

IRS Criminal Investigation's 2016 Annual Report on Illegal Source Tax Crimes

By Michael A. Villa, Jr. and Paul M. Budd

Michael A. Villa, Jr. and Paul M. Budd examine the IRS Criminal Investigation's 2016 Annual Report on Illegal Source Tax Crimes.



WOn February 27, IRS Criminal Investigation (“CI”) released its 2016 Annual Report (the “Report”).¹ The Report addresses several items from CI’s 2016 fiscal year, including investigation statistics, staff changes, and top priorities. While the Report addresses various tax crimes CI investigated in 2016, this article focuses on illegal source tax crimes. Illegal source tax crimes involve illicit funds obtained through criminal activity separate from any tax crimes. Because illegal source tax crimes involve multiple criminal acts, they are often serious in nature and labeled as “high impact area cases.”²

I. IRS Criminal Investigation 2016 Annual Report

A general understanding of the overall Report provides helpful context for its assessment of illegal source tax crimes. The Report statistics and stated priorities are briefly discussed below.

A. Statistics: Decreases in Staff and Case Investigations

A common theme throughout the 2016 Report is the downward trend in almost every statistic. Budget cuts led to a 4% decrease in CI special agents in 2016 as compared to 2015.³ That trend is even more significant over the past five years. From 2012 to 2016, the number of CI special agents decreased by a staggering 19%.⁴ Fewer agents mean fewer resources available to investigate criminal activity. The statistics support that proposition, showing a substantial 12% drop in CI case investigations in 2016 as compared to 2015 (*see* Chart 1).⁵

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CI's Chief, Richard Weber, commented on the lack of resources and dwindling staff after the Report was released. "We're at the same staffing level as 1956, which is just unbelievable when you think about it," said Weber.⁶ "There's no decrease in crime ... [t]here are certainly enough areas for us to work, if we had the resources."⁷

Despite fewer resources and a decline in the overall number of investigations, CI is concentrating efforts in a few high-priority areas. The Report shows that CI initiated more investigations in 2016 than it did in 2015 in only three areas—healthcare fraud, employment tax fraud, and public corruption.⁸ Two of the three—healthcare fraud and public corruption—are illegal source tax crimes.

B. Investigative Priorities

The Report shows the following crimes were "Investigative Priorities" in 2016.

1. Tax Crimes⁹

1. Abusive Return Preparer Fraud,
2. Abusive Tax Scheme Fraud,
3. Employment Tax Fraud,
4. Fraud Referral Program,
5. Identity Theft Fraud,

6. International Tax Fraud, and
7. Questionable Refund Fraud.

2. Other Financial Crimes¹⁰

1. Counterterrorism/National Security/Terrorist Financing,
2. Cyber-crimes (including Virtual Currency),
3. Organized Crime Drug Enforcement Task Force (OCDETF)/High Intensity Drug Trafficking Area (HIDTA)/Transnational Organized Crime, and
4. Public Corruption.

