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IRS Whistleblower CLE

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nroberts@protectuslaw.com



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SUBMITTING A WHISTLEBLOWER CLAIM TO THE UNITED STATES INTERNAL REVENUE SERVICE

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ProtectUS Video Presentations on Whistleblowing Practices

1) FILING A CASE UNDER THE UNITED STATES FALSE CLAIMS ACT
2) PREPARING A TCR FOR THE SEC: REPORTING CORPORATE FRAUD AND FOREIGN CORRUPTION
3) FILING A MONEY LAUNDERING/SANCTIONS CASE WITH THE DEPARTMENT OF TREASURY
4) SUBMITTING A WHISTLEBLOWER CLAIM TO THE UNITED STATES INTERNAL REVENUE SERVICE

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History → Framework → Form 211

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IRS WHISTLEBLOWER HISTORY

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Revenue Act of 1862

July 1, 1862.

1862, ch. 163, § 25. *Post*, pp. 661, 627.

1863, ch. 74. *Post*, p. 713.

Office of Commissioner of Internal Revenue, created.

Commissioner, appointment, salary, duty, &c.,

to prepare rules, forms, blanks, &c.,

CHAP. CXIX. — *An Act to provide Internal Revenue to support the Government and to pay Interest on the Public Debt.*

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That, for the purpose of superintending the collection of internal duties, stamp duties, licenses, or taxes imposed by this act, or which may be hereafter imposed, and of assessing the same, an office is hereby created in the Treasury Department to be called the office of the Commissioner of Internal Revenue; and the President of the United States is hereby authorized to nominate, and, with the advice and consent of the Senate, to appoint, a Commissioner of Internal Revenue, with an annual salary of four thousand dollars, who shall be charged, and hereby is charged, under the direction of the Secretary of the Treasury, with preparing all the instructions, regulations, directions, forms, blanks, stamps, and licenses, and distributing the same,

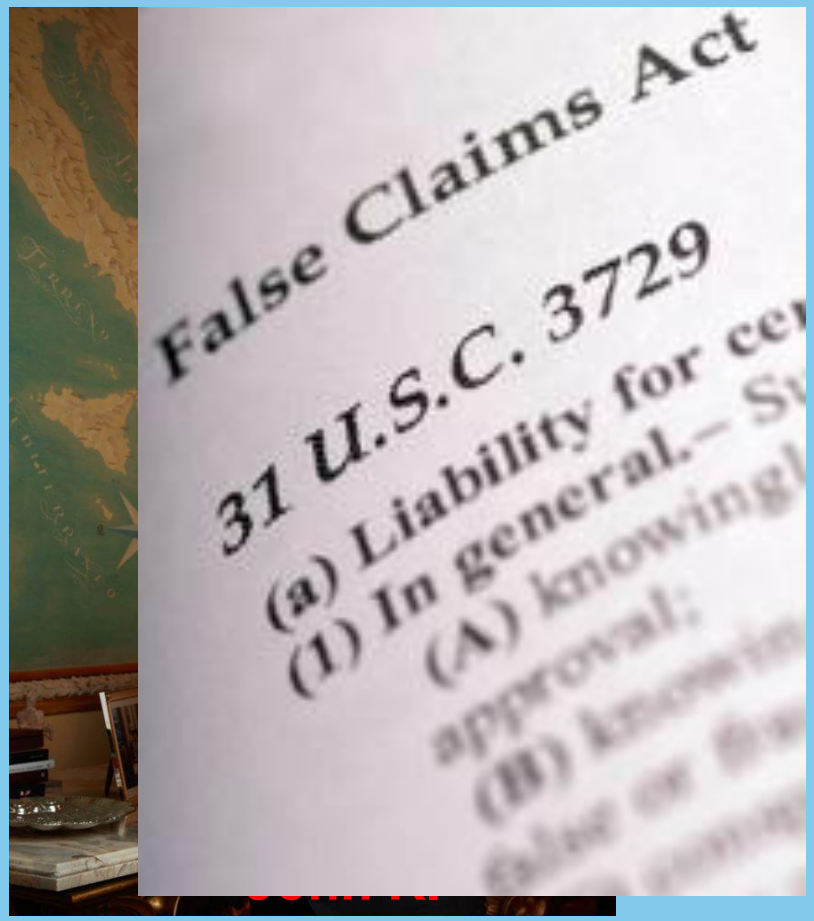
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Revenue Act of 1867

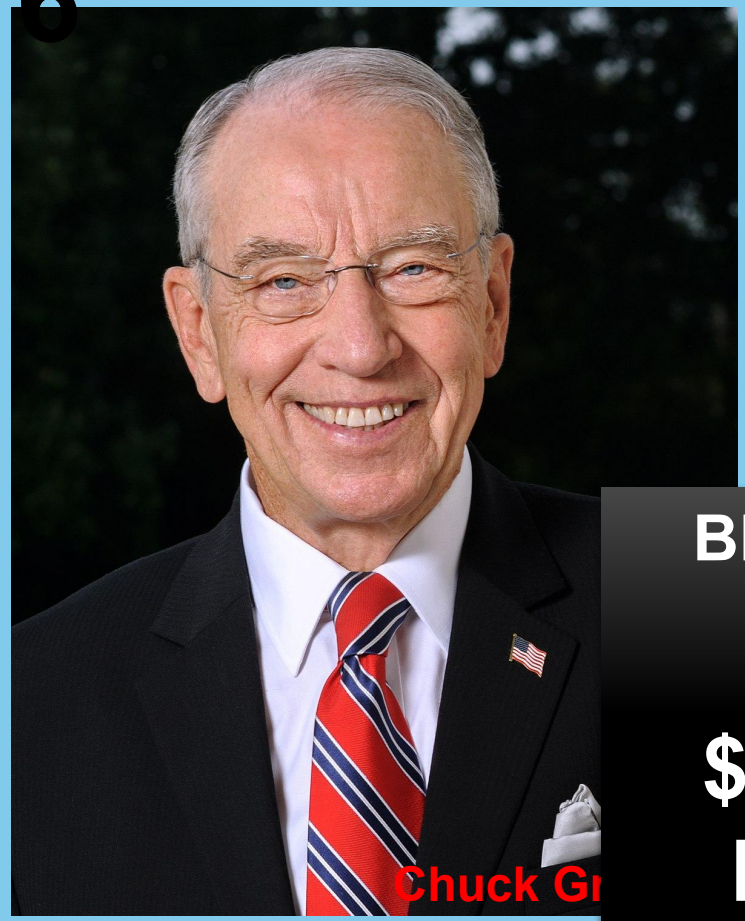
(a) **IRC§7623(a):** states "In general -
The Secretary, under regulation prescribed by the Secretary, is authorized to pay such sums as he deems necessary for-
(1) detecting underpayment of tax, or
(2) detecting and bringing to trial and punishment persons guilty of violating the internal revenue laws or conniving at the same"

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Phillips



Chuck Gr

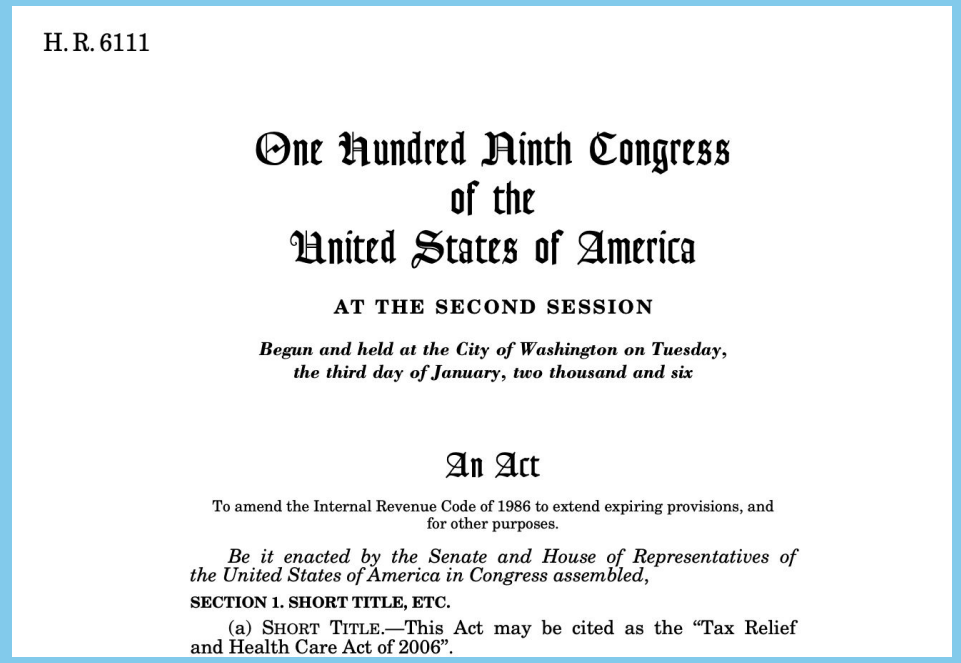
BETWEEN 1986 AND 2006:

$18 BILLION IN RECOVERIES

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Source: U.S. Department of Justice, Report of False Claims, available at https://www.justice.gov/archive/opa/pr/2006/November/06_civ_783.html

2006



H. R. 6111

One Hundred Ninth Congress
of the
United States of America

AT THE SECOND SESSION

Begun and held at the City of Washington on Tuesday, the third day of January, two thousand and six

An Act

To amend the Internal Revenue Code of 1986 to extend expiring provisions, and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

SECTION 1. SHORT TITLE, ETC.

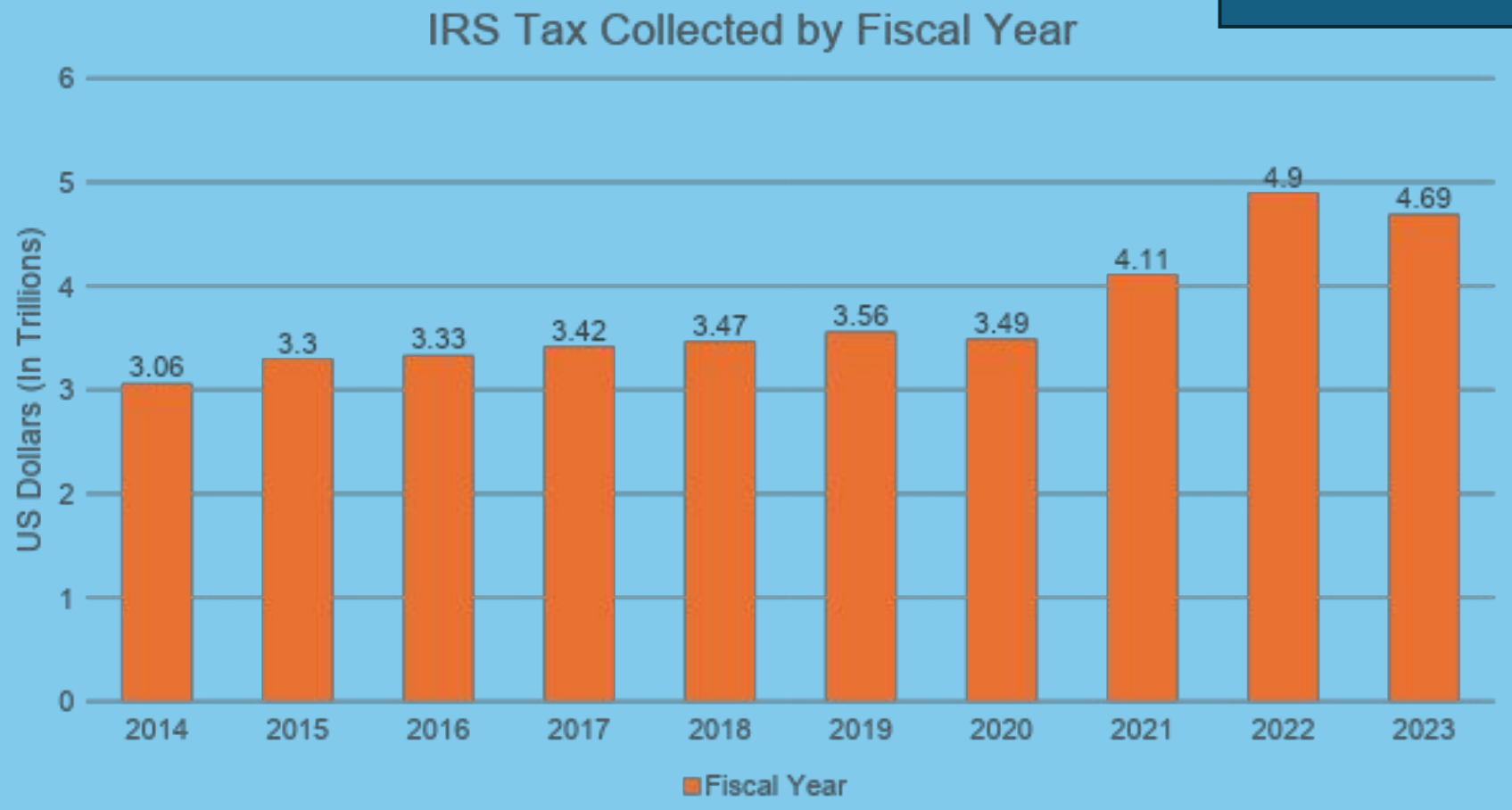
(a) SHORT TITLE.—This Act may be cited as the "Tax Relief and Health Care Act of 2006".



