

PUBLIC SUBMISSION

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Docket: FINCEN-2024-0002

Agency Information Collection Activities; Proposed Collection; Comment Request; Beneficial Ownership Information Requests

Comment On: FINCEN-2024-0002-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Beneficial Ownership Information Requests

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General Comment

As a federally licensed tax professional (Enrolled Agent - IRS) we are obligated under various rules such as GLBA and Section 7216 to safeguard even a client or potential client's name. We also much disclose and obtain consent in writing before entering even a client's contact information such as name, address, email etc. into any 3rd party software. Our interpretation is that includes widely used software such as android apps, intuit, Microsoft, google etc.

IN the spirit of these rules, FINCEN MUST protect the information it is gathering under the new BOI rules.

I believe that FINCEN should disclose to the applicants upfront a minimum upfront:

- 1- What type of parties are able to access the information under some legal basis without the affirmative consent in writing of the applicants.
- 2- All other releases MUST require affirmative written consent that can be granted AND RETRACTED by the applicants.

REGARDLESS, when ANY party is granted access under any rules, those releases should be able to be viewed by logging back into the FINCEN portal. Those entering BOI information should have BROAD TRANSPARENCY about ANYONE who has accessed their information.

While recognizing the purpose of the new law is to identify criminal activities that harm the Country's security, most of the beneficial owners are law abiding citizens which should have access easily to who can see and use their information.