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## **Comments Received:**

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.

For an American living abroad, EVERY ACCOUNT IS A FOREIGN ACCOUNT! Think for a moment how many accounts you have to your name! Checking, savings, shared account with your spouse, an account for your child, maybe some pension accounts and investment accounts and accounts created by your employer for pension savings. I am a normal employee but I have a constant stress that I might make a mistake on my FBAR and miss mentioning an account or making sole unintentional error and face a fine of 10000 dollars per mistake!! This is insane! A fine like that would break me and it would be unjust as I am already making a great effort to comply! I have requested recently to renounce my citizenship largely due to this sword of Damocles hanging over my head.

Please, either raise the limit to something reasonable like 100,000\$ and remove the penalty for not filing perfectly. It is easy to miss an account or to not realise that your spouse also has access to the account.