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UNITED STATES GENERAL ACCOUNTING OFFICE

WASHINGTON, D.C. 20548

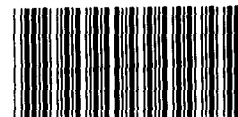
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STATEMENT OF  
JOHNNY C. FINCH, SENIOR ASSOCIATE DIRECTOR  
GENERAL GOVERNMENT DIVISION  
BEFORE THE  
SUBCOMMITTEE ON COMMERCE, CONSUMER  
AND MONETARY AFFAIRS  
COMMITTEE ON GOVERNMENT OPERATIONS  
HOUSE OF REPRESENTATIVES  
ON  
UNITED STATES CITIZENS  
LIVING IN FOREIGN COUNTRIES  
AND  
NOT FILING FEDERAL INCOME TAX RETURNS

Mr. Chairman and Members of the Subcommittee:

We are pleased to be here this morning to assist the Subcommittee in its inquiry into the problem of United States citizens who live in foreign countries and do not file federal income tax returns. Our testimony today is based on work done during the past 11 months in response to this Subcommittee's request. Our work focused primarily on obtaining information

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which would allow us to quantify the extent of the overseas non-filer problem. In so doing, we met with government officials from Austria, Canada, France, West Germany, and the United Kingdom to determine if data was maintained on U.S. citizens residing within their countries.

We found that none of these countries maintained information concerning U.S. citizen residents which was in a form that could be used to identify nonfilers. Further, we identified little information in the U.S. that would be available to IRS in its efforts to identify overseas nonfilers. We used the best information available to GAO to arrive at an overseas non-filing rate--information that is not generally available to IRS. Because of the sensitivity of the information used, the Subcommittee and GAO agreed not to disclose the source of the information.

Based on this information, we estimate that about 61 percent of our sample may be nonfilers. In other words, we found no record of tax returns being filed for tax years 1981 through 1983 by 2,376, or 60.9 percent, of the 3,905 individuals in our sample. While such a rate might seem to indicate a need for further action, the significance of the rate must be qualified in light of the following:

--Our sample was limited to U.S. citizens residing in and around seven cities within four countries--Austria, Italy, Mexico, and West Germany. We chose these seven from an original sample of 46 cities located in nine countries, because they had the largest number of U.S. citizens' social security numbers. In order to match the information with IRS records, social security numbers were necessary.

--The computer program that we used to identify possible nonfilers matched the social security numbers of the individuals in our sample against primary social security numbers shown on tax returns. This means that on joint tax returns, which generally have two social security numbers, one for each spouse, only one of the numbers would have been detected through the computer match. Thus, our results may include a certain number of possible nonfilers who may, in fact, have filed a joint tax return. We used only primary social security numbers because the computer matching was done during the same period that IRS' computer system was almost totally devoted to the processing of income tax returns. This limited the amount of computer time available to us.

--We did not determine whether the possible nonfilers we identified had a tax liability. In order to do this, we would have had to furnish to IRS the identities of those individuals so that IRS could contact them and determine their tax liability, if any. However, since IRS does not generally have access to the information we used, we did not disclose to IRS the identities of the individuals in our sample.

In addition to quantifying the potential overseas nonfiler problem as outlined above, we also performed a limited analysis of IRS' efforts to address the problem. We found one effort that was discontinued and one that has several shortcomings. Our work indicated that:

--IRS' efforts to address the overseas nonfiling problem are hampered because many countries do not routinely collect taxpayer-related information which IRS could use in its information returns program. In addition, about one-third of the information which IRS does receive from foreign countries cannot be used because it is incomplete or is received too late to be used as part of IRS' current year's Information Returns Program.

--IRS does not effectively communicate filing requirements to individuals identified as possible nonfilers. IRS often accepts inaccurate explanations of filing and tax requirements from nonfilers. Rather than closing these cases, as it now does, IRS should educate these individuals about their filing and tax requirements.

