

# PUBLIC SUBMISSION

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**Docket:** FINCEN-2021-0005  
Beneficial Ownership Information Reporting Requirements

**Comment On:** FINCEN-2021-0005-0462  
Beneficial Ownership Information Access and Safeguards, and Use of FinCEN Identifiers for Entities

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## General Comment

As a financial institution, how would BOI be shared under the safe harbor laws such as 314(b)? Would BOI on a noncustomer business entity be able to be searched during suspicious activity investigations? We understand and appreciate the sensitive nature of BOI and the need to restrict access to permissible purpose, but in some cases it may be necessary to know the BOI without alerting a customer that you are gathering that information.