SEP, SIMPLE, and qualified plans 29 Self-employed health insurance deduction 30 Penalty on early withdrawal of savings 31a Alimony paid b Recipient's SSN 32 IRA deduction 33 Student loan interest deduction 34 Tuition and fees. Attach Form 8917 35 Domestic production activities deduction. Attach Form 8903 36 Add lines 23 through 35 37 Subtract line 36 from line 22. This is your adjusted gross income 315,718.



**SCHEDULE B**  
(Form 1040A or 1040)

**Interest and Ordinary Dividends**

OMB No. 1545-0074

**2014**  
Attachment  
Sequence No. **08**

Department of the Treasury  
Internal Revenue Service (99)

▶ Attach to Form 1040A or 1040.

▶ Information about Schedule B and its instructions is at [www.irs.gov/scheduleb](http://www.irs.gov/scheduleb).

Name(s) shown on return

Your social security number

FORMER CITIZEN

000-00-0000

**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 ▶

(See instructions on back and the instructions for Form 1040A, or Form 1040, 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 payer and enter the total interest shown on that form.

.....		<b>1</b>
.....		
.....		
.....		
.....		
.....		
.....		
.....		
.....		
.....		
<b>2</b> Add the amounts on line 1 . . . . .		<b>2</b>
<b>3</b> Excludable interest on series EE and I U.S. savings bonds issued after 1989. Attach Form 8815 . . . . .		<b>3</b>
<b>4</b> Subtract line 3 from line 2. Enter the result here and on Form 1040A, or Form 1040, line 8a . . . . . ▶		<b>4</b>

**Amount**

**Note.** If line 4 is over \$1,500, you must complete Part III.

**Amount**

**Part II**  
**Ordinary Dividends**

**5** List name of payer ▶ .....

(See instructions on back and the instructions for Form 1040A, or Form 1040, 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 on that form.

.....		<b>5</b>
.....		
.....		
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.....		
<b>6</b> Add the amounts on line 5. Enter the total here and on Form 1040A, or Form 1040, line 9a . . . . . ▶		<b>6</b>

**Note.** If line 6 is over \$1,500, you must complete Part III.

**Part III**  
**Foreign Accounts and Trusts**

(See instructions on back.)

		Yes	No
<b>You must complete this part if you (a) had over \$1,500 of taxable interest or ordinary dividends; (b) had a foreign account; or (c) received a distribution from, or were a grantor of, or a transferor to, a foreign trust.</b>			
<b>7a</b>	At any time during 2014, did you have a financial interest in or signature authority over a financial account (such as a bank account, securities account, or brokerage account) located in a foreign country? See instructions . . . . .	X	
	If "Yes," are you required to file FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR), to report that financial interest or signature authority? See FinCEN Form 114 and its instructions for filing requirements and exceptions to those requirements . . . . .	X	
<b>b</b>	If you are required to file FinCEN Form 114, enter the name of the foreign country where the financial account is located ▶ CA Canada .....		
<b>8</b>	During 2014, did you receive a distribution from, or were you the grantor of, or transferor to, a foreign trust? If "Yes," you may have to file Form 3520. See instructions on back . . . . .		X

**SCHEDULE D  
(Form 1040)**

**Capital Gains and Losses**

OMB No. 1545-0074

Department of the Treasury  
Internal Revenue Service (99)

▶ **Attach to Form 1040 or Form 1040NR.**  
▶ **Information about Schedule D and its separate instructions is at [www.irs.gov/scheduled](http://www.irs.gov/scheduled).**  
▶ **Use Form 8949 to list your transactions for lines 1b, 2, 3, 8b, 9, and 10.**

**2014**  
Attachment  
Sequence No. **12**

Name(s) shown on return  
FORMER CITIZEN

Your social security number  
000-00-0000

**Part I Short-Term Capital Gains and Losses—Assets Held One Year or Less**

See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you round off cents to whole dollars.	(d) Proceeds (sales price)	(e) Cost (or other basis)	(g) Adjustments to gain or loss from Form(s) 8949, Part I, line 2, column (g)	(h) Gain or (loss) Subtract column (e) from column (d) and combine the result with column (g)
<b>1a</b> 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 .				
<b>1b</b> Totals for all transactions reported on Form(s) 8949 with <b>Box A</b> checked . . . . .				
<b>2</b> Totals for all transactions reported on Form(s) 8949 with <b>Box B</b> checked . . . . .				
<b>3</b> Totals for all transactions reported on Form(s) 8949 with <b>Box C</b> checked . . . . .	0 .	680,000 .		-680,000 .
<b>4</b> Short-term gain from Form 6252 and short-term gain or (loss) from Forms 4684, 6781, and 8824 . . . . .				<b>4</b>
<b>5</b> Net short-term gain or (loss) from partnerships, S corporations, estates, and trusts from Schedule(s) K-1 . . . . .				<b>5</b>
<b>6</b> Short-term capital loss carryover. Enter the amount, if any, from line 8 of your <b>Capital Loss Carryover Worksheet</b> in the instructions . . . . .				<b>6</b> ( )
<b>7 Net short-term capital gain or (loss).</b> Combine lines 1a through 6 in column (h). If you have any long-term capital gains or losses, go to Part II below. Otherwise, go to Part III on the back . . . . .				<b>7</b> -680,000 .

