

PUBLIC SUBMISSION

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Comment On: FINCEN-2023-0001-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Individual FinCEN Identifiers

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Submitter Information

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General Comment

Greetings, as the INDIVIDUAL beneficiary, my concern is the level of effort required for updating ALL the locations where my new mail location is when I move (e.g. when I move to a new work location); however, what I do have as a central repository is the National Creditors Registry

<https://bankruptcynotices.uscourts.gov/>

The Registry holds all the derivative styled names and allows my adding other derivative names, e.g. SEAN S. HAGGERTY vs SEAN SCOTT HAGGERTY vs SEAN HAGGERTY along and other more mangled styles of the name even my A.F. Oath of Office fictitious name SEAN S. HAGGERTY 2LT, USAFA on my OPM DOD DD214 records are all reported/linked to my BNC# of the National Creditor Registry;

Also, the National Creditor Registry also has email, mailing addresses

If only the U.S. Bankruptcy Court had additional fields, whether elective or mandatory, that would allow the added BOI elements, the existing BNC registration is to me a GREAT way to remove redundancies; Between usa.gov and V.A. and SAM.GOV , DUNS, ID.ME, IRS, SSA, FAA, FCC's FRN#, etc., there are so many places to keep up to date

ALSO

What name style do we use for the Fields capturing my NAME?

According the 6 CFR 37.3 "Full Legal Name" is defined:

means an individual's first name, middle name(s), and last name or surname, without use of initials or nicknames

<https://www.law.cornell.edu/cfr/text/6/37.3>

However !

Per SSA <https://secure.ssa.gov/poms.nsf/lnx/0110212001> RM 10212.001 Defining the Legal Name for an SSN

We do not consider the middle name or suffix part of the legal name,
So the "First & Middle" name (if there is a middle name) goes in the First Name Field, just as the Surname suffix goes into the Last Name Field for SSA Purposes

What "Rule" for the NAME do we follow when completing any of the FINCEN form? i.e. Fincen 114, Fincen 8300, Certificate of Beneficial Owner etc ?

thank you for your review

Sean Scott

Haggerty

Attachments

BNC Registered Creditor