

Form **708**
(December 2025)
Department of the Treasury
Internal Revenue Service

**United States Return of Tax for Gifts and Bequests Received
From Covered Expatriates**

Go to www.irs.gov/Form708 for instructions and the latest information.
For covered gifts or bequests received during calendar year 20 .

OMB No. 1545-XXXX

Part I General Information (see instructions)

1 Recipient's first name and middle initial, or name of trust		2 Recipient's last name	3 Identifying number
4a Address (number and street). If you have a P.O. box, see instructions.		4b Apt. or suite no.	
4c City, town, or post office. For foreign addresses, also complete lines 4f, 4g, and 4h.		4d State	4e ZIP code
4f Foreign country name		4g Foreign province/state/county	4h Foreign postal code
5 Name of fiduciary		6 Title of fiduciary	

- | | Yes | No |
|--|-----|----|
| 7 Did you receive a covered gift or covered bequest from a covered expatriate? If "Yes," complete Part IV, Section 1 | | |
| 8 Did you receive a distribution from a non-electing foreign trust? If "Yes," complete Part IV, Section 2; and Part VI | | |
| 9 Did you extend the date to file this Form 708? | | |
| 10 Are you filing a protective Form 708? | | |
| 11a Are you an individual? If "Yes," answer 11b, and go to line 16 | | |
| b Check whether: ☐ U.S. citizen ☐ U.S. resident (noncitizen) | | |
| 12 Are you a domestic trust? If "Yes," go to line 14 | | |
| 13a Are you a foreign trust? If "Yes," complete (as instructed) lines 13b–13f, and go to line 15 | | |
| b Are you electing to be treated as a domestic trust pursuant to section 2801(e)(4)(B)(iii)? If "Yes," go to line 15, and complete Part VII and VIII | | |
| c Do you already have a valid election in effect to be treated as a domestic trust pursuant to section 2801(e)(4)(B)(iii) for the current year? | | |
| d If line 13c is "Yes," enter the calendar year for which the Form 708 making the election was filed: _____ | | |
| e Are you terminating an election to be treated as a domestic trust pursuant to section 2801(e)(4)(B)(iii)? | | |
| f Has the identity or address of your U.S. agent changed since you last filed Form 708? If "Yes," complete Part VII, Section 1 | | |
| 14 Did you become a migrated foreign trust described in Reg. section 28.2801-4(a)(2)(iv) during this year? If "Yes," complete Part VII, Section 2 | | |
| 15 If line 13b or line 14 is "Yes," did you receive a covered gift or covered bequest in a prior calendar year? If "Yes," complete Part IV, Section 3 | | |
| 16 Were gift or estate taxes paid to a foreign country with respect to covered gifts or covered bequests reported on this return? If "Yes," complete Part V | | |

Part II Tax Computation (see instructions)

1 Total value of covered gifts and bequests (from Part IV, Section 4, line 4)	1	
2 Amount of section 2801(c) exclusion for the calendar year. See instructions	2	
3 Taxable amount. Subtract line 2 from line 1	3	
4 Tax. Multiply line 3 by 40% (0.40)	4	
5 Foreign tax paid on covered gifts and bequests (from Part V, line 4)	5	
6 Total tax. Subtract line 5 from line 4. If zero or less, enter -0-	6	
7 Amount paid with Form 7004	7	
8 Tax due. If the amount on line 6 is more than the amount on line 7, subtract line 7 from line 6. For details on how to pay, go to www.irs.gov/Payments or see the instructions	8	
9a Overpayment. If the amount on line 7 is more than the amount on line 6, subtract line 6 from line 7. To elect direct deposit for this amount, complete lines 9b, 9c, and 9d	9a	
b Routing number	c Type: ☐ Checking ☐ Savings	
d Account number		

**Sign
Here**

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

Signature

Date

**Paid
Preparer
Use Only**

Preparer's name	Preparer's signature	Date	Check ☐ if self-employed	PTIN
Firm's name	Firm's EIN			
Firm's address	Phone no.			

For Disclosure, Privacy Act, and Paperwork Reduction Act Notice, see the instructions for this form.

Cat. No. 202301

Form **708** (12-2025) Created 5/12/25

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Part IV Covered Gifts and Covered Bequests (see instructions)

If additional entries are needed, duplicate and use this page.