**Part II Long-Term Capital Gains and Losses—Assets Held More Than One Year**

See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you round off cents to whole dollars.	(d) Proceeds (sales price)	(e) Cost (or other basis)	(g) Adjustments to gain or loss from Form(s) 8949, Part II, line 2, column (g)	(h) Gain or (loss) Subtract column (e) from column (d) and combine the result with column (g)
<b>8a</b> 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 .				
<b>8b</b> Totals for all transactions reported on Form(s) 8949 with <b>Box D</b> checked . . . . .				
<b>9</b> Totals for all transactions reported on Form(s) 8949 with <b>Box E</b> checked . . . . .				
<b>10</b> Totals for all transactions reported on Form(s) 8949 with <b>Box F</b> checked . . . . .	1,539,797 .	339,350 .	-250,000 .	950,447 .
<b>11</b> Gain from Form 4797, Part I; long-term gain from Forms 2439 and 6252; and long-term gain or (loss) from Forms 4684, 6781, and 8824 . . . . .				<b>11</b>
<b>12</b> Net long-term gain or (loss) from partnerships, S corporations, estates, and trusts from Schedule(s) K-1 . . . . .				<b>12</b>
<b>13</b> Capital gain distributions. See the instructions . . . . .				<b>13</b>
<b>14</b> Long-term capital loss carryover. Enter the amount, if any, from line 13 of your <b>Capital Loss Carryover Worksheet</b> in the instructions . . . . .				<b>14</b> ( )
<b>15 Net long-term capital gain or (loss).</b> Combine lines 8a through 14 in column (h). Then go to Part III on the back . . . . .				<b>15</b> 950,447 .

**Part III Summary**

<b>16</b>	Combine lines 7 and 15 and enter the result . . . . .	<b>16</b>	270,447.
	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>		
<b>17</b>	Are lines 15 and 16 <b>both</b> gains? <input checked="" type="checkbox"/> <b>Yes.</b> Go to line 18. <input type="checkbox"/> <b>No.</b> Skip lines 18 through 21, and go to line 22.		
<b>18</b>	Enter the amount, if any, from line 7 of the <b>28% Rate Gain Worksheet</b> in the instructions . . . ▶	<b>18</b>	
<b>19</b>	Enter the amount, if any, from line 18 of the <b>Unrecaptured Section 1250 Gain Worksheet</b> in the instructions . . . . . ▶	<b>19</b>	
<b>20</b>	Are lines 18 and 19 <b>both</b> zero or blank? <input checked="" type="checkbox"/> <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). <b>Do not</b> complete lines 21 and 22 below.  <input type="checkbox"/> <b>No.</b> Complete the <b>Schedule D Tax Worksheet</b> in the instructions. <b>Do not</b> complete lines 21 and 22 below.		
<b>21</b>	If line 16 is a loss, enter here and on Form 1040, line 13, or Form 1040NR, line 14, the <b>smaller</b> of: <ul style="list-style-type: none"> <li>• The loss on line 16 or</li> <li>• (\$3,000), or if married filing separately, (\$1,500) } . . . . .</li> </ul> <p><b>Note.</b> When figuring which amount is smaller, treat both amounts as positive numbers.</p>	<b>21</b>	( )
<b>22</b>	Do you have qualified dividends on Form 1040, line 9b, or Form 1040NR, line 10b?  <input type="checkbox"/> <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).  <input type="checkbox"/> <b>No.</b> Complete the rest of Form 1040 or Form 1040NR.		

# Sales and Other Dispositions of Capital Assets

Department of the Treasury  
Internal Revenue Service

► Information about Form 8949 and its separate instructions is at [www.irs.gov/form8949](http://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.

**2014**  
Attachment  
Sequence No. **12A**

Name(s) shown on return  
FORMER CITIZEN

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

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).

**Part I Short-Term.** Transactions involving capital assets you held 1 year or less are short term. For long-term 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

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





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

Your social security number

FORMER CITIZEN

000-00-0000

**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.)	1	315,718.
2	Medical and dental. If you or your spouse was 65 or older, enter the <b>smaller</b> of Schedule A (Form 1040), line 4, or 2.5% (.025) of Form 1040, line 38. If zero or less, enter -0-	2	
3	Taxes from Schedule A (Form 1040), line 9	3	
4	<b>Enter the home mortgage interest adjustment, if any, from line 6 of the worksheet in the instructions for this line</b>	4	
5	Miscellaneous deductions from Schedule A (Form 1040), line 27.	5	
6	If Form 1040, line 38, is \$152,525 or less, enter -0-. Otherwise, see instructions	6	( 0. )
7	Tax refund from Form 1040, line 10 or line 21	7	( )
8	Investment interest expense (difference between regular tax and AMT).	8	
9	Depletion (difference between regular tax and AMT)	9	
10	Net operating loss deduction from Form 1040, line 21. Enter as a positive amount	10	
11	Alternative tax net operating loss deduction	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	
15	Estates and trusts (amount from Schedule K-1 (Form 1041), box 12, code A)	15	
16	Electing large partnerships (amount from Schedule K-1 (Form 1065-B), box 6)	16	
17	Disposition of property (difference between AMT and regular tax gain or loss)	17	0.
18	Depreciation on assets placed in service after 1986 (difference between regular tax and AMT)	18	
19	Passive activities (difference between AMT and regular tax income or loss)	19	
20	Loss limitations (difference between AMT and regular tax income or loss)	20	
21	Circulation costs (difference between regular tax and AMT)	21	
22	Long-term contracts (difference between AMT and regular tax income)	22	
23	Mining costs (difference between regular tax and AMT)	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	Intangible drilling costs preference	26	
27	Other adjustments, including income-based related adjustments	27	
28	<b>Alternative minimum taxable income.</b> Combine lines 1 through 27. (If married filing separately and line 28 is more than \$242,450, see instructions.)	28	334,035.