I would now like to discuss the overseas nonfiler issue in greater detail.

**IRS SUSPECTS THAT MANY  
U.S. CITIZENS ABROAD  
ARE NOT FILING TAX RETURNS**

All U.S. citizens whose income exceeds the statutory minimum--\$3,300 for individuals in 1984--must file federal income tax returns, even if their earned income is exempt from tax. U.S. citizens residing in foreign countries are subject to the same tax return filing requirements as U.S. citizens residing in the United States. Moreover, U.S. citizens are generally taxed by the United States on their worldwide income no matter where they reside. Most other countries' tax systems are based on residence. That is, citizens of one country earning income while residing in another country must abide by the tax laws of the country where they reside. The income is generally not subject to tax by the country of which they are citizens.

Despite the U.S. filing requirements, IRS believes that many U.S. citizens living overseas are not filing federal income tax returns. IRS' belief is based on statistics regarding the number of U.S. citizens residing abroad and the number of federal tax returns filed by such persons. For example, the State Department estimated that about 1.8 million U.S. citizens lived abroad in 1983. IRS statistics, however, indicate that about 246,000 individual income tax returns were filed in 1983 by U.S. citizens living overseas. Neither of these figures include U.S. military personnel and their families stationed abroad--about 950,000 in 1983.

IRS recognizes that the income of some U.S. citizens living overseas may not exceed the statutory minimum. Thus, some U.S. citizens may not be required to file tax returns. However, based on data developed through several of its compliance programs and the discrepancy between the number of citizens living overseas and the number of tax returns filed, IRS believes that there is an overseas nonfiler problem.

Despite its belief that an overseas nonfiler problem exists, IRS has been hampered in its efforts to quantify the extent or significance of the problem. One reason is that there is little foreign or U.S. information available to IRS that would help it identify overseas nonfilers. Furthermore, the Privacy Act generally precludes IRS from accessing certain nontax information, such as passport applications, which may be useful in addressing the nonfiler problem.

GAO'S RESULTS INDICATE THAT OVERSEAS  
NONFILING POSES A POTENTIAL COMPLIANCE PROBLEM

At the request of this Subcommittee, we attempted to quantify the extent of the overseas nonfiler problem. Based on a limited sample of U.S. citizens living abroad, we found that nonfiling by individuals in the cities we sampled poses a potential compliance problem. However, IRS faces a difficult task in addressing this problem because there is little foreign or U.S. information available to the Service which would be useful to identify nonfilers.

With respect to foreign information, we met with U.S. and foreign government officials in Austria, Canada, France, West Germany, and the United Kingdom to identify possible sources

of information concerning U.S. citizens who live overseas. We learned that while various sources of taxpayer-related information exist, the information is generally not useful to identify nonfilers. This is because foreign tax information generally does not contain references concerning an individual's citizenship. As we mentioned previously, most foreign countries' tax systems are based on residency rather than citizenship. Thus, for example, France is not particularly concerned, for tax purposes, whether individuals are citizens of other countries; its only concern is whether they reside in France. If they do, then their income is generally subject to French tax.

We also identified little information in the U.S. that would be available and useful to IRS in its efforts to identify overseas nonfilers. Further, we found little U.S. information maintained overseas. In this regard, we originally planned to randomly sample the U.S. citizen resident populations living in or around 46 cities located in nine countries. These countries account for about 59 percent of the estimated total U.S. population residing overseas. We found, however, that few of these locations maintained the type of information--names and social security numbers--we needed to make our match. Thus, we had to limit our sample to 3,905 U.S. citizens living in or near locations where that type of information was available, namely Vienna, Austria; Genoa, Florence, and Rome, Italy; Nuevo Laredo and Tijuana, Mexico; and Hamburg, West Germany.

We used the best information available to GAO--information that is not generally available to IRS. After collecting the necessary information, we matched it against IRS' records of tax returns filed for tax years 1981 through 1983. This match indicated that 2,376, or 60.9 percent, of the 3,905 U.S. citizens included in our sample may not have filed federal tax returns during that period. Because of the previously mentioned limitations associated with our data, these individuals should be characterized as possible nonfilers.

