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As a US citizen abroad who has long conformed to the strict standards of US tax and FBAR compliance, I am grateful for the opportunity to share some important points as to why, after 50 years, it is time to reconsider the efficacy of this system as well as how it impacts well-intended US citizens. In general, information collection from U.S. citizens who reside outside the United States has a wide range of consequences due to lack of awareness, confusion of filing requirements, and definitions, and it puts taxpayers at undue risk of disproportionately high penalties.

While the FBAR's primary purpose is to reduce the potential for overseas money laundering, it predominantly impacts citizens who possess a basic bank account in order to receive salary, pay their bills, and live a normal life, which has nothing to do whatsoever with the citizen's connection to the United States. In a globalized world, international mobility is increasingly more common, and archaic tax rules and requirements hinder US citizens from competitively participating in a global context as they are stringently tethered to rules that have not been reconsidered since 1970 when the world, and international mobility, was a far different reality. Despite tax thresholds (e.g. FEIE) being raised each year due to inflation and other factors, the \$10,000 filing threshold for the FBAR has been in place since 1970. If updated for inflation, this amount should at least be set at \$79,000 for 2024. The strict and harsh penalties lead to a wide range of citizens revoking their citizenship in order to avoid accidentally falling into non-compliance by misunderstanding the unclear regulations, deadlines, and penalties surrounding the FBAR.

As one of the few countries with citizen-based rather than residence-based taxation, the United States creates enormous pressure for American citizens abroad -- particularly those who have never lived nor intend to live in the United States or those who have lived outside of the United States for the vast majority of their lives. The lack of change and recognition of the unnecessary burden of tax compliance on US citizens abroad has been systematically ignored and has not received the attention it deserves for the undue pressure and sense of threat and penalty that it places on average citizens who simply have chosen to live outside of the United States. I therefore believe that the Department of Treasury should work closely with Congress to finally reassess the value and efficacy of US citizen abroad tax compliance and FBAR regulations and penalties in order to align the United States with how the majority of other countries around the world approach tax policies for their citizens abroad.