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

Information Reports

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General Comment

I am writing to comment on the form to be submitted as part of the collection of beneficial ownership information required by the Corporate Transparency Act, Fincen #2023-0002 and OMB control no. 1506-0076. The Corporate Transparency Act was a huge step forward in controlling money laundering, tax evasion, and the use of US properties and assets to hide kleptocracy and support the Administration's national security goals. These goals are potentially being rendered illusory through the current form, which allows respondents to refuse to answer basic questions like name, address, etc. by checking a box for "unknown." There is no reason why those filling out the form should not be able to answer basic questions, since they are the entities (or representatives of the entities) directly involved -- not third parties who could conceivably not have access to this information. The ability to refuse to answer basic questions will render this whole exercise useless, frustrating the will of Congress and imperiling our international commitments to effectively combat corruption. I urge you to change the form to make the information that Congress wanted made available, actually available. Thank you.

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