

Andrea M. Gacki, Director  
Financial Crimes Enforcement Network  
c/o Policy Department  
P.O. Box 39  
Vienna, VA 22183

National Security Agency  
c/o Office of the General Counsel  
9800 Savage Road; Suite 6272  
Fort Meade, MD 20755-6000

Re: Interim Final Rule: Information Collection from Foreign Financial Agencies  
Federal Register Vol. 90, No. 99 (May 23, 2025)  
Docket Number FINCEN-2025-0006  
OMB control number 1506-0055

I am writing in response to Director Gacki's request for comments, and recommending delaying implementing the Interim Final Rule without an interagency data governance policy that aligns the Final Rule to the Bank Secrecy Act (BSA) and its critical national security objectives.

As background, the BSA protects national security interests -- including, but not limited to, combatting terrorism / the financing of terrorism -- by requiring financial institution (FI) recordkeeping that's highly useful in criminal, tax, and intelligence/counterintelligence activities. Conversely, the Interim Final Rule purports to modify or eliminate some or all of FI's current recordkeeping requirements. What national security interests are served by eliminating records that are highly useful in criminal or intelligence activities?

My personal experience underlines this case. On March 21, 2025 -- when the Interim Final Rule was released -- I augmented the BSA e-filing profile with personally-identifying information (PII), including depositary bank information. How would individual PII collection achieve BSA or Corporate Transparency Act objectives? Has previous thinking changed to believe checking and savings accounts have been hiding billions of missing U.S. dollars, all along?

For these, and other policy considerations, I believe the Interim Final Rule should be delayed from implementation until BSA's means and ends can be studied. Thank you for your consideration and I am happy to arrange a discussion at your convenient time.

Sincerely,

Thea Janeway

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