- 1 by filing or eausing to be filed with the Secretary or his
- 2 delegate a true and accurate return, in the manner prescribed
- 3 in subtitle F (sec. 6001 and following, relating to procedure
- 4 and administration), including therein all the information
- 5 which the Secretary or his delegate may deem necessary
- 6 for the calculation of such deductions and credits. This sub-
- 7 section shall not be construed to deny the credits provided
- 8 by sections 31 and 32 for tax withheld at source or the credit
- 9 provided by section 39 for certain uses of gasoline and
- 10 lubricating oil."
- 11 (e) EXPATRIATION TO AVOID TAX.
- 12 (1) Subpart A of part II of subchapter N of chap-
- ter 1 (relating to nonresident alien individuals) is
- amended by redesignating section 877 as section 878,
- and by inserting after section 876 the following new
- 16 section:

17 "SEC. 877. EXPATRIATION TO AVOID TAX.

- 18 "(a) IN GENERAL. Every nonresident alien individ-
- 19 ual who at any time after March 8, 1965, and within the 5-
- 20 year period immediately preceding the close of the taxable
- 21 year lost United States citizenship, unless such loss did not
- 22 have for one of its principal purposes the avoidance of taxes
- ²³ under this subtitle or subtitle B, shall be taxable for such
- 24 taxable year in the manner provided in subsection (b) if the
- 25 tax imposed pursuant to such subsection exceeds the tax