Form **8854**

Department of the Treasury
Internal Revenue Service

Initial and Annual Expatriation Statement

Go to *www.irs.gov/Form8854* for instructions and the latest information.
Please print or type.

OMB No. 1545-0074

2025

Attachment Sequence No. **112**

For calendar year 2025, or tax year beginning , 2025, and ending , 20 .

Name

Identifying number (see instructions)

Part I General Information. For all filers.

1 Mailing address and telephone number where you can be reached after expatriation

2 Address of principal foreign residence (if different from line 1)

3 Country of tax residence (if different from line 2)

4 Check the box that applies. See instructions.

- ☐ Initial expatriation statement for persons who expatriated in 2025. Complete Part II.
- ☐ Annual expatriation statement for persons who expatriated before 2025. Complete Part III.

5 Date of expatriation under section 877A(g)(3) for expatriating citizens and long-term residents (see instructions).

- ☐ Citizen
- ☐ Long-term resident
- ☐ Long-term resident with dual residency in a treaty country. Date commencing to be treated, for tax purposes, as a resident of the treaty country

6 List all countries (including the United States) of which you are a citizen. See instructions.

a Name of country

b Date you became a citizen of each country listed on line 6a (see instructions)

7 How you became a U.S. citizen ☐ By birth ☐ By naturalization

8a Date you became a U.S. lawful permanent resident

b Date your U.S. lawful permanent resident status was revoked or abandoned (see instructions)

c Date you relinquished your permanent resident card (see instructions)

Part II Initial Expatriation Statement for Persons Who Expatriated in 2025

Section A Expatriation Information

1 Enter your U.S. income tax liability (after foreign tax credits) for the 5 tax years ending before the date of your expatriation.
Caution: These amounts are not your balance due. See instructions.

1st Year Before Expatriation	2nd Year Before Expatriation	3rd Year Before Expatriation	4th Year Before Expatriation	5th Year Before Expatriation
$	$	$	$	$

2 Enter your net worth on the date of your expatriation for tax purposes . . . . . $

3 Have there been significant changes in your assets and liabilities for the 5 years ending before the date of your expatriation? See instructions . . . . . ☐ **Yes** ☐ **No**
If "Yes," attach an explanation.

4 Did you become at birth a U.S. citizen and a citizen of another country, and do you continue to be a citizen of, and taxed as a resident of, that other country? . . . . . ☐ **Yes** ☐ **No**

5 If you answered "Yes" to question 4, have you been a resident of the United States for not more than 10 of the last 15 tax years (including the year of your expatriation)? . . . . . ☐ **Yes** ☐ **No**

6 Were you under age 18½ on the date you expatriated and have you been a U.S. resident for not more than 10 tax years? . . . . . ☐ **Yes** ☐ **No**

7 Do you certify under penalties of perjury that you have complied with all of your tax obligations for the 5 preceding tax years? See instructions . . . . . ☐ **Yes** ☐ **No**

Section B Balance Sheet

List in U.S. dollars the fair market value (FMV) and the U.S. adjusted basis of your assets and liabilities as of your expatriation date. For lines 6 and 7, list in U.S. dollars the present value of your pensions and deferred compensation interests as of your expatriation date. For more details, see the instructions.

	Assets	(a) FMV	(b) U.S. adjusted basis
1	Cash, including bank deposits		
2	Marketable stock and securities issued by U.S. companies		
3	Marketable stock and securities issued by foreign companies		
4	Nonmarketable stock and securities issued by U.S. companies		
5	Nonmarketable stock and securities issued by foreign companies		
a	Separately state stock issued by foreign companies that would be controlled foreign corporations if you were still a U.S. citizen or permanent resident. See instructions		
b	Provide the name, address, and EIN, if any, of any such company		
6	Pensions or similar retirement arrangements (both U.S. and foreign) (see instructions)		
7	Deferred compensation (including stock options) (see instructions)		
8	Partnership interests (see instructions)		
9	Assets held in trust (see instructions)		
10	Beneficial interests in trusts not included on line 9 (see instructions)		
11	Intangibles used in the United States		
12	Intangibles used outside the United States		
13	Loans to U.S. persons		
14	Loans to foreign persons		
15	Real property located in the United States		
16	Real property located outside the United States		
17	Business property located in the United States		
18	Business property located outside the United States		
19	Other assets (see instructions)		
20	Total assets. Add lines 1 through 5 and lines 6 through 19. Don't include amounts on line 5a in this total		
	Liabilities	**Amount**	
21	Installment obligations		
22	Mortgages, etc.		
23	Other liabilities (see instructions)		
24	Total liabilities. Add lines 21 through 23		
25	**Net worth.** Subtract line 24 from line 20, column (a)		

Section C Property Owned on Date of Expatriation

Don't complete Section C if:

- Your average net income tax liability for the 5 tax years immediately before expatriation (see line 1 in Section A) wasn't more than $206,000.00, your net worth on the date of your expatriation (see line 2 in Section A) was under $2 million, and you checked "Yes" on line 7 in Section A;
- In Section A, you checked "Yes" on lines 4, 5, and 7; or
- In Section A, you checked "Yes" on lines 6 and 7.