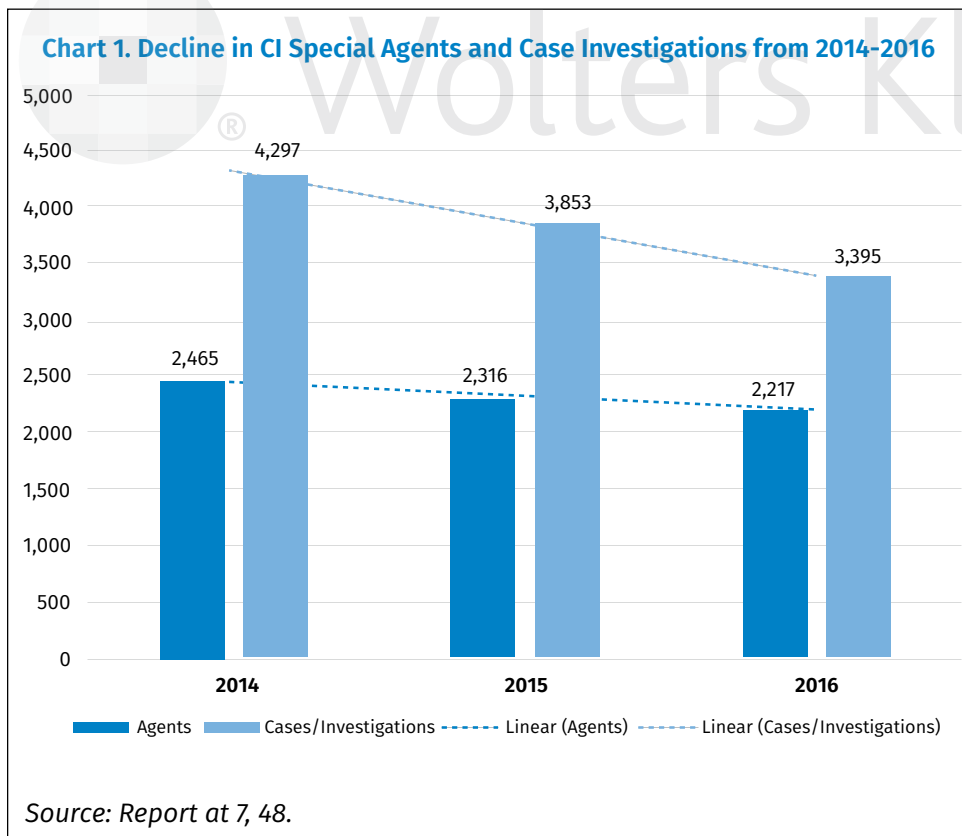
II. Illegal Source Tax Crimes

Illegal source tax crimes, as opposed to legal source tax crimes, are tax crimes committed with income derived from criminal activity.¹¹ CI investigates illegal source tax crimes such as fraud, embezzlement, bribery, and illegal gaming operations. The following sections discuss each of the illegal source tax crimes identified in the Report.

A. Financial Institution Fraud

CI investigates cases of financial institution fraud perpetrated against financial institutions.¹² Financial institutions include banks, credit unions, check cashers, savings and loan associations, and stockbrokers.¹³ CI plays an active role in identifying and investigating cases of financial institution fraud through its ability to "follow the money" and identify unreported income. CI investigations into financial institution fraud focus on income tax fraud and money laundering.¹⁴

The Report provides case summaries that highlight some recent CI investigations of financial institution fraud. The cases show that CI is often one agency that is part of a multi-agency federal investigation of financial institution fraud. Other agencies, such as the Securities Exchange Commission (SEC), are usually involved as well. In one case, a Florida CEO defrauded over 1,400 investors through a fraudulent real-estate scheme.¹⁵ As part of



this scheme, the CEO obtained more than \$20 million worth of bank loans through multiple fraudulent mortgage transactions. The CEO was prosecuted and sentenced to 480 months in prison and ordered to forfeit \$303,800,000 for the bank fraud.¹⁶ In another case, an Ohio man fraudulently obtained over \$10 million in loans from a credit union by bribing the chief operating officer of the credit union.¹⁷ He was sentenced to 300 months in prison and ordered to pay \$16 million in restitution.¹⁸

The number of financial fraud investigations initiated, prosecutions recommended, and sentencing for financial institution crimes all dropped in 2016 compared to previous years. CI only initiated 66 investigations in 2016 as opposed to 84 in 2015 and 108 in 2014.¹⁹ CI recommended 53 prosecutions in 2016 as opposed to 69 and 100 in 2015 and 2014, respectively.²⁰ Sentencing also saw a steep decline in 2016, as only 64 individuals were sentenced for financial fraud crimes, compared to 160 in 2015 and 88 in 2014 (*see* Table 1).²¹

B. Public Corruption

Public corruption was an investigative priority in 2016.²² CI investigates public corruption crimes committed by elected and appointed officials at all levels of government.²³ Public corruption investigations usually focus on bribery, tax fraud, extortion, illegal kickbacks, embezzlement, and money laundering.²⁴ Public corruption was one of the only three areas where CI initiated more investigations in 2016 than it did in the previous year.²⁵

