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## Inside How Private Placement Life Insurance Slips Through the Cracks, Tax Notes

Philadelphia-based Shareholder Kevin Sweeney Shares Insights in Tax Notes

**Article**

October 11, 2024

In an article published in Tax Notes on September 24, 2024, Philadelphia-based Shareholder Kevin Sweeney shared his insights concerning the types of tax issues that can arise with private placement life insurance (PPLI) arrangements and the IRS's awareness of the issues.

Sweeney told Tax Notes that the issue boils down to investor control when it comes to sheltering money in offshore insurance accounts. He noted that this particular matter is unlikely to draw the attention of the IRS Criminal Investigation division.

There just hasn't been a lot of PPLI-type audits, so I haven't run into a revenue agent that I felt was acutely aware of it, Sweeney said.

To review the full article, subscribers may click [here](#).