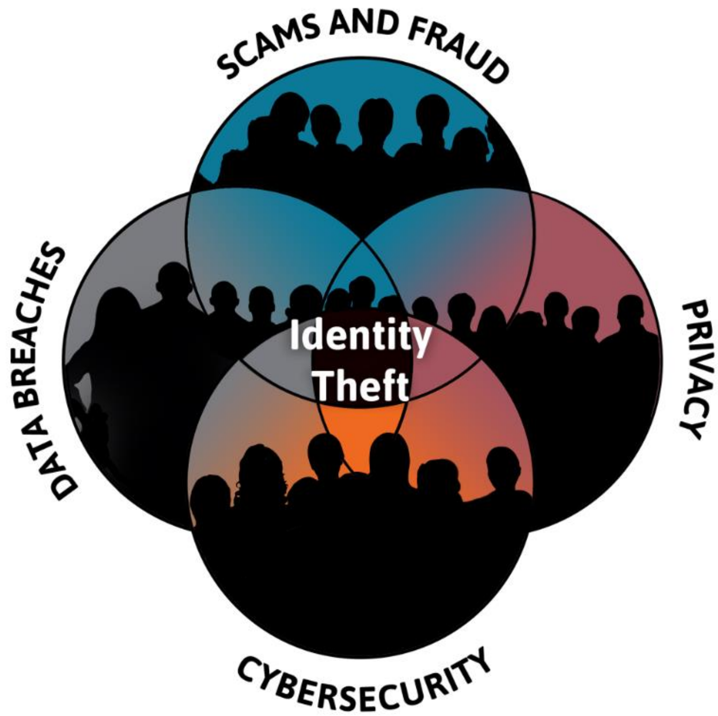

Identity Theft: #1 Complaint 15 Consecutive Years

Identity Theft Resource Center Offers Additional Insight on FTC's Recently Released Consumer Sentinel Data Book

Conducted by the Identity Theft Resource Center® (ITRC)[i]
Original data compiled by the Federal Trade Commission CSN[ii],

Data analyzed by: Identity Theft Resource Center

Research Sponsored by: Google

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INTRODUCTION

Identity theft continued its ranking as the number one reported consumer complaint for the 15th consecutive year, according to the Federal Trade Commission's in its recently released *2014 Consumer Sentinel Network Data Book*.

Out of the 2,582,851 total consumer complaints filed with or collected by the FTC, 332,646 were related to identity theft, representing 13 percent of all complaints in 2014.[iii]

While the numbers for 2014 are alarming, they do not come as a surprise to those of us who are active in this field. This consistency in consumer complaints over this length of time is telling – and troubling. The problem is clearly not only attributable to the headline-grabbing data breaches of recent years.

Identity theft was first identified as a federal crime with the passing of the Identity Theft and Assumption Deterrence Act of 1998. "Law enforcement and policymakers suggested that the current laws at the time were ineffective at combating the growing prevalence of identity theft[iv]; the laws were not keeping up with technology, and stronger laws were needed to investigate and punish identity thieves."[v] In addition, this Act "established the Federal Trade Commission (FTC) as the federal government's one central point of contact for reporting instances of identity theft by creating the Identity Theft Data Clearinghouse."[vi]

The Identity Theft Resource Center (ITRC), founded in 1999, has assisted tens of thousands of victims over the years and is accustomed to seeing the number of identity theft complaints increase year over year. The ITRC call center receives calls daily from identity theft victims telling us how identity theft has affected their lives and how desperate they are for assistance in resolving the issue.

In this paper, we intend to review the data submitted to the FTC, with special attention paid to the states where the volume of complaints indicates most and least impacted populations. We will review the types of identity theft experienced in these states and the questions brought to the surface by this data, as well as potential responses.

KEY FINDINGS

- **In 2014, there was an interesting shift in where the most identity crime is occurring (as reported to the CSN), though the top state is no surprise.**

  Florida is once again the worst state in the nation per capita for identity theft and fraud complaints. Floridians submitted more than 37,000 identity theft complaints in 2014, representing more than 11 percent of all reported identity theft complaints last year. This significantly outpaced any other state in per capita complaints, at a rate of 186 incidents per 100,000 people. Beyond the top spot, however, there were some notable changes.

