To the Committees Reviewing Tax Reform as it pertains to Citizens Living Abroad

I welcome the opportunity to express our feelings on taxation based on citizenship

I am a dual citizen, Canadian and US. I was born in Buffalo, a premature birth. I was registered as a Canadian born abroad by my father. I am 65 plus years old and have been a Canadian citizen all my life. My wife is Canadian, my children are Canadian and our grandchildren are Canadian. I have no ties with the U.S. I rarely go to the U.S., in fact I avoid it. I have never lived, worked or had any education in the U.S.

My wife and I are eighth generation Canadians living in Canada. Our ancestors all resided in Sussex NJ, until the War of Independence. They fought on the British side during that war and the war of 1812-1814.

We have been burdened by the US tax on citizens world-wide. It is a huge frustration for me. We are honest people trying to enjoy our lives in our country but unfortunately with Big Brother (IRS) over our heads.

The World standard is residency based; I prepare my Canadian return in an hour hassle free I never hear from the government except the notice of assessment confirming I filed my taxes properly. I used to work for Revenue Canada - Federal Income Taxation.

The U.S. side is a genuine night mare; I have a professional do my return. I have to prepare FBAR. That takes hours and I am never certain if it what the IRS wants. God forbid there be an error. They keep changing the rules. Canada is not a tax haven as Canadian Finance Minister Jim Flarety pointed out. It is causing all kinds of stress on good people in Canada especially seniors. We want only to live our lives in peace. I am not taxable in the US, my returns are always NIL, I have substantial amount of unused foreign tax credit built up. Why do I have to keep filing? Copy of Jim Flaherty's letter attached.

The stress is unbelievable. I have had health issues. I had a mini stroke ten years ago; I have now lost my speech and ability to write legibly. I had cataract surgery two years ago. I had full knee replacement on the left one in 2013 and five months ago on the right one. **I fear these laws are going to kill me**.

The enforcement of the rules is going back to the high rollers who got caught hiding huge amounts in SWISS banks. They were residents in the U.S. Why should we pay the price of their dishonesty? It was common knowledge for years about numbered SWISS bank accounts. I heard about them when I was ten years old.

Not only that the IRS paid the largest whistle blower fee to a common criminal. Millions of dollars. I know lot of people who will not file because they don't trust the IRS. I can't imagine

the cost of processing these ACA returns. There likely is money to be saved by going resident based taxation.

I want only to retire, enjoy our grandchildren and live in peace. It's not possible until resident based taxation is implemented. I want to rid myself of panic attacks when my thoughts turn to these events.

In summary:

- Canada is not a tax haven
- The average U.S resident citizen will never have to deal with FBAR. Those not resident will.
- The stress it has caused on seniors, grandmothers and fathers, they fear their life saving are going to be stolen by the IRS. There needs to be tolerance, the IRS needs to be controlled.
- There should a standard universal treatment, (residency based tax.)
- A lot of innocent people are going to get hurt
- The IRS is not a trusted agency
- IRS cannot manage world taxation it is too costly, too complicated and they are under servicing the tax payer.
- This is colonialism, plain and simple. The U.S. should not a part of this. Remember the Boston Tea Party …… sometimes conveyed as the start of the American Revolution
- There will be a backlash from these draconian measures.
- Accountants worldwide describe it as a daunting task for the U.S. taxpayer. They are sympathetic
- There is a lack of knowlegable preparers

I do appreciate the opportunity to voice my opinion; a lot of people worldwide have been impacted. For me and others it is an emotional issue. It what happens when unfair laws exists. I sincerely hope it will be changed for the better. It's in your hands to move the country forward.

Robert S Clendening CPA, CGA

Canadian - Charted Professional Accountant