Dear Sir or Madam,

I am an overseas voter from California, currently living in the UK. As I'm sure you know, there are, according to State Department estimates, **7.6 million Americans living and working around the globe**, the vast majority of whom are law-abiding citizens who feel strong ties to their homeland and serve as unofficial ambassadors for its image and its goods and services around the globe.

You are certainly also aware that, even though those who work in their host countries are taxed by those same countries, they are also subject to income taxation by the United States, virtually the only country to tax domestically on the basis of residence and internationally on the basis of citizenship.

What you may not realize is that, in addition to this potential double tax liability, many US citizens face problems abroad that are due only to legislation crafted in the United States without taking into account the particular circumstances of overseas Americans. One of these problems, the most widely covered in the press today and currently the most harmful for America's overseas population, is **the loss of access to financial services, both at home and abroad, largely due to the Foreign Account Tax Compliance Act of 2010 (FATCA)**. Because of FATCA, foreign financial institutions are closing the accounts of Americans because the reporting obligations are too burdensome; foreign spouses and partners are removing Americans from jointly-held bank accounts to avoid what they consider invasive intrusion into their personal and/or business affairs; American entrepreneurs and NGO leaders are becoming unwelcome in joint business ventures and non-profit organizations abroad, etc.

As a US citizen abroad, I urge you to consider three possible solutions:

1. Implement Residence-Based Taxation as a wholesale replacement for citizenship-based taxation.
2. Support a definition of "foreign" in Treasury and IRS regulations which excludes financial accounts already reported in the country of bona fide residence.
3. Support a general and complete IRS amnesty for a limited period of time to allow the *non-willful* non-compliant US taxpayer to enter the system without fear of penalties.

Yours sincerely,

Mark Stanford

[redacted]