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I was born in the USA, but moved to Canada in 2002 for my wife's career. We are working professionals with good careers, and our bank accounts are normal checking and savings accounts with banks down the street from our house. We don't have assets hidden in the Cayman Islands or shell corporations in the Bahamas. Nevertheless, as an American living abroad, I have filed countless US tax returns and FBAR forms from Canada, informing the Department of the Treasury about my retirement accounts, my checking accounts, and my savings accounts here in Canada. The collection of this information from U.S. citizens who reside outside the United States is a colossal burden due to poor documentation, low-quality websites, and lengthy forms.

FBAR may have been conceived for noble reasons, to look for money laundering or tax evasion on a large scale. However, because of the very low \$10,000 filing threshold, the law forces many ordinary people to file long, repetitive forms each year. The burden on employees of the IRS and Treasury must be substantial, leaving less time for actual enforcement of serious fraud or tax evasion.

The low \$10,000 filing threshold has been in place since 1970, and it was probably unrealistically low back then. It should be updated, at least. The penalties associated with failure to file are cruel and unusual considering the severity of the "crime". I personally know people who have renounced their US citizenship to avoid the stress and fear associated with the tax filing requirements for overseas citizens.

Instead of threatening ordinary, law-abiding Americans abroad with the potential for massive penalties and cumbersome filing requirements, the Department of Treasury and Congress should work together to bring the USA into line with the entire rest of the world in how it taxes its non-resident citizens.