In one case, CI investigated a county deputy auditor in Indiana who embezzled over \$150,000 of local government funds and defrauded her disabled father-in-law out

of more than \$600,000.²⁶ Not surprisingly, the county auditor did not report the illegally obtained funds on her income tax return. She was sentenced to 84 months in prison and ordered to pay \$801,315 in restitution.²⁷ CI also investigated a New York police officer who used his public position to locate and burglarize several residential houses, and a California state senator who used his campaign to commit an assortment of RICO crimes such as exchanging favors for bribes, trafficking weapons, and laundering money.²⁸ Both investigations resulted in convictions and multiple-year prison sentences.²⁹

The uptick in public corruption investigations in 2016 went against the overall downward trend in investigations. Recommended prosecutions, indictments, and sentences for public corruption crimes, however, were down in 2016 as compared to 2015 (*see* Table 2).³⁰

C. Corporate Fraud

Corporate fraud usually involves executives illegally taking funds out of a public or private corporation to use for their own personal benefit. Corporate fraud includes falsifying corporate financial statements or tax returns, embezzling corporate funds, and illegitimate loans.³¹ CI investigations into corporate fraud focus on violations of the Internal Revenue Code stemming from acts of corporate fraud.³² Like financial institution fraud, corporate fraud investigations usually involve multiple federal law enforcement agencies.

In 2016, the Report discusses multiple corporate fraud investigations in which corporate executives embezzled funds from their corporation and then failed to report the illegally obtained funds on their income tax return.³³

TABLE 1: FINANCIAL INSTITUTION FRAUD

	2016	2015	Change from 2015 to 2016
Investigations Initiated	66	84	(21%) Decrease
Prosecutions Recommended	53	69	(23%) Decrease
Informations/Indictments	46	73	(37%) Decrease
Sentenced	64	160	(60%) Decrease

Source: Report at 49.

TABLE 2: PUBLIC CORRUPTION

	2016	2015	Change from 2015 to 2016
Investigations Initiated	84	68	24% Increase
Prosecutions Recommended	59	68	(13%) Decrease
Informations/Indictments	61	69	(12%) Decrease
Sentenced	57	60	(1%) Decrease

Source: Report at 50.

The Report also highlights corporate fraud cases in which corporate executives defrauded investors by using investors' funds contributed to the corporation for their own personal use.³⁴ Obtaining funds through corporate fraud often leads to illegal source tax crimes, which may trigger a CI investigation into the source of the unreported funds.

In 2016, CI initiated fewer corporate fraud investigations than in 2015 or 2014; however, it recommended more prosecutions than in 2015.³⁵ CI investigations into corporate fraud also resulted in fewer sentencing in 2016 than in either 2015 or 2014 (*see* Table 3).³⁶

D. Gaming

The illegal gaming industry encompasses a wide range of criminal activity. It includes bookmaking, numbers, online gaming, and even charitable gaming operations.³⁷ CI investigations into gaming operations focus on tax, money laundering, and other financial crimes relating to illegal proceeds of gaming operations.³⁸ The Internet has profoundly affected the illegal gaming industry in recent years. The Report emphasizes that the Internet has greatly expanded the reach of domestic and international gaming operations.³⁹

CI uses various aggressive tactics to investigate gaming operations. The Report identifies a two-faceted approach to CI investigations of the illegal gaming industry. First, CI investigates entities it suspects of violating tax, money laundering, or related financial crimes.⁴⁰ Second, CI works in unison with federal authorities, state authorities, tribal gaming boards, licensing commissions, and various industry regulators to enforce compliance in the field.⁴¹

The Report provides two case summaries of recent CI gaming investigations. The first investigation involved the owner of an illegal video poker business called Magic Minutes.⁴² Magic Minutes placed illegal video poker machines in gas stations, liquor stores, and party shops throughout South Carolina. The machines generated over a million dollars in illegal gambling profits for their owner, on which the owner paid no taxes.⁴³ As a result of CI's investigation, the owner of Magic Minutes was sentenced to 15 months

in prison and ordered to pay \$251,000 in restitution.⁴⁴ The second case involved a sports bookmaking operation in Philadelphia. In the case, a bookmaker received more than \$500,000 in illegal proceeds from bettors.⁴⁵ The bookmaker did not report any of those funds as income on his federal income tax returns.⁴⁶ CI investigated his operation and the bookmaker was eventually sentenced to 12 months in prison and ordered to pay \$238,000 in taxes, interest, and penalties.⁴⁷

The Report does not provide any statistics for gaming investigations in 2016, however, it appears to be an area of increasing interest for CI. In gaming cases, small bookmakers often unwittingly expose their small-scale gaming operation to a large-scale federal investigation by failing to report or pay taxes on their gaming proceeds.

