

ATTN: International Tax Reform Working Group

Dear Representative Nunes and Blumenaur,

I am writing to ask that the International Taxation Committee of the Ways & Means Committee for Tax Reform seriously consider the ACA proposal for reform to Residency-based taxation RBT. See link:

<http://americansabroad.org/files/6513/6370/3681/finalsbrbtmarch2013.pdf>

As one of nearly 7 million American citizens living, working and voting from abroad, and contributing to the economic growth of the U.S. economy, I believe the current Citizenship based taxation regime must be reformed. Current tax policy is negatively affecting this important sector of American and their ability to compete for jobs, grow the US economy through international business and exports, and live overseas. Current tax policy damages both individuals and the welfare of our country.

The following are some examples of the fallout on Americans working overseas from current U.S. Citizenship based taxation:

- Inability to relocate and work internationally
- Denial of job opportunities or job advancement
- Refusal of entry into business partnerships
- Closure or denial of financial instruments (pensions, insurance policies, bank accounts, etc.)
- Exposure to double taxation or increased tax burden
- Financially ruinous penalties due to broad application of criminal tax evasion regulations on those making simple filing errors due to complexity of the US tax code.

I have been personally affected by this situation. I am an American citizen and have lived happily in Switzerland now for 10 years. With the passing of the currently banking laws, most notably the new FACTA regulations, it has become next to impossible to live in Switzerland. I can no longer open a bank account, open a retirement account, open an investment account or take out a mortgage on a house. Things only seem to be getting worse by the day. Banks (notably Raiffeisen, Post Finance) are closing the bank accounts and mortgages of people who's only crime is being American. It's bad enough that the US government basically treats me like a criminal because I live overseas (having to still file taxes and having to declare my bank accounts of the country that I live in) but now Switzerland is also treating me like a criminal. To make matters worse, not only can I not open a bank account in Switzerland, I also can't even open a bank account in the US. So am I supposed to do?

Please seriously consider the RBT proposal submitted by American Citizens Abroad (ACA). A move towards a residence-based system, like the rest of the world, not only would it be simpler and fairer for Americans living abroad, but it would actually bring in MORE tax revenue than the current system, which wastes compliance resources for very little return. RBT would increase United States exports strongly by facilitating American mobility in the global business environment of today's world.

Yours sincerely,

Bryan Patton