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Comments Received:

I am a US citizen who has lived abroad for a number of years.

FBAR information collection from U.S. citizens who reside outside the United States is an undue burden due to lack of awareness, confusion of filing requirements, and definitions and puts taxpayers at risk of disproportionately high penalties.

While the FBAR exists to catch overseas money laundering, they often end up ensnaring US citizens abroad who need a basic bank account in order to receive salary, pay their bills, and live a normal life. I am, and people like me, are not, money launderers. We are innocent Americans who happen to live abroad. The FBAR should exclude American individuals abroad to reduce the burden on both the citizens and the Treasury and to ensure that Treasury can devote its resources to the actual overseas money launders.

Additionally, the extremely low \$10,000 filing threshold has been in place since 1970. It is overdue for an update to at the very least be indexed to inflation, which would be \$79,000 for 2024. Innocent people who go over the threshold as a one-off buying their first home or paying school tuition fees are unaware of the FBAR, don't file, then face risk of penalties. People who have heard of the FBAR are scared to death of doing it incorrectly since instructions are confusing - even tax professionals recommend over-reporting "just in case". Additionally, there are inconsistencies in the information required between the FBAR and IRS Form 8938.

This unfair treatment is a symptom of the overall problem – American individuals living abroad are put in the same basket and subjected to the same treatment as corporations in the war against overseas tax evasion and money laundering. The IRS recognizes Americans abroad as an underserved community. Surely that would mean that the FBAR is long overdue for review given that it is a massively complicated filing requirement that hasn't changed for over 50 years.

Instead of threatening innocent Americans abroad with life-altering penalties and burdensome filing requirements, the Department of Treasury should work with Congress to bring the US into line with the entire rest of the world in the way it taxes its expats.