ARRIVAL FILE · SAMPLE

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Moving from Medellín, Colombia, to Coral Gables, Florida · U.S. tax residency begins July 1, 2026 · File dated July 1, 2026

July 1
U.S. TAX RESIDENCY BEGINS, 2026

$19.4M
FAMILY ASSETS AT FAIR MARKET VALUE

$10.7M
PRE-ARRIVAL GAIN KEPT OUTSIDE U.S. TAX

$0.95M
PRE-ARRIVAL GAIN STILL INSIDE (BY CHOICE)

WHAT THIS FILE PROVES

Question	Answer, with the record behind it
When did U.S. tax residency begin?	July 1, 2026. The family meets the IRS presence test for 2026; an 8-day February visit is excluded under the 10-day rule (page 2).
Were the planning steps finished in time?	**Yes. Every step took effect before July 1, 2026 (page 2).**
What was everything worth?	$19,350,000 at fair market value, each value backed by a valuation, appraisal or statement (page 3).
What is the U.S. basis of each asset?	$18,400,000 in total, up from $8,400,000 before the planning (page 4).

One asset left as it was. The family kept the Medellín apartment without a planning step, on advice that a sale today would cost more in Colombian tax. If it is sold after arrival, the U.S. can tax its $950,000 of pre-arrival gain. The file records that choice and its reason.

HOW TO READ THIS FILE

- The U.S. gives no fresh tax basis to people who move here. Without planning, the U.S. can tax gain built up long before the family arrived.
- The family's U.S. tax counsel designed steps that reset basis before residency began. This file proves when residency began, that each step came first, and what every asset was worth.
- The basis figures on page 4 are the numbers the family will use when they sell, possibly decades from now.
- All amounts are in U.S. dollars at COP 4,100 to $1, the rate on June 30, 2026 (illustrative).

WHEN U.S. TAX RESIDENCY BEGAN · THE DAY COUNT AND THE PLANNING TIMELINE

U.S. DAYS, ANDRÉS (LUCÍA'S MATCH)

Year	Days in the U.S.	Days counted	What they were
2024	24	24	Visits to Miami
2025	30	30	Visits to Miami and the school search
2026	192	184	February visit (8 days), then the move on July 1

2026 presence test: 184 counted days in 2026 + 1/3 of 30 + 1/6 of 24 = 198, over 183, so the family is resident for 2026. The 8 February days are excluded under the rule that ignores up to 10 days of presence when the closer connection was abroad.

THE PLANNING STEPS, IN ORDER

Date	Step	Record on file	Before July 1?
May 14, 2026	Farm in Antioquia sold to an unrelated buyer; proceeds wired to the U.S. account	Sale deed and wire confirmation	**Before**
June 12, 2026	Coral Gables home purchased	Closing statement	**Before**
June 18 to 19, 2026	Panama portfolio sold and repurchased	Broker trade confirmations	**Before**
June 25, 2026	Entity classification election for Restrepo Holdings takes effect (eligibility confirmed by U.S. counsel)	Election and IRS acceptance letter	**Before**
June 30, 2026	Values recorded for every asset	Valuation, appraisals and statements	**Before**
July 1, 2026	Family arrives; U.S. tax residency begins	Flight records and the day log	**Start**

HOW TO READ THIS PAGE

- Residency starts on the first day of presence in the year the family meets the test. Excluding the short February visit moves that day to July 1.
- Every planning step has to take effect before that date. A step one day late leaves the old basis in place.
- The day log comes from the same day-tracking used for our residency clients, kept from the first visit.

