

Oct. 29, 2023

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Submitted electronically via
https://www.reginfo.gov/public/do/PRA/icrPublicCommentRequest?ref_nbr=202309-1506-001

RE: **Notice of Revised Beneficial Ownership Information Report**
OMB 1506-0076; ICR 202309-1506-001

Dear Director Gacki:

This letter responds to the request for comment by the Financial Crimes Enforcement Network (FinCEN) of the U.S. Department of the Treasury (Treasury) on the format and content of the revised Beneficial Ownership Information Report (BOIR) Form¹ to be filed with the beneficial ownership registry established by the Corporate Transparency Act (CTA)² and its key implementing regulation.³ The BOIR Form described in the September 29 Notice, which will serve as the primary intake form for the registry, has been revised from the BOIR Form proposed earlier this year.⁴

The revised BOIR Form is a significant improvement over the earlier proposed form, primarily because it deletes 31 answer options that would have enabled reporting companies to avoid providing legally required beneficial ownership information by claiming to be “unable” to obtain it or that the required information is “unknown.” In addition, the revised BOIR Form incorporates several technical improvements. Unfortunately, the Notice also spends the bulk of its text explaining what it calls a “potential alternative implementation” proposal that would seek to reinstate some version of the 31 answer options that were just deleted from the BOIR Form, a course of action that would not only violate the law, but also waste tens of millions of taxpayer dollars by creating a beneficial ownership registry that would be incomplete and ineffective. Treasury and FinCEN should delete all references to the alternative implementation proposal and halt all attempts to use the BOIR Form to rewrite the mandatory disclosure obligations established by the CTA and its implementing regulation.

¹ The revised BOIR Form is described in a Notice entitled, “Agency Information Collection Activities; Submission for OMB Review; Comment Request; Beneficial Ownership Information Reports,” FinCEN, 88 FR 67443 (9/29/2023), <https://www.govinfo.gov/content/pkg/FR-2023-09-29/pdf/2023-21293.pdf> (hereinafter “Notice”).

² The CTA was enacted into law as Title LXIV of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, P.L. 116-283 (1/1/2021), and is codified at 31 U.S.C. § 5336 et seq.

³ “Beneficial Ownership Information Reporting Requirements,” FinCEN, Final Rule, 87 FR 59498 (9/30/2022).

⁴ The earlier BOIR Form is described in “Agency Information Collection Activities; Proposed Collection; Comment Request; Beneficial Ownership Information Reports,” FinCEN, 88 FR 2760 (Docket Number: FINCEN-2023-0002), (1/17/2023), <https://www.govinfo.gov/content/pkg/FR-2023-01-17/pdf/2023-00703.pdf>.

These comments are based on work I performed for the U.S. Senate Permanent Subcommittee on Investigations from 1999 to 2014, including over a decade as staff director and chief counsel for Senator Carl Levin. During my tenure with the subcommittee, I gained expertise on a wide variety of anti-money laundering and anti-corruption issues, including issues related to beneficial ownership. The subcommittee's investigations, hearings, and reports frequently dealt with shell companies, trusts, and other entities with hidden owners.⁵ In response, Senator Levin became the first member of Congress to introduce a bill to require greater beneficial ownership transparency.⁶ I assisted in the development of that bill as well as subsequent legislation to increase beneficial ownership transparency, culminating in enactment of the CTA.

Statutory and Regulatory Requirements. The primary purpose of the Corporate Transparency Act is to increase ownership transparency for certain entities formed or registered to do business in the United States and to prevent entities with hidden owners from engaging in illicit finance and other wrongdoing within U.S. borders. In essence, the CTA requires covered entities to know the identity of their beneficial owners and disclose them to the beneficial ownership registry so that U.S. law enforcement, regulators, financial institutions, and others can understand who is directing a legal entity operating within the United States. If a reporting company willfully fails to disclose the required beneficial ownership information to the registry, the CTA subjects it to civil and criminal penalties.

The CTA imposes a carefully designed set of mandatory disclosure requirements on reporting companies subject to the Act. Section 5336(b)(1)(A) of title 31, United States Code, states:

In accordance with regulations prescribed by the Secretary of the Treasury, each reporting company *shall* submit to FinCEN a report that contains the information described in paragraph (2). (Emphasis added.)

