

Author Full Name : Milan Solarz-Patel**Received Date :** 10/30/2023 10:19 PM**Comments Received :**

Dear Sir or Madam:

I submit the following comments with respect to the proposed FinCEN BOIR:

1. Will you allow special characters for entries like umlaut, accents, hyphen, apostrophe, etc. since both domestic and foreign reporting companies are involved?
2. Are driver's license or government issued ID cards issued by a U.S. Territory valid for identification purposes?
3. For foreign individuals, the BOIR requires a foreign passport for identification purposes? What about foreign individuals that do not have a passport? Shouldn't a validly issued government ID be allowed?
4. For the Reporting Company legal name, do you want to include the entity type designation, i.e., LLC or Inc.? What about foreign entity type designations like IBC, GmbH, SA, AG, etc.?
5. There is no guidance for trusts. In simple example, where domestic trust owns 100% of a domestic LLC and there is an individual trustee, a trust protector, and one trust beneficiary - who should report? The trustee under substantial control? Is the protector reportable under substantial control? Is the trust beneficiary reportable because he/she is sole beneficiary of trust or possibly if grantor trust for control issue? The guidance on trust reporting is seriously lacking.