



June 16, 2023

Nicholas Panos, Senior Special Counsel,  
Valian Afshar, Special Counsel,  
Office of Mergers and Acquisitions, Division of Corporation Finance  
U.S. Securities and Exchange Commission, 100 F Street NE,  
Washington, DC 20549

Sent via email to [rule-comments@sec.gov](mailto:rule-comments@sec.gov)

**RE:** Reopening of Comment Period for Modernization of Beneficial Ownership

Dear Messers Panos and Afshar:

The Virginia Society of CPAs (VSCPA) Accounting & Auditing Advisory Committee has reviewed the Exposure Draft (ED) — Reopening of Comment Period for Modernization of Beneficial Ownership, issued by the Securities and Exchange Commission (SEC). The VSCPA is the leading professional association in Virginia dedicated to enhancing the success of all CPAs and their profession by communicating information and vision, promoting professionalism, and advocating members' interests. The VSCPA membership consists of nearly 13,000 individual members who actively work in public accounting, private industry, government, and education.

The Committee supports the SEC's objectives to provide guidance to adopt rule amendments to modernize the beneficial ownership reporting obligations. Overall, we agree with the requirements of the ED.

The VSCPA appreciates the opportunity to respond to this ED. Please direct any questions or concerns to VSCPA Vice President, Advocacy Emily Walker, CAE, at [REDACTED] or [REDACTED].

Sincerely,

Zach Borgerding, CPA  
Chair 2023-2024  
VSCPA Accounting & Auditing Advisory Committee

**VSCPA Accounting & Auditing Advisory Committee 2023-2024**

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