**Part II Alternative Minimum Tax (AMT)**

29	Exemption. (If you were under age 24 at the end of 2014, see instructions.) <b>IF your filing status is . . . AND line 28 is not over . . . THEN enter on line 29 . . .</b> Single or head of household . . . . . \$117,300 . . . . . \$52,800 <b>Married filing jointly or qualifying widow(er)</b> 156,500 . . . . . 82,100 Married filing separately . . . . . 78,250 . . . . . 41,050 If line 28 is <b>over</b> the amount shown above for your filing status, see instructions.	29	0.
30	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, and 35, and go to line 34	30	334,035.
31	• If you are filing Form 2555 or 2555-EZ, see instructions for the amount to enter. • <b>If you reported capital gain distributions directly on Form 1040, line 13; you reported qualified dividends on Form 1040, line 9b; or you had a gain on both lines 15 and 16 of Schedule D (Form 1040) (as refigured for the AMT, if necessary), complete Part III on the back and enter the amount from line 64 here.</b> • <b>All others:</b> 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.	31	61,446.
32	Alternative minimum tax foreign tax credit (see instructions)	32	
33	Tentative minimum tax. Subtract line 32 from line 31	33	61,446.
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, refigure that tax without using Schedule J before completing this line (see instructions)	34	52,088.
35	<b>AMT.</b> Subtract line 34 from line 33. If zero or less, enter -0-. Enter here and on Form 1040, line 45	35	9,358.

**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.

<b>36</b>	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 . . . . .	<b>36</b>	334,035.
<b>37</b>	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 . . . . .	<b>37</b>	270,447.
<b>38</b>	<b>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 . . . . .</b>	<b>38</b>	
<b>39</b>	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 . . . . .	<b>39</b>	270,447.
<b>40</b>	Enter the <b>smaller</b> of line 36 or line 39 . . . . .	<b>40</b>	270,447.
<b>41</b>	Subtract line 40 from line 36 . . . . .	<b>41</b>	63,588.
<b>42</b>	<b>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 . . . ▶</b>	<b>42</b>	16,533.
<b>43</b>	Enter: <ul style="list-style-type: none"> <li>• \$73,800 if married filing jointly or qualifying widow(er),</li> <li>• \$36,900 if single or married filing separately, or</li> <li>• \$49,400 if head of household.</li> </ul>	<b>43</b>	36,900.
<b>44</b>	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 . . . . .	<b>44</b>	45,271.
<b>45</b>	Subtract line 44 from line 43. If zero or less, enter -0- . . . . .	<b>45</b>	0.
<b>46</b>	Enter the <b>smaller</b> of line 36 or line 37 . . . . .	<b>46</b>	270,447.
<b>47</b>	Enter the <b>smaller</b> of line 45 or line 46. This amount is taxed at 0% . . . . .	<b>47</b>	0.
<b>48</b>	Subtract line 47 from line 46 . . . . .	<b>48</b>	270,447.
<b>49</b>	Enter: <ul style="list-style-type: none"> <li>• \$406,750 if single</li> <li>• \$228,800 if married filing separately</li> <li>• \$457,600 if married filing jointly or qualifying widow(er)</li> <li>• \$432,200 if head of household</li> </ul>	<b>49</b>	228,800.
<b>50</b>	Enter the amount from line 45 . . . . .	<b>50</b>	0.
<b>51</b>	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 . . . . .	<b>51</b>	45,271.
<b>52</b>	Add line 50 and line 51 . . . . .	<b>52</b>	45,271.
<b>53</b>	Subtract line 52 from line 49. If zero or less, enter -0- . . . . .	<b>53</b>	183,529.
<b>54</b>	Enter the smaller of line 48 or line 53 . . . . .	<b>54</b>	183,529.
<b>55</b>	Multiply line 54 by 15% (.15) . . . . . ▶	<b>55</b>	27,529.
<b>56</b>	Add lines 47 and 54 . . . . .	<b>56</b>	183,529.
	<b>If lines 56 and 36 are the same, skip lines 57 through 61 and go to line 62. Otherwise, go to line 57.</b>		
<b>57</b>	Subtract line 56 from line 46 . . . . .	<b>57</b>	86,918.
<b>58</b>	Multiply line 57 by 20% (.20) . . . . . ▶	<b>58</b>	17,384.
	<b>If line 38 is zero or blank, skip lines 59 through 61 and go to line 62. Otherwise, go to line 59.</b>		
<b>59</b>	Add lines 41, 56, and 57 . . . . .	<b>59</b>	
<b>60</b>	Subtract line 59 from line 36 . . . . .	<b>60</b>	
<b>61</b>	Multiply line 60 by 25% (.25) . . . . . ▶	<b>61</b>	
<b>62</b>	Add lines 42, 55, 58, and 61 . . . . .	<b>62</b>	61,446.
<b>63</b>	<b>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</b>	<b>63</b>	91,705.
<b>64</b>	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 . . . . .	<b>64</b>	61,446.

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

Department of the Treasury  
Internal Revenue Service (99)

▶ Attach to your tax return.

▶ Information about Form 8960 and its separate instructions is at [www.irs.gov/form8960](http://www.irs.gov/form8960).