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THE NUMBERS

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Source: Internal Revenue Service, Gross Tax Collection Table, Available at https://www.irs.gov/statistics/collections-activities-penalties-and-appeals#:~:text=In%20Fiscal%20Year%20(FY)%202023,transfers%20(Table%2027%20XLSX)

Tax Year	Gross Tax Gap Estimate	Voluntary Compliance Rate	Enforced and Other Late Payments
2001	$345 billion	83.7%	$55 billion
2006	$450 billion	83.1%	$65 billion
2008-2010	$458 billion	81.7%	$52 billion
2011-2013	$438 billion	83.7%	$58 billion
2014-2016	$496 billion	85%	$68 billion
2017-2019	$540 billion	85.1%	$70 billion
2020	$601 billion	84.6%	$63 billion
2021	$688 billion	84.9%	$63 billion

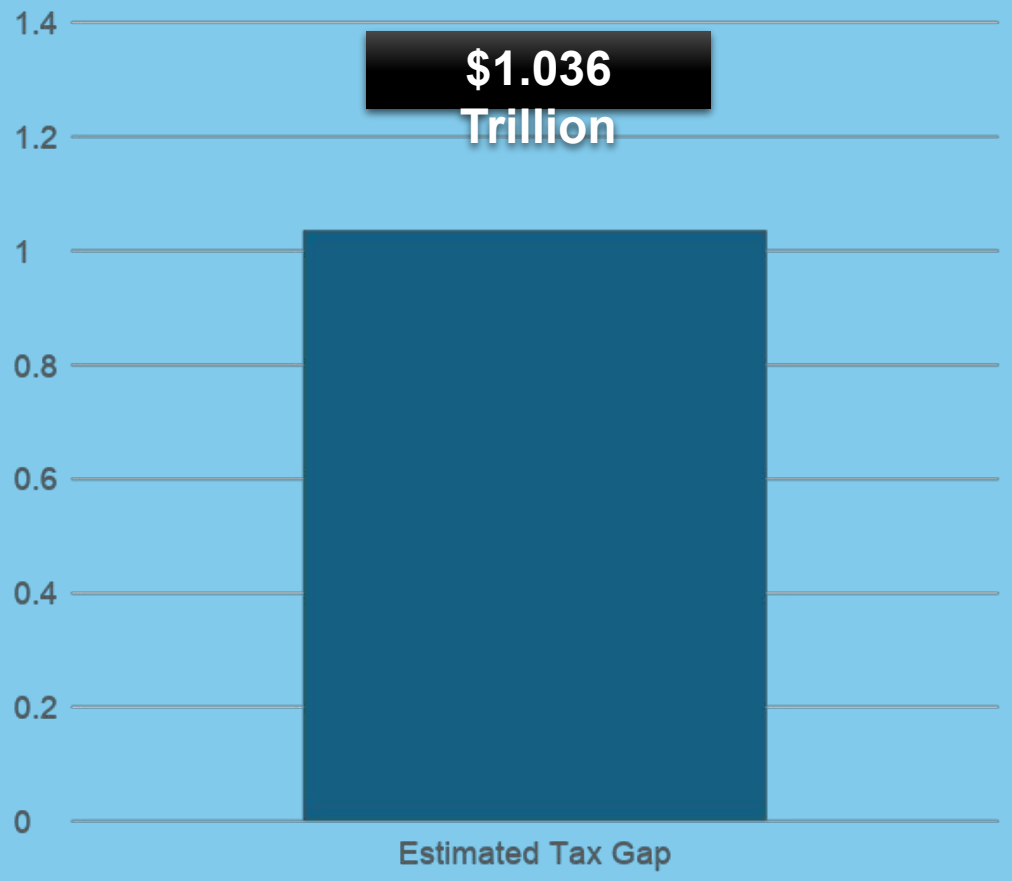
Source: Internal Revenue Service, Tax Gap Statistics Table, Available at https://bipartisanpolicy.org/explainer/breaking-down-the-federal-tax-gap/

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Tax Gap Context

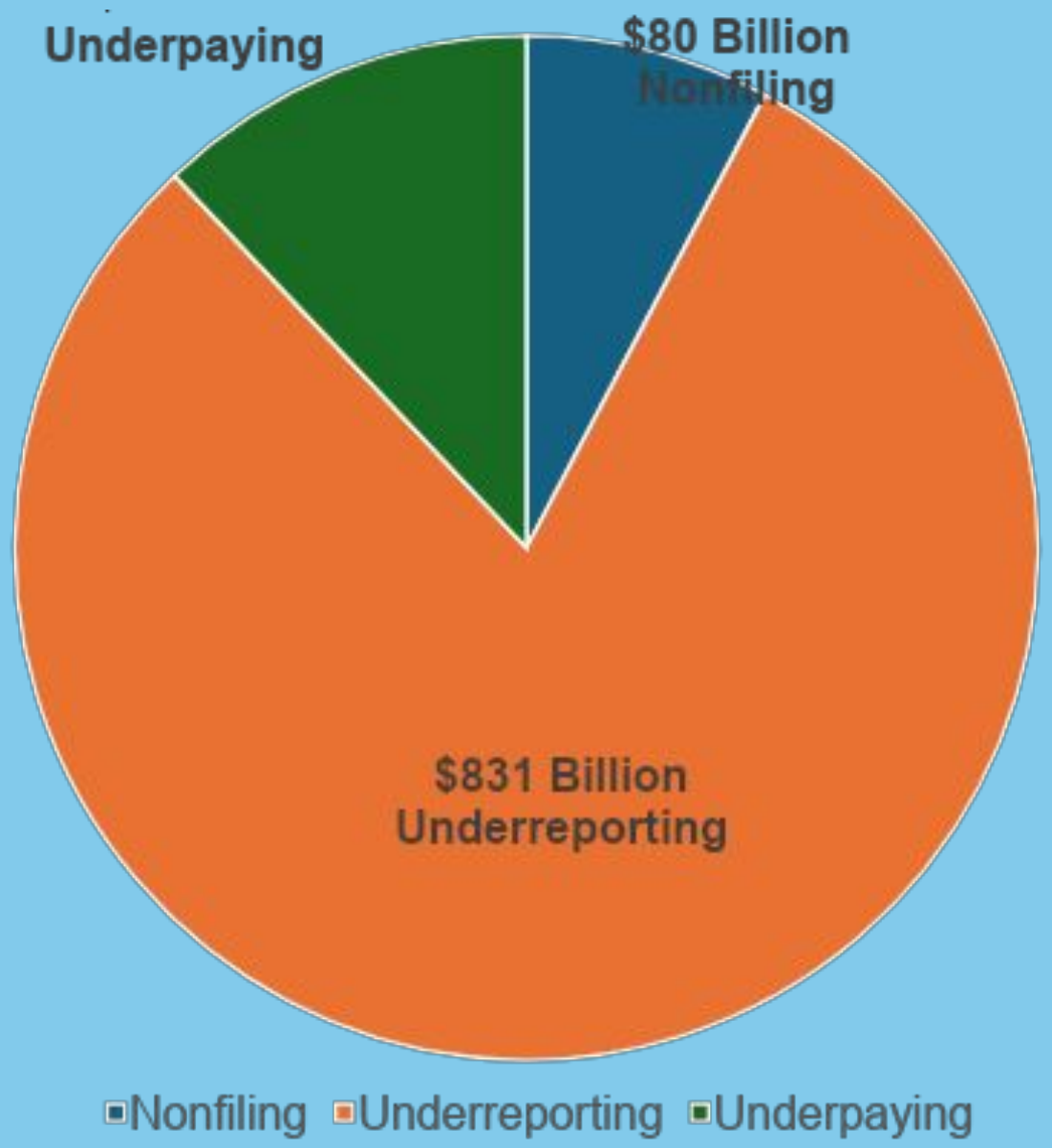
IRS Total Tax Collected 2014 to 2019	$20.14 Trillion
Voluntary Compliance Rate	~85%

X



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Source: U.S. Internal Revenue Service, Tax Gap Estimates, available at https://www.irs.gov/newsroom/the-tax-gap.



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Source: U.S. Internal Revenue Service, Tax Gap Estimates, available at https://www.irs.gov/newsroom/the-tax-gap.

