



TaxNewsFlash

United States



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IRS practice unit: Expatriation on or after June 17, 2008—mark-to-market tax regime

The IRS Large Business and International (LB&I) division publicly released a “practice unit”—part of a series of IRS examiner “job aides” and training materials intended to describe for IRS agents leading practices about tax concepts in general and specific types of transactions.

The title of the practice unit is:

- *Expatriation On or After June 17, 2008 – Mark-to-Market (MTM) Tax Regime*

Read the practice unit on the [IRS practice unit webpage](#) (posting date of July 12, 2023).

The practice unit discusses the mark-to-market (MTM) rules under section 877A, which imposes an “exit tax” through a MTM tax regime on the worldwide assets of a “covered expatriate” (CE).

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