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## **Comments Received:**

The collection of FBAR information from U.S. residents living internationally imposes an unreasonable challenge due to a general lack of familiarity with its requirements, confusing regulations, and ambiguous definitions - not even tax experts fully grasp these obligations, placing many taxpayers in jeopardy of facing steep fines.

Originally designed to track down international money laundering, the FBAR often inadvertently captures U.S. citizens living overseas who simply require local banking services to manage their day-to-day financial needs such as receiving salaries and paying bills. These individuals are not culprits of money laundering; they are merely Americans residing in other countries. Exempting these expatriates from the FBAR mandate would improve efficiency, allowing the Treasury to focus its efforts on true criminal activities abroad.

Moreover, the \$10,000 threshold for FBAR filing, unchanged since 1970, is outdated and fails to reflect the current economic reality. Adjusted for inflation, this threshold should be raised to \$100,000 or even more. Often, Americans who unexpectedly surpass this limit due to major life purchases, like buying a house or funding education, are unaware of the FBAR and miss filing it, subsequently risking severe penalties. The fear of misfiling is pervasive, compounded by intricate guidelines that even lead tax professionals to advise erring on the side of over-reporting.

Such detrimental impact highlights the broader issue of how U.S. citizens abroad suffer undeserved consequences in the battle against international tax evasion and money laundering. Recognized by the IRS as a underserved group, it stands to reason that the antiquated and complex FBAR requirement is ripe for a thorough evaluation, having remained unchanged for more than half a century.

Rather than penalizing blameless Americans overseas with drastic sanctions and complex reporting demands, the Treasury Department should collaborate with Congress to reform how the U.S. taxes its expatriates, aligning more closely with global norms.