

## Terry Ralph M

---

**From:** Rebecca Sullivan Voelker 92 [Rebecca.Sullivan.Voelker.92@Alum.Dartmouth.ORG]  
**Sent:** Monday, January 03, 2011 8:02 AM  
**To:** Terry Ralph M  
**Subject:** IRS Form 8938 - For transmission to Mr. Gerald Shields

To Mr. Ralph M. Terry for transmission to Mr. Gerald Shields

Dear Mr. Terry,  
Thank you for your assistance in this matter.

Dear Mr. Shields,

I am responding to the request for comments regarding the proposed IRS Form 8938 - Statement of Foreign Financial Assets. As one of the over 5 million Americans living overseas, I ask your office to reconsider implementing this onerous and invasive requirement.

My family already files yearly tax declarations with the IRS, which naturally includes income derived from investments and savings in German and American institutions.

Requiring account information and balances on our German accounts would not only represent a significant repetition of the labor already required by the Treasury for TD F 90-22.1, but also be a deep invasion of the privacy of our financial matters. Dishonest filers would simply leave accounts unreported, as they are probably already leaving income unreported, while honest filers would be subject to unwarranted scrutiny. Americans residing in the US, who naturally have almost all their financially accounts in American institutions, are not required to provide this information in their tax returns, so I must ask why should Americans residing abroad be?

I would like to raise the additional point of personal data security for your consideration. Filing from an overseas location means that we must entrust our tax documentation to local mail services (instead of, for example, being able to file over a secure electronic connection). Requiring us to include detailed information, including account numbers, for our accounts worldwide represents an opportunity for data and identity theft with serious consequences for law-abiding Americans. Additionally, recent high-profile cases of data loss or theft from credit card firms, large corporations, and even the US government raises the question of how securely the IRS could maintain this most private of data.

Very few Americans move overseas to avoid payment of U.S. federal taxes (and those that do, don't move to Germany). I urge you to realize that the burden and risk this requirement would place on expatriate Americans far outweighs any modest benefit to the IRS in tax collection.

Should you have any further questions, I can be reached at the sending email address, or at the below street address.

Sincerely,  
Rebecca Sulllivan Voelker

Am Domacker 46  
47447 Moers, Germany