

► Information about Form 8833 and its instructions is at www.irs.gov/form8833.

Name	U.S. taxpayer identifying number	Reference ID number, if any (see instructions)
Address in country of residence	Address in the United States	

• The taxpayer is disclosing a treaty-based return position as required by section 6114 ► ☐

• The taxpayer is a dual-resident taxpayer and is disclosing a treaty-based return position as required by Regulations section 301.7701(b)-7 ► ☐

Note. If the taxpayer is a dual-resident taxpayer and a long-term resident, by electing to be treated as a resident of a foreign country for purposes of claiming benefits under an applicable income tax treaty, the taxpayer will be deemed to have expatriated pursuant to section 877A. For more information, see the instructions.

Check this box if the taxpayer is a U.S. citizen or resident or is incorporated in the United States ☐

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|--|---|
| <p>1 Enter the specific treaty position relied on:</p> <p>a Treaty country _____</p> <p>b Article(s) _____</p> | <p>3 Name, identifying number (if available to the taxpayer), and address in the United States of the payor of the income (if fixed or determinable annual or periodical). See instructions.</p> |
| <p>2 List the Internal Revenue Code provision(s) overruled or modified by the treaty-based return position</p> | |
| <p>4 List the provision(s) of the limitation on benefits article (if any) in the treaty that the taxpayer relies on to prevent application of that article ►</p> | |
| <p>5 Is the taxpayer disclosing a treaty-based return position for which reporting is specifically required pursuant to Regulations section 301.6114-1(b)? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If "Yes," enter the specific subsection(s) of Regulations section 301.6114-1(b) requiring reporting ► _____</p> <p>Also include the information requested in line 6.</p> | |
| <p>6 Explain the treaty-based return position taken. Include a brief summary of the facts on which it is based. Also, list the nature and amount (or a reasonable estimate) of gross receipts, each separate gross payment, each separate gross income item, or other item (as applicable) for which the treaty benefit is claimed</p> | |