

1 by filing or causing 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 30 for certain uses of gasoline and
 10 lubricating oil."

11 ~~(c)~~ **EXPATRIATION TO AVOID TAX.—**

12 ~~(1)~~ Subpart A of part II of subchapter N of chap-
 13 ter 1 (relating to nonresident alien individuals) is
 14 amended by redesignating section 877 as section 878,
 15 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