EVERYTHING THE FAMILY OWNS, AT FAIR MARKET VALUE · AS OF JUNE 30, 2026

Asset	Where	Fair market value	Source of the value
Restrepo Holdings S.A.S. (owns the family's distribution company)	Colombia	$9,500,000	Independent valuation of the company, June 2026
Investment portfolio, Banco de Panamá	Panama	$3,200,000	Broker statement, June 30, 2026
Apartment, El Poblado, Medellín	Colombia	$1,400,000	Appraisal, May 2026
Home, Coral Gables, Florida	United States	$2,600,000	Purchase closing statement, June 12, 2026
Cash, U.S. accounts (includes the farm sale)	United States	$2,300,000	Bank statement, June 30, 2026
Cash, Colombian accounts	Colombia	$350,000	Bank statement, June 30, 2026
Total		**$19,350,000**	

HOW TO READ THIS PAGE

- Fair market value is what each asset would sell for between willing parties, on the date shown.
- Each value comes from an outside source: a business valuation, an appraisal, a closing statement or a bank or broker statement.
- The farm in Antioquia does not appear because it was sold on May 14; its proceeds are in the U.S. cash line.

Why the date matters. These values are the starting point for the basis on page 4 and for the family's first U.S. balance sheet. Recorded now, they are easy to prove. Rebuilt years later, a Colombian company's 2026 value is very hard to support.

THE U.S. BASIS OF EACH ASSET · AFTER THE PRE-ARRIVAL PLANNING · AS OF JULY 1, 2026

Asset	Original cost	Planning step	Effective	U.S. basis now	Gain kept outside U.S. tax
Restrepo Holdings S.A.S. (owns the family's distribution company)	$800,000	Entity classification election, filed by U.S. counsel	June 25, 2026	$9,500,000	$8,700,000
Investment portfolio, Banco de Panamá	$1,900,000	Sold June 18 and repurchased June 19	June 19, 2026	$3,200,000	$1,300,000
Apartment, El Poblado, Medellín	$450,000	Kept: no step (the family's choice; see note)	None	$450,000	None
Home, Coral Gables, Florida	$2,600,000	Bought June 12, 2026; basis is cost	None needed	$2,600,000	None
Cash, U.S. accounts (includes the farm sale)	$2,300,000	Cash has no gain	None needed	$2,300,000	None
Cash, Colombian accounts	$350,000	Cash has no gain	None needed	$350,000	None
Farm in Antioquia (sold May 14, 2026)	$1,100,000	Sold before residency	May 14, 2026	Now cash	$700,000
Total	**$9,500,000**			**$18,400,000**	**$10,700,000**

HOW TO READ THIS PAGE

- Basis is the starting point for measuring gain when an asset is sold. A higher basis means less taxable gain.
- Each step reset basis to fair market value before the family became U.S. residents, so the gain built up in Colombia and Panama is not taxed by the U.S. later.
- Keep this page with the family’s permanent records. It is the support for every future sale of these assets.

Who decided what. The family's U.S. tax counsel chose the steps and confirmed the company was eligible for the election. Baratelli recorded each step, its date and the values, and checked that every step took effect before July 1.

THE FIRST U.S. BALANCE SHEET AND THE FIRST YEAR'S FILINGS · AS OF JULY 1, 2026

BALANCE SHEET AT FAIR MARKET VALUE, JULY 1, 2026

Asset	Fair market value
Cash, U.S. accounts	$2,300,000
Cash, Colombian accounts	$350,000
Investment portfolio, Panama	$3,200,000
Restrepo Holdings S.A.S.	$9,500,000
Home, Coral Gables	$2,600,000
Apartment, Medellín	$1,400,000
Net worth (no debts)	**$19,350,000**

WHAT COMES NEXT

When	Filing or work
April 15, 2027	2026 U.S. return: nonresident to June 30, resident from July 1 (a dual-status year)
April 15, 2027	Report of foreign bank and financial accounts, and the foreign asset statement with the return
With the return	The information return for each foreign company, as its U.S. classification requires
Every month from July	Books for every entity in Baratelli Bankable; Colombian company books kept in pesos beside them

HOW TO READ THIS PAGE

- This is the family's first U.S. balance sheet. From July 1 the books run monthly in U.S. dollars, with the Colombian company's own books in pesos beside them.
- The first U.S. return covers only part of 2026 as residents, which is why 2026 is a dual-status year.
- Missing a foreign account or company report carries large penalties, so each one is on the calendar from the first day.