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FinCEN itself is a misnomer given "Crimes" is in the title - many of us who have been overseas for years/decades have not committed any crimes and have filed out FBAR/FinCen religiously every year and even gone back and amended a prior filing if we found an error - forcing law abiding US citizens to a "Crimes" web site is both a farce and difficult to get one's head around - how is it what we have done a CRIME? - Living Overseas?.

Treasury has been collecting comments for many years - yet NOTHING has come of that - why?

In addition, some "US Citizens" who are living overseas are accidental citizens - many of them aren't even aware of FinCEN and certainly take no part in reporting their "Financial Crimes".

OVERLAP - when filing our annual tax return we submit our FATCA form - to the IRS - which last I checked is part of the US Treasury - so why do we have to submit basically the same data TWICE?

Balances - when moving money from one account to another or institution we end up reporting a far greater amount of a balance than we actually ever had - so that reporting skews any test of reasonableness. High Balance is absolutely useless when it comes to anything approaching reasonableness - try doing what US banks do for IRAs - report the year end balance.

Filing Threshold: \$10,000 is a long ago base from which to determine whether or not one should file an FBAR - moving enough money to cover the renovation of your kitchen or similar is enough to go over the \$10,000 - REALLY - is that what the intention was when this was conceived?

But as always I suspect our dear US Gov't bureaucrats don't really care what we think or say and I suspect these all get put in the dustbin.

But thanks for asking!