Section 5336(b)(2) states, in turn, that a report delivered under paragraph (1) “*shall*” identify “each beneficial owner of the applicable reporting company and each applicant” by providing their full legal name, birthdate, address, and a unique number from an acceptable identification document. (Emphasis added.)⁷

⁵ See, e.g., U.S. Senate Permanent Subcommittee on Investigations, “U.S. Vulnerabilities to Money Laundering, Drugs, and Terrorist Financing: HSBC Case History,” S.Hrg. 112-597 (7/17/2012); “Keeping Foreign Corruption Out of the United States,” S.Hrg. 111-540 (2/4/2010); “Tax Haven Abuses: The Enablers, The Tools and Secrecy,” S.Hrg. 109-797 (8/1/2006); Money Laundering and Foreign Corruption: Enforcement and Effectiveness of the Patriot Act,” S.Hrg. 108-633 (7/15/2004); “Role of U.S. Correspondent Banking in International Money Laundering,” S.Hrg. 107-84 (3/1-2, 6/2001); and “Private Banking and Money Laundering: A Case Study of Opportunities and Vulnerabilities,” S.Hrg. 106-428 (11/9-10/1999).

⁶ Incorporation Transparency and Law Enforcement Assistance Act, S. 2956, 110th Congr. (5/1/2008)(introduced by Sen. Levin and cosponsored by Sen. Norm Coleman (R-MN) and Sen. Barack Obama (D-IL)).

⁷ Those mandatory disclosure requirements are in line with international best practice. Earlier this year, the Financial Action Task Force (FATF) on money laundering issued new guidance on “Beneficial Ownership of Legal Persons,” advocating the establishment of beneficial ownership registries and requiring companies “to provide basic and beneficial ownership information to the company registry upon registration.” FATF, “Beneficial Ownership of Legal Persons” (3/10/2023), at 89(i), <https://www.fatf-gafi.org/en/publications/Fatfrecommendations/Guidance-Beneficial-Ownership-Legal-Persons.html>.

The key regulation issued by Treasury to implement the CTA faithfully transcribes its mandatory disclosure requirements in a new 31 C.F.R. § 1010.380. In particular, Section 1010.380(a) states that “[e]ach reporting company *shall* file an initial report in the form and manner specified in paragraph (b).” (Emphasis added.) Section 1010.380(b)(1) states that the “initial report of a reporting company *shall* include the following information.” (Emphasis added.) The regulation then describes the required information, stating that the initial report *shall* include, for each reporting company, its full legal name, any trade name, address, the jurisdiction where the company was formed, and a U.S. or foreign taxpayer identification number.⁸ In addition, the regulation states that the initial report *shall* include for “every individual who is a beneficial owner of such reporting company, and every individual who is a company applicant with respect to such reporting company,” that individual’s full legal name, birthdate, address, a unique number from an acceptable identification document, and an image of the identification document.⁹ In the special case of certain pooled investment vehicles (PIVs) formed in a non-U.S. country, Section 1010.380(b)(2) states that the foreign PIV is deemed to be a reporting company subject to the same disclosure requirements as other reporting companies, except that the information required for individuals applies to only one individual “who exercises substantial control over the entity.”¹⁰

The statutory and regulatory disclosure requirements imposed on reporting companies are clearcut and mandatory. They require reporting companies to disclose specified information about beneficial owners, company applicants, and individuals who control certain foreign pooled investment vehicles in BOIR Reports filed with the registry. They contain no provisions allowing filers to skip some or all of the mandatory disclosures. The revised BOIR Form as currently configured complies with the law.

Revised BOIR Form. The revised BOIR Form, like its predecessor, is composed of three parts. After indicating whether the filing is an initial, corrected, or updated report, Part I requires the reporting company to provide information about itself, including the reporting company’s full legal name, any alternate name, its tax identification number, the jurisdiction where it was formed or first registered to do business in the United States, its current U.S. address, and any FinCEN Identifier.¹¹

Part II of the revised BOIR Form requires reporting companies to provide information about their company applicants, and Part III requires reporting companies to provide information about their beneficial owners.¹² Again, in compliance with the law and its implementing regulation, the revised BOIR Form requires the reporting company to provide specified information for each of those individuals, including the individual’s first, last and any middle name; any suffix; a birthdate; an address; a unique number from an acceptable identification document; and an image of the identifying document.¹³

⁸ 31 C.F.R. § 1010.380(b)(1)(i).

