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Ariel A. Neuman and Alexander H. Tran Author Article on Foreign Bank Account-Related Fines Implicated by Upcoming Supreme Court Case

Bird Marella attorneys Ariel A. Neuman and Alexander H. Tran authored the *Daily Journal* article, "Bank Secrecy Act exposes failure of Congress in articulating its intent." It analyzes how U.S. persons who fail to disclose foreign bank or brokerage accounts will be impacted by the upcoming U.S. Supreme Court case of Bittner v. United States (2021).

The article offers Neuman's and Tran's analysis of the immediate and less apparent impacts the Bittner decision will have on U.S. taxpayers in America and abroad. It also analyzes the conflicting interpretations presented by the Ninth and Fifth Circuits and the need for Congress to provide fair notice to U.S. taxpayers and consistent application of U.S. tax penalties across the country.

Read the article in the *Daily Journal* here (subscription required).