Tax Gap Context

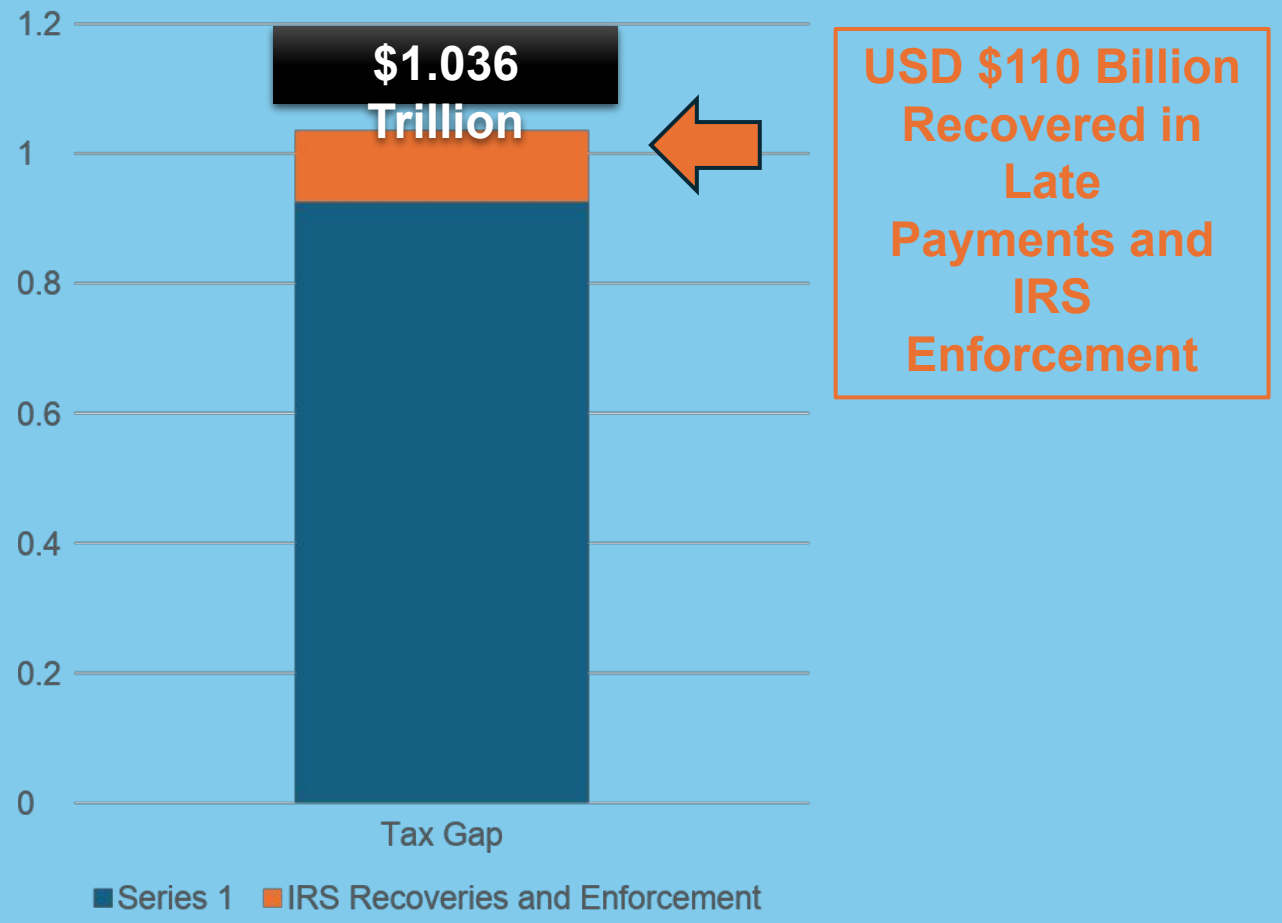
IRS Total Tax Collected 2014 to 2019

$20.75 Trillion

X

Voluntary Compliance Rate

~85%



USD $110 Billion Recovered in Late Payments and IRS Enforcement

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Source: U.S. Internal Revenue Service, Tax Gap Estimates, available at https://www.irs.gov/newsroom/the-tax-gap.

Tax Gap Context

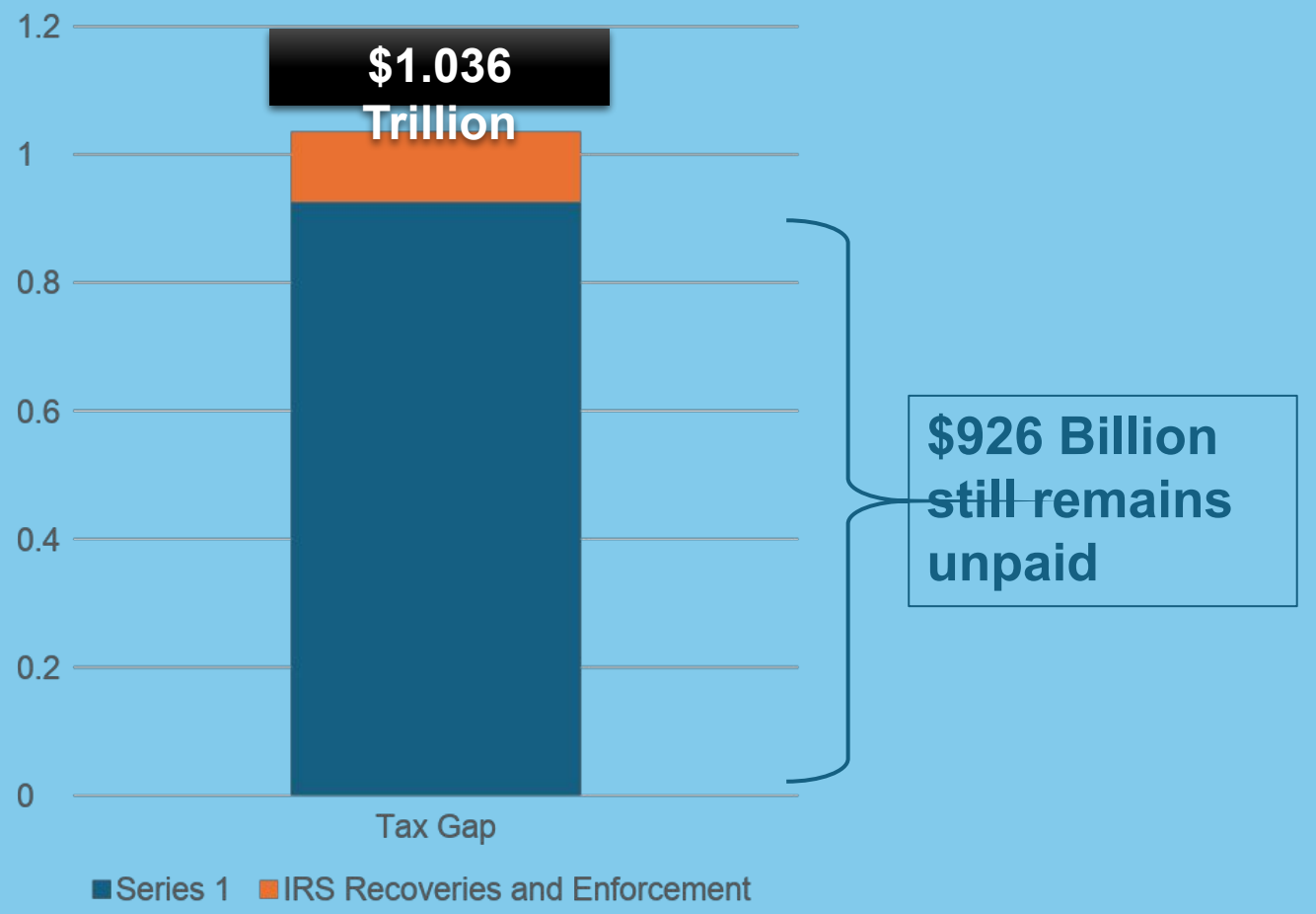
IRS Total Tax Collected 2014 to 2019

$20.75 Trillion

X

Voluntary Compliance Rate

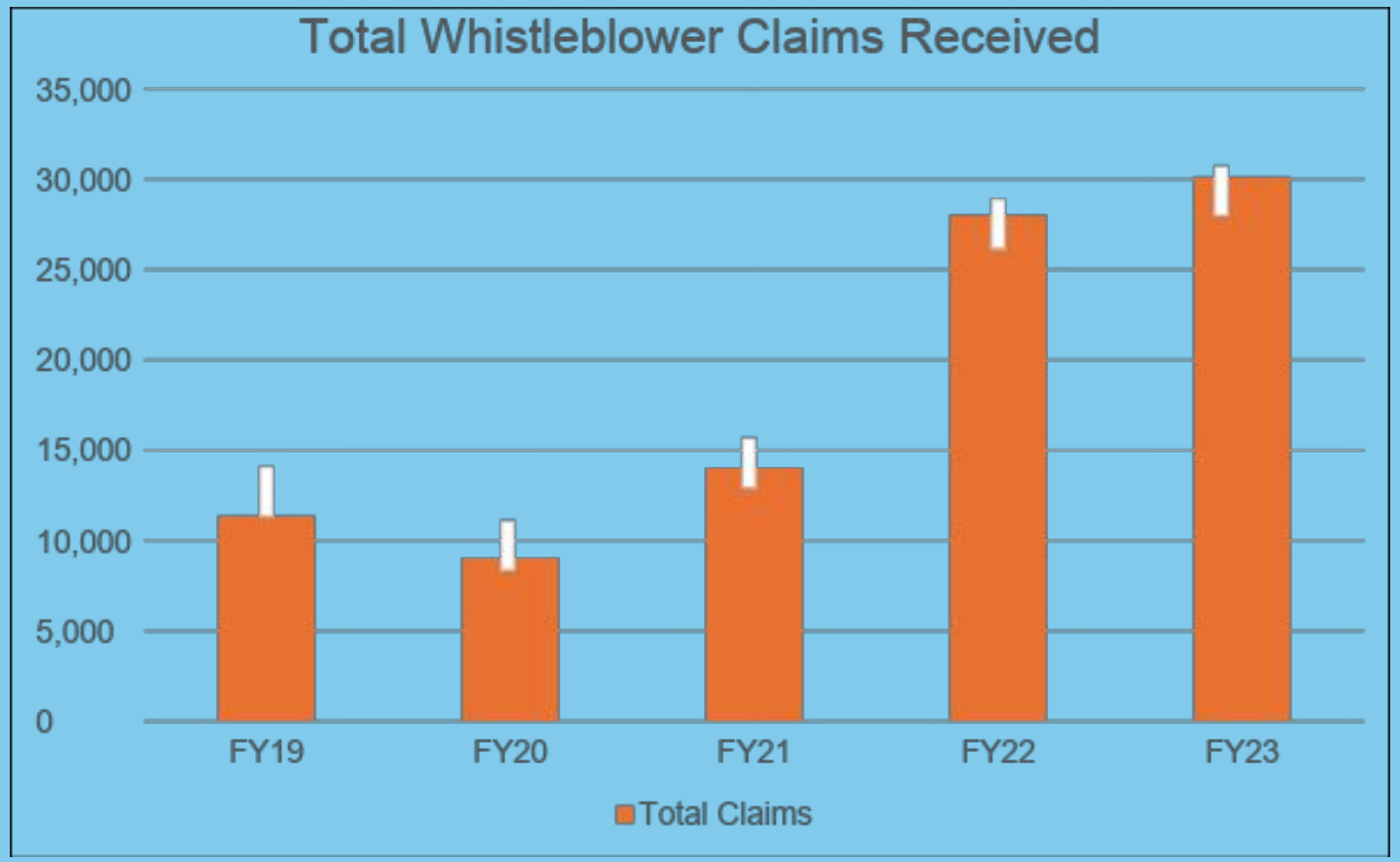
~85%



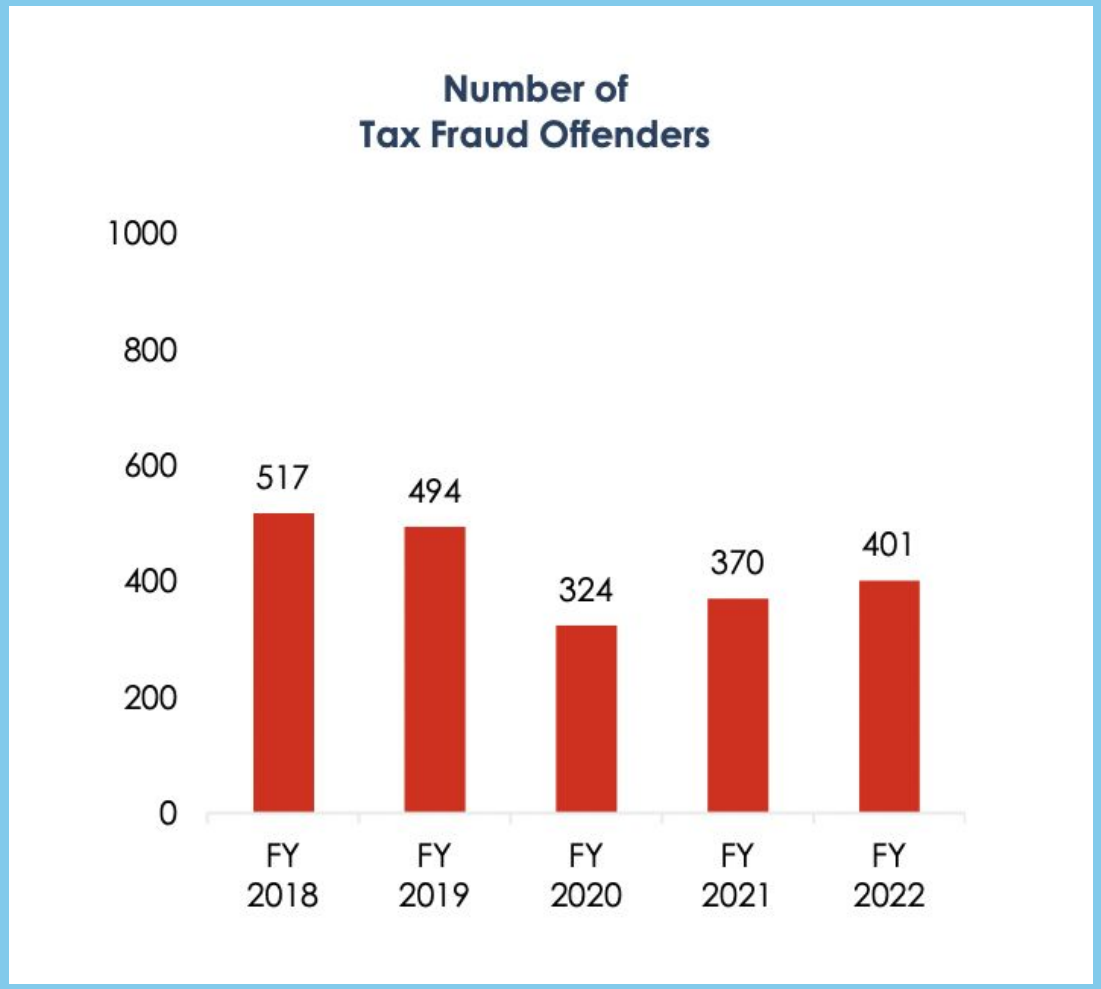
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Source: U.S. Internal Revenue Service, Tax Gap Estimates, available at https://www.irs.gov/newsroom/the-tax-gap.