⁹ 31 C.F.R. § 1010.380(b)(1)(ii).

¹⁰ 31 C.F.R. § 1010.380(b)(2)(iii).

¹¹ See “Filing Information” and “Part I. Reporting Company Information,” Notice at 67446-47.

¹² See “Part II. Company Applicant Information” and “Part III. Beneficial Owner Information,” Notice at 67447-48.

¹³ The revised BOIR Form also states, in Item 16, that companies created or registered before January 1, 2024, do not have to provide any identifying information for their company applicants. Notice at 67447.

Three Technical Improvements. Although the revised BOIR Form is a significant improvement over the preceding proposal, it still contains three technical problems that could be easily corrected.

Most importantly, while the Notice states that “[t]he BOIR Form will also include a certification whereby filers must certify that the information furnished is true, correct, and complete,”¹⁴ no certification statement appears in the Appendix describing the Form’s proposed data fields. The wording of the certification is important, because it should not only require the filer to certify the quality of the information being submitted, but also inform the filer of the consequences of submitting inaccurate or incomplete information in order to incentivize a careful submission. Accordingly, the Appendix and the final BOIR form should address both issues in a new Item 50 that could word the certification provision along the following lines:

50. * I certify that the information furnished is true, correct, and complete. I understand that the willful provision of false, fraudulent, or incomplete information to FinCEN for purposes of complying with the Beneficial Ownership Information Reporting Requirements may result in civil or criminal penalties.

Second, Part I of the revised BOIR Form seeking information about the reporting company should add a new data field, using a checkbox format, to disclose the type of entity submitting the form. Requiring reporting companies to identify themselves as a corporation, limited liability company, partnership, trust, or other entity (with a data field requiring them to specify what type of entity) is essential to clarify their status as a covered entity and confirm their identity; enable registry users to search for reporting companies by type of entity; help federal and state auditors analyze the types of entities that may be failing to register, providing corrected or updated reports, or supplying false or incomplete information; help analyze issues related to FinCEN Identifiers; and help GAO perform the analysis required by the CTA¹⁵ to evaluate the extent to which partnerships, trusts, and other legal entities already file with the registry or should be added to the types of entities subject to the CTA due to illicit finance risks.

Third, the revised BOIR Form should clarify that a foreign PIV required to file a registry report to identify an individual exercising substantial control over the PIV (hereinafter “PIV controller”) should complete Part III of the report on beneficial owners by providing the required information related to that individual (rather than complete Part II on company applicants).

Unknown Checkbox Option. In response to what the Notice characterizes as “uniform” criticism of an earlier proposal to include language in Parts II and III of the BOIR Form allowing reporting companies to omit statutorily required information by claiming that the reporting company is either “[u]nable” to provide the required information¹⁶ or that the required

¹⁴ Notice at 67445. This certification is required by 31 U.S.C. § 5336(b)(4)(B)(ii) and 31 C.F.R. § 1010.380(b).

¹⁵ See CTA, § 6502(d).

¹⁶ See Items 17 (“Unable to identify all Company Applicants (check if you are unable to obtain any required information about one or more Company Applicants)”) and 34 (“Unable to identify all Beneficial Owners (check if you are unable to obtain any required information on one or more Beneficial Owners)”), 88 FR at 2763-2764.

information is “[u]known,”¹⁷ the revised BOIR Form correctly eliminates all 31 of the proposed so-called “unknown checkbox” options. At the same time, however, the Notice states that FinCEN may nevertheless employ “a potential alternative implementation, which may be adopted [at] a later date following feedback from filers, law enforcement agencies, and other key stakeholders,” to reinstate a version of the checkboxes just eliminated. The Notice proposes this alternative despite widespread criticism of the entire concept and the absence of anyone other than the agency itself expressing support for it. Treasury and FinCEN seem unable to let go of what has been uniformly panned as a bad idea.

The Notice provides four justifications for later adopting the potential implementation alternative. First, the Notice says that if a filer is “unable to obtain certain required information” by a specified deadline, the filer may file the BOIR report late or not at all.¹⁸ But concern that some reporting companies may miss a filing deadline does not justify establishing reporting options that are contrary to the law’s mandatory disclosure obligations.

