



July 28, 2017

The Honorable Stephen F. Lynch  
United States House of Representatives  
2268 Rayburn House Office Building  
Washington, DC 20515

The Honorable Peter T. King  
United States House of Representatives  
339 Cannon House Office Building  
Washington, DC 20515

The Honorable Carolyn B. Maloney  
United States House of Representatives  
2308 Rayburn House Office Building  
Washington, DC 20515

**RE: Aircraft Ownership Transparency Act of 2017 (H.R.3544)**

Dear Representatives Lynch, King, and Maloney,

On behalf of the Financial Accountability and Corporate Transparency Coalition (FACT Coalition), we thank you for sponsoring the **Aircraft Ownership Transparency Act of 2017 (H.R.3544)**. The FACT Coalition is a non-partisan alliance of more than 100 state, national, and international organizations promoting policies to combat the harmful impacts of corrupt financial practices.<sup>1</sup>

Today, companies with hidden ownership are used as a primary vehicle for carrying out fraudulent and other illegal activities while hiding the people that are really behind the company and the illegal activities. U.S. law requires that aircraft operating in the U.S. be registered with the Federal Aviation Administration (FAA). This registration process requires that the aircraft's owner be identified on the registration form, but allows that owner to be a legal entity that is registered in any U.S. state (a U.S. Legal Person).

Unfortunately, there is no requirement that any U.S. state collect and maintain records about whom ultimately owns or controls a U.S. Legal Person. As a result, the FAA does not really have any idea who owns aircraft operating in America if the registered owner is a U.S. Legal Entity, despite the registration requirement.

This is an untenable situation. U.S. aircraft can be weaponized — as we know all too well. They can be bought and sold in order to launder money or transfer money/value from one person to another with little detection. They can be used to transport illegally generated cash, drugs, and other contraband. Not knowing who owns these aircraft can put Americans at risk.

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<sup>1</sup> For a full list of FACT Coalition members, visit <https://thefactcoalition.org/about/coalition-members-and-supporters/>

We applaud your efforts to ensure that the problem we have in the U.S. with anonymous companies does not leave a gaping hole in the information that the FAA collects regarding aircraft ownership. While it is critical to address the larger issue of anonymous companies, plugging holes like these are an important measure to safeguard American interests in the meantime.

As such, we support the Aircraft Ownership Transparency Act of 2017 and appreciate your leadership. We look forward to continuing to work with you and your staff on this legislation.

For additional information, please contact Heather Lowe ([hlowe@gfintegrity.org](mailto:hlowe@gfintegrity.org)), Liz Confalone ([lconfalone@gfintegrity.org](mailto:lconfalone@gfintegrity.org)), or Clark Gascoigne ([cgascoigne@thefactcoalition.org](mailto:cgascoigne@thefactcoalition.org)).

Thank you again for your commitment to this important issue.

Sincerely,

**Gary Kalman**  
Executive Director  
The FACT Coalition

**Clark Gascoigne**  
Deputy Director  
The FACT Coalition

cc Members of the U.S. House Committee on Transportation and Infrastructure

FACTCOALITION

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