June 10, 2019

The Honorable Maxine Waters Chairwoman House Committee on Financial Services Washington, D.C. 20515 The Honorable Patrick McHenry Ranking Member House Committee on Financial Services Washington, D.C. 20515

Dear Chairwoman Waters and Ranking Member McHenry:

The undersigned state bankers associations write to express our strong support for H.R. 2513, the Corporate Transparency Act of 2019. This measure will bring needed clarity and transparency to the beneficial ownership requirements.

We commend Representative Carolyn Maloney (D-NY), Chairwoman of the Subcommittee on Investor Protection, Entrepreneurship and Capital Markets, for her attention to this important issue. H.R. 2513 is a bipartisan piece of legislation that would require corporations and limited liability companies to self-report beneficial owners to the Financial Crime Enforcement Network (FinCEN) at the time of formation of the entity. Further, the bill would require all companies within two years to file such information with FinCEN.

A single federal registry would help ease the burden on companies because the beneficial ownership information would be located in one place. A company would not be required to provide that information to a financial institution each and every time it opens a new account. The information also would be readily accessible to law enforcement and would provide an easy way for financial institutions to verify beneficial ownership information.

While financial institutions go to great lengths to know their customer and follow all requirements to know the beneficial owner, there is no formal system in place to ensure that shell companies are not hiding money to facilitate illegal activities. And while this legislation may be transformative for the United States, it would simply bring the U.S. in line with other developed countries.

We support H.R. 2513 and urge the members of the Committee to pass this important measure.

Sincerely,

Alabama Bankers Association
Alaska Bankers Association
Arizona Bankers Association
Arkansas Bankers Association
Colorado Bankers Association
Connecticut Bankers Association
Delaware Bankers Association
Florida Bankers Association
Georgia Bankers Association
Hawaii Bankers Association
Idaho Bankers Association
Illinois Bankers Association
Indiana Bankers Association
Indiana Bankers Association
Iowa Bankers Association

Kansas Bankers Association

Kentucky Bankers Association

Louisiana Bankers Association

Maine Bankers Association

Maryland Bankers Association

Massachusetts Bankers Association

Michigan Bankers Association

Minnesota Bankers Association

Mississippi Bankers Association

Missouri Bankers Association

Montana Bankers Association

Nebraska Bankers Association

Nevada Bankers Association

New Hampshire Bankers Association

New Jersey Bankers Association

New Mexico Bankers Association

New York Bankers Association

North Carolina Bankers Association

North Dakota Bankers Association

Ohio Bankers League

Oklahoma Bankers Association

Oregon Bankers Association

Pennsylvania Bankers Association

Puerto Rico Bankers Association

Rhode Island Bankers Association

South Carolina Bankers Association

South Dakota Bankers Association

Tennessee Bankers Association

Texas Bankers Association

Utah Bankers Association

Vermont Bankers Association

Virginia Bankers Association

Washington Bankers Association

Western Bankers Association

West Virginia Bankers Association

Wisconsin Bankers Association

Wyoming Bankers Association

cc:

Members of the House Committee on Financial Services