Exhibit A presents the results of our match by city and by gender. It shows that the potential nonfiling rate ranges from a low of 37 percent for Nuevo Laredo and Tijuana, Mexico to a high of about 78 percent for Genoa, Italy. In other words, 206 (or 37 percent) of the 557 U.S. citizens living in Nuevo Laredo and Tijuana, Mexico and included in our sample, had not filed a tax return for tax years 1981 through 1983. As for Genoa, Italy, 657 (or 77.7 percent) of the 846 U.S. citizens included in our sample had not filed a return during that period.

Exhibit A also shows that 1,469 (or 71 percent) of the 2,080 females in our sample had not filed tax returns. This rate may be inflated, however, because our match, as previously mentioned, only involved primary social security numbers. Consequently, a number of the females identified in our sample as possible nonfilers, may have filed joint returns with their spouses.

On the other hand, 907 (or 49.7 percent) of the 1,825 males in our sample did not file a tax return for tax years 1981 through 1983. Thus, limiting the focus to only the males in the sample, our results are still indicative of a potential nonfiling problem.

Revenue impact of nonfiling  
was not measured

As stated earlier, we did not determine whether the possible nonfilers we identified had a tax liability. In this regard, the tax liability of U.S. citizens living in foreign countries would be affected by several tax benefits not generally available to domestic taxpayers.

These benefits include (1) excluding up to \$80,000 of foreign earned income from U.S. taxable income and (2) deducting certain foreign housing expenses from U.S. taxable income. U.S. citizens living abroad may also elect to take a credit against their U.S. tax liability for any foreign taxes paid. In this regard, the Joint Committee on Taxation estimated, for example, that the foreign earned income exclusion for U.S. citizens living overseas would result in reduced tax revenues of \$2.6 billion during the period 1982 through 1986.

IRS EFFORTS TO IDENTIFY  
OVERSEAS NONFILERS

The Subcommittee also asked us to review IRS efforts to identify overseas nonfilers. We found two specific efforts--one that was discontinued several years ago and one that is ongoing but has several shortcomings.



Early IRS effort to identify  
U.S. citizens living abroad

An early IRS attempt to identify overseas nonfilers began in the mid-1960's with the State Department's cooperation. The effort involved State Department foreign service post officials requesting U.S. citizens living abroad to complete IRS Form 3966 (Internal Revenue Service Identification of U.S. Citizen Residing Abroad) when they applied for passport and registration services.

The form provided information beneficial to both U.S. citizens and IRS. In terms of benefits for U.S. citizens, the form cited the federal tax responsibilities of U.S. citizens living abroad and provided the U.S. citizen with information regarding the availability of tax information and taxpayer assistance overseas. Regarding benefits for IRS, the form requested information concerning a U.S. citizen's occupation and when and where he or she last filed a federal income tax return. Generally, Form 3966 was the only source of information available to IRS with respect to such U.S. citizens.

IRS initially felt that Form 3966 and the publicity surrounding it would encourage voluntary compliance abroad--IRS estimated that about 60,000 forms would be filed annually once the effort was fully implemented. Expected implementation, however, never occurred primarily because there was no legal requirement that the form be filed. This meant that refusing to complete the form did not preclude a person from receiving passport and registration services from the State Department. IRS and State Department officials told us that U.S. citizens began

complaining that the form violated their privacy rights. As a result, when U.S. citizens learned that completing the form was voluntary, many declined to do so. Because neither the State Department nor IRS had any authority to require completion of the form, IRS decided in 1979 to discontinue its use.

IRS did not measure the effectiveness of Form 3966 and we could not locate any IRS officials who had personal knowledge in that regard. The only indication of the form's effectiveness came from our discussions with tax practitioners located overseas. Several recalled various clients who came to them for filing assistance after being asked to complete a Form 3966.