The CTA states plainly that reporting companies “*shall* submit to FinCEN a report that contains” certain specified information, and that the report “*shall*” identify each beneficial owner and company applicant by providing four pieces of information – their full legal name, birthdate, address, and a unique identifying number from an acceptable identification document.¹⁹ The law nowhere states that reporting companies can avoid providing the required information by claiming to be “unable” to obtain it or that the information is “unknown.” Similarly, the regulation implementing the law never mentions allowing reporting companies to claim that they are “unable” to submit the required information or that the information is “unknown.” To the contrary, both the law and its implementing regulation are clear that they impose mandatory disclosure requirements on reporting companies backed by civil and criminal penalties for willfully submitting false, fraudulent, incomplete, or outdated information.²⁰

In addition to its mandatory disclosure requirements, the CTA repeatedly directs the Treasury Secretary to take steps to ensure the beneficial ownership registry and the information in it are accurate, complete, and highly useful to registry users.²¹ The importance of that

¹⁷ See for “Company Applicants,” Items 19(z), 20(z), 23(z), 24(z), 25(z), 26(z), 27(z), 28(z), 29(z), 30(z), 31(z), 32(a-z, b-z, c-z), and 33(a); and for “Beneficial Owners,” 38(z), 39(z), 42(z), 43(z), 44(z), 45(z), 46(z), 47(z), 48(z), 49(z), 50(a-z, b-z, c-z), and 51(z), Proposed Report, 88 FR at 2763-2764.

¹⁸ Notice at 67444.

¹⁹ 31 U.S.C. §§ 5336(b)(1)(A) and (b)(2).

²⁰ 31 U.S.C. § 5336(h).

²¹ See CTA, § 6402(8)(C) (requiring Treasury, “in prescribing regulations to provide for the reporting of beneficial ownership information,” to “collect information in a form and manner that is reasonably designed to generate a database that is highly useful to national security, intelligence, and law enforcement agencies and Federal functional regulators”); 31 U.S.C. § 5336(b)(1)(F) (requiring Treasury, in “promulgating the regulations required” for submitting BOI reports to FinCEN, to “collect information … in a form and manner that ensures the information is highly useful in—(I) facilitating important national security, intelligence, and law enforcement activities; and (II) confirming beneficial ownership information provided to financial institutions to facilitate the compliance of the financial institutions with anti-money laundering, countering the financing of terrorism, and customer due diligence requirements under applicable law”); 31 U.S.C. § 5336(b)(4)(B)(ii) (requiring Treasury, when implementing “procedures and standards governing any report” to FinCEN or related to FinCEN identifiers to “ensure the beneficial ownership information reported to FinCEN is accurate, complete, and highly useful”); 31 U.S.C. § 5336(d)(2) (requiring “Federal, State, and Tribal agencies … to … cooperate with and provide information requested

statutory directive is magnified by its repetition in the law, yet the alternative implementation proposal contradicts and undermines that directive by explicitly permitting reporting companies to omit vital information from their registry filings. Including the unknown checkbox option in the BOIR Form would likely permit reporting companies not only to omit the names of their beneficial owners, company applicants, and PIV controllers, but also information on those individuals' birthdates, addresses, identifying numbers, and images of the identifying documents.

The reporting companies required to provide beneficial ownership and applicant information are not third parties that have no right to the specified information. Reporting companies inherently depend upon human beings to take action and so, at a minimum, always know who controls them. At the same time, if reporting companies are given the option to dodge disclosing specific information about their beneficial owners, company applicants, and PIV controllers, it is common sense that many reporting companies will take advantage of that option and omit the required information from their BOIR Forms. Common sense also dictates that reporting companies controlled by terrorists, criminals, tax evaders, or other wrongdoers will routinely select any and all unknown checkbox options in order to hide their identities – exactly the reporting companies of most interest to registry users. The resulting registry will not only be riddled with incomplete registry forms missing vital beneficial ownership information, but will also produce a beneficial ownership database of little or no use to national security, intelligence, and law enforcement agencies trying to stop illicit finance.

