

Whistleblower awarded \$104M

TAXES • Bradley Birkenfeld, the former UBS AG banker who told the Internal Revenue Service how the bank helped thousands of Americans evade taxes, secured an IRS award of \$104 million, an amount his lawyers said may be the largest ever for an individual U.S. whistleblower.

He told authorities how UBS bankers came to the U.S. to woo rich Americans, managed \$20 billion of their assets, and helped them cheat the IRS. He pleaded guilty to conspiracy in 2008, a year after reporting the bank's conduct to the Justice Department, U.S. Senate, IRS and Securities and Exchange Commission. He was released from prison Aug. 1.

The award is the first issued under the IRS tax whistleblower law, according to his attorneys.

UBS avoided prosecution in the U.S. by agreeing to pay \$780 million, disclosing data on more than 250 Swiss accounts, and admitting it helped foster tax evasion. It later agreed to hand over data on another 4,450 accounts. Since Birkenfeld came forward, at least 33,000 Americans have voluntarily disclosed offshore accounts to the IRS, generating more than \$5 billion.

Birkenfeld began serving a 40-month sentence in January 2010 and received good-time credit that reduced his term.