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Comments Received:

FBAR information collection from private U.S. citizens who reside outside the United States - along with US imposed double taxation (taxation by the US and the citizen's country of residence) 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 US is one only 2 countries in the world that have this draconian requirement for their citizens. It's completely unfair and is causing many Americans to make the unthinkable decision to give up their citizenship. This burden, of which the FBAR is a big part, adds great annual expense to tax filing, serious problems with retirement savings and planning since the tax treaties between other countries and the US do not clearly address these issues, major barriers to being self employed abroad since the US taxation of small businesses owned by Americans abroad make it impossible and a great deal of stress and harm for the American involved and their entire family.

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.

How much money is the US Treasury making off private individual Americans abroad via this unfair treatment? Is it really worth it financially? Is it worth forcing Americans to renounce their citizenship? This treatment does not feel like the American values of fairness and goodwill for those that work hard and contribute that I was raised with. It feels like abuse.

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.