Total IRS Whistleblower Claims

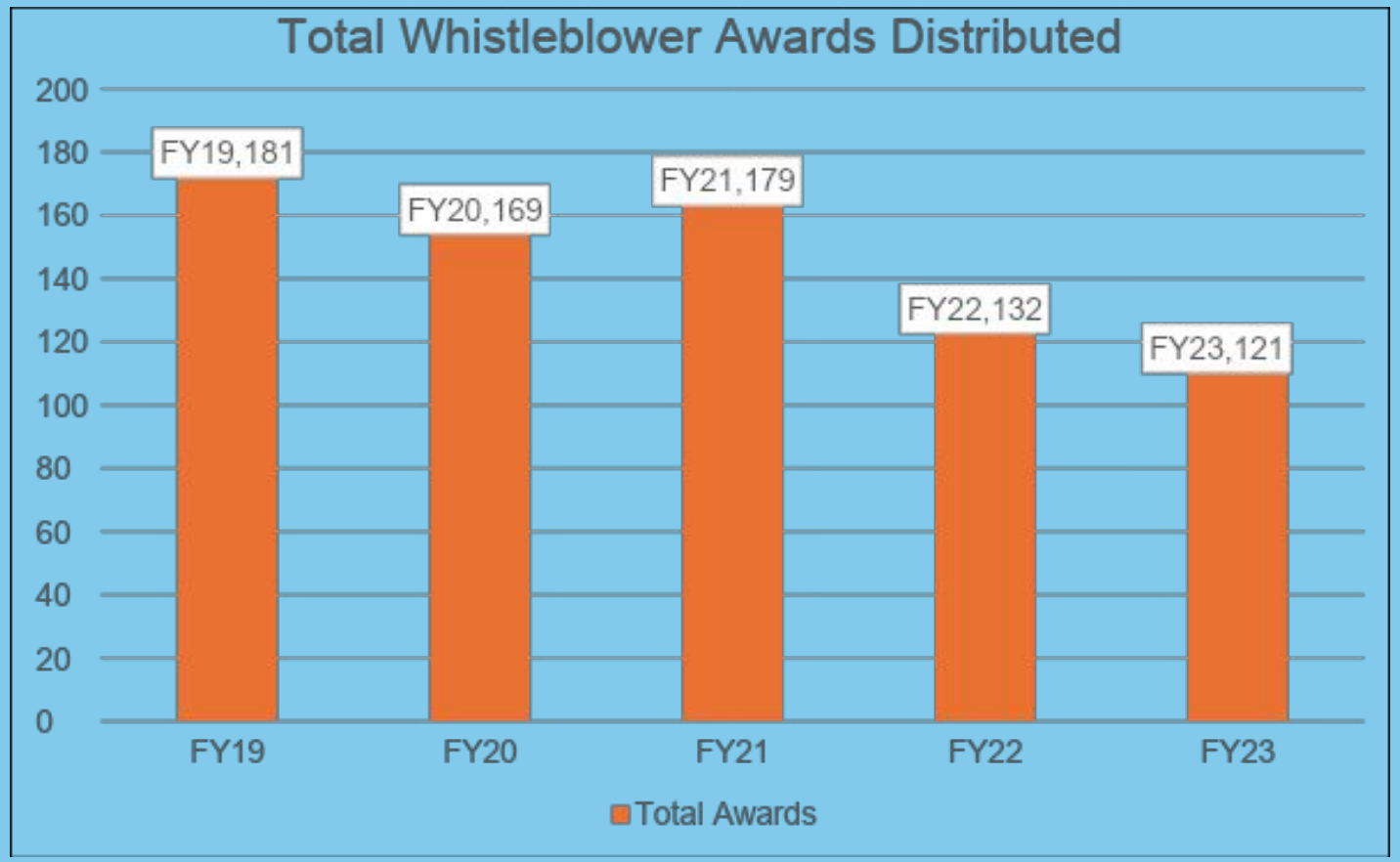


Source: Internal Revenue Service, Whistleblower Program Annual Report (2019-2023), Available at https://www.irs.gov/compliance/whistleblower-office-annual-reports



Source: United States Sentencing Commission, Tax Fraud Quick Facts (2023), Available at https://www.ussc.gov/sites/default/files/pdf/research-and-publications/quick-facts/Tax_Fraud_FY22.pdf

Total IRS Whistleblower Awards

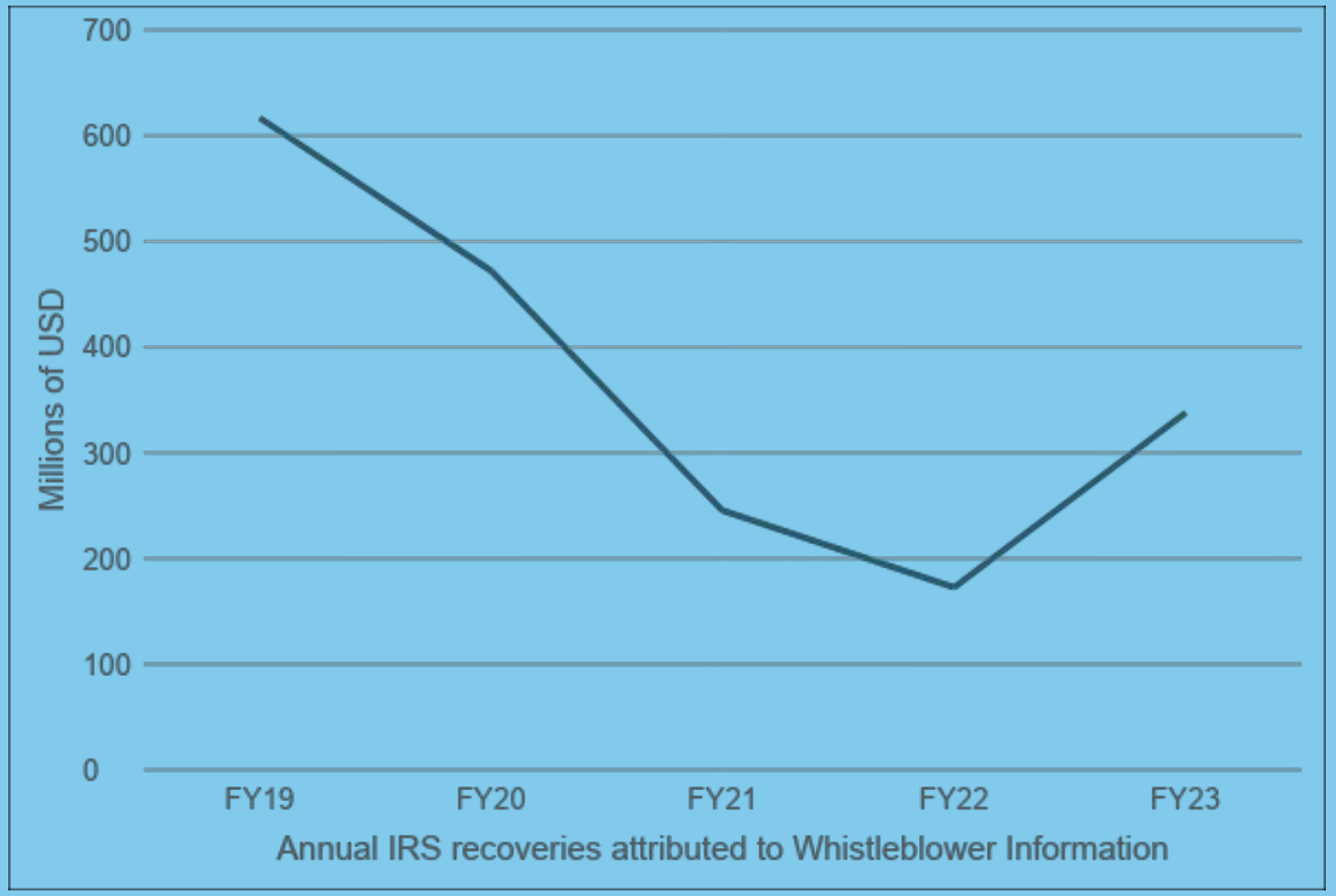


Average Percentage of Claims that Receive an Award: 0.84%

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Source: Internal Revenue Service, Whistleblower Program Annual Report (2019-2023), Available at https://www.irs.gov/compliance/whistleblower-office-annual-reports

