This is a submission of comments to the working group on how tax policy has affected Americans living abroad.

As an American resident in England for 35 years, I have found that remaining compliant with the FATCA, FBAR and US tax regulations is taking an unreasonable amount of time and, with the complexities due to being a resident in a foreign country, the professional fees to help with these forms are unaffordable and out of proportion when there is no tax due.

Decades ago I use to spend up to a couple of days completing my US tax return, but over the years this has increased to a couple of weeks. More time is needed trying to understand the changes in the regulations, pull together the additional information needed, and complete many more pages for the tax return. I have also found it more difficult obtaining answers to queries. One year I had planned to travel to the embassy in London for help in understanding a new form that needed completing. Fortunately I phoned the office first to check if they would be able to help me with my queries on this form and the response was that no one at their office knew how to complete that form. At least I didn't waste time and expense going to London, but I needed to spend many more hours reading the legislation and ended up paying $700 for professional help limited to answering a few queries. When trying to receive help from the IRS, sometimes the response has been very helpful, but other times the response has been that it was outside their remit to help and I was directed to use the website or pay a professional. Quotes for help in completing my whole tax return came to over a month of my salary, which I cannot afford and is unreasonable. In comparison, completing my UK tax return takes me no more than half a day, and if I were to pay a professional, the cost would be around $150. My US tax return comes to over 100 pages, plus there is also the need to repeat some of this information for the FBAR submission. My UK tax return comes to only 15 pages.

I also worry about the protection of the data in my US tax return, as it includes the details of all my bank accounts, investments, and pension funds, which could be fraudulently taken should this information fall into the wrong hands.

For me, to be able to survive in the UK workplace, I need to be equal to other British professionals in my field and not be disadvantaged due to being a US Citizen. Most roles in my profession require me to be a signatory on my UK employer's bank accounts, and UK employers may not wish to have a US citizen as signatory if it means that their financial information will be transmitted to a foreign government agency. There is also the worry that I and my employer may be excluded access to European bank accounts or other financial products and possibly have additional fees imposed, due to my being a US citizen. When I retire in the UK, I would like to continue to use my skills for local charities, but I would not feel comfortable offering my help under the current regulations.

As I plan to retire in the UK, I need full access to UK savings and UK pension products and certainty as to how they are taxed. Americans are told to avoid certain financial products abroad and I have been told to avoid certain UK pension products as there is uncertainty as to their US tax treatment. American's living abroad may not wish to invest in US products, due to the risks in changes in exchange rates, and need the freedom to invest in the products recommended by professional advisors in their countries.

Due to these issues, I have felt it necessary to renounce my American citizenship. I may no longer be a US citizen, but I will always be American in my heart and am concerned about the harm the FATCA regulations are doing to American citizens abroad and to the reputation of the US in the eyes of businesses around the world. With the US being the only industrialised nation that uses Citizenship-based taxation, I **hope** that the US government will replace this with Residence-based taxation, such as that set out by American Citizens Abroad, and to bring in Same Country Exception for FATCA. If this were in place, then I and many other Americans would not feel it is necessary to give up their US citizenship in order to live abroad. If this change cannot be put into place, than an alternative would be to raise the filing status for the tax return and FBAR for those who are bonafide residents abroad.

Jody Sharp
Mobile: [redacted]
[redacted]

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