Section 1 – Covered Gifts & Bequests (excluding Distributions From Non-Electing Foreign Trust)

1 Enter, in the order received, the covered gifts and covered bequests received during the calendar year.

(a) Item number	(b) Name of covered expatriate donor or decedent	(c) 28.2801-4(d)(8) (ii) election for future interests	(d) Date of receipt	(e) Description of covered gift or covered bequest	(f) Value
A		☐			
A		☐			
A		☐			
A		☐			
A		☐			
A		☐			
A		☐			
A		☐			
A		☐			
A		☐			
A		☐			
A		☐			
A		☐			
A		☐			
A		☐			
A		☐			
A		☐			
A		☐			
A		☐			
2 Add all amounts in column (f)					2
3 Total from column (f) from additional Parts IV, Section 1, attached to this return					3
4 Total covered gifts and covered bequests. Add lines 2 and 3. Enter here and on Part IV, Section 4, line 1					4

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Part IV Covered Gifts and Covered Bequests (see instructions) *(continued)*

If additional entries are needed, duplicate and use this page.

Section 2—Distributions from Non-Electing Foreign Trusts. Complete this section if you received a distribution from a non-electing foreign trust attributable to covered gifts or bequests. You must first complete Part VI for each non-electing foreign trust from which you received a distribution.

1 Enter, in the order received, the distributions received during the calendar year.

(a) Item number	(b) Description of distributed property	(c) Date of receipt of distribution	(d) Value of distribution	(e) Section 2801 ratio on date in column (c) (from Part VI, Section 2, column (h))	(f) Value (multiply column (d) by column (e))
B					
B					
B					
B					
B					
B					
B					
B					
B					
B					
B					
B					
B					
B					
B					
B					
B					
B					
B					
B					
2	Add all amounts in column (f)			2	
3	Total from column (f) from additional Parts IV, Section 2, attached to this return			3	
4	Total distributions from non-electing foreign trust. Add lines 2 and 3. Enter here and on Part IV, Section 4, line 2			4	

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Part IV Covered Gifts and Covered Bequests (see instructions) *(continued)*

If additional entries are needed for Section 3, line 1, duplicate and use this page.

Section 3—Covered Gifts or Bequests Received by Electing Foreign Trusts and Migrated Foreign Trusts in Prior Year(s). If you are or were a foreign trust, complete this part to report covered gifts or bequests you received in a prior year if this is the initial calendar year for which: (1) you are making the election to be treated as a domestic trust for purposes of section 2801, or (2) you are treated as a domestic trust as defined in section 7701(a)(30)(E).

1 Section 2801 Ratio. List the initial covered gift or bequest received by you, as a non-electing foreign trust, first, and then list all contributions you received subsequent to the initial covered gift or bequest received as a non-electing foreign trust in chronological order.

(a) Date of foreign trust's receipt of contribution	(b) Value of contribution to foreign trust on date in column (a)	(c) Pre-contribution value of trust	(d) Post-contribution value of trust (add column (b) and column (c))	(e) Pre-contribution value of covered gift or bequest portion of trust (multiply column (c) by column (h) of previous line)*	(f) Is contribution a covered gift or bequest?		(g) Value of covered gift or bequest. If column (f) is "Yes," add column (b) and column (e). If "No," enter amount in column (e).	(h) Section 2801 ratio (divide column (g) by column (d))	(i) Name of covered expatriate	(j) Description of covered gift or bequest
					(i)	(ii)				
					Yes	No				
					☐	☐				
					☐	☐				
					☐	☐				
					☐	☐				
					☐	☐				
					☐	☐				

2 Complete columns (b)–(e) below, to determine the value of covered gifts or bequests received by you, as a non-electing foreign trust in prior year(s).

(a) Item number	(b) Immediately preceding calendar year	(c) Value of trust on Dec. 31 of year listed in column (b)	(d) Last Section 2801 ratio from line 1(h) above on Dec. 31 of year listed in column (b)	(e) Value (multiply column (c) by (d)). Include on Part IV, Section 4, line 3.
C1				

Section 4—Total Covered Gifts and Covered Bequests

1	Total value of Section 1—Covered Gifts and Covered Bequests. Enter amount from Part IV, Section 1, line 4	1	
2	Total value of Section 2—Distributions from Non-Electing Foreign Trust. Enter amount from Part IV, Section 2, line 4	2	
3	Total value of Section 3—Covered Gifts or Bequests Received by Electing Foreign Trusts and Migrated Foreign Trusts in Prior Year(s). Enter amount from Part IV, Section 3, line 2, column (e)	3	
4	Total value of covered gifts or bequests listed on Part IV. Add lines 1 through 3. Enter here and on Part II, line 1	4	

* If this is your initial entry on line 1 and there is no previous column (h) with a ratio, enter zero (-0-).

