Finance Committee
United States Senate

Re: Individual Income Tax; American Overseas – Input to Senate Finance Committee

Ladies and Gentlemen,

Thank you very much for your solicitation of input from Americans on how to address fundamental issues in our individual taxation system for United States Citizens and Residents.

I write to you as a United States citizen that resides outside of America. I reside in France and have done so since 1965.

There are two issues that are critical to me as an American residing overseas:

- Repeal of FATCA (Foreign Account Tax Compliance Act)
- Residence-based Taxation

I know others are providing more detailed submissions with more detailed analysis on these issues so I thought I would just provide you some concrete example of how FATCA has significantly negatively impacted my life and decreased the ability of America to export goods and services through the support of Americans overseas.

I have dual nationality and my husband is 100% French. I have lived outside the USA for 50 years and my husband and I have never lived, worked in or had property in the USA. Nor have we ever filed a US tax return. We live, vote, and pay all our taxes here, at home, in France.
Being 100% French, my husband will NEVER file a US tax return. The whole idea is absurd. The IRS informed me we are obliged to file a joint-return. Hence even if I were willing to file a US return, **which I am not,** I could not do so without my husband. I've had many sleepless nights trying to figure out what to do.
Both FATCA and worldwide taxation discussions are tearing us apart as a couple. It is difficult for an American to understand and totally incomprehensible for a non-American. We are fighting with our bank. My husband has shouting matches with our French elected officials. Even to renounce my US citizenship has become complicated. We will not divorce. What we are working on is how best to resist. We are worried about our retirement savings and our house. We are worried about what will happen to me if my husband should die first and I am still American. We are angry with our bank, we are angry with our home country, France, for accepting that a foreign law be applied here, and we are angry with America for voting such a stupid destructive law. By destroying the lives, reputations, businesses of Overseas Americans, America is destroying the trust and networks it needs to function smoothly on the world stage. Overseas Americans are (or were?) America's best unpaid diplomats. How dare the US government criminalize us.

As a result, I believe that FATCA should be repealed in its entirety.

Sincerely,
Susan Holt
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