

Proposal: 1726(AF97) Threshold Requirements Collect, Retain, Transmit Information on Funds Transfers and Trans

Description:

Comment ID: 137421

From: Nicholas Sobb

Proposal: 1726(AF97) Threshold Requirements Collect, Retain, Transmit Information on Funds Transfers and Trans

Subject: Threshold for the Requirement to Collect, Retain, and Transmit Information on Funds Transfers and Tr

Comments:

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I vehemently oppose the Federal Reserve and FinCEN's proposed changes to the Bank Secrecy Act, those changes which would lower the threshold for the warrantless surveillance of certain financial transactions to \$250.

This threshold is ridiculous as it will harm my financial privacy, creating a continual expanding bloated database with useless information.

This rule change is unprecedented in its scope and reach. It is going to cripple a nascent industry with unnecessary burdensome regulations. Tech companies that are building on the networks of crypto will simply go where there isn't such onerous regulations. With such rules, emergent blockchain companies will seek environments that are meant to encourage innovation, not stifle them. FinCEN needs to crack down on the money laundering that is happening in traditional banks and banking services where the VAST MAJORITY of financial crimes happen. The most used instrument in money laundering and tax evasion is the US dollar.

Does the government need to continually add its databases information about my financial decisions, decisions that are very personal and private. The collection and storing of this information by 3rd parties and the government will be ripe for abuse, hacking and misuse. There is no justifiable or proven NEED for it given the cost of losing my privacy and the societal cost of lost jobs and opportunities because blockchain companies moved elsewhere to innovate.

The damage to financial privacy and society at large should be considered in the cost benefit analysis of the newly proposed rule. Also there should be more consideration and studies on how this will affect the entrepreneurial ecosystem as a whole. The industry leaders are clear, they do not want these rules to be adopted (see Brian Armstrong, of Coinbase, published opposition to them). The steady degradation of financial privacy must be reversed, not accelerated. I implore the agencies to take more time in studying the issues. They need to solicit the ideas and opinions of our blockchain industry leaders as well as its users.

This rule change should be retired until some proper considerations and the interests of all relevant stakeholders are properly taken into account. I close by reiterating my opposition to reducing the threshold for the warrantless surveillance of certain financial transactions.

Nicholas Sobb