

S 2769

A bill to amend the Internal Revenue Code of 1986 to prevent the continued use of renouncing United States citizenship as a device for avoiding United States taxes.

Congress: 107 (2001–2003, Ended)

Chamber: Senate

Policy Area: Taxation

Introduced: Jul 22, 2002

Current Status: Read twice and referred to the Committee on Finance.

Latest Action: Read twice and referred to the Committee on Finance. (Jul 22, 2002)

Official Text: <https://www.congress.gov/bill/107th-congress/senate-bill/2769>

Sponsor

Name: Sen. Harkin, Tom [D-IA]

Party: Democratic • **State:** IA • **Chamber:** Senate

Cosponsors (1 total)

Cosponsor	Party / State	Role	Date Joined
Sen. Stabenow, Debbie [D-MI]	D · MI		Jul 22, 2002

Committee Activity

Committee	Chamber	Activity	Date
Finance Committee	Senate	Referred To	Jul 22, 2002

Subjects & Policy Tags

Policy Area:

Taxation

Related Bills

Bill	Relationship	Last Action
107 HR 4880	Identical bill	Jun 6, 2002: Referred to the House Committee on Ways and Means.

Summary (as of Jul 22, 2002)

Amends the Internal Revenue Code to establish that all property of "covered expatriates" shall be treated as sold on the day before the "expatriation date" for its fair market value, and that gain and loss shall be taken into account for the taxable year of the sale (with proper subsequent adjustment). Defines "expatriate" and "expatriation date."

Permits an individual to make an irrevocable decision to defer the additional tax attributable to such property provided that adequate security is furnished and that the individual waives any rights under treaties of the United States that would preclude assessment or collection of relevant tax.

Excludes certain "United States real property interests" and interest in certain retirement plans from counting as sold under this Act. Establishes special rules applicable to "covered expatriates" interests in trusts and qualified trusts, including a tax in instances of the latter. Sets forth that such tax shall be replaced by another tax under certain delineated conditions, including if a trust ceases to be a qualified trust.

Imposes a tax on "covered gifts and bequests" of more than \$10,000 from expatriates to American citizens and residents, with certain specified exceptions.

Actions Timeline

- **Jul 22, 2002:** Introduced in Senate
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