## **PUBLIC SUBMISSION**

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Agency Information Collection Activities; Proposals, Submissions, and Approvals: Renewal Without Change of Reports of Foreign Financial Accounts Regulations and FinCEN Form 114, Report of Foreign Bank and Financial Accounts

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## **General Comment**

The FBAR filing requirement places an undue burden on Americans who live abroad permanently. We are collateral damage in a system designed to find tax cheats. It is difficult and time-consuming to find the maximum amount of each account during a year, and the penalties for non-filing are overly harsh. Americans who live abroad permanently should be EXEMPTED from FBAR filing.