Current IRS efforts to detect overseas nonfilers

Within its Information Returns Program, IRS has several individual segments to detect nonfilers. One of these, the Nonfilers Program, detects those taxpayers who should, but do not, file tax returns. This program matches information which IRS receives on both magnetic tape and paper documents, such as taxpayers' wages and salaries (Form W-2) and investment income (Form 1099), with income tax returns. The presence of an information document and the absence of a corresponding tax return indicates a possible nonfiling situation. Another segment, the Stopfilers Program, is concerned with those taxpayers who filed tax returns for the previous tax year but not for the current tax year.

Most of the information IRS receives as part of the Information Returns Program comes from domestic sources, such as employers and financial institutions. In addition, IRS receives

tax information from many of the 34 countries which have a tax treaty with the United States. IRS received an average of about 677,000 foreign information returns annually from treaty partners for tax years 1980, 1981, and 1982. The foreign information returns, which vary in form and content on a country-by-country basis, reflect foreign-source income earned by U.S. citizens. Generally, the returns reflect investment income, such as interest and dividends, rather than wages and other income derived from the performance of personal services.

Some of the information IRS receives from foreign countries concerning income earned in those countries by U.S. taxpayers is useful. However, about one-third of the information returns cannot be used. Moreover, IRS does not receive information on all foreign-source income earned by U.S. citizens.

One shortcoming associated with foreign information returns is that IRS cannot process many of them. Although the percentage of processed returns has increased over the last 3 years, IRS remains unable to process a significant portion. For tax year 1982 returns for example, 34 percent of the documents were not processed by IRS. This compares to 48 percent that were not processed in 1980. While these figures show improvement, they indicate that a large percentage of documents are still not processed. Generally, this is because they are (1) incomplete (for example, they contain no taxpayer social security number) or (2) are received too late to be processed as part of IRS' current year's Information Returns Program. We

have discussed foreign information returns previously before this Subcommittee during hearings held in April 1983 and February 1984.

Government officials and private sector representatives overseas told us foreign financial institutions are not that concerned with obtaining taxpayer identification numbers because they do not feel it is their responsibility to help administer U.S. tax laws. Further, requiring prospective investors to provide identification numbers runs counter to most countries' desires to attract foreign investment. Foreign financial institutions believe that requiring such information would merely cause foreign investors who seek anonymity to take their investments elsewhere.

The foreign information documents both processed and not processed by IRS represent large sums of foreign-source income. Until 1983, IRS recorded the income reflected on both processed and nonprocessed returns. The 342,600 foreign returns received and processed by IRS for tax year 1980 reflected \$394 million in foreign-source income received by individual U.S. taxpayers. The 321,700 returns which were not processed reflected \$323 million in foreign-source income received. In 1983, IRS stopped recording the amount of income reflected on the nonprocessed returns. Foreign returns for 1981 and 1982 were processed after that cutoff date and reflected about \$485 million and \$459 million of foreign-source income received by U.S. citizens, respectively. Income figures for the nonprocessed returns are not available, however. Further, a September 1984 IRS Internal

Audit report entitled "The Service's Use of Information Reports and Documents on International Transactions," indicated that a portion of the income reflected on the foreign returns is paid to taxpayer agents or nominees. Thus, the returns do not identify the individuals who ultimately receive the income.

Another shortcoming associated with the foreign information returns is that not all U.S. treaty partners collect information which they can provide to IRS. For example, while 33 of the U.S.' 34 tax treaties contain exchange of information provisions, only 17 treaty partners provided information returns to IRS for tax year 1982. Some of the tax treaty countries which provided no foreign information returns were Belgium, Italy, Korea, the Netherlands Antilles, and the Philippines. In addition, countries which do not have tax treaties with the United States generally supply no taxpayer information to IRS. Tax haven countries such as Panama, the Bahamas, and the Cayman Islands are included in this group. Exhibit B shows the countries and the volume of information provided to IRS. As noted in that exhibit, one country--Canada--provided about 647,000, or 95 percent, of all foreign information returns which IRS received for tax year 1982.

