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We have lived overseas for over 20 years, and are increasingly frustrated with all of the paperwork and changes each year. We have tried very hard to be careful and submit everything properly, but we have found in questioning tax professionals that even THEY have difficulty keeping up with all of the yearly changes in forms and considerations. We appreciate having the rights and responsibilities of being US citizens, but the issues of filing by citizenship rather than residency (as opposed to almost EVERY OTHER country in the world) really do not make sense to us! FBAR is one of the issues, along with so much more!

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.

We truly hope that the situation will change and respect that the US will honor the role that their citizens abroad play as 'general ambassadors to the public', in aspects of cultural exchange, and broadening their own minds and those in the world whom they encounter.

Respectfully yours, A former US Peace Corps Volunteer, married to another RPCV, and a devoted US citizen abroad