

Tax Insights | March 8, 2023
**Tracking Tax News,
You Need to Know**



Supreme Court Decides To Reduce FBAR Fine

The U.S. Supreme Court [decided](#) to throw out a \$2.72 million fine on a Romanian-American businessman who failed to file Foreign Bank and Financial Accounts (FBAR) reports while living abroad. The taxpayer contended that the maximum penalty under federal law is \$50,000. The IRS argued that the person violated the law 272 times, once for each account that was not reported in each of the five years. The Supreme Court held for the taxpayer, in a 5-4 vote, writing “that the failure to file a legally compliant report as one violation carrying a maximum penalty of \$10,000, not a cascade of such penalties calculated on a per-account basis.”

Senate Democrats Push for Disclosure of Country-by-Country Tax Information

Senate Democrats reintroduced a [bill](#) that would force large multinational companies to reveal in their financial statements country-by-country information on business details that include profits, taxes and tangible assets. The bill’s disclosure requirements are expected to prevent companies from holding assets in low-tax jurisdictions. The bill came ahead of the Financial Accounting Standard Board’s proposal that will demand companies to disclose more tax details in the financial statements, including tax obligations by major jurisdictions.

Philadelphia DOR Issues FAQs About Tax Resolution Process

The Philadelphia Department of Revenue (DOR) [issued](#) frequently asked questions about the dispute resolution process of the Tax Review Board regarding tax assessments for property, corporate income, individual income, sales and use, excise and trust income tax purposes. The FAQs include the procedure for filing an appeal with the board. Also, the process after the appeal is filed and the procedure to follow if the taxpayer disagrees with the board’s decision is included.



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