The shortcomings of the foreign information returns are further exacerbated by the fact that the information returns IRS receives do not reflect all possible sources of foreign-source income. For example, while most of the foreign information

returns received by IRS reflect investment income, such as interest and dividends earned by U.S. citizens, few reflect salaries or wages earned by U.S. citizens who are working and living in foreign countries.

In addition, some foreign countries impose no tax or reporting requirements on foreigners' deposits in financial institutions. In France, for example, interest paid on deposits made in certain foreign currencies (such as U.S. dollars and Swiss francs) is exempt from French tax. French tax authorities told us that the government's tax exemption for such deposits is based, in part, on France's desire to attract foreign investment. And because France imposes no tax on these earnings, French financial institutions are not required to routinely report information concerning these accounts to French tax authorities. Without such reporting, it would be difficult for IRS to detect U.S. citizens receiving certain interest income from French financial institutions.

Because of these shortcomings, IRS' document matching programs are limited in their ability to effectively identify U.S. citizens residing abroad who have not filed federal income tax returns. Even so, the programs do identify some possible overseas nonfilers. In fact, in the two years for which data is available--1981 and 1982--IRS identified about 26,000 possible cases involving overseas nonfilers. IRS statistics on the revenue impact of these cases are not available, however.

IRS COULD DO MORE TO COMMUNICATE  
WITH NONFILERS ABROAD

As part of our review, we also examined how well IRS communicates with and handles cases involving possible nonfilers. When a possible nonfiler is identified through the Nonfiler or Stopfiler Programs, IRS generally attempts to contact the individual in an effort to resolve the matter. Contact is usually made through a series of up to four computerized notices sent over a period of 14 weeks. If IRS does not receive an acceptable response to the notices, it may take further, more direct, action to contact the individual. This action could involve a meeting between the individual and an IRS collection officer.

Originally, we randomly selected 482 cases from the approximately 15,100 cases which IRS identified as involving possible nonfiling by U.S. taxpayers living abroad for tax year 1982. Our original sample of 482 cases was reduced to 353 after we eliminated cases involving citizens living in U.S. territories (these individuals have different filing requirements than U.S. citizens living in foreign countries).

Our sample of 353 cases included those in which the taxpayers responded to IRS' first notice and IRS closed the cases as a result of the response. The 353 cases represent a portion of the cases which IRS closed after the taxpayer's first response. Because we were unable to determine the total number of cases closed by IRS in this manner for tax year 1982, we could not determine if 353 cases were sufficient for us to project our results to the overall universe.

In reviewing the cases in our sample, we found numerous instances where taxpayers made statements that indicated a misunderstanding of their filing requirements and IRS did nothing to correct that misunderstanding. The case files indicated that about 113, or 32 percent, of the 353 taxpayers erroneously believed that they did not have to file a tax return either because (1) their foreign residency exempted them from filing and paying taxes to the United States, (2) the foreign earned income exclusion or the foreign tax credit would have reduced their U.S. tax liability to zero, or (3) their annuity income was not taxable or was exempt under the foreign income exclusion.

U.S. citizens residing abroad are generally required to file federal income tax returns regardless of (1) foreign residency, (2) the type of income earned, (3) the amount of foreign taxes paid, or (4) the effect of the foreign earned income exclusion. This is so for a number of reasons. First, foreign residency alone does not exempt U.S. citizens from filing a U.S. return because, as stated earlier, U.S. citizens are taxed based on citizenship, not residency. In addition, most types of income, including annuities and investment income, are subject to tax. Second, in order to claim the foreign tax credit, IRS Form 1116 (Computation of Foreign Tax Credit) and sufficient proof that tax was paid to a foreign jurisdiction, must be filed along with a tax return. And third, in order to qualify for the foreign earned income exclusion, a taxpayer must meet either a bona fide residence or physical presence test. The information



IRS uses to determine if an individual meets one of the tests and qualifies for the exclusion is contained on the form which is to be filed with the tax return. In other words, it is IRS, not the individual, who ultimately must decide whether a taxpayer does or does not qualify for certain exclusions, credits, or the like, and IRS cannot do that unless the taxpayer files a return.

