

# Tax Issues Impacting U.S. Persons Residing Abroad After U.S. Tax Reform

Paul Marcotte presented on October 31, 2018 as part of STEP Mid-Atlantic - Advising Families Across Generations.

Paul, who Chairs the firm's Tax practice group and is a member of its Estate Planning, Estate & Trust Administration and Nonprofit groups, was a panelist for a discussion titled: "Tax Issues Impacting U.S. Persons Residing Abroad After U.S. Tax Reform."

The program included:

U.S. persons living abroad were subject to complex international tax and compliance provisions as a result of the worldwide income and transfer tax regime applicable to U.S. taxpayers, as well as local country tax compliance. The 2017 U.S. Tax Reform changed the international tax rules applicable to U.S. persons. This panel talked about how the new rules have impacted U.S. person living abroad as well as other developments.

The panelists presented in a Q&A format and discussed a number of issues, including:

- U.S. tax compliance developments
- How to remediate U.S. tax filing omissions
- FBAR developments
- The new U.S. international tax regimes for U.S. persons owning non-U.S. corporations
- GILTI Developments
- Section 962 Developments
- Interesting PFIC Case
- Tax Planning After the Repeal of the "30 Day" Subpart F Rule
- Future IRS/Treasury Guidance
- There will be an opportunity to pose questions