



Jim Nussle
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May 8, 2019

The Honorable Maxine Waters
Committee on Financial Services
House of Representatives
Washington, DC 20515

The Honorable Patrick McHenry
Committee on Financial Services
House of Representatives
Washington, DC 20515

Dear Chairwoman Waters and Ranking Member McHenry:

On behalf of America's credit unions, I am writing today in response to the markup of H.R. 2513, the "Corporate Transparency Act of 2019," and H.R. 2514, the "Coordinating Oversight, Upgrading and Innovating Technology, and Examiner Reform Act of 2019." The Credit Union National Association represents America's credit unions and their 115 million members.

Credit unions support efforts to track money laundering and terrorist financing, but also believe it is important to strike the right balance between the compliance costs to financial institutions, like credit unions, and the benefits to the federal government. As such, we support, H.R. 2513 and H.R. 2514, which address the redundancies, unnecessary burdens, and opportunities for efficiencies within the Bank Secrecy Act/Anti-Money Laundering (BSA/AML) statutory framework.

Credit unions appreciate the importance of financial institutions, law enforcement, and the federal government all working together to combat money laundering, however, we would argue that the compliance burden for some of the BSA/AML requirements outweigh the value of the information reported. To that end, CUNA fully supports efforts to raise and/or index for inflation the Currency Transaction Report (CTR) threshold and further study the impact of Suspicious Activity Reports (SAR).

The dollar amount thresholds included in the BSA/AML have not been updated since the law was originally enacted in 1970. In today's market the \$10,000 CTR threshold has the same buying power as \$1,500 when the law was enacted fifty years ago – according to the Consumer Pricing Index's Inflation Calculator provided by the Bureau of Labor and Statistics. And yet, credit unions are required to report every cash transaction of \$10,000 or more, even when the credit union knows that the transaction has no criminal implications. This is a clear example of the compliance burden far outweighing the value of the information to law enforcement.

On behalf of America's credit unions and their 115 million members, thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Jim Nussle". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Jim Nussle
President & CEO