

**Initial and Annual Expatriation Statement**  
For calendar year 2022 or other tax year beginning \_\_\_\_\_, 2022, and ending \_\_\_\_\_, 20\_\_\_\_\_  
Go to [www.irs.gov/Form8854](http://www.irs.gov/Form8854) for instructions and the latest information.  
Please print or type.

Name \_\_\_\_\_ Identifying number (see instructions) \_\_\_\_\_

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

- 1 Mailing address and telephone number where you can be reached after expatriation \_\_\_\_\_
- 2 Address of principal foreign residence (if different from line 1) \_\_\_\_\_
- 3 Country of tax residence (if different from line 2) \_\_\_\_\_
- 4 Check the box that applies. See instructions.
  - Initial expatriation statement for persons who expatriated in 2022. Complete Part II.
  - Annual expatriation statement for persons who expatriated before 2022. Complete Part III.
- 5 Date of expatriation under section 877A(g)(3) for expatriating citizens and long-term residents. See instructions.
  - Citizen \_\_\_\_\_
  - Long-term resident \_\_\_\_\_
  - Long-term resident with dual residency in a treaty country. Date commencing to be treated, for tax purposes, as a resident of the treaty country \_\_\_\_\_
- 6 List all countries (including the United States) of which you are a citizen (see instructions).
  - a Name of country \_\_\_\_\_
  - b Date you became a citizen of each country listed in line 6a (see instructions). \_\_\_\_\_
- 7 How you became a U.S. citizen  By birth  By naturalization
- 8 Date you became a U.S. lawful permanent resident \_\_\_\_\_

INTERNAL USE ONLY  
DRAFT AS OF  
September 29, 2022

**Part II Initial Expatriation Statement for Persons Who Expatriated in 2022**

**Section A Expatriation Information**

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

1st Year	2nd Year	3rd Year	4th Year	5th Year
Before Expatriation	Before Expatriation	Before Expatriation	Before Expatriation	Before Expatriation
\$ _____	\$ _____	\$ _____	\$ _____	\$ _____
- 2 Enter your net worth on the date of your expatriation for tax purposes . . . . . \$ \_\_\_\_\_
- 3 Did you become at birth a U.S. citizen and a citizen of another country, and do you continue to be a citizen of, and taxed as a resident of, that other country? . . . . .  Yes  No
- 4 If you answered "Yes" to question 3, have you been a resident of the United States for not more than 10 of the last 15 tax years (including the year of your expatriation)? . . . . .  Yes  No
- 5 Were you under age 18½ on the date you expatriated and have you been a U.S. resident for not more than 10 tax years? . . . . .  Yes  No
- 6 Do you certify under penalties of perjury that you have complied with all of your tax obligations for the 5 preceding tax years? See instructions . . . . .  Yes  No

**Section B Balance Sheet**

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

<b>Assets</b>		<b>(a) Fair market value (FMV)</b>	<b>(b) U.S. adjusted basis</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 . . . . .		
<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>	Provide the name, address, and EIN, if any, of any such company . . . . .		
<b>6</b>	Pensions or similar retirement arrangements (both U.S. and foreign). See instructions . . . . .		
<b>7</b>	Deferred compensation (including stock options). See instructions . . . . .		
<b>8</b>	Partnership interests. See instructions . . . . .		
<b>9</b>	Assets held in trust. See instructions . . . . .		
<b>10</b>	Beneficial interests in trusts not included in line 9. 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>	Real property located outside the United States . . . . .		
<b>17</b>	Business property located in the United States. . . . .		
<b>18</b>	Business property located outside the United States. . . . .		
<b>19</b>	Other assets. See instructions . . . . .		
<b>20</b>	Total assets. Add lines 1 through 5 and lines 6 through 19. Don't include amounts on line 5a in this total . . . . .		
<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 . . . . .		
<b>25</b>	<b>Net worth.</b> Subtract line 24 from line 20, column (a) . . . . .		



**Section D Deferral of Tax**

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

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

If you checked the "Yes" box, continue to line 2. Otherwise, don't complete lines 2 through 5.

<b>2</b>	Enter the total tax you would have reported, absent the deferral election, on Form 1040 or 1040-SR, line 24, for the part of the year including the day before the expatriation date absent the deferral election . . . . .	<b>2</b>	
<b>3</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>3</b>	
<b>4</b>	Subtract line 3 from line 2. <b>This is the amount of tax eligible for deferral</b> . . . . .	<b>4</b>	
<b>5</b>	Enter the total tax deferred from Part II, Section C, line 4, column (g) . . . . .	<b>5</b>	
	<ul style="list-style-type: none"> <li>If you are filing Form 1040 or 1040-SR, enter this amount in brackets to the left of the entry space for line 24. Identify as "EXP."</li> <li>If you are filing Form 1040-NR, enter this amount in brackets to the left of the entry space for line 24. Identify as "EXP."</li> </ul>		

**Part III Annual Expatriation Statement for Persons Who Expatriated Before 2022**

- If you made an election to defer the payment of tax, complete line 1.
  - If you have an item of eligible deferred compensation, complete line 2.
  - If you are a beneficiary of a nongrantor trust, complete line 3.
- 1** Complete columns (a), (b), and (c) for all property on which you deferred tax on a prior year Form 8854. Complete column (d) for any property you disposed of in 2022 and see the instructions for Part III.

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

**Part III Annual Expatriation Statement for Persons Who Expatriated Before 2022** *(continued)*

**2** Did you receive any distributions of eligible deferred compensation items for 2022? . . . . .  **Yes**  **No**  
 If "Yes," enter the amount of distribution(s) and amount withheld at source, if any, below.

	Amount of distribution	Amount withheld at source, if any
<b>1</b>		
<b>2</b>		
<b>3</b>		

**3** Did you receive any distributions from a nongrantor trust for 2022? . . . . .  **Yes**  **No**  
 If "Yes," enter the amount of distribution(s) and amount withheld at source, if any, below.

	Amount of distribution	Amount withheld at source, if any
<b>1</b>		
<b>2</b>		
<b>3</b>		

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

**Sign Here**

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

**Paid  
Preparer  
Use Only**

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.	

**September 29, 2022**