

## Contact

### Houston

1200 Smith Street, Suite 1400  
Houston, Texas 77002-4310  
Tel: 713.658.1818  
Fax: 713.658.2553

### Atlanta

191 Peachtree Street, N.E.,  
Forty-Sixth Floor  
Atlanta, Georgia 30303  
Tel: 404.659.1410  
Fax: 404.659.1852

### Philadelphia

50 South 16th Street, Suite  
1700  
Philadelphia, PA 19102  
Tel: 610.772.2300  
Fax: 610.772.2305

### San Antonio

112 East Pecan Street, Suite  
1450  
San Antonio, Texas 78205  
Tel: 210.253.8383  
Fax: 210.253.8384

## “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](#).