E. Insurance Fraud and Healthcare Fraud

CI is devoting an increasing amount of resources to combat insurance fraud and healthcare fraud. Despite further budget cuts and fewer agents, CI investigated more cases of healthcare fraud in 2016 than in 2015.⁴⁸ CI's Insurance Fraud Program focuses on tax crimes and money laundering related to fraudulent insurance claims.⁴⁹ Insurance fraud takes many forms, including fake insurance companies, offshore Internet companies, and staged accidents.⁵⁰ CI's Healthcare Fraud Program focuses on insurance fraud schemes targeting health care insurance companies.⁵¹ Healthcare fraud includes billing insurance providers for medical expenses that never incurred, artificially inflating medical expenses, and performing unnecessary medical procedures.⁵² In recent years, the healthcare industry had been especially vulnerable to abuse because of rapid changes to federal healthcare laws.

The Report's case summaries illustrate the complexity and pervasiveness of insurance and healthcare fraud. Medicaid and Medicare fraud are particularly rampant. For example, a doctor in North Carolina was sentenced to 240 months in prison and ordered to pay restitution of \$5,962,189 after he was convicted of using the Medicaid provider he operated to fraudulently bill Medicaid for millions of dollars' worth of fraudulent claims.⁵³ Two

TABLE 3: CORPORATE FRAUD

	2016	2015	Change from 2015 to 2016
Investigations Initiated	62	75	(17%) Decrease
Prosecutions Recommended	59	35	69% Increase
Informations/Indictments	49	29	69% Increase
Sentenced	33	43	(23%) Decrease

Source: Report at 48.

other CI investigations centered on doctors engaging in similar schemes where they fraudulently billed Medicaid for millions of dollars' worth of unnecessary prescriptions and medical procedures.⁵⁴ Another common form of healthcare fraud involves illegal kickbacks. A chiropractor in Texas was sentenced to 168 months in prison and ordered to pay \$17,908,179 in restitution for soliciting millions in illegal kickbacks from healthcare providers in exchange for patient referrals.⁵⁵

The Report shows that CI devoted substantial resources to investigating healthcare fraud in 2016. Despite fewer agents and depleted resources, CI investigated more cases of healthcare fraud in 2016 than in 2015 or 2014.⁵⁶ It also recommended more prosecutions in 2016 than either of the previous two years.⁵⁷ This uptick runs counter to the overall decline in the number of investigations in other areas. The healthcare fraud outlier is likely due to CI's efforts to address the rampant problem of healthcare fraud in the United States (*see* Table 4).

F. Bankruptcy Fraud

Bankruptcy fraud is the last illegal source tax crime mentioned in the Report. Bankruptcy fraud generally occurs when a debtor in bankruptcy fraudulently hides assets from the bankruptcy trustee, thereby depriving creditors of proceeds they are legally entitled to as part of a bankruptcy settlement.⁵⁸ The IRS is often a creditor in bankruptcy proceedings that is seeking unpaid taxes, in which case bankruptcy fraud will constitute tax fraud.⁵⁹

The case summaries illustrate the serious nature of bankruptcy fraud when the IRS is a creditor. In one case, a North Carolina man who owed \$300,000 in taxes was convicted of bankruptcy fraud when he declared bankruptcy and concealed rental income from the bankruptcy court.⁶⁰ He was sentenced to 24 months in prison and ordered to pay \$404,619 in restitution. In a separate case, a woman was convicted of conspiracy to commit bankruptcy fraud when she and her husband hid their assets before filing bankruptcy.⁶¹ She was sentenced to 12 months of home confinement and five years of supervised release.⁶²

III. Additional Priority Areas

In addition to tax crimes, CI plays an active role in investigations of large-scale criminal activity reaching well beyond the scope of tax crimes. The Report addresses CI's investigations into narcotics trafficking, terrorism, money laundering, and complex financial crimes. In these areas, CI is usually part of a joint-investigation involving several federal law enforcement agencies working together to investigate large-scale criminal activity. What CI provides in these joint-investigations are its access to important financial information and expert ability to trace criminal proceeds to specific assets and bank accounts.

