

#### **D. Summary**

There are several potential purposes that a tax regime for former citizens and former long-term residents could serve. The design of the taxing regime and evaluation of the effectiveness of the regime depends on one's view of the appropriate purpose for the regime. Congress has indicated that the present-law alternative tax regime is intended to serve the purpose of removing the tax incentives for citizenship relinquishment or residency termination. The scope of this review, therefore, is limited to analyzing the present-law rules to determine whether they are effective in achieving that purpose.