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To whom it may concern: Democrats Abroad has alerted me to your request for comments on FBAR. I am a US citizen who resides in Canada. I moved to Canada in 1985 order to take a faculty position at a Canadian university. I dutifully file US income taxes with the IRS every year. Initially, I prepared my submission myself. Several years ago I started using an accountant, who prepares both my Canadian and US returns. The FBAR requirement was introduced after I had already started using an accountant. I understand that the FBAR requirement is intended to catch overseas money laundering. From my perspective, however, all it does is enrich my accountant by making my tax return more complicated than it need be. And of course it adds to the time I must spend readying information to provide to my accountant.

Democrats Abroad points out a number of troublesome issues with FBAR. Here is their statement, which I fully endorse: 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 US citizens abroad who need a basic bank account in order to receive salary, pay their bills, and live a normal life. These aren't money launderers, they're innocent Americans 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. 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".

This unfair treatment is a symptom of the overall problem - Americans abroad are 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.

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.