

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>

My children are among the 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 Americans 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. My dual national American/Swiss children currently plan to renounce their US citizenship in order to have equal opportunity in Switzerland unless the necessary changes are made to US taxation. They are each fluent in at least 4 languages, college + educated and could be valuable assets to the USA. Being an American now limits their career opportunities and their ability to invest for retirement in Switzerland due to FATCA fallout. They are unwilling to pay more taxes, the high cost for compliance (tax preparers proficient in dual preparations currently charge upwards of \$2000) and have fewer opportunities than their Swiss compatriots. Without changes to remedy this, such as residence-based taxation of Americans, they will renounce their citizenship.

We are dual nationals, Swiss/American, and I currently live in USA. Since FATCA my Swiss bank told me to close the account that I use to pay Swiss bills on my flat there. FATCA infringes greatly on my freedom and rights as a Swiss citizen because I am a US resident! US residents that are citizens of another country should be able to maintain a bank account and to invest in the country of their citizenship so that they can one day return and live there. Americans have the right to maintain US accounts and investments when they live abroad yet FATCA now prevents foreigners living in the US from these same rights.

Residence based taxation is a viable solution for expats. Another solution is required for citizens of other countries living in the US.

Yours sincerely,

Elizabeth Cammack