1a Do you have any **eligible deferred compensation items**? Checking the "Yes" box is an irrevocable waiver of any right to claim any reduction in withholding for such eligible deferred compensation item under any treaty with the United States . . . . . ☐ **Yes** ☐ **No**

b Do you have any **ineligible deferred compensation items**? If "Yes," you must include in income the present value of your account on the day before your expatriation date . . . . . ☐ **Yes** ☐ **No**

c Do you have an interest in a **specified tax deferred account**? If "Yes," you must include in income the amount of your entire interest in the account on the day before your expatriation date . . . . . ☐ **Yes** ☐ **No**

d Are you a beneficiary of a **nongrantor trust**? See instructions . . . . . ☐ **Yes** ☐ **No**

☐ Check this box to elect under section 877A(f)(4)(B) to be treated as having received the value of your entire interest in the trust (as determined for purposes of section 877A) as of the day before your expatriation date. Attach a copy of your valuation letter ruling issued by the IRS. See instructions.

2 Recognition of gain or loss on the deemed sale of mark-to-market property. **Caution: Don't include in column (a) any property described on line 1a, 1b, 1c, or 1d.**

Complete column (g) only if you are deferring tax on gain from any property listed in column (a).

(a) Description of property	**(b)** FMV on day before date of expatriation	**(c)** Cost or other basis*	**(d)** **Gain or (loss).** Subtract (c) from (b)	**(e)** Gain after allocation of the exclusion amount (see instructions)	**(f)** Form or schedule on which gain or loss is reported	**(g)** Amount of tax deferred (attach computations)
3 **Total.** Add the amounts in column (d) and column (e) . . .						
4 **Total tax deferred.** Add the amounts in column (g). Enter here and on Part II, Section D, line 5						

* You must identify as "(h)(2)" any property for which you are making the special basis election under section 877A(h)(2). This election is irrevocable. See the instructions for Part II, Section C, line 2, column (c).

Section D Deferral of Tax

Election to defer tax. You can defer tax only if you enter into a tax deferral agreement with the IRS. See instructions.

1 Are you electing to defer tax under section 877A(b)?

Checking the "Yes" box is an irrevocable waiver of any right under any treaty of the United States that would prevent assessment or collection of any tax imposed because of section 877A . . . . . ☐ **Yes** ☐ **No**

If you checked "Yes" on line 1, continue to lines 2 through 5. Otherwise, continue to Part III.

2	Enter the total tax you would have reported, absent the deferral election, on Form 1040 or 1040-SR, line 24, for the part of the year including the day before the expatriation date	**2**	
3	Enter the total tax for the same part of the tax year determined without regard to the amounts attributable to section 877A(a). Attach computation	**3**	
4	Subtract line 3 from line 2. **This is the amount of tax eligible for deferral**	**4**	
5	Enter the total tax deferred from Part II, Section C, line 4, column (g)	**5**	
	• If you are filing Form 1040, 1040-SR, or 1040-NR, enter this amount in brackets to the left of the entry space for line 24. Identify as "EXP."		

Part III Annual Expatriation Statement for Persons Who Expatriated Before 2025

- If you made an election to defer the payment of tax, complete line 1.
- If you have an item of eligible deferred compensation, complete line 2.
- If you are a beneficiary of a nongrantor trust, complete line 3.

1 Complete columns (a), (b), and (c) for all property on which you deferred tax on a prior-year Form 8854. Complete column (d) for any property you disposed of in 2025 and see the instructions for Part III.

(a) Description of property	**(b)** Amount of mark-to-market gain or (loss) reported on prior-year Form 8854	**(c)** Amount of tax deferred on prior-year Form 8854	**(d)** Date of disposition (if any)

Part III **Annual Expatriation Statement for Persons Who Expatriated Before 2025** *(continued)*

2 Did you receive any distributions of eligible deferred compensation items for 2025? . . . . . ☐ **Yes** ☐ **No**
If "Yes," enter the amount of distribution(s) and amount withheld at source, if any, below.

	Amount of distribution	Amount withheld at source, if any
1		
2		
3		

3 Did you receive any distributions from a nongrantor trust for 2025? . . . . . ☐ **Yes** ☐ **No**
If "Yes," enter the amount of distribution(s) and amount withheld at source, if any, below.

	Amount of distribution	Amount withheld at source, if any
1		
2		
3		

Sign Here

Under penalties of perjury, I declare that I have examined this form, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than filer) is based on all information of which preparer has any knowledge.

Your signature	Date

Paid Preparer Use Only

Preparer's name	Preparer's signature	Date	Check ☐ if self-employed	PTIN

Firm's name	Firm's EIN
Firm's address	**Phone no.**