Attachment  
Sequence No. **72**

Name(s) shown on your tax return

Your social security number or EIN

FORMER CITIZEN

000-00-0000

- Part I Investment Income**  Section 6013(g) election (see instructions)  
 Section 6013(h) election (see instructions)  
 Regulations section 1.1411-10(g) election (see instructions)

<b>1</b>	Taxable interest (see instructions)		<b>1</b>	
<b>2</b>	Ordinary dividends (see instructions)		<b>2</b>	
<b>3</b>	Annuities (see instructions)		<b>3</b>	
<b>4a</b>	Rental real estate, royalties, partnerships, S corporations, trusts, etc. (see instructions)	<b>4a</b>		
<b>b</b>	Adjustment for net income or loss derived in the ordinary course of a non-section 1411 trade or business (see instructions)	<b>4b</b>		
<b>c</b>	Combine lines 4a and 4b		<b>4c</b>	
<b>5a</b>	Net gain or loss from disposition of property (see instructions)	<b>5a</b>	270,447.	
<b>b</b>	Net gain or loss from disposition of property that is not subject to net investment income tax (see instructions)	<b>5b</b>		
<b>c</b>	Adjustment from disposition of partnership interest or S corporation stock (see instructions)	<b>5c</b>		
<b>d</b>	Combine lines 5a through 5c		<b>5d</b>	270,447.
<b>6</b>	Adjustments to investment income for certain CFCs and PFICs (see instructions)		<b>6</b>	
<b>7</b>	Other modifications to investment income (see instructions)		<b>7</b>	
<b>8</b>	Total investment income. Combine lines 1, 2, 3, 4c, 5d, 6, and 7		<b>8</b>	270,447.

**Part II Investment Expenses Allocable to Investment Income and Modifications**

<b>9a</b>	Investment interest expenses (see instructions)	<b>9a</b>		
<b>b</b>	State, local, and foreign income tax (see instructions)	<b>9b</b>		
<b>c</b>	Miscellaneous investment expenses (see instructions)	<b>9c</b>		
<b>d</b>	Add lines 9a, 9b, and 9c		<b>9d</b>	
<b>10</b>	Additional modifications (see instructions)		<b>10</b>	
<b>11</b>	Total deductions and modifications. Add lines 9d and 10		<b>11</b>	

**Part III Tax Computation**

<b>12</b>	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-		<b>12</b>	270,447.
<b>Individuals:</b>				
<b>13</b>	Modified adjusted gross income (see instructions)	<b>13</b>	315,718.	
<b>14</b>	Threshold based on filing status (see instructions)	<b>14</b>	125,000.	
<b>15</b>	Subtract line 14 from line 13. If zero or less, enter -0-	<b>15</b>	190,718.	
<b>16</b>	Enter the smaller of line 12 or line 15		<b>16</b>	190,718.
<b>17</b>	Net investment income tax for individuals. Multiply line 16 by 3.8% (.038). Enter here and include on your tax return (see instructions)		<b>17</b>	7,247.
<b>Estates and Trusts:</b>				
<b>18a</b>	Net investment income (line 12 above)	<b>18a</b>		
<b>b</b>	Deductions for distributions of net investment income and deductions under section 642(c) (see instructions)	<b>18b</b>		
<b>c</b>	Undistributed net investment income. Subtract line 18b from 18a (see instructions). If zero or less, enter -0-	<b>18c</b>		
<b>19a</b>	Adjusted gross income (see instructions)	<b>19a</b>		
<b>b</b>	Highest tax bracket for estates and trusts for the year (see instructions)	<b>19b</b>		
<b>c</b>	Subtract line 19b from line 19a. If zero or less, enter -0-	<b>19c</b>		
<b>20</b>	Enter the smaller of line 18c or line 19c		<b>20</b>	
<b>21</b>	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)		<b>21</b>	

### 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](http://www.irs.gov/form8965).

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 I Marketplace-Granted Coverage Exemptions for Individuals:** If you and/or a member of your tax household have an exemption granted by the Marketplace, complete Part I.

	a Name of Individual	b SSN	c Exemption Certificate Number
1			
2			
3			
4			
5			
6			

**Part II Coverage Exemptions for Your Household Claimed on Your Return:**

7a Are you claiming an exemption because your household income is below the filing threshold?  Yes  No

b Are you claiming a hardship exemption because your gross income is below the filing threshold?  Yes  No

**Part III Coverage Exemptions for Individuals Claimed on Your Return:** If you and/or a member of your tax household are claiming an exemption on your return, complete Part III.

	a Name of Individual	b SSN	c Exemption Type	d Full Year	e	f	g	h	i	j	k	l	m	n	o	p
					Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
8	FORMER CITIZEN	000-00-0000	C	X												
9																
10																
11																
12																
13																

# Initial and Annual Expatriation Statement

For calendar year 2014 or other tax year beginning \_\_\_\_\_, 2014, and ending \_\_\_\_\_, 20\_\_\_\_  
▶ Information about Form 8854 and its separate instructions is at [www.irs.gov/form8854](http://www.irs.gov/form8854).  
▶ Please print or type.

Name **FORMER CITIZEN** Identifying number (see instructions) **000-00-0000**

**Part I General Information.** For all filers.

- 1 Mailing address and telephone number where you can be reached after expatriation  
BORN WITH US CITIZENSHIP ONLY - US "ELIGIBLE" PENSION, 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
- 4 **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
- 5 Date of notification of expatriating act, termination of residency, or claim of treaty benefits (see instructions).
  - Citizen. Date notification given to Department of State 11/01/2014
  - 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 \_\_\_\_\_
- 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.
  - a 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 II 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 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.
- 2 Were you physically present in the United States for more than 30 days but not more than 60 days during the tax year?  **Yes**  **No**
  - a If you checked "Yes" to line 2, were you performing services for an unrelated employer?  **Yes**  **No**
  - 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**
 Next: Go to Part V.