The second reason given by the Notice for reinstating the unknown checkbox option is that the BOIR Form might otherwise “incentivize reporting companies to file meaningless or untruthful information in certain fields to make a deadline.”²² This justification is inherently weak, because the final BOIR Form will require filers to certify that their information is “true, correct, and complete.” The certification could also warn filers, as recommended earlier, that “the willful provision of false, fraudulent, or incomplete information … may result in civil or criminal penalties.” The Notice offers no research or other evidence that reporting companies would willingly submit inaccurate or incomplete information on the BOIR Form, given the civil and criminal penalties at stake. More broadly, it is surprising that Treasury and FinCEN would take the position that mandatory disclosure obligations in government forms automatically incentivize filers to submit meaningless or untruthful information, given that the vast majority of persons who complete government forms do so honestly.²³

The third reason given by the Notice for potentially reinstating the unknown checkbox option is that reporting companies lacking needed information “have the potential to significantly increase the volume of inquiries to FinCEN’s Contact Center” to clarify their filing requirements.²⁴ Again, the Notice cites no research or specific evidence supporting this

by FinCEN for purposes of maintaining an accurate, complete, and highly useful database for beneficial ownership information”); 31 U.S.C. § 5336(h)(4) (requiring the Treasury Inspector General, in coordination with the Treasury Secretary, to collect complaints “regarding the accuracy, completeness, or timeliness” of the registry’s information and provide Congress with a report containing recommendations “to ensure the beneficial ownership information reported to FinCEN is accurate, complete, and highly useful”).

²² Notice at 67444.

²³ See, e.g., “Lying on taxes: Who’s guilty of fudging their finances?” (Richard Laycock, [finder.com](https://www.finder.com/americans-lying-on-taxes) (2/27/2023), <https://www.finder.com/americans-lying-on-taxes>).

²⁴ Notice at 67444.

assertion. To the contrary, FinCEN has already estimated that the vast majority of reporting companies will have only one or two beneficial owners, which means they will have no trouble providing the required filing information. It is also logical to assume that companies controlled by terrorists, criminals, tax evaders, or other wrongdoers will not be calling the FinCEN Contact Center to draw attention to their existence. Honest reporting companies with complex structures are already likely to employ lawyers who can determine what they need to disclose. In short, it is unclear exactly what group of companies or how many would actually increase their contact with FinCEN personnel if the unknown checkboxes were absent from the BOIR Form; it seems equally possible that including the unknown checkboxes in the form might increase inquires to FinCEN. It is also telling that no country setting up a new beneficial ownership registry or operating an existing one has recommended using an unknown checkbox mechanism as a way to avoid inquiries from reporting companies. Moreover, the goal of reducing calls to FinCEN personnel cannot justify FinCEN’s undermining the law’s mandatory disclosure requirements, producing a beneficial ownership registry riddled with incomplete information, or allowing companies with hidden beneficial owners to operate freely within U.S. borders.

The fourth reason provided by the Notice for potentially reinstating the unknown checkbox option is the claim that allowing reporting companies to submit partial beneficial ownership information to the registry would be of greater assistance to FinCEN and registry users than denying entry to the registry unless all required information is submitted.²⁵ The first problem with this justification is that the proposed approach has no legal basis. Congress could have enacted a law allowing partial beneficial ownership information to be submitted to the registry, but it did not. Instead, it followed the model provided by decades of U.S. anti-money laundering laws as well as other federal financial and tax filing requirements – requiring those who operate or wish to operate within the United States to submit all required information or pay a penalty. It is also telling that no law enforcement agency or financial institution identified getting partial disclosures as a reason to include the 31 unknown checkboxes in the earlier proposed form; instead, they uniformly opposed including the 31 answer options.

It is also important to note that the Notice fails to cite any precedent for the alternative implementation proposal, and that the Notice itself would set a dangerous precedent that could undermine mandatory disclosure requirements in other federal disclosure forms. An obvious analogy is to the federal anti-money laundering laws and regulations that currently require financial institutions to “know their customers” and collect KYC information for their accounts, including accounts opened by legal entities.²⁶ Those laws and regulations do not permit a financial institution to dispense with its KYC obligations when opening an account by claiming that it is “unable” to collect beneficial ownership information for a legal entity, or that such information is “unknown” to the financial institution. Instead, the laws and regulations flatly require financial institutions to obtain the information, and use audits and government examinations to ensure they meet their KYC responsibilities. As a result, financial institutions collect the required KYC information from their accountholders; decline to open accounts for persons who fail to provide the required information; or pay a penalty for not supplying all mandatory KYC disclosures.

²⁵ Notice at 67444.

²⁶ See 31 U.S.C. §§ 5318(h) - (l); 31 C.F.R. Chapter X.