  Behind Florida, significant increases in identity theft complaints rates occurred in several states. Washington, jumping into second place from 23rd in 2013, reported nearly 11,000 complaints, an increase of more than 100 percent over 2013 figures. Oregon moved all the way up from 33rd to 3rd place with a dramatic increase in complaints, reporting less than 2,400 complaints in 2013 to nearly 5,000 complaints in 2014. Missouri jumped from 25th in 2013 to 4th in 2014, a 77 percent increase.

  Meanwhile, Georgia dropped from 2nd in 2013 to 5th in the ranking, notably receiving approximately 2,000 fewer complaints in 2014. Michigan, which slipped from 4th to 6th, remained in the top 10, with more than 104 incidents per 100,000 residents. California, with the highest overall number of complaints (38,982), dropped from 3rd to 7th in the state rankings.

  Rounding out the top 10 in 2014 were Nevada dropping to 7th, Arizona slipping to 8th, and Maryland and Texas tying for tenth place after ranking 6th and 8th, respectively. New York and Illinois dropped out of the top 10, from 9th to 17th and 10th to 12th, respectively.

- **Seventeen of the top 50 Metropolitan Statistical Areas (MSA) - with the highest level of per capita incidents of identity theft - are located in Florida.**

  That's more than 1/3 of the list in a single state. Top-ranked Miami-Fort Lauderdale-West Palm Beach reported 316.2 complaints per 100,000 population. The second place ranked MSA, Seattle-Tacoma-Bellevue in Washington, trails behind with 207.0 complaints per 100,000 population.

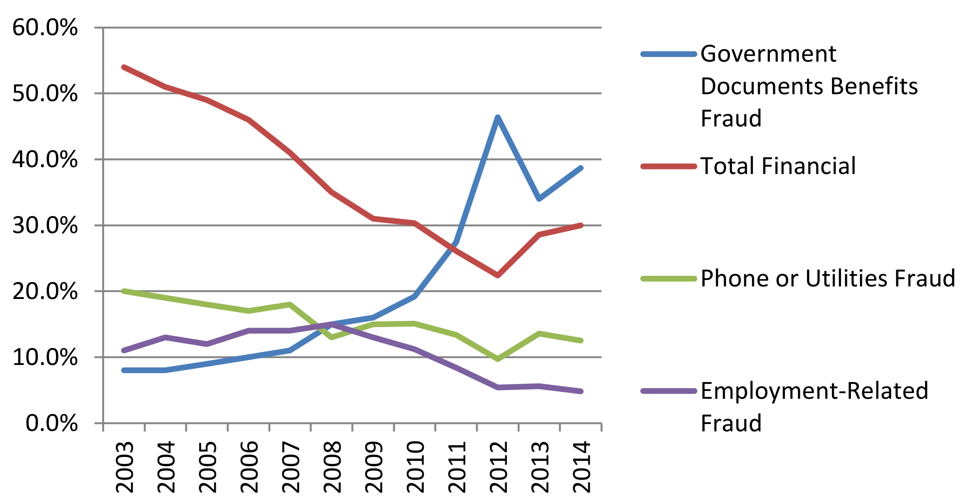
California and Washington each have six areas ranked in the top, but to be fair to Washington, one of those areas is Portland-Vancouver-Hillsboro, thus the impact is shared with Oregon. Missouri, Colorado, and West Virginia each only have one MSA in the top 50, despite the fact that Missouri ranked as the 4th highest state in per-capita identity theft complaints in this year's report.

- ***Government Documents or Benefits Fraud*, at 38.7 percent of the recorded identity theft complaints in 2014, totaled more than *Credit Card Fraud, Bank Fra*ud and *Loan Fraud* combined (30.0 percent) according to the FTC data.**

  Tax- or Wage-Related Fraud and *Government Benefits (Applied for/Received)* two of the three subtypes included in *Government Documents or Benefits Fraud*, reflected only small increases in 2014, up 2.8 percent and 1.7 percent, respectively.

  As a sub-category, *Tax- or Wage-Related Fraud* jumped exponentially from 3.7 percent of the reported complaints in 2003 to 32.8 percent of the complaints in 2014. This represents nearly 85 percent of all complaints in the *Government Documents or Benefits Fraud* category.

Figure 1: How Victims' Information is Misused 2003 to 2014



In Figure 1 above, Total Financial[vii] represents the three categories of *Credit Card*, *Bank Fraud*, and *Loan Fraud* combined. Not included in the chart is the category "Other Identity Theft," which is a total of more than 10 subtypes, including (but not limited to) medical, uncertain, miscellaneous, and internet/email.

