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Dear Madam or Sir,

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 - even tax professionals aren't aware of the filing requirements, which puts taxpayers at risk of disproportionately high penalties.

The FBAR exists to catch overseas money laundering, but often ends up ensnaring U.S. citizens abroad who need a bank account in their country of residence in order to receive salary, pay their bills, and live a normal life. These aren't money launderers, they're honest, law-abiding Americans willing to pay their share of taxes both in the U.S. and their country of residence who happen to live abroad. The FBAR should exclude Americans abroad to reduce the signal-to-noise ratio so 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. American citizens such as me who are aware of the FBAR are anxious about completing the forms incorrectly since the instructions are confusing - even tax professionals recommend over-reporting "just in case." For example, I am required to report dividends paid on my investments in Germany to the IRS annually even though the dividends are automatically reinvested, i.e., I do not receive them as a payout. Although I have no immediate access to these funds, I am required to report them per the FBAR.

This unfair treatment is a symptom of the overall problem - Americans abroad are unfairly treated as collateral damage 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 and is a burden to millions of U.S. citizens living abroad.

Instead of threatening innocent, law-abiding 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.

Sincerely,
Dr. Liisa Eisenlohr
Berlin, Germany, and Malmö, Sweden