A. Narcotics and Counterterrorism

CI's Narcotics and Counterterrorism section is a part of CI's International Operations (IO).⁶³ The Narcotics and Counterterrorism Program assists the U.S. Government in combating transnational organized crime.⁶⁴ CI contributes to the U.S. Government's goal to combat drug trafficking, terrorism, and money-laundering by "following the money" so the government can seize assets and cut-off criminal organizations' valuable financial resources.⁶⁵ This is a vital part of the U.S. Government's strategy to crack down on drug trafficking and money laundering. By tracking down and cutting off criminal organizations' source of funds, CI can effectively cripple a criminal operation.

The Report highlights multiple large-scale drug trafficking operations that CI played a large role in shutting down. In 2016, CI helped apprehend the largest cocaine supplier to Alaska.⁶⁶ A CI investigation also helped the U.S. Government bring racketeering charges against gang members in California, as well as drug trafficking and money laundering charges against a drug distribution operation in the Dallas-Fort Worth area.⁶⁷ While tax-related crimes are not the central focus of these investigations, CI investigations often uncover additional tax crimes, money laundering, and financial crimes that augment the U.S. Government's case against drug traffickers or provide an alternative basis for criminal charges. CI's

TABLE 4: HEALTHCARE FRAUD

	2016	2015	Change from 2015 to 2016
Investigations Initiated	127	122	4% Increase
Prosecutions Recommended	101	91	11% Increase
Informations/Indictments	90	79	14% Increase
Sentenced	46	64	(28%) Decrease

Source: Report at 49.

expert ability to track down criminal assets is a critical part of the U.S. Government’s drug trafficking and counterterrorism objectives.⁶⁸

In 2016, CI initiated fewer narcotics investigations and recommended fewer narcotics prosecutions than in prior years. Narcotics investigations did, however, represent the most “high impact area” case investigations in 2016, with identity theft a distant second.⁶⁹ Thus, despite fewer agents working fewer cases, CI still invested substantial resources into narcotics investigations (*see* Table 5).

B. Money Laundering

CI partners with other federal law enforcement agencies to investigate and prosecute individuals and organizations who attempt to launder money derived from criminal activities.⁷⁰ CI is extremely active in money laundering investigations because of its unparalleled access to financial information and network of relationships with domestic and foreign financial institutions. CI uses these tools to trace laundered money that may appear “clean,” back to its illegal source. CI needs only a minimal amount of evidence to proceed with a civil forfeiture action to seize an individual’s assets. The heavily pro-government civil asset forfeiture laws give CI a powerful weapon to yield against alleged criminal actors.

Money laundering investigations are not limited to international drug traffickers or large criminal organizations. The federal government may bring money laundering charges for almost any crime. A 2016 money laundering investigation involved a trustee who breached his fiduciary duty to his trust when he pledged the trust as collateral for a \$52 million loan.⁷¹ The trustee then used the loan proceeds for

his own personal benefit, exhausting all \$52 million in six months on various purchases and business investments.⁷² The trustee was convicted of defrauding the trust out of \$52 million by using the trust as collateral to secure loan proceeds for his own personal use.⁷³ The trustee was also convicted of laundering \$52 million because it constituted an attempt to conceal the source of criminally derived proceeds.⁷⁴ The trustee was sentenced to 160 months in prison and ordered to pay restitution to the trust of over \$45 million.⁷⁵

Money-laundering investigations remain a priority for CI. As with most areas, however, money-laundering investigations were down in 2016.⁷⁶ CI also recommended fewer prosecutions and obtained fewer sentences for money laundering in 2016 than the prior years (*see* Table 6).⁷⁷

