



TaxNewsFlash

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Final regulations: Guidance under section 2801 regarding the imposition of tax on certain gifts and bequests from covered expatriates

The U.S. Treasury Department and IRS today released [final regulations](#) (T.D. 10027) (129 pages) under section 2801, which imposes a tax on U.S. citizens, residents, and certain trusts that receive gifts or bequests from certain individuals who have expatriated from the United States.

The final regulations, which provide detailed guidance on the application, reporting, and payment of this tax, generally adopt proposed regulations (REG-112997-10) issued in September 2015.

The final regulations apply to covered gifts and bequests received on or after January 1, 2025.

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