**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.

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

**2** Did you receive any distributions of eligible deferred compensation items for 2014?  Yes  No  
 If "Yes," Amount of distribution: \_\_\_\_\_ Amount withheld at source, if any: \_\_\_\_\_

**3** Did you receive any distributions from a nongrantor trust for 2014?  Yes  No  
 If "Yes," Amount of distribution: \_\_\_\_\_ Amount withheld at source, if any: \_\_\_\_\_

**Part IV For Persons Who Expatriated During 2014**

**Section A Expatriation Information**

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

1st Year Before Expatriation	2nd Year Before Expatriation	3rd Year Before Expatriation	4th Year Before Expatriation	5th Year Before Expatriation
\$ 0	\$ 0	\$ 0	\$ 0	\$ 0

**2** Enter your net worth on the date of your expatriation for tax purposes . . . . . \$ 2,322,881

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

**4** If you answered "Yes" to question 3, have you been a resident of the United States for not more than 10 of the last 15 tax years? . . . . .  Yes  No

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

**6** Do you certify under penalties of perjury that you have complied with all of your tax obligations for the 5 preceding tax years (see instructions)? . . . . .  Yes  No

**Section B** | **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 Section A;
- In Section A, you checked “Yes” on lines 3, 4, and 6; or
- In Section A, you checked “Yes” on lines 5 and 6.

**7a** Do you have any **eligible deferred compensation items**? Checking the “Yes” box is an irrevocable waiver of any right to claim any reduction in withholding for such eligible deferred compensation item under any treaty with the United States . . . . .  **Yes**  **No**

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

**c** Do you have any **specified tax deferred accounts**? If “Yes,” you must include in income the entire account balance on the day before your expatriation date . . . . .  **Yes**  **No**

**d** Do you have an interest in a **nongrantor trust**? Checking the “Yes” box is a waiver of any right to claim any reduction in withholding on any distribution from such trust under any treaty with the United States unless you make the election below . . . . .  **Yes**  **No**

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

**8** 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).

(a) Description of property	(b) Fair market value on day before date of expatriation	(c) Cost or other basis*	(d) Gain or (loss). Subtract (c) from (b)	(e) Gain after allocation of the exclusion amount (see instructions)	(f) Form or Schedule on which gain or loss is reported	(g) Amount of tax deferred (attach computations)
<b>9 Total.</b> Add the amounts in column (d) and column (e) . . . . .						
<b>10 Total tax deferred.</b> Add the amounts in column (g). Enter here and on line 15 . . . . .						

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



**Section C**    **Deferral of Tax**

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

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

If you checked the "Yes" box, continue to line 12. Otherwise, do not complete lines 12 through 15.

<b>12</b>	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 . . . . .	<b>12</b>	
<b>13</b>	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 . . . . .	<b>13</b>	
<b>14</b>	Subtract line 13 from line 12. <b>This is the amount of tax eligible for deferral</b> . . . . .	<b>14</b>	
<b>15</b>	Enter the total tax deferred from line 10, column (g) . . . . .	<b>15</b>	
	<ul style="list-style-type: none"> <li>• If you are filing Form 1040, enter this amount in brackets to the left of the entry space for line 63. Identify as "EXP."</li> <li>• If you are filing Form 1040NR, enter this amount in brackets to the left of the entry space for line 61. Identify as "EXP."</li> </ul>		

**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.

<b>Assets</b>	<b>(a) Fair market value (FMV)</b>	<b>(b) U.S. adjusted basis</b>	<b>(c) Gain or (loss). Subtract column (b) from column (a)</b>	<b>(d) FMV on beginning date of U.S. residency (optional, for long-term residents only)</b>
<b>1</b> Cash, including bank deposits . . . . .				
<b>2</b> Marketable stock and securities issued by U.S. companies . . . . .				
<b>3</b> Marketable stock and securities issued by foreign companies . . . . .	20,990	10,495	8,274	
<b>4</b> Nonmarketable stock and securities issued by U.S. companies . . . . .				
<b>5</b> Nonmarketable stock and securities issued by foreign companies . . . . .				
<b>a</b> 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>b</b> <b>Provide the name, address, and EIN, if any, of any such company</b> _____				
<b>6</b> Pensions from services performed in the United States . . . . .	804,074	0	804,074	
<b>7</b> Pensions from services performed outside the United States . . . . .				
<b>8</b> Partnership interests (see instructions) . . . . .				
<b>9</b> Assets held by trusts you own under sections 671 through 679 (see instructions)				
<b>10</b> Beneficial interests in nongrantor trusts (see instructions) . . . . .				
<b>11</b> Intangibles used in the United States . . . . .				
<b>12</b> Intangibles used outside the United States . . . . .				
<b>13</b> Loans to U.S. persons . . . . .				
<b>14</b> Loans to foreign persons . . . . .				
<b>15</b> Real property located in the United States . . . . .				
<b>16</b> <b>Real property located outside the United States</b> . . . . .	1,072,099	100,000	972,099	
<b>17</b> Business property located in the United States . . . . .				
<b>18</b> Business property located outside the United States . . . . .				
<b>19</b> <b>Other assets (see instructions)</b> RRSP . . . . .	446,708	217,852	228,855	
<b>20</b> 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	
<b>Liabilities</b>	<b>Amount</b>			
<b>21</b> Installment obligations . . . . .				
<b>22</b> Mortgages, etc. . . . .				
<b>23</b> Other liabilities (see instructions) . . . . .				
<b>24</b> Total liabilities. Add lines 21 through 23 . . . . .	0			
<b>25</b> <b>Net worth.</b> Subtract line 24 from line 20, column (a). . . . .	2,322,881			

