June 15, 2018

Congressman Steve Pearce  
U.S. House of Representatives  
2432 Rayburn House Office Building  
Washington, DC 20515

Dear Congressman Pearce:

On behalf of NFIB, the nation’s leading small business advocacy organization, I write in support of H.R. 6068, the Counter Terrorism and Illicit Finance Act. This legislation provides legal protections and regulatory relief to community banks and credit unions and avoids placing additional and unnecessary reporting requirements on small businesses.

The Counter Terrorism and Illicit Finance Act provides an 18-month enforcement safe harbor for individuals that act in good faith as they work to comply with the Department of Treasury Financial Crimes Enforcement Network’s (FinCEN’s) new Customer Due Diligence (CDD) rule. The CDD rule, which was implemented on May 11, 2018, requires financial institutions to collect and report beneficial ownership information of business customers to FinCEN. This safe harbor allows time to evaluate how the new CDD rule will affect financial institutions and their small business customers without creating or shifting compliance burdens onto small business owners.

Other legislative proposals would create redundant regulatory frameworks that specifically target small businesses and place unacceptable compliance burdens on them. With the implementation of CDD, these frameworks would be duplicative and result in the same information being collected.

Over the past year, you have recognized the concerns of small business stakeholders and have written a bill that is worthy of the support of this community. We look forward to working with you to protect small business as the 115th Congress moves forward.

Sincerely,

Juanita D. Duggan  
President & CEO  
NFIB