In the same way, the CTA requires reporting companies to know their beneficial owners. By explicitly requiring reporting companies to provide identifying information for each and every beneficial owner in the BOIR Forms filed with the registry, the CTA compels them to obtain what could be called “know your owners” or “KYO” information. The law effectively puts an end to the days in which reporting companies can willfully ignore, set up barriers against learning, or pretend that they do not know the human beings who own or control them – implausible claims that have nonetheless made it difficult for national security, intelligence, and law enforcement agencies to fight illicit finance and enabled entities with hidden beneficial owners to operate within the United States. The CTA instead imposes mandatory beneficial ownership disclosure requirements on reporting companies operating in the United States, backed by civil and criminal penalties. And it directs Treasury and FinCEN to impose those penalties on reporting companies that willfully refuse to provide mandatory beneficial ownership information. What the CTA does not empower Treasury or FinCEN to do is to design registry forms that, by offering “unable” or “unknown” answer options, undercut the mandatory nature of the law’s disclosure requirements.

To understand the full import of the Notice’s alternative implementation proposal, consider a money launderer who forms a U.S. corporation owned 100% by a shell company in a foreign secrecy jurisdiction with laws prohibiting disclosure of the shell company’s beneficial owners. Suppose further that the money launderer causes the foreign shell company to hire a U.S. individual to manage its U.S. subsidiary. Under the potential alternative implementation proposal, that U.S. manager could fill out the proposed alternative registry intake form stating that the identity of the beneficial owner of the offshore shell company is “unknown” to the U.S. manager and can’t be obtained by the manager due to the foreign jurisdiction’s secrecy laws. Using the proposed dropdown options cited in the Notice, the U.S. manager could select “Cannot Contact BO” or “Third Party Refused to Provide”²⁷ to circumvent the CTA’s mandatory disclosure requirements and conceal its beneficial owners’ identities while operating legally within U.S. borders without penalty.

By allowing the U.S. company to claim an inability to identify its beneficial owners instead of requiring it to find out and disclose its beneficial owners, the proposed alternative would allow the reporting company to submit a BOIR Form containing no beneficial ownership information at all, the exact opposite of what the CTA requires and FinCEN’s statement that every reporting company will be required to identify at least one beneficial owner in its registry filing.²⁸ Allowing reporting companies to file BOIR Forms without naming any beneficial owner at all would resurrect the offshore corporate secrecy problem that the Corporate Transparency Act was designed to overcome. It would also make a mockery of the law, producing an absurd result contrary to both the CTA and its implementing regulation.

Some have pointed out that the CTA does not empower FinCEN or Treasury to sue a reporting company to compel it to obtain the information required by the law. That is true. But the CTA does require FinCEN and Treasury to establish a registry with beneficial ownership

²⁷ Id.

²⁸ See “Beneficial Ownership Information Reporting Requirements,” FinCEN, Final Rule, 87 FR 59498, 59525 (9/30/2022) (“FinCEN expects that a reporting company will always identify at least one beneficial owner” in its registry form, since every company is under the substantial control of at least one human being.)

information that is accurate, complete, and highly useful and to impose civil and criminal penalties on reporting companies that willfully refuse to provide required information. Treasury and FinCEN must not attempt to evade those legal obligations by creating an unknown checkbox option in the registry intake form to make it easy for reporting companies to bypass the CTA's mandatory disclosure requirements.

Treasury and FinCEN should reissue the BOIR Form without any reference to an “alternative implementation” proposal that would reinstate the unknown checkbox option just deleted. Reinstating the unknown checkbox option would not only violate the plain language of the CTA and its implementing regulation, but also waste tens of millions of taxpayer dollars by creating an incomplete and unreliable beneficial ownership registry.

Conclusion. The revised BOIR Form is a significant improvement over the proposed form by deleting the 31 “unable” and “unknown” checkbox options that would have enabled reporting companies to continue to hide their beneficial owners and by making other technical changes. The final form could be further improved with a few additional technical adjustments as indicated above and by excising all reference to an “alternative implementation” proposal seeking to reinstate the unknown checkbox options just deleted.

Thank you for this opportunity to comment on the revised BOIR Form.

Sincerely,

Elise Bean
Former staff director and chief counsel
U.S. Senate Permanent Subcommittee on Investigations