C. Bank Secrecy Act

The Bank Secrecy Act (BSA) requires individuals to report large currency transactions with financial institutions, disclose foreign bank accounts, and report any transportation of currency across U.S. borders.⁷⁸ The Report emphasizes the growth of CI’s BSA Program over the last 15 years.⁷⁹ CI plays a significant role in enforcing the BSA by collecting and analyzing BSA data. CI focuses on fraudulent tax evasion, money laundering, narcotics trafficking, terrorist financing, and other financial crimes.⁸⁰ The CI BSA Program partners with U.S. Attorney Offices in various judicial districts to help combat financial crimes.⁸¹

An important goal of the CI BSA Program is establishing strong relationships with financial institutions, both domestically and abroad.⁸² In 2016, CI hosted two bank forums aimed at strengthening relationships with officials in the financial institutions.⁸³ Financial institutions are an

	2016	2015	Change from 2015 to 2016
Investigations Initiated	788	955	(17%) Decrease
Prosecutions Recommended	684	897	(24%) Decrease
Informations/Indictments	721	872	(17%) Decrease
Sentenced	635	580	9% Increase

Source: Report at 49.

	2016	2015	Change from 2015 to 2016
Investigations Initiated	1201	1436	(16%) Decrease
Prosecutions Recommended	1010	1301	(22%) Decrease
Informations/Indictments	979	1221	(20%) Decrease
Sentenced	668	691	(3%) Decrease

Source: Report at 49.

integral part of CI's efforts to enforce BSA requirements through their voluntary compliance and assistance in CI investigations into financial crimes.

Another CI initiative in 2016 was the Financial Crimes Enforcement Network (FinCEN) issuing Geographic Targeting Orders (GTOs) that temporarily require some U.S. title insurance companies to identify natural persons using legal business entities ("shell companies") to pay "all-cash" for large residential real estate purchases in select U.S. counties.⁸⁴ For certain large, all-cash transactions, title insurance companies will be required to identify the true "beneficial owner" behind the shell company purchasing the real estate.⁸⁵ The goal of this initiative is to assist CI in tracing criminally derived proceeds and identifying potentially illegal activity. Recently, criminals have used numerous layers of shell companies to conceal their identity as the companies' beneficial owner of the shell company and its funds. They create several shell companies and contribute proceeds from their criminal activity to their shell companies. The shell companies then use the criminal proceeds to purchase valuable real-estate in "all-cash" purchases. The real estate title lists a shell company as the real estate's owner, rather than the beneficial owner of the shell company. The complex Russian-doll assortment of endless shell companies conceals the true identity of the real-estate purchaser. At its core, this is a complex means of laundering illicit money by converting the money into real-estate holdings that cannot be traced back to anyone.

The Report shows that BSA investigations dropped off significantly in 2016. CI initiated 504 investigations in 2016, compared to 613 and 809 in 2015 and 2014, respectively.⁸⁶ Those numbers represent an incredible 38% decrease in BSA investigations over a two-year span. The Report shows similar downward trends for prosecution recommendations and sentencings for BSA crimes.⁸⁷

The huge drop-off in BSA cases since 2014 may be attributable to a recent IRS policy change. In October 2014, the IRS announced it would no longer seize funds associated solely with "legal source" structuring transactions.⁸⁸ Structuring transactions are regular cash transactions that fall below the BSA's \$10,000 reporting threshold.⁸⁹ This policy change possibly removed several potential BSA

cases from CI's investigation radar, thereby contributing in large part to the 38% decrease in BSA investigations from 2014 to 2016 (see Table 7).

D. Virtual Currency

The Report briefly addresses the issue of virtual currency, which was an investigative priority for 2016. Virtual currency presents an unusual challenge to CI efforts to enforce BSA compliance and crackdown on money laundering.⁹⁰ Virtual currency (*e.g.*, Bitcoin) is a medium of exchange that operates like currency but does not have a legal tender status in any jurisdiction.⁹¹ That makes it nearly impossible to trace. Virtual currency can be used in the commission of a wide variety of crimes such as tax fraud, money laundering, and financing illegal activity.⁹² Virtual currency is commonly used in illegal Internet transactions. An example is the Silk Road investigation, in which drugs and other illicit contraband were sold over the Internet in exchange for virtual currency.⁹³

