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The Honorable Scott Bessent
Secretary
U.S. Department of Treasury
1500 Pennsylvania Ave, NW
Washington, D.C. 20220

Re: Comments on Suspension of Enforcement and Proposed Rule Changes to the Corporate Transparency Act

Dear Secretary Bessent,

On behalf of the National District Attorneys Association (NDAA), the unified voice of America's prosecutors, representing elected and appointed district attorneys and their staff in jurisdictions across the country, we submit this letter as part of the official comment period regarding the Treasury Department's announcement suspending enforcement of the Corporate Transparency Act (CTA) against U.S. citizens and domestic reporting companies, and the proposed rulemaking to limit the CTA's scope to foreign entities only.

NDAA respectfully urges the Department to not proceed with this course of action. Weakening or narrowing the CTA will have devastating consequences for law enforcement's ability to fight criminal enterprises that exploit shell companies to launder money, traffic drugs and weapons, and fund human trafficking and terrorism. For those of us charged with protecting public safety and administering justice in our communities, the CTA has been a long overdue and vital tool to pull back the veil of anonymity that has enabled criminal networks to thrive.

The CTA is a cornerstone of modern anti-laundering enforcement. Signed into law during President Trump's first term, the CTA was intentionally crafted with bipartisan congressional support to balance transparency with feasibility, focusing on basic beneficial ownership disclosure that bad actors have long used to exploit our system. For most legitimate business owners, the reporting requirements are minimal, and compliance can be achieved in minutes. Meanwhile, without this data, prosecutors are left blind when investigating shell companies used by fentanyl and human traffickers, cybercriminals, and corrupt foreign actors. These are not abstract concerns – these are real threats to American families and communities.

We respectfully ask the Department to reconsider its proposed rule change and to restore domestic enforcement of the CTA. At a minimum, we urge Treasury to engage with law enforcement stakeholders before finalizing any such rule making. The proposed rule change as currently drafted would greatly curtail our ability to combat shell companies fueling illegal operations plaguing communities across our country and would jeopardize public safety and our nation's security.



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We remain committed to working with you to ensure our financial and legal systems reflect both the needs of small businesses and the imperatives of public safety. The CTA strikes that balance and retreating from it puts the American people at risk.

Thank you for the opportunity to provide comments, and for your service to the country.

Sincerely,

A handwritten signature in cursive script that reads "Nelson O. Bunn, Jr.".

Nelson Bunn
Executive Director
National District Attorneys Association