Recoveries Based on Whistleblower Information

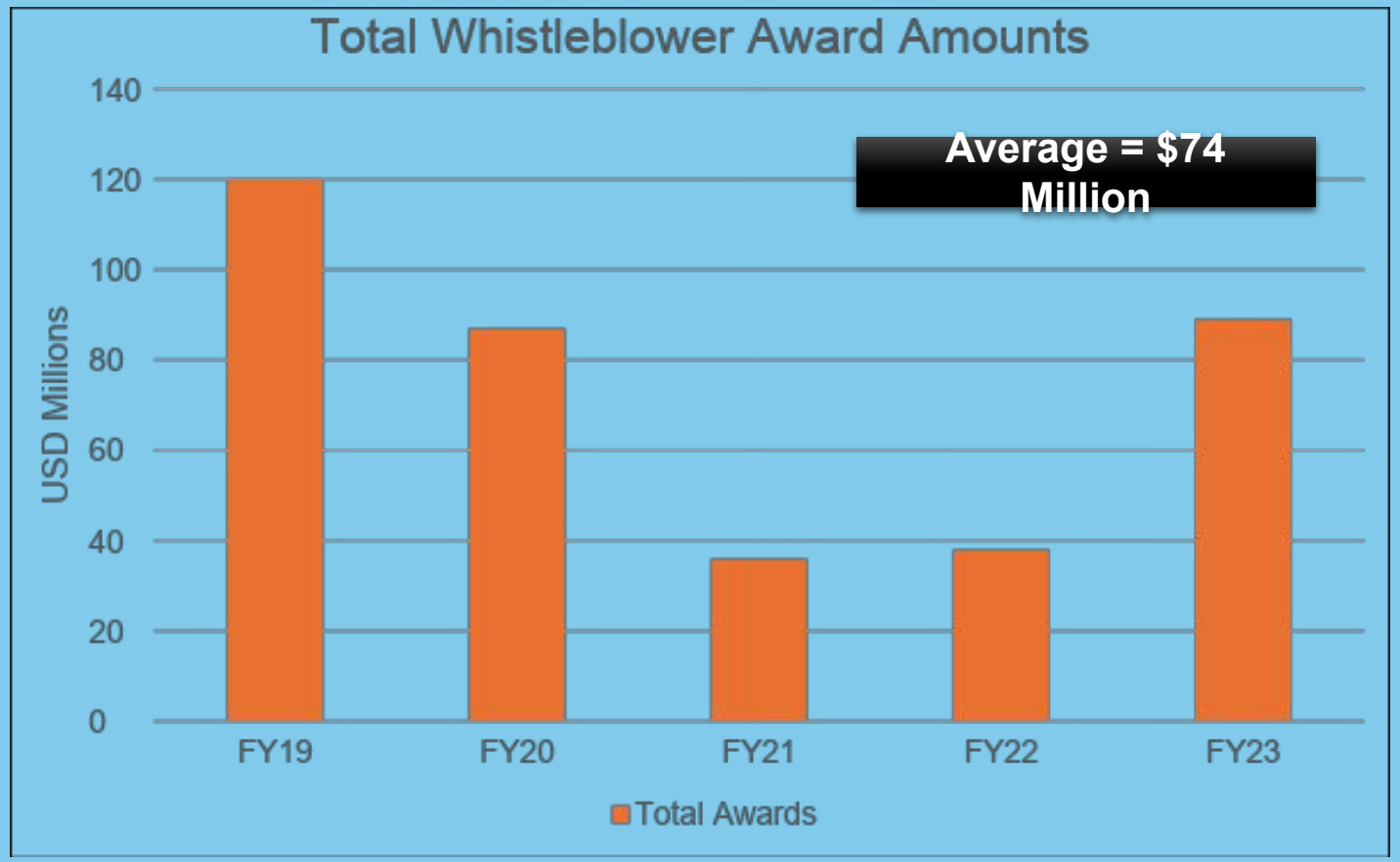


Avg Percentage of Tax Gap

XXX

Source: Internal Revenue Service, Whistleblower Program Annual Report (2019-2023), Available at https://www.irs.gov/compliance/whistleblower-office-annual-reports

Total IRS Whistleblower Award Amounts



Average Percentage of Proceeds Collected that are Awards: 20.14%

Source: Internal Revenue Service, Whistleblower Program Annual Report (2019-2023), Available at https://www.irs.gov/compliance/whistleblower-office-annual-reports

THE LAW

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WHEN STATUTE APPLIES

§7623(b)(5): states "APPLICATION OF THIS SUBSECTION.—This subsection shall apply with respect to any action— "(A) against any taxpayer, but in the case of any individual, only if such individual's gross income exceeds $200,000 for any taxable year subject to such action, and "(B) if the tax, penalties, interest, additions to tax, and additional amounts in dispute exceed $2,000,000.

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AWARD TO WHISTLEBLOWER

§7623(b)(1): states "IN GENERAL.—
If the Secretary proceeds with any administrative or judicial action described in subsection (a) based on information brought to the Secretary's attention by an individual, such individual shall, subject to paragraph (2), receive as an award at least 15 percent but not more than 30 percent of the collected proceeds (including penalties, interest, additions to tax, and additional amounts) resulting from the action (including any related actions) or from any settlement in response to such action. The determination of the amount of such award by the Whistleblower Office shall depend upon the extent to which the individual substantially contributed to such action"

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AWARD FOR LESS SUBSTANTIAL CONTRIBUTION

§7623(b)(2)(A): states "IN GENERAL.—
In the event the action described in paragraph (1) is one which the Whistleblower Office determines to be based principally on disclosures of specific allegations (other than information provided by the individual described in paragraph (1)) resulting from a judicial or administrative hearing, from a governmental report, hearing, audit, or investigation, or from the news media, the Whistleblower Office may award such sums as it considers appropriate, but in no case more than 10 percent of the collected proceeds (including penalties, interest, additions to tax, and additional amounts) resulting from the action (including any related actions) or from any settlement in response to such action, taking into account the significance of the individual's information and the role of such individual and any legal representative of such individual in contributing to such action."

ATTORNEY FEES

26 USC § 62(21): states “ATTORNEYS FEES RELATING TO AWARDS TO WHISTLEBLOWERS.—
Any deduction allowable under this chapter for attorney fees and court costs paid by, or on behalf of, the taxpayer in connection with any award under section 7623(b) (relating to awards to whistleblowers). The preceding sentence shall not apply to any deduction in excess of the amount includible in the taxpayer’s gross income for the taxable year on account of such award.”

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Foreign Bank Account Report (FBAR)

Important Taxpayer Requirement

When to file

The FBAR is an annual report, due April 15 following the calendar year reported. You're allowed an automatic extension to October 15 if you fail to meet the FBAR annual due date of April 15. You don't need to request an extension to file the FBAR. See FinCEN's website PDF for further information.

If you're affected by a natural disaster, the government may further extend your FBAR due date. It's important that you review relevant FBAR relief notices for complete information.

The government continues to extend the FBAR due date for certain employees or officers with signature or other authority over, but no financial interest in certain foreign financial accounts. Review important details about this extension in the most recent notice for certain financial professionals.

Per the Bank Secrecy Act, every year you must report certain foreign financial accounts, such as bank accounts, brokerage accounts and mutual funds, to the Treasury Department and keep certain records of those accounts. You report the accounts by filing a Report of Foreign Bank and Financial Accounts (FBAR) on Financial Crimes Enforcement Network (FinCEN) Form 114.

Who must file

A U.S. person, including a citizen, resident, corporation, partnership, limited liability company, trust and estate, must file an FBAR to report:

1. a financial interest in or signature or other authority over at least one financial account located outside the United States if
2. the aggregate value of those foreign financial accounts exceeded $10,000 at any time during the calendar year reported.

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Bank
Secrecy
Act

Select Your FBAR E-Filing Method



File PDF FBAR

- Adobe Reader is required
- Work at your own pace
- Save as you go / Reuse form
- Offline form preparation

Prepare	Submit

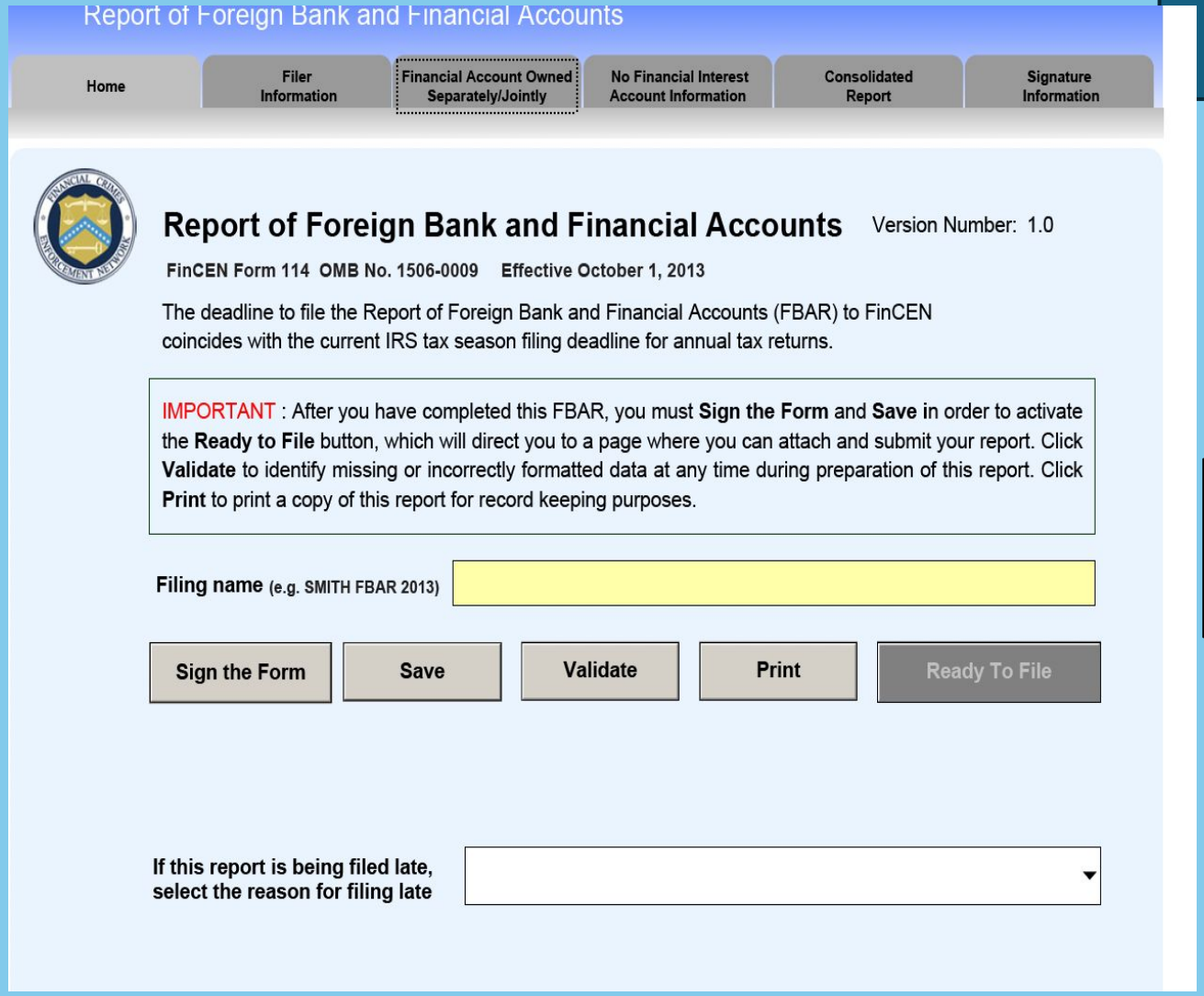


File Online FBAR

- Adobe Reader NOT required
- You are ready to file today
- One-time submission
- Online form preparation