Part VI Section 2801 Ratio for Distributions Received From Foreign Trust (see instructions)

If additional entries are needed, duplicate and use this page.

If you received a distribution from a non-electing foreign trust, complete and attach this Part VI for each non-electing foreign trust from which you received a distribution reported on Part IV. You must attach the additional information required by the instructions.

Section 1 – Foreign Trust Information

1 Name of distributing foreign trust		2 Name of trustee	
3 Address (number and street). If you have a P.O. box, see instructions.		4 Apt. or suite no.	
5 City, town, or post office. For foreign addresses, also complete lines 8, 9, and 10.	6 State		7 ZIP code
8 Foreign country name	9 Foreign province/state/county		10 Foreign postal code

Section 2 – Section 2801 Ratio. List the initial covered gift or bequest received by the foreign trust first, and then list all contributions received subsequent to the initial covered gift or bequest received by the foreign trust in chronological order.

(a) Date of foreign trust's receipt of contribution	(b) Value of contribution to foreign trust on date in column (a)	(c) Pre-contribution value of trust	(d) Post-contribution value of trust (add column (b) and column (c))	(e) Pre-contribution value of covered gift or bequest portion of trust (multiply column (c) by column (h) of previous line)*	(f) Is contribution a covered gift or bequest?		(g) Value of covered gift or bequest. If column (f) is "Yes," add column (b) and column (e). If "No," enter amount in column (e).	(h) Section 2801 ratio (divide column (g) by column (d))	(i) Name of covered expatriate	(j) Description of covered gift or bequest
					(i)	(ii)				
					Yes	No				
					☐	☐				
					☐	☐				
					☐	☐				
					☐	☐				
					☐	☐				
					☐	☐				
					☐	☐				

* If this is your initial entry on line 1 and there is no previous column (h) with a ratio, enter zero (-0-).

Part VII U.S. Agent and Prior Distributions to U.S. Recipients (see instructions)

If additional entries are needed for Section 2, line 2, duplicate and use this page.

Section 1—U.S. Agent. Complete this part to provide or update information about your U.S. agent.

1 U.S. Agent's first name and middle initial	2 U.S. Agent's last name	3 TIN
4 Address (number and street). If you have a P.O. box, see instructions.		5 Apt. or suite no.
6 City, town, or post office	7 State	8 ZIP code
10 Have you made the required designation of the above-named U.S. agent by filing Form 2848, Power of Attorney and Declaration of Representative? ☐ Yes ☐ No		
11 If "Yes" to line 10, enter the date Form 2848 was filed. If "No," a valid designation of a U.S. agent has not been made		

Section 2—Prior Distributions to U.S. Recipients. Complete this part to disclose all of your prior distributions to U.S. recipients attributable to covered gifts or bequests made before: (1) if you are an electing foreign trust, the initial effective date of the domestic trust election made on this return, or (2) if you are a migrated foreign trust, the date that you became a domestic trust.

1 Check this box if you have not made any prior distributions to U.S. recipients attributable to covered gifts or bequests: ☐

2 Enter prior distributions to U.S. recipients. You must first complete Part IV, Section 3, line 1, to determine your Section 2801 ratio.

(a) Date of distribution	(b) Name of U.S. recipient	(c) Address of U.S. recipient	(d) TIN of U.S. recipient	(e) Description of distribution	(f) Value of distribution	(g) Section 2801 ratio on date in column (a) (from Part IV, Section 3, line 1, column (h))	(h) Value of distribution attributable to covered gifts or bequests (multiply column (f) by column (g))

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Part VIII

Declaration of Foreign Trustee. Complete this part if you are electing to be treated as a domestic trust.

By my signature below, I, as the trustee of a foreign trust that is electing to be treated as a domestic trust pursuant to section 2801(e)(4)(B)(iii), hereby agree to timely file a return to report each covered gift and covered bequest made to the trust in accordance with Reg. 28.2801-5(d)(3) and, under penalties of perjury, I declare that each permissible distributee was notified that I am making (or have made) the election as of January 1 of the calendar year for which this Form 708 is filed.

1 Name of electing foreign trust

2 Signature	3 Title	4 Date
Name		

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