Our review of IRS files on the cases in our sample indicated, however, that IRS made no attempt to communicate to these taxpayers the filing requirements of U.S. citizens living overseas. Instead, IRS closed the cases. It seems to us that by accepting these questionable responses without further explanation, IRS is reinforcing the taxpayers' already erroneous interpretations of their filing requirements. For reasons previously explained, we did not pursue any of the 113 cases to determine how many would have resulted in tax returns being filed and tax being paid. However, we believe that when U.S. citizens living abroad respond to an IRS notice by incorrectly explaining their filing and tax requirements, IRS should explain those requirements.

The notices that IRS sends to possible overseas nonfilers that it identifies make no mention of the special provisions that apply to U.S. citizens living abroad. The computerized form sent to possible overseas nonfilers is identical to the form sent to possible nonfilers residing in the U.S. As such, it simply asks the taxpayer to file a tax return or to explain why a return need not be filed. We think that when IRS sends

its first notice to taxpayers abroad, it should assume that the taxpayers are unaware of their filing requirements. Therefore, the notice should contain information explaining these requirements. For example, the notice should explain that (1) foreign residency, in and of itself, does not exempt a U.S. citizen from filing a return or paying taxes while residing abroad, (2) a person must file a return in order to qualify for the foreign earned income exclusion or a foreign tax credit, and (3) pension, annuity, interest, dividend, and all other forms of investment-type income cannot be offset by the foreign earned income exclusion.

IRS personnel with whom we have discussed this matter agree that providing such information would be useful. The information could either be outlined in a flier included with the notice or made part of the notice itself at very little cost to IRS. For example, IRS could add one or two paragraphs to the current notice or print a short one page flier to accompany the notice. Regardless, the information would serve to explain the filing and tax requirements for U.S. citizens living abroad.

We believe that providing accurate information to U.S. citizens living overseas regarding their filing and tax requirements could have a positive effect on compliance. Not only would it help individual taxpayers understand and comply with the requirements, it could also improve compliance by reducing the chance of misinformation being spread among U.S. citizens living overseas. In this regard, U.S. government and private sector officials told us that U.S. citizen communities overseas

are generally tightly knit and that interpersonal communication networks are very active. Thus, inaccurate information concerning tax filing requirements could spread far beyond those U.S. citizens receiving notices from IRS. Any action which serves to reduce the spread of inaccurate or erroneous information could serve to reduce the possibility of additional noncompliance.

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In summary Mr. Chairman, the results of our limited analysis indicates that the overseas nonfiler issue deserves further attention. IRS' ability to effectively address the issue is limited, however, because there is little information available to IRS to identify overseas nonfilers. Further, there are shortcomings with respect to the quality and scope of the information IRS does receive.

When IRS does identify a possible nonfiler, it needs to improve the way it communicates with the taxpayer. Specifically, IRS needs to better educate these individuals regarding their tax filing requirements. By not doing so, IRS may be exacerbating the problem of inaccurate or incorrect information being shared among U.S. citizens living in foreign countries and thus may be adding to the overall compliance problem.

Given this, we believe that IRS should consider advising taxpayers who live overseas of their filing requirements in any correspondence sent to them, particularly after they have been identified as possible nonfilers. In our opinion, this action would go a long way toward educating U.S. citizens about their

filing responsibilities while living overseas. This would not, however, address the lack of information which hinders IRS' efforts to identify overseas nonfilers.

As mentioned previously, we found little foreign or U.S. information available to IRS which would help it identify overseas nonfilers. IRS' Form 3966 was aimed at addressing the information problem. Generally, the information on Form 3966 was the only information available to IRS concerning U.S. citizens living overseas. The effort was stopped, however, when U.S. citizens complained that the form violated their privacy rights. Further, filing the form was voluntary and the State Department could not refuse to provide services to those U.S. citizens who chose not to complete the form.