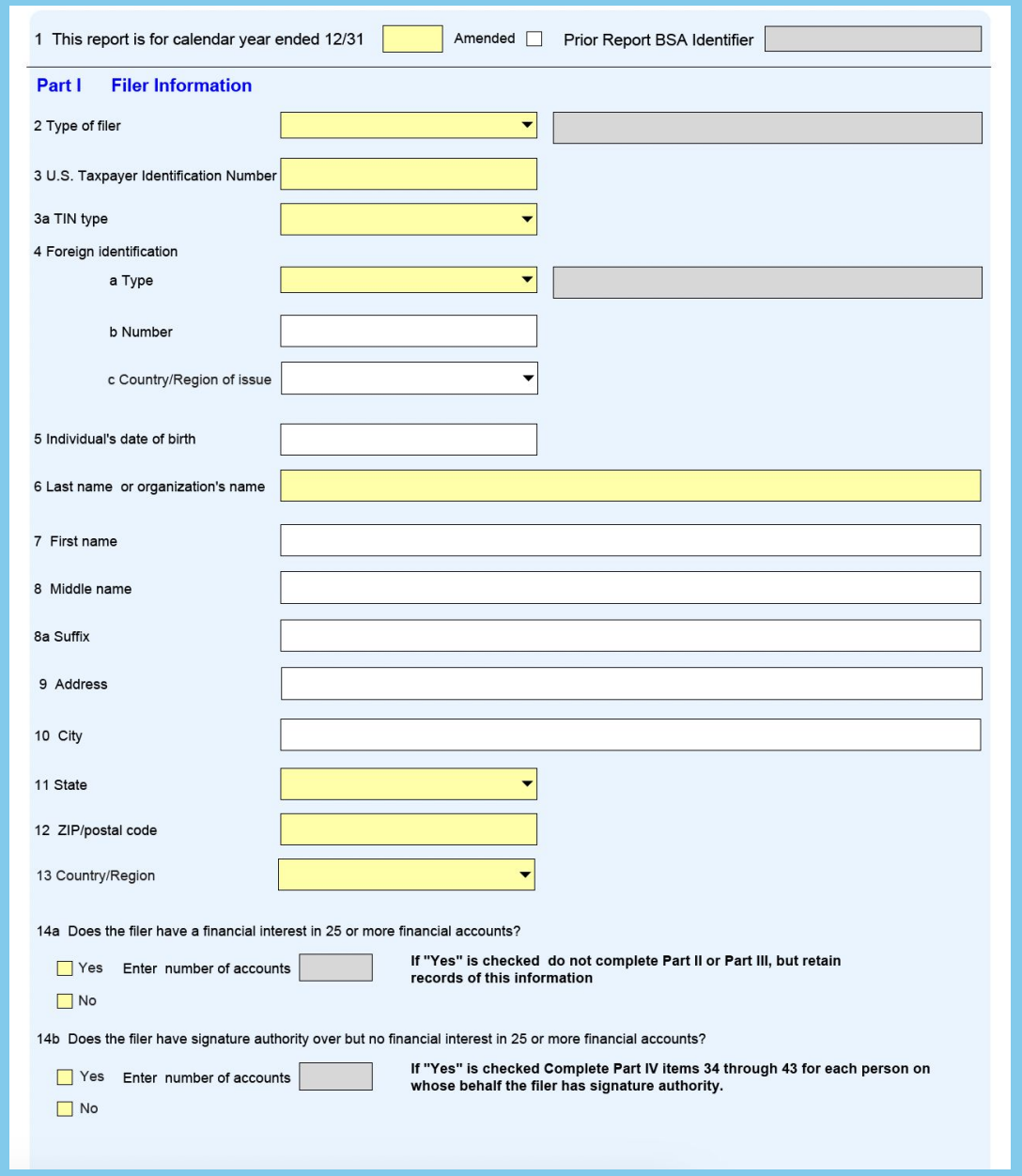
Prepare & Submit

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Filing system found at: https://bsaefiling.fincen.treas.gov/main.html

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1 This report is for calendar year ended 12/31 ☐ Amended ☐ Prior Report BSA Identifier

Part I Filer Information

2 Type of filer

3 U.S. Taxpayer Identification Number

3a TIN type

4 Foreign identification

a Type

b Number

c Country/Region of issue

5 Individual's date of birth

6 Last name or organization's name

7 First name

8 Middle name

8a Suffix

9 Address

10 City

11 State

12 ZIP/postal code

13 Country/Region

14a Does the filer have a financial interest in 25 or more financial accounts?

☐ Yes Enter number of accounts

☐ No

If "Yes" is checked do not complete Part II or Part III, but retain records of this information

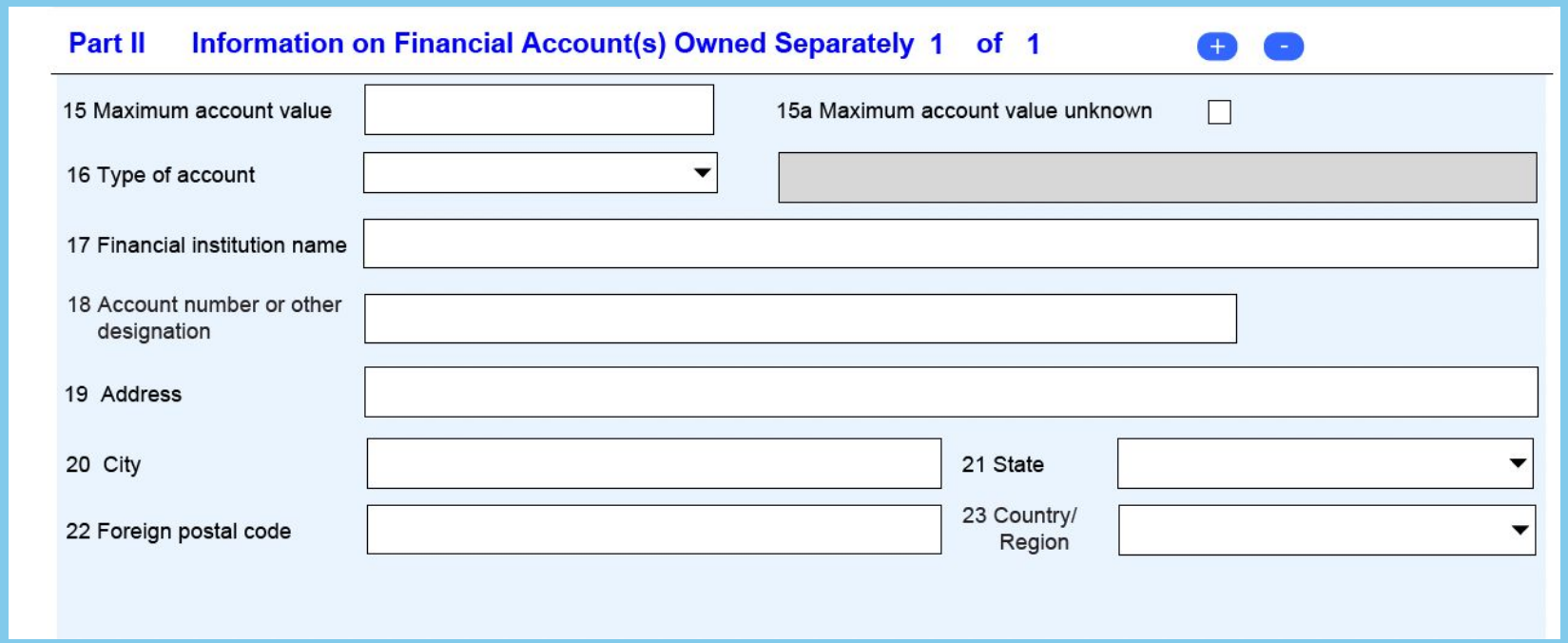
14b Does the filer have signature authority over but no financial interest in 25 or more financial accounts?

☐ Yes Enter number of accounts

☐ No

If "Yes" is checked Complete Part IV items 34 through 43 for each person on whose behalf the filer has signature authority.

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Part II Information on Financial Account(s) Owned Separately 1 of 1 + -

15 Maximum account value

15a Maximum account value unknown ☐

16 Type of account

17 Financial institution name

18 Account number or other designation

19 Address

20 City

21 State

22 Foreign postal code

23 Country/ Region

ProtectUS Law

Part III Information on Financial Account(s) Owned Jointly 1 of 1 + -

Account Information

15 Maximum account value

15a Maximum account value unknown ☐

16 Type of account

17 Financial institution name

18 Account number or other designation

19 Address

20 City

21 State

22 Foreign postal code

23 Country/ Region

24 Number of joint owners

Principal Joint Owner Information

Check ☐ if entity

25 Taxpayer Identification Number (TIN)

25 a TIN type

26 Last name or organization name

27 First name

28 Middle name

28a Suffix

29 Address

30 City

31 State

32 ZIP/postal code

33 Country/ Region

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Part IV Information on Financial Account(s) Where Filer has Signature or Other Authority but No financial Interest in the Account(s) 1 of 1

Account Information

15 Maximum account value

15a Maximum account value unknown ☐

16 Type of account

17 Financial institution name

18 Account number or other designation

19 Address

20 City

21 State

22 Foreign postal code

23 Country/ Region

Owner Information

Check ☐ if entity

34 Last name or organization name

35 Taxpayer Identification Number (TIN)

35 a TIN type

36 First name

37 Middle name

37a Suffix

38 Address

39 City

40 State/territory/province

41 ZIP/postal code

42 Country/Region

43 Filer's title with this owner

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Part V Information on Financial Account(s) Where Filer is Filing a Consolidated Report 1 of 1

Account Information

15 Maximum account value

15a Maximum account value unknown ☐

16 Type of account

17 Financial institution name

18 Account number or other designation

19 Address

20 City

21 State

22 Foreign postal code

23 Country/ Region

Owner Information

34 Organization name

35 Taxpayer Identification Number (TIN)

35 a TIN type

38 Address

39 City

40 State/territory/province

41 ZIP/postal code

42 Country/Region

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FBAR VIOLATION PENALTY

31 USC § 5321(a)(5)(B): states "Amount of Penalty .-

(i) In general.-

Except as provided in subparagraph (C), the amount of any civil penalty imposed under subparagraph (A) shall not exceed $10,000.

(ii) Reasonable cause exception.-

No penalty shall be imposed under subparagraph (A) with respect to any violation if-

(I) such violation was due to reasonable cause, and

(II) the amount of the transaction or the balance in the account at the time of the transaction was properly reported

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WILLING FBAR VIOLATIONS

31 USC § 5321(a)(5)(C): states "Willful violations .-

In the case of any person willfully violation, or willfully causing any violation of, any provision of section 5314

(i) The maximum penalty under subparagraph (B)(i) shall be increased to the greater of-

(I) $100,000, or

(II) 50% of the amount determined under subparagraph (D), and

(ii) subparagraph (B)(ii)

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A REPORT TO CONGRESS
IN ACCORDANCE WITH §361(b)

OF THE

UNITING AND STRENGTHENING AMERICA BY PROVIDING APPROPRIATE TOOLS REQUIRED TO INTERCEPT AND OBSTRUCT TERRORISM ACT OF 2001

(USA PATRIOT ACT)

It is difficult to determine with any accuracy how many taxpayers are failing to file required FBARs in any calendar year. Extrapolating from the limited information available concerning the number of foreign bank and credit card accounts held by United States citizens, the IRS estimates that there may be as many as 1 million U.S. taxpayers who have signature authority or control over a foreign bank account and may be required to file FBARs.[7] Thus, the approximate rate of compliance with the FBAR filing requirements based on this information could be less than 20 percent.

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Swiss Bank UBS Whistleblower Scandal

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BUSINESS

The New York Times

SUBSCRIBE

Whistle-Blower Awarded $104 Million by I.R.S.

