PUBLIC SUBMISSION

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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

There is concern regarding providing personal documentation with individual SSNs, Drivers License numbers, etc as this is being provided to third parties prior to being uploaded to a secure site. Further concern is with the government site itself. The request for both all personal information, along with a copy of the documentation places all information in one system, which would be enticing to nefarious web hackers.

The burden as well for collecting all of this information for third parties collecting for individuals is much more time consuming then anticipated as individuals have privacy concerns, are not local, or are silent individuals associated with entities or trusts held by entities. While it is understandable to request names of all beneficiaries, compiling all documentation is not feasible, especially in under a 90 day time period as requested for all new entities.