**Schedule B 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 through 7.**

<b>1</b>	U.S. source gross income not effectively connected with the conduct of a U.S. trade or business.				
<b>a</b>	Interest . . . . .	<b>1a</b>	0	00	
<b>b</b>	Dividends . . . . .	<b>1b</b>	0	00	
<b>c</b>	Royalties . . . . .	<b>1c</b>	0	00	
<b>d</b>	Pension distributions . . . . .	<b>1d</b>	0	00	
<b>e</b>	Other . . . . .	<b>1e</b>	0	00	
<b>f</b>	<b>Total.</b> Add lines a through e . . . . .	<b>1f</b>		0	00
<b>2</b>	Gross income that is effectively connected with the conduct of a U.S. trade or business . . . . .	<b>2</b>		0	00
<b>3</b>	Income from the performance of services in the United States . . . . .	<b>3</b>		0	00
<b>4</b>	Gains from the sale or exchange of:				
<b>a</b>	Property (other than stock or debt obligations) located in the United States . . . . .	<b>4a</b>		0	00
<b>b</b>	Stock issued by a U.S. domestic corporation . . . . .	<b>4b</b>		0	00
<b>c</b>	Debt obligations of U.S. persons or of the United States, a state or political subdivision thereof, or the District of Columbia . . . . .	<b>4c</b>		0	00
<b>d</b>	<b>Total.</b> Add lines a through c . . . . .	<b>4d</b>		0	00
<b>5</b>	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) . . . . .	<b>5</b>		0	00
<b>6</b>	<b>Gains on certain exchanges of property that ordinarily would not be recognized (see instructions)</b>	<b>6</b>		0	00
<b>7</b>	Income received or accrued by certain foreign corporations (see instructions) . . . . .	<b>7</b>		0	00
<b>8</b>	Add lines 1f, 2, 3, 4d, 5, 6, and 7 . . . . .	<b>8</b>		0	00
<b>9</b>	Gross income from all other sources . . . . .	<b>9</b>		315,718	00
<b>10</b>	<b>Total.</b> Add lines 8 and 9 . . . . .	<b>10</b>		315,718	00

**Sign Here**

Under penalties of perjury, I declare that I have examined this form, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than filer) is based on all information of which preparer has any knowledge.

Your signature \_\_\_\_\_ Date \_\_\_\_\_

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶
	Firm's address ▶				Phone no.

# SCENARIO 5

EXPATRIATED UNDER THE AGE OF 18 1/2

For the year Jan. 1–Dec. 31, 2014, or other tax year beginning 01/01, 2014, ending 01/01, 2014 See separate instructions.

Your first name and initial FORMER Last name CITIZEN Your social security number 000-00-0000

If a joint return, spouse's first name and initial Last name Spouse's social security number

Home address (number and street). If you have a P.O. box, see instructions. KID UNDER 18 1/2 - LESS THAN 10 Y IN THE US Apt. no. Make sure the SSN(s) above and on line 6c are correct.

City, town or post office, state, and ZIP code. If you have a foreign address, also complete spaces below (see instructions). LIVES IN ST KITTS AND NEVIS Presidential Election Campaign

Foreign country name St. Kitts and Nevis Foreign province/state/county BASSETERRE Foreign postal code Check here if you, or your spouse if filing jointly, want \$3 to go to this fund. Checking a box below will not change your tax or refund.

Filing Status 1 [X] Single 2 [ ] Married filing jointly (even if only one had income) 3 [ ] Married filing separately. Enter spouse's SSN above and full name here. 4 [ ] Head of household (with qualifying person). (See instructions.) If the qualifying person is a child but not your dependent, enter this child's name here. 5 [ ] Qualifying widow(er) with dependent child

Exemptions 6a [X] Yourself. If someone can claim you as a dependent, do not check box 6a. b [ ] Spouse. c Dependents: (1) First name Last name (2) Dependent's social security number (3) Dependent's relationship to you (4) [ ] if child under age 17 qualifying for child tax credit (see instructions). Boxes checked on 6a and 6b 1. No. of children on 6c who: • lived with you • did not live with you due to divorce or separation (see instructions). Dependents on 6c not entered above. Add numbers on lines above 1.

Income 7 Wages, salaries, tips, etc. Attach Form(s) W-2 7 8a Taxable interest. Attach Schedule B if required 8a b Tax-exempt interest. Do not include on line 8a 8b 9a Ordinary dividends. Attach Schedule B if required 9a b Qualified dividends 9b 10 Taxable refunds, credits, or offsets of state and local income taxes 10 11 Alimony received 11 12 Business income or (loss). Attach Schedule C or C-EZ 12 13 Capital gain or (loss). Attach Schedule D if required. If not required, check here [ ] 13 14 Other gains or (losses). Attach Form 4797 14 15a IRA distributions 15a b Taxable amount 15b 16a Pensions and annuities 16a b Taxable amount 16b 17 Rental real estate, royalties, partnerships, S corporations, trusts, etc. Attach Schedule E 17 18 Farm income or (loss). Attach Schedule F 18 19 Unemployment compensation 19 20a Social security benefits 20a b Taxable amount 20b 21 Other income. List type and amount 21 22 Combine the amounts in the far right column for lines 7 through 21. This is your total income 22

Adjusted Gross Income 23 Educator expenses 23 24 Certain business expenses of reservists, performing artists, and fee-basis government officials. Attach Form 2106 or 2106-EZ 24 25 Health savings account deduction. Attach Form 8889 25 26 Moving expenses. Attach Form 3903 26 27 Deductible part of self-employment tax. Attach Schedule SE 27 28 Self-employed SEP, SIMPLE, and qualified plans 28 29 Self-employed health insurance deduction 29 30 Penalty on early withdrawal of savings 30 31a Alimony paid b Recipient's SSN 31a 32 IRA deduction 32 33 Student loan interest deduction 33 34 Tuition and fees. Attach Form 8917 34 35 Domestic production activities deduction. Attach Form 8903 35 36 Add lines 23 through 35 36 37 Subtract line 36 from line 22. This is your adjusted gross income 37





