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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

Accidental Americans are whom US law deems to be an American citizen, but who has no or only a tenuous connection with the USA. One has to spend sufficient time in the U.S. to meet the physical presence requirements to pass down their U.S. citizenship to their own children born outside of the United States. They grow up outside the USA many speak very little to no English. Their residence/homestead is NOT the USA. To survive outside the USA you need to follow the law of the country you are permanently residing, i.e. Italy, Germany, France, etc., which requires paying Taxes, having Health Insurance, supplementary Pensions, misc. Insurances, and savings to avoid poverty in old age. Different criteria's.

Accidental Americans marry mostly noncitizens. These noncitizens now have to unfold all their financial means to a Government they have no affiliation with – the family disaster is preprogrammed; especially American women and their children are hurting now from:

- Dependency of the noncitizen spouse
- Unknown Data protection effect
- Reporting hurdles to open a small business w/noncitizen spouse
- Stigmatized as criminals
- Fear and anxiety for making a mistake on a "foreign report"
- Bank account denied or closed
- Insurances denied
- Unable to invest for retirement or education for their children
- Limited employment opportunities due to Fbar and so much more

FATCA/Fbar is unnecessary for both sides of the aisle. It destroys families, especially American women's lives, unnecessary bureaucracy and waste of tax payers' money (fully-loaded rate of \$52.55). FATCA should concentrate on the money laundering within the USA (26% of global secrecy weight) and overseas multi-million US corporations. An Accidental American is unable to understand FinCen Form 114 due to different reporting culture and language. One mistake is costly. The website or downloads are often not working. Not everyone has access to a PC.

All above is not a single case, a burden to Accidental Americans as well as massive amounts of unnecessary paperwork (Fbar/IRS) diverting human and financial resources away from investigating genuine tax evasion and financial crimes. Accidental Americans need to be exempt from reporting, it saves time, money and paperwork.