

American Federal Tax Reports

CRAWFORD v. DEPT. OF THE TREAS., Cite as 120 AFTR 2d 2017-5913, Code Sec(s) 1471; 6011, (CA6), 09/26/2017

Mark CRAWFORD; Rand Paul, in his official capacity as member of the United States Senate; Roger Johnson; Daniel Kuettel; Stephen J. Kish; Donna-Lane Nelson; L. Marc Zell, PLAINTIFFS-APPELLANTS v. UNITED STATES DEPARTMENT OF THE TREASURY; United States Internal Revenue Service; United States Financial Crimes Enforcement Network, DEFENDANTS-APPELLEES.

Case Information:

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Code Sec(s): 1471; 6011  
Court Name: U.S. Court of Appeals, Sixth Circuit,  
Docket No.: No. 16-3539,  
Date Decided: 09/26/2017.  
Prior History: Rehearing en banc of (2017, CA6) 120 AFTR 2d 2017-5544, affirming (2016, DC OH) 117 AFTR 2d 2016-1400, denied. Earlier proceeding at (2015, DC OH) 116 AFTR 2d 2015-6288.  
Disposition: Rehearing denied.  
HEADNOTE

1. Actions against Treas. Dept.—Foreign Account Tax Compliance Act; intergovernmental agreements; Report of Foreign Bank and Financial Accounts—standing. Rehearing en banc of 6th Cir.'s opinion in suit against Treas. Dept. was denied, due to no judge favoring same and because issues raised in petition were fully considered upon original submission and decision of case.

Reference(s): ¶ 74,336.505(25); ¶ 14,715.01(10); ¶ 60,115.01(5) Code Sec. 1471; Code Sec. 6011

FBAR  
OPINION

UNITED STATES COURT OF APPEALS FILED FOR THE SIXTH CIRCUIT,

BEFORE: BOGGS, SILER, and MOORE, Circuit Judges.

ORDER

Judge: Deborah S. Hunt, Clerk

[1] The court received a petition for rehearing en banc. The original panel has reviewed the petition for rehearing and concludes that the issues raised in the petition were fully considered upon the original

submission and decision of the case. The petition then was circulated to the full court. No judge has requested a vote on the suggestion for rehearing en banc.

Therefore, the petition is denied.

ENTERED BY ORDER OF THE COURT

Deborah S. Hunt, Clerk