### 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](http://www.irs.gov/form8965).

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 I Marketplace-Granted Coverage Exemptions for Individuals:** If you and/or a member of your tax household have an exemption granted by the Marketplace, complete Part I.

	a Name of Individual	b SSN	c Exemption Certificate Number
1			
2			
3			
4			
5			
6			

**Part II Coverage Exemptions for Your Household Claimed on Your Return:**

7a Are you claiming an exemption because your household income is below the filing threshold? . . . . .  Yes  No

b Are you claiming a hardship exemption because your gross income is below the filing threshold? . . . . .  Yes  No

**Part III Coverage Exemptions for Individuals Claimed on Your Return:** If you and/or a member of your tax household are claiming an exemption on your return, complete Part III.

	a Name of Individual	b SSN	c Exemption Type	d Full Year	e	f	g	h	i	j	k	l	m	n	o	p
					Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
8	FORMER CITIZEN	000-00-0000	C	X												
9																
10																
11																
12																
13																



**Additional information from your 2014 Federal Tax Return****Schedule B: Interest and Dividend Income****Part III Fgn Accounts and Trusts****Continuation Statement**

<b>Fgn Cd</b>	<b>Fgn Country Name</b>
SC	St. Kitts and Nevis
BH	Belize
PM	Panama
CJ	Cayman Islands

**Total**

# Initial and Annual Expatriation Statement

For calendar year 2014 or other tax year beginning \_\_\_\_\_, 2014, and ending \_\_\_\_\_, 20\_\_\_\_  
▶ Information about Form 8854 and its separate instructions is at [www.irs.gov/form8854](http://www.irs.gov/form8854).  
▶ Please print or type.

Name **FORMER CITIZEN** Identifying number (see instructions) **000-00-0000**

**Part I General Information.** For all filers.

- 1 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
- 2 Address of principal foreign residence (if different from line 1) \_\_\_\_\_
- 3 Country of tax residence (if different from line 2) ST KITTS AND NEVIS
- 4 **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
- 5 Date of notification of expatriating act, termination of residency, or claim of treaty benefits (see instructions).
  - Citizen. Date notification given to Department of State 01/01/2014
  - 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 \_\_\_\_\_
- 6 Number of days you were physically present in the United States in the current year 358
- 7 List all countries (other than the United States) of which you are a citizen.
  - a Name of country ST KITTS AND NEVIS
  - b Date you became a citizen of each country listed in line 7a 06/30/2013
- 8 How you became a U.S. citizen  By birth  By naturalization

**Part II 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 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.
- 2 Were you physically present in the United States for more than 30 days but not more than 60 days during the tax year?  **Yes**  **No**
  - a If you checked "Yes" to line 2, were you performing services for an unrelated employer?  **Yes**  **No**
  - 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**  
Next: Go to Part V.

**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.

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

**2** Did you receive any distributions of eligible deferred compensation items for 2014?  Yes  No  
 If "Yes," Amount of distribution: \_\_\_\_\_ Amount withheld at source, if any: \_\_\_\_\_

**3** Did you receive any distributions from a nongrantor trust for 2014?  Yes  No  
 If "Yes," Amount of distribution: \_\_\_\_\_ Amount withheld at source, if any: \_\_\_\_\_

**Part IV For Persons Who Expatriated During 2014**

**Section A Expatriation Information**

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

1st Year Before Expatriation	2nd Year Before Expatriation	3rd Year Before Expatriation	4th Year Before Expatriation	5th Year Before Expatriation
\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000

**2** Enter your net worth on the date of your expatriation for tax purposes . . . . . \$ 1,000,000,000

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

**4** If you answered "Yes" to question 3, have you been a resident of the United States for not more than 10 of the last 15 tax years? . . . . .  Yes  No

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

**6** Do you certify under penalties of perjury that you have complied with all of your tax obligations for the 5 preceding tax years (see instructions)? . . . . .  Yes  No

**Section B** | **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 Section A;
- In Section A, you checked “Yes” on lines 3, 4, and 6; or
- In Section A, you checked “Yes” on lines 5 and 6.

- 7a** Do you have any **eligible deferred compensation items**? Checking the “Yes” box is an irrevocable waiver of any right to claim any reduction in withholding for such eligible deferred compensation item under any treaty with the United States . . . . .  **Yes**  **No**
- b** Do you have any **ineligible deferred compensation items**? If “Yes,” you must include in income the present value of your account on the day before your expatriation date . . . . .  **Yes**  **No**
- c** Do you have any **specified tax deferred accounts**? If “Yes,” you must include in income the entire account balance on the day before your expatriation date . . . . .  **Yes**  **No**
- d** Do you have an interest in a **nongrantor trust**? Checking the “Yes” box is a waiver of any right to claim any reduction in withholding on any distribution from such trust under any treaty with the United States unless you make the election below . . . . .  **Yes**  **No**
- Check this box to elect under section 877A(f)(4)(B) to be treated as having received the value of your entire interest in the trust (as determined for purposes of section 877A) as of the day before your expatriation date. Attach a copy of your valuation letter ruling issued by the IRS (see instructions).

**8** 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).

(a) Description of property	(b) Fair market value on day before date of expatriation	(c) Cost or other basis*	(d) Gain or (loss). Subtract (c) from (b)	(e) Gain after allocation of the exclusion amount (see instructions)	(f) Form or Schedule on which gain or loss is reported	(g) Amount of tax deferred (attach computations)
<b>9 Total.</b> Add the amounts in column (d) and column (e) . . . . .						
<b>10 Total tax deferred.</b> Add the amounts in column (g). Enter here and on line 15 . . . . .						

