

# TAX ADVICE

## for the Mobile Foreign Executive

### PART 2

He has prepared successful Reasonable Cause Statements submitted to the IRS under the two Streamlined programs, enabling U. S. taxpayers to prevent assertion of penalties by IRS for their prior noncompliance.

*In our normally mobile world (when not in the midst of a pandemic), US tax practitioners are often asked to advise foreign executives who are considering an extended US-based work assignment about the US tax consequences of becoming a green card holder and a permanent US resident. It is important for practitioners who provide services to these clients to develop expertise in the particular tax laws that affect them. Foreign executives, their spouses, and their children may ultimately plan to leave the United States and return home when a foreign executive retires, abandoning their green cards. Part 1 of this article, published in the Spring 2021 issue of the WealthCounsel Quarterly, addressed the income tax planning for these foreign executives before their move to the United States. Part 2 addresses the exit tax and inheritance tax considerations upon their departure from the United States.*

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