Share full article

By David Kocieniewski



Bradley Birkenfeld

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Igor Olenicoff

UBS

More than 4,500 Individuals

Investing over $20 Billion dollars

Total Fine: $780 Million

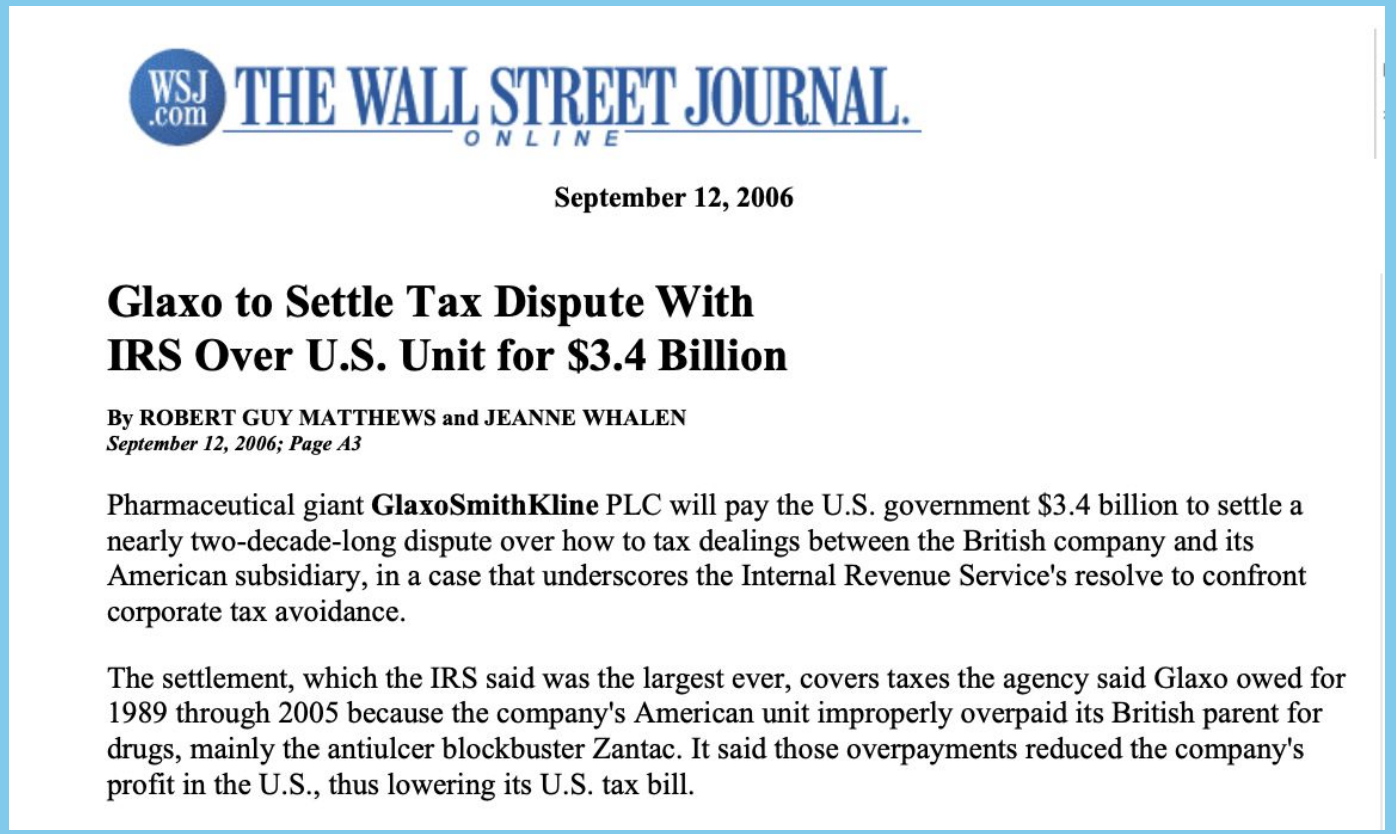
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TRANSFER PRICING

What Is transfer Pricing



WSJ.com THE WALL STREET JOURNAL. ONLINE

September 12, 2006

Glaxo to Settle Tax Dispute With IRS Over U.S. Unit for $3.4 Billion

By ROBERT GUY MATTHEWS and JEANNE WHALEN
September 12, 2006; Page A3

Pharmaceutical giant **GlaxoSmithKline** PLC will pay the U.S. government $3.4 billion to settle a nearly two-decade-long dispute over how to tax dealings between the British company and its American subsidiary, in a case that underscores the Internal Revenue Service's resolve to confront corporate tax avoidance.

The settlement, which the IRS said was the largest ever, covers taxes the agency said Glaxo owed for 1989 through 2005 because the company's American unit improperly overpaid its British parent for drugs, mainly the antiulcer blockbuster Zantac. It said those overpayments reduced the company's profit in the U.S., thus lowering its U.S. tax bill.

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Increased U.S. transfer-pricing enforcement: What's at stake?

By Steven C. Wrappe, J.D., LL.M., Washington, D.C., and Chris Lee, San José, Calif.
February 1, 2024

RELATED

June 20, 2024
Supreme Court issues narrow opinion upholding Sec. 965 transition tax

June 1, 2024
E-invoicing mandates and intercompany transactions

June 1, 2024
Taxpayer-initiated transfer pricing adjustments in MAP

TOPICS

International Tax

Tax Accounting

Uncertainty

Editor: Greg A. Fairbanks, J.D., LL.M.

Over the last four years, the IRS has reversed its performance in transfer-pricing litigation during the previous four decades and achieved unprecedented success in transfer-pricing cases dealing with well-known taxpayers and extremely large amounts of taxes, penalties, and interest. Further encouraging better transfer-pricing documentation compliance, the IRS has repeatedly announced its intention to assert transfer-pricing penalties more aggressively, even when the taxpayer has documentation, if that documentation is deemed insufficient. The increased transfer-pricing exposure is not limited to tax compliance; financial reporting for transfer-pricing issues could also be affected by these two enforcement changes.

In this new enforcement environment, taxpayers should reevaluate their U.S. transfer-pricing compliance. First, taxpayers should reevaluate their risk assessments for noncompliance due to potential costs based on recent IRS wins and assertion of penalties. Next, taxpayers should update their existing documentation for issues such as best method selection and whether the functional analysis is robust enough to satisfy the IRS's reasonable-application standard. Finally, taxpayers should consider whether a proactive approach, such as the Advance Pricing Agreement (APA) Program or International Compliance Assurance Program (ICAP), could reduce overall global transfer-pricing exposure.

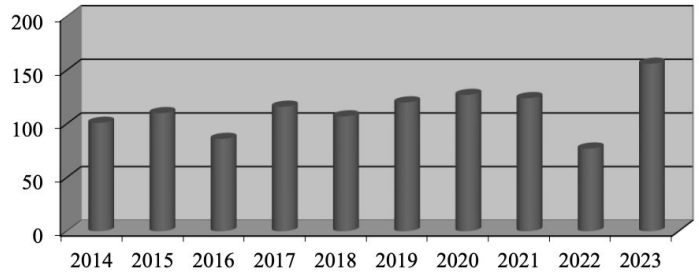
Capture Essence of Article

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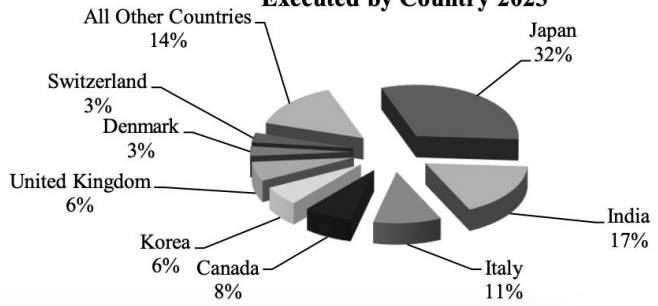
Table 2: Executed[4] and Pending APAs
§ 521(b)(2)(C)(ii-vi)

	Unilateral	Bilateral	Multilateral	**Total**
Total Executed 1991-2022	697	1,549	22	2,268
Total Executed in 2023	24	130	2	156
Total Executed 1991-2023	**721**	**1,679**	**24**	**2,424**
Total Pending as of 12/31/2023	**44**	**480**	**34**	**558**
Renewals Executed in 2023[5]	*15*	*59*	*0*	*74*
Renewals Pending[6] as of 12/31/2023	*33*	*199*	*20*	*252*

APAs Executed
2014-2023



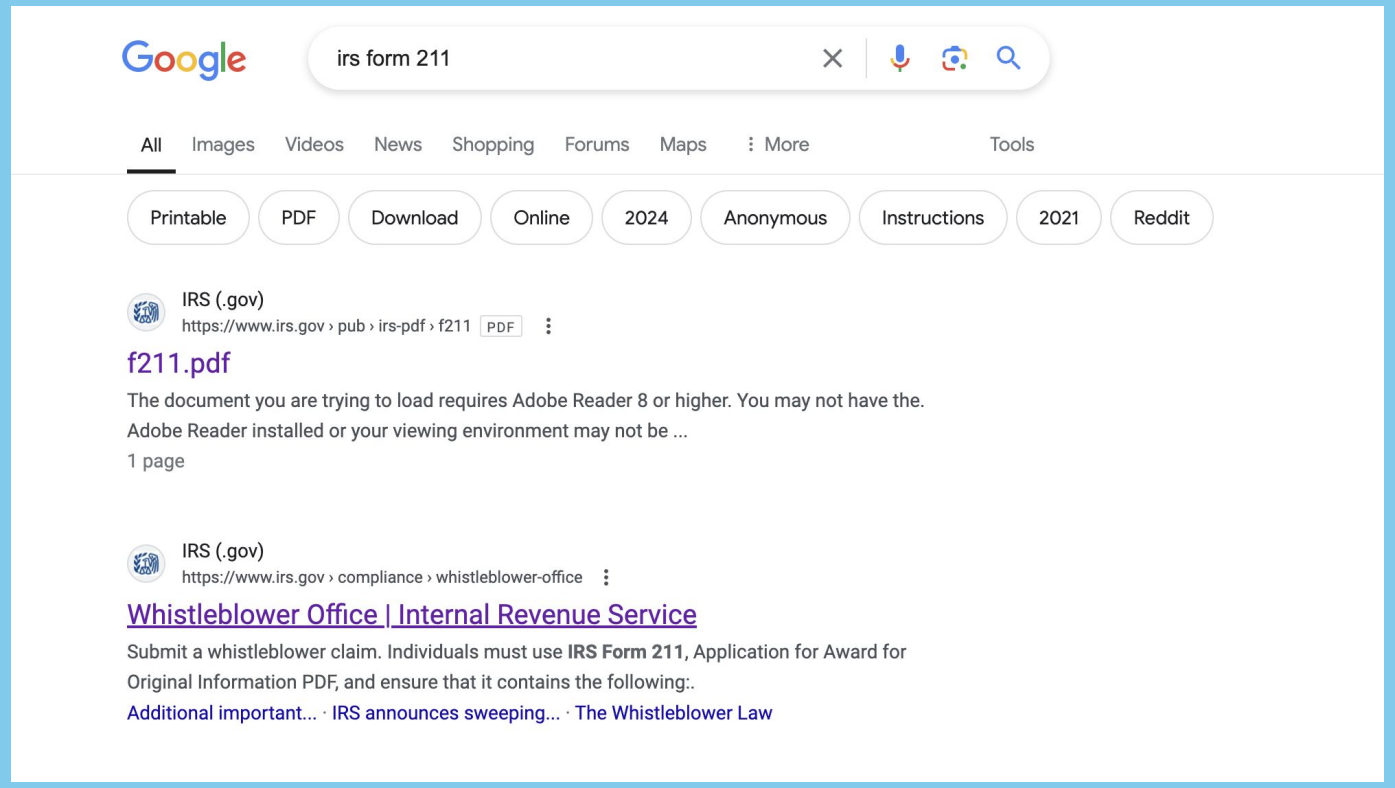
Bilateral APAs
Executed by Country 2023



Source: Internal Revenue Service, Advance Pricing Agreements Report (2023), Available at https://www.irs.gov/pub/irs-drop/a-24-16.pdf

FORM 211

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Submit a whistleblower claim

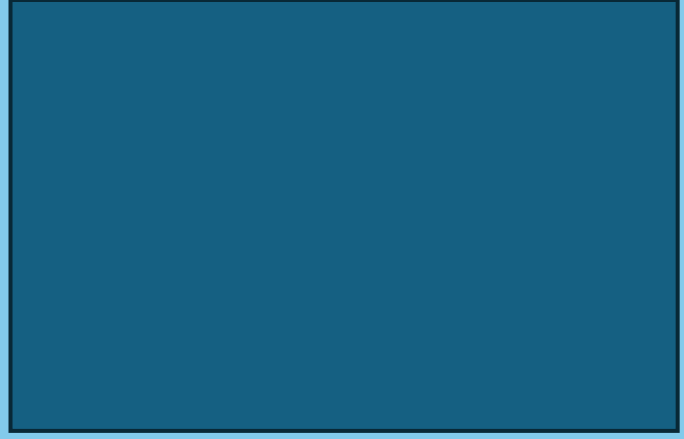
Individuals must use IRS Form 211, Application for Award for Original Information PDF, and ensure that it contains the following:

- A description of the alleged tax noncompliance, including a written narrative explaining the issue(s).
- Information to support the narrative, such as copies of books and records, ledger sheets, receipts, bank records, contracts, emails, and the location of assets.
- A description of documents or supporting evidence not in the whistleblower's possession or control, and their location.
- An explanation of how and when the whistleblower became aware of the information that forms the basis of the claim.
- A complete description of the whistleblower's present or former relationship (if any) to the subject of the claim (for example, family member, acquaintance, client, employee, accountant, lawyer, bookkeeper, customer).
- The whistleblower's original signature on the declaration under penalty of perjury (a representative cannot sign Form 211 for the whistleblower) and the date of signature.