We believe that the Subcommittee should explore with the State Department and IRS potential avenues of information exchange that may lead to improved tax compliance without infringing on U.S. citizens' privacy rights.

Without more and better information concerning U.S. citizens living abroad, IRS should focus its efforts on educating those possible overseas nonfilers it does identify.

That concludes my statement. We would be pleased to answer any questions the Subcommittee may have.

RESULTS OF MATCH BY CITY  
 FOR FEDERAL INCOME TAX  
 RETURNS FILED BETWEEN  
 TY 1981 AND TY 1983

CITY	TOTAL	TOTALS				TOTAL	MALE				TOTAL	FEMALE			
		RECORD OF RETURN	%	NO RECORD OF RETURN	%		RECORD OF RETURN	%	NO RECORD OF RETURN	%		RECORD OF RETURN	%	NO RECORD OF RETURN	%
HAMBURG	1197	370	30.9	827	69.1	535	216	40.4	319	59.6	662	154	23.3	508	76.7
VIENNA	502	301	60.0	201	40.0	276	199	72.1	77	27.9	226	102	45.1	124	54.9
FLORENCE	497	210	42.3	287	57.7	206	108	52.4	98	47.6	291	102	35.1	189	64.9
GENOA	846	189	22.3	657	77.7	347	95	27.4	252	72.6	499	94	18.8	405	81.2
ROME	306	108	35.3	198	64.7	146	57	39.0	89	61.0	160	51	31.9	109	68.1
NUEVO LAREDO	108	68	63.0	40	37.0	46	35	76.1	11	23.9	62	33	53.2	29	46.8
TIJUANA	449	283	63.0	166	37.0	269	208	77.3	61	22.7	180	75	41.7	105	58.3
TOTALS	3905	1529	39.1	2376	60.9	1825	918	50.3	907	49.7	2080	611	29.4	1469	70.6

EXHIBIT A

EXHIBIT A

FOREIGN INFORMATION RETURNS - TAX YEAR 1982  
(Individual Returns)

Country	Number of documents received	Percent of total documents	Documents processed		Total amount of income	Documents not processed	
			number	percent		numbers	percent
					\$		
Canada	647,224	95.11	431,595	66.7	416,697,799	215,629	33.3
United Kingdom	5,110	.75	3,712	72.6	16,081,830	1,398	27.4
Sweden	4,836	.71	3,758	77.7	1,735,992	1,078	22.3
Trinidad & Tobago	4,485	.66	1,551	34.6	1,188,943	2,934	65.4
Switzerland	4,336	.64	3,145	72.5	13,527,922	1,191	27.5
Netherlands	3,269	.48	2,644	80.9	2,213,115	625	19.1
France	3,266	.48	180	5.5	605,478	3,086	84.5
New Zealand	2,099	.31	1,380	65.7	1,517,997	719	34.3
West Germany	1,751	.26	236	13.5	3,432,214	1,515	86.5
Norway	1,709	.25	144	8.4	827,668	1,565	91.6
Finland	1,127	.17	551	48.9	761,447	576	51.1
Australia	137	*	8	5.8	1,249	129	94.2
Ireland	24	*	9	37.5	6,232	15	62.5
Denmark	17	*	7	41.2	65	10	58.8
South Africa	14	*	14	100.0	108,142	-	-
Austria	5	*	1	20.0	173,367	4	80.0
Sierra Leone	1	*	1	100.0	-	-	-
Others	<u>1,100</u>	<u>.16</u>	<u>1,100</u>	<u>100.0</u>	<u>397,014</u>	<u>-</u>	<u>-</u>
Totals	680,510 *****	100.00 *****	450,036 *****	66.1	\$459,276,474 *****	230,474 *****	33.9

\* - Negligible