



Pat Smith Quoted Regarding Florida Bankers Supreme Court Case

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Bloomberg BNA Daily Tax Report

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Ivins attorney Pat Smith was quoted in a story in Bloomberg BNA Daily Tax Report on the Supreme Court's denial of the petition for certiorari in *Florida Bankers. Supreme Court Won't Hear IRS Bank Reporting Rule Case*.

"It's clearly the end of the line for this case," Patrick Smith, a partner at Ivins, Phillips & Barker, Chartered in Washington, told Bloomberg BNA June 6.

"The most important issue was the AIA. It's not the end of the line on the application of DMA to the AIA. Judge Kavanaugh's decision was clearly wrong. Other challenges to regulations will be raised elsewhere that will provide an opportunity for a circuit split, which will provide a much stronger case for Supreme Court review," Smith said.