Individuals must then mail the Form 211 with supporting documentation to:

Internal Revenue Service
Whistleblower Office – ICE
1973 N Rulon White Blvd.
M/S 4110
Ogden, UT 84404

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Form **211** (March 2024)	Department of the Treasury - Internal Revenue Service **Application for Award for Original Information**	OMB Number 1545-0409

Do not send the same claim information multiple times or through multiple channels (e.g., electronic, mail, fax) as this may cause claim processing delays. Fields on this form have been designed to expand and may cause a narrative or other field to appear when a box is checked.

Check the box to print a blank copy of the form and manually complete ☐

Section A – Information About the Person or Business You Are Reporting

1. Are you submitting information related to an existing claim ☐ Yes ☐ No

2. Did you submit this information to the IRS, other Federal or State Agencies, or government personnel ☐ Yes ☐ No

3. Check the box if you are including attachment(s) with this claim submission ☐

4. Name of taxpayer (person or business; include aliases) who committed the violation

5. Taxpayer Identification Number *(e.g., SSN, ITIN, or EIN)*

6. Taxpayer's date of birth or approximate age

7. Taxpayer's address *(including ZIP code)*

8. Check the box to add additional taxpayers to the list ☐

9. What is your relationship (current and former) to the alleged noncompliant taxpayer(s) *(check all that apply) (attach sheet(s) if needed)*

☐ Current employee ☐ Former employee ☐ Attorney ☐ CPA
☐ Relative/Family member ☐ Other ☐ None

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Section B – Information About the Alleged Violation

10. Alleged violation *(check all that apply) (information about IRS compliance work areas is available at irs.gov/whistleblower)*

- ☐ Unreported/Under Reported Income
- ☐ Income Characterization
- ☐ International/Foreign Transaction
- ☐ Undisclosed Foreign Bank and Financial Accounts
- ☐ Specific Allegations of Tax Fraud
- ☐ Employee vs. Subcontractor
- ☐ Money Laundering and Bank Secrecy Act
- ☐ Tax Shelter/Abusive Transaction
- ☐ Other *(identify)* _____
- ☐ Overstated/False Deductions
- ☐ Cryptocurrency/Digital Assets
- ☐ Failure to Withhold Tax
- ☐ Failure to File Tax/Informational Return
- ☐ Failure to Pay Tax
- ☐ Tax Exempt/ Governmental Entity Tax Issue
- ☐ Promoter of Tax Avoidance Schemes
- ☐ Terrorism

11. Describe the alleged violation and provide all pertinent facts. Attach a detailed explanation, include all records and supporting information in your possession, and describe the availability and location of any additional supporting information not in your possession

12. Is the information in this claim based on public information ☐ Yes ☐ No

13. Describe the amount of tax owed by the taxpayer(s). Provide all records and a summary of the information you have that supports your claim as to the amount owed *(i.e., books, ledgers, records, receipts, tax returns, etc) (Attach sheet(s) if needed)*

Catalog Number 16571S www.irs.gov Form **211** (Rev. 3-2024)

14. Fill in tax year (TY) and dollar amount ($), if known

Check the box to indicate if the alleged violation(s) is ongoing ☐

Tax Year (TY)	Dollar Amount ($)	Tax Year (TY)	Dollar Amount ($)	Tax Year (TY)	Dollar Amount ($)	Tax Year (TY)	Dollar Amount ($)	Tax Year (TY)	Dollar Amount ($)
									+ x

See Attached Narrative

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Section C – Information About Yourself

15. Check the box to indicate if multiple claimants are filing this claim jointly ☐

Provide the claimant's information *(use the button to add additional claimants to the list)*

Claimant 1.

16. Name of individual claimant

17. Claimant's date of birth *(MMDDYYYY)*	18. Claimant's SSN or ITIN

19. Address of claimant *(including ZIP code)*

Check the box if you agree to have correspondence mailed to the address on record with the IRS ☐

20. Telephone number *(including area code)*	21. Email address

22. Check the box if Form 2848, Power of Attorney and Declaration of Representative, is attached to this claim submission ☐

23. Are you the spouse or a dependent of an IRS employee	☐ Yes	☐ No
24. Are you currently, or formerly, an employee of the Department of Treasury or any of its agencies	☐ Yes	☐ No
25. Are you currently, or formerly, an employee of the Federal Government	☐ Yes	☐ No
26. Are there any Federal laws or regulations that require you to disclose this information	☐ Yes	☐ No
27. Are there any Federal laws or regulations that prohibit you from disclosing this information	☐ Yes	☐ No
28. Are you currently, or formerly, a Federal Government contractor	☐ Yes	☐ No
29. Are you filing this form based on information obtained from an ineligible person	☐ Yes	☐ No

30. I declare under penalty of perjury that I have examined this application, my accompanying statement, and supporting documentation and aver (affirm) that such application is true, correct, and complete, to the best of my knowledge

Signature of Claimant *(required)*	Date

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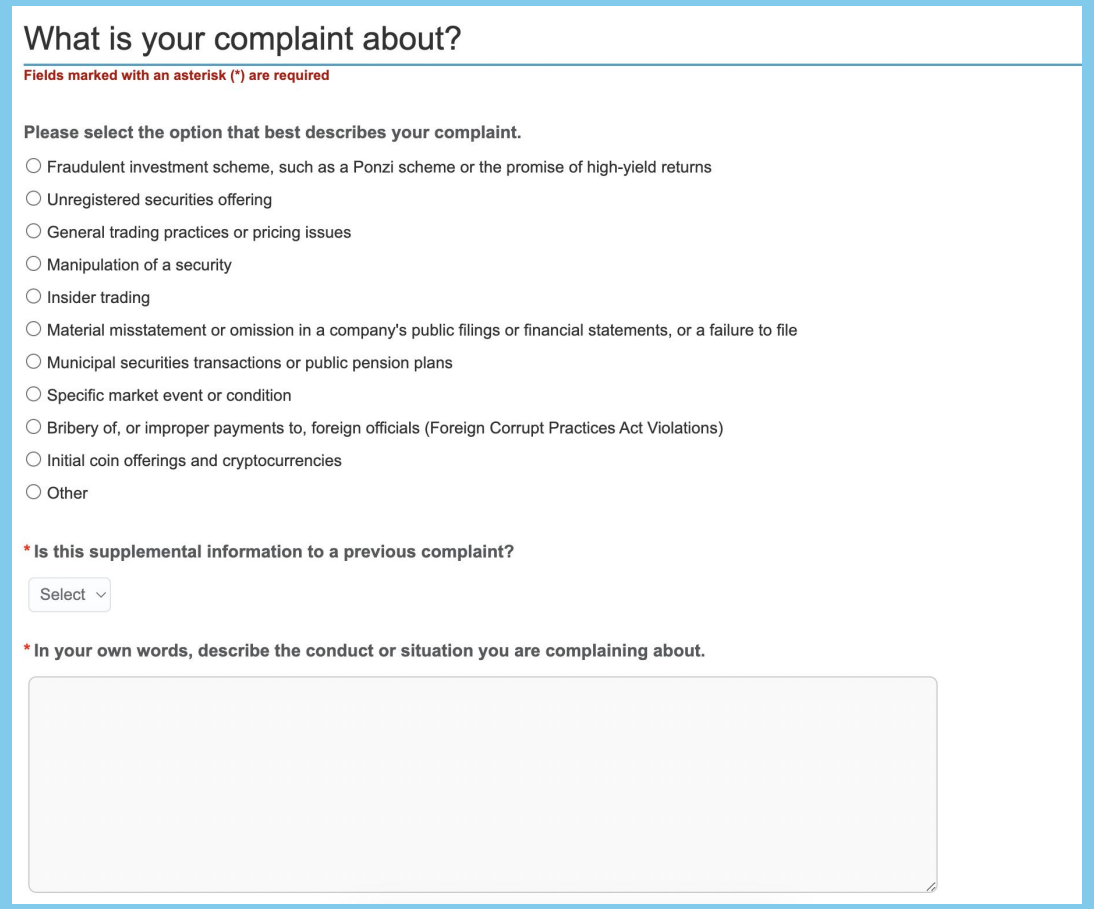
MULTIPLE TCRS

TCRs can be submitted via email to Nell Williams, Senior Enforcement Officer at FinCEN, at nell.williams@fincen.gov while FinCEN works on developing a more official portal. Submissions can either be multiple emails to accommodate file sizes, or an upload to an FTP site with instructions to download.



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IRS says Microsoft owes an additional $29 billion in back taxes

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Jake Piazza
@IN/JAKE-PIAZZA-01AAB8200/

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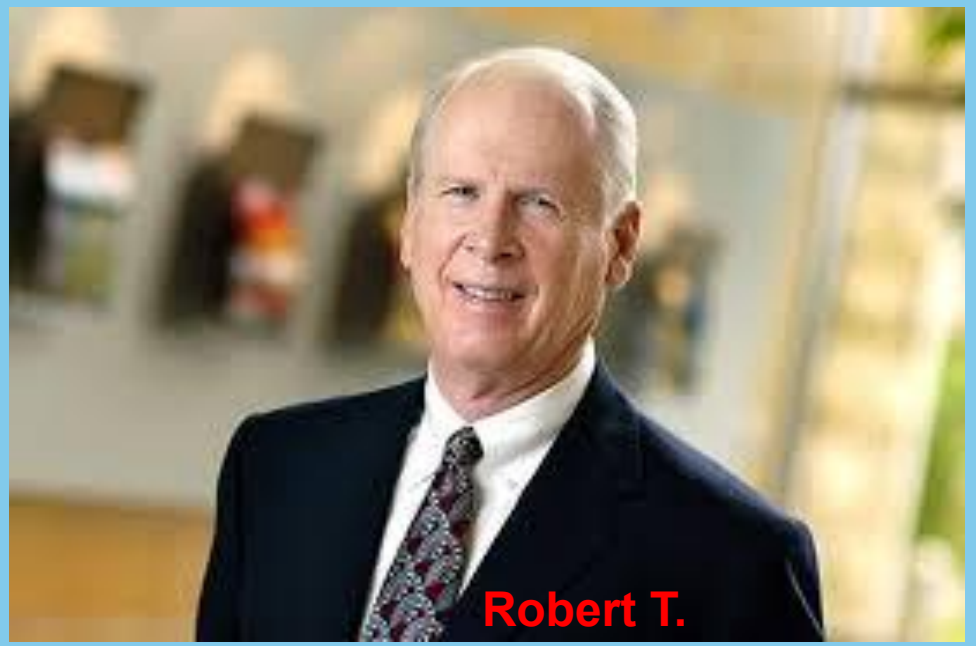
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PRESS RELEASE

CEO of Multibillion-dollar Software Company Indicted for Decades-long Tax Evasion and Wire Fraud Schemes

Thursday, October 15, 2020

For Immediate Release



Robert T. Brockman

ProtectUS Law

Los Angeles businessman, Utah fuel plant operators and employees sentenced to prison for billion-dollar biofuel tax fraud scheme

Date: April 7, 2023



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If you would like to expand practice to include whistleblowing cases and be part of PROTECTUS Law's whistleblowing communications network

PLEASE EMAIL ME AT:

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