

# PUBLIC SUBMISSION

<b>As of:</b> 1/18/23, 9:36 AM
<b>Received:</b> January 17, 2023
<b>Status:</b> Non_Public
<b>Tracking No.</b> ld0-p0wq-989n
<b>Comments Due:</b> March 20, 2023
<b>Submission Type:</b> API

**Docket:** FINCEN-2023-0002

Agency Information Collection Activities; Proposed Collection; Comment Request; Beneficial Ownership Information Reports

**Comment On:** FINCEN-2023-0002-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Beneficial Ownership Information Reports

**Document:** FINCEN-2023-0002-DRAFT-0003

Comment on FR Doc # 2023-00703

---

## Submitter Information

**Name:** Richard Winblad

**Address:**

Edmond, OK, 73034

**Email:** Richard@winbladlaw.com

**Phone:** 14056960422

---

## General Comment

There are number of additional forms of identification which are reliable and should be included as options. For example, military identification cards. Also, the Veteran's Administration issues cards with unique identification numbers. In particular, the Veteran's Identification could be especially useful when an owner is elderly, has lost the ability to drive, or has no other form of identification.

A TSA Global identification should also be considered as a valid alternative.

In Oklahoma a handgun license is issued the Oklahoma Bureau of Investigation, it has a unique identification number, and an expiration date. In addition, before issuing the application must be fingerprinted. It seems that this, and similar forms of identification should be eligible as they are issued by a department or subdivision of a state.

Also, other identification sources might be useful. For instance, an individual who is an owner but is confined and therefore cannot leave the facility to obtain the required identification. Usually, a photographic record with an inmate number may be available.

The questionnaire should include an option for the reporter to explain why obtaining an identification would be impossible. For instance, a person who is in a coma, ICU may not be physically able to provide current information. At a minimum, the reporting company should be able to provide relevant facts.

Finally, there may be an issue regarding who has ownership or management of reporting company. The

person reporting should be offered an opportunity to upload additional information or to make a statement since

---

## **Attachments**

Military Identification

Veteran Identification

TSA Global