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

**Section C** | **Deferral of Tax**

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

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

If you checked the "Yes" box, continue to line 12. Otherwise, do not complete lines 12 through 15.

<b>12</b>	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 . . . . .	<b>12</b>	
<b>13</b>	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 . . . . .	<b>13</b>	
<b>14</b>	Subtract line 13 from line 12. <b>This is the amount of tax eligible for deferral</b> . . . . .	<b>14</b>	
<b>15</b>	Enter the total tax deferred from line 10, column (g) . . . . .	<b>15</b>	
	<ul style="list-style-type: none"> <li>• If you are filing Form 1040, enter this amount in brackets to the left of the entry space for line 63. Identify as "EXP."</li> <li>• If you are filing Form 1040NR, enter this amount in brackets to the left of the entry space for line 61. Identify as "EXP."</li> </ul>		

**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.

<b>Assets</b>	<b>(a) Fair market value (FMV)</b>	<b>(b) U.S. adjusted basis</b>	<b>(c) Gain or (loss). Subtract column (b) from column (a)</b>	<b>(d) FMV on beginning date of U.S. residency (optional, for long-term residents only)</b>
<b>1</b> Cash, including bank deposits . . . . .				
<b>2</b> Marketable stock and securities issued by U.S. companies . . . . .				
<b>3</b> Marketable stock and securities issued by foreign companies . . . . .				
<b>4</b> Nonmarketable stock and securities issued by U.S. companies . . . . .				
<b>5</b> Nonmarketable stock and securities issued by foreign companies . . . . .	250,000,000	50,000,000	200,000,000	
<b>a</b> 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>b</b> <b>Provide the name, address, and EIN, if any, of any such company</b> FRIENDS AND POWER INC FLORAL PARK ROAD, BELMOPAN, BELIZE				
<b>6</b> Pensions from services performed in the United States . . . . .				
<b>7</b> Pensions from services performed outside the United States . . . . .				
<b>8</b> Partnership interests (see instructions) . . . . .				
<b>9</b> Assets held by trusts you own under sections 671 through 679 (see instructions)				
<b>10</b> Beneficial interests in nongrantor trusts (see instructions) . . . . .	250,000,000			
<b>11</b> Intangibles used in the United States . . . . .				
<b>12</b> Intangibles used outside the United States . . . . .				
<b>13</b> Loans to U.S. persons . . . . .				
<b>14</b> Loans to foreign persons . . . . .				
<b>15</b> Real property located in the United States . . . . .				
<b>16</b> <b>Real property located outside the United States</b> . . . . .	250,000,000	150,000,000	100,000,000	
<b>17</b> Business property located in the United States . . . . .				
<b>18</b> Business property located outside the United States . . . . .				
<b>19</b> <b>Other assets (see instructions)</b> PERSONAL PROPERTY . . . . .	250,000,000	250,000,000	250,000,000	
<b>20</b> 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	
<b>Liabilities</b>	<b>Amount</b>			
<b>21</b> Installment obligations . . . . .				
<b>22</b> Mortgages, etc. . . . .				
<b>23</b> Other liabilities (see instructions) . . . . .				
<b>24</b> Total liabilities. Add lines 21 through 23 . . . . .	0			
<b>25</b> <b>Net worth.</b> Subtract line 24 from line 20, column (a). . . . .	1,000,000,000			

**Schedule B** | **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 through 7.**

<b>1</b>	U.S. source gross income not effectively connected with the conduct of a U.S. trade or business.				
<b>a</b>	Interest . . . . .	<b>1a</b>	0	00	
<b>b</b>	Dividends . . . . .	<b>1b</b>	0	00	
<b>c</b>	Royalties . . . . .	<b>1c</b>	0	00	
<b>d</b>	Pension distributions . . . . .	<b>1d</b>	0	00	
<b>e</b>	Other . . . . .	<b>1e</b>	0	00	
<b>f</b>	<b>Total.</b> Add lines a through e . . . . .	<b>1f</b>		0	00
<b>2</b>	Gross income that is effectively connected with the conduct of a U.S. trade or business . . . . .	<b>2</b>		0	00
<b>3</b>	Income from the performance of services in the United States . . . . .	<b>3</b>		0	00
<b>4</b>	Gains from the sale or exchange of:				
<b>a</b>	Property (other than stock or debt obligations) located in the United States . . . . .	<b>4a</b>		0	00
<b>b</b>	Stock issued by a U.S. domestic corporation . . . . .	<b>4b</b>		0	00
<b>c</b>	Debt obligations of U.S. persons or of the United States, a state or political subdivision thereof, or the District of Columbia . . . . .	<b>4c</b>		0	00
<b>d</b>	<b>Total.</b> Add lines a through c . . . . .	<b>4d</b>		0	00
<b>5</b>	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) . . . . .	<b>5</b>		0	00
<b>6</b>	<b>Gains on certain exchanges of property that ordinarily would not be recognized (see instructions)</b>	<b>6</b>		0	00
<b>7</b>	Income received or accrued by certain foreign corporations (see instructions) . . . . .	<b>7</b>		0	00
<b>8</b>	Add lines 1f, 2, 3, 4d, 5, 6, and 7 . . . . .	<b>8</b>		0	00
<b>9</b>	Gross income from all other sources . . . . .	<b>9</b>		0	00
<b>10</b>	<b>Total.</b> Add lines 8 and 9 . . . . .	<b>10</b>		0	00

**Sign Here**

Under penalties of perjury, I declare that I have examined this form, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than filer) is based on all information of which preparer has any knowledge.

Your signature \_\_\_\_\_ Date \_\_\_\_\_

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶
	Firm's address ▶				Phone no.