The Report emphasizes CI's efforts to understand and stay current in the area of virtual currency. CI is part of the IRS's Virtual Currency Issue Team that studies current issues surrounding virtual currency and how it is being used to commit tax fraud and other financial crimes.⁹⁴ The Report says that all of CI's field officers attended cybercrime and virtual currency training in 2016.⁹⁵ In 2017, CI plans to continue working with Financial Crimes Enforcement Network (FinCEN) and other federal agencies to identify virtual currency transactions that represent criminally derived proceeds.⁹⁶ Virtual currency is a point of emphasis that CI will continue to track because of the increasing threat it poses as a viable criminal currency.

IV. Conclusion

In 2016, CI continued to aggressively pursue illegal source tax crimes despite another year of budget cuts and staff reduction. With fewer agents, CI seemingly has changed its approach to combatting illegal source tax crimes by committing more resources to a few high-priority crimes. In 2016, these high-priority crimes included healthcare fraud and public corruption.

TABLE 7: BANK SECRECY ACT (BSA)

	2016	2015	Change from 2015 to 2016
Investigations Initiated	504	613	(18%) Decrease
Prosecutions Recommended	411	519	(21%) Decrease
Informations/Indictments	399	533	(25%) Decrease
Sentenced	449	557	(19%) Decrease

Source: Report at 48.

Taxpayers would be wise to ignore any rumors that the IRS budget cuts have caused it to go soft on tax crimes. IRS-CI may publicly lament the budget cuts and the fact it is “at the same staffing level as 1956,” however, CI still has some very serious weapons for combatting tax crimes. CI’s most powerful weapon is its access to information. In today’s e-commerce global economy, CI’s access to and ability to track financial information is like a Death Star, which the U.S.

Government uses to blow-up assets or bank accounts it believes might be proceeds of criminal activity. While CI may be staffed at the same level as 1956, it operates on an entirely different level. Taxpayers would be foolish to misinterpret CI’s claims of a shrinking staff and further budget cuts as an inability to enforce tax laws. With its unfettered access to almost any financial information, the IRS can still uncover even the most innocuous tax crimes.

ENDNOTES

- 1 Internal Revenue Service Criminal Investigation, 2016 Annual Report, available online at www.irs.gov/pub/foia/ig/ci/2016_annual_report_02092017.pdf [hereinafter Report].
- 2 *Id.*, at 5.
- 3 David Voreacos, *IRS Criminal Cases Fall 12 Percent as Agents Head for Exits* (Feb. 27, 2017, 2:59 PM), www.bloomberg.com/news/articles/2017-02-27/irs-criminal-cases-fall-by-12-percent-as-agents-head-for-exits.
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- 6 *Id.*
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- 9 Report, *supra* note 1, at 4.
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- 25 *Id.*, at 48–50.
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- 64 *Id.*, at 37.
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- 66 *Id.*, at 38.
- 67 *Id.*, at 38–39.
- 68 *Id.*, at 37.
- 69 *Id.*, at 5 (788 Narcotics cases and 573 Identity Theft cases investigated in 2016).
- 70 *Id.*, at 41.
- 71 *Id.*
- 72 *Id.*
- 73 *Id.*
- 74 *Id.*
- 75 *Id.*
- 76 *Id.*
- 77 *Id.*
- 78 *Id.*, at 42.
- 79 *Id.*
- 80 *Id.*
- 81 *Id.*
- 82 *Id.*, at 42–43.
- 83 *Id.*, at 43.
- 84 *Id.*
- 85 *Id.*
- 86 *Id.*, at 42.
- 87 *Id.*
- 88 New IRS Special Procedure to Allow Property Owners to Request Return of Property, Funds in Specific Structuring Cases (June 16, 2016), www.irs.gov/uac/newsroom/new-irs-special-procedure-to-allow-property-owners-to-request-return-of-property-funds-in-specific-structuring-cases.
- 89 *Id.*
- 90 Report, *supra* note 1, at 43.
- 91 *Id.*
- 92 *Id.*
- 93 *Id.*
- 94 *Id.*
- 95 *Id.*
- 96 *Id.*

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