- ***Phone or Utilities Fraud* dipped slightly in 2014 from 2013 figures.**

  However, the above chart clearly indicates a significant decline in this category since 2003, when one in five reported complaints were reported in this category. This decrease could be due, in part, to improved authentication efforts on the part of the utilities and providers.

- ***Employment-Related Fraud* dropped to a six-year low in 2014, at 4.8 percent of the complaints.**

  This is down from the record high of 15 percent reported in 2008. From 2003 to 2008, this category reported small incremental growth over the 11.0 percent which was reported in 2003.

- **Combined financial identity theft complaints (*Credit Card Fraud, Bank Fraud,* and *Loan Fraud*), totaled 30% in 2014, representing a substantial decrease from the record high of 54.0 percent in 2003.**

  There is no definitive answer as to why the level of complaints for these financial categories of identity theft has changed so dramatically over the years. Two contributing factors could be (1) that identity thieves began to recognize the high reward/low risk ratio which could be achieved with government-related tax fraud and (2) financial institutions were continuing to strengthen their initial authentication techniques and security measures.

- **In 2014, year-over-year increases in government-related tax identity fraud were reported in 45 states.**

  These increases range from one percent for Washington, D.C., and Nevada, all the way up to a 41 percent jump for Oregon and a 34 percent increase for the state of Washington. It is important to note that in 2013, 47 states reported decreases in government-related identity theft complaints, down from the record high levels reported by the FTC during 2012. Georgia, with 41 percent reported in this category for 2014, and Florida, with 52 percent, were both down from the 2013 figures, -10 percent and -3 percent, respectively. Despite ongoing and continuing efforts to address this issue, these statistics seem to be a clear indicator that much more needs to be done to slow and reverse the growth of this crime.

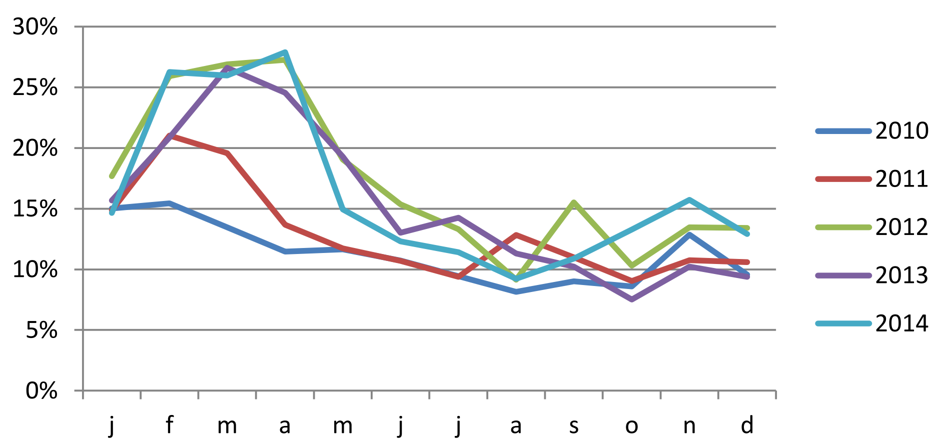
It is important to recognize that the FTC's CSN Data Book is issued using data compiled by the Consumer Sentinel Network Database, a clearing house of information which is collected from a variety of sources.

The U.S. Department of the Treasury, Internal Revenue Service (IRS), as a contributor to the CSN Data Book, reported 22,136 complaints for 2014, up from only 635 complaints for 2013. ITRC is pleased to note that the IRS is providing more robust complaint data to the FTC as this will afford us a clearer picture as to the scope of the problem. This could be well be a contributing factor as to why *Government Documents and Benefits Fraud* saw such a dramatic increase last year.

The ITRC compiles statistics on identity theft victims calling into the victim call center and found that the percentage of government-related identity theft cases, *out of all cases*, has increased considerably from an annual average of 24.3 percent in 2010 to 34.0 percent in 2014.

Of these government-related cases, the percentage of those which were IRS-related totaled 47.8 percent in 2014. The five-year average for IRS-related cases is nearly 54 percent of all *government-related* cases.

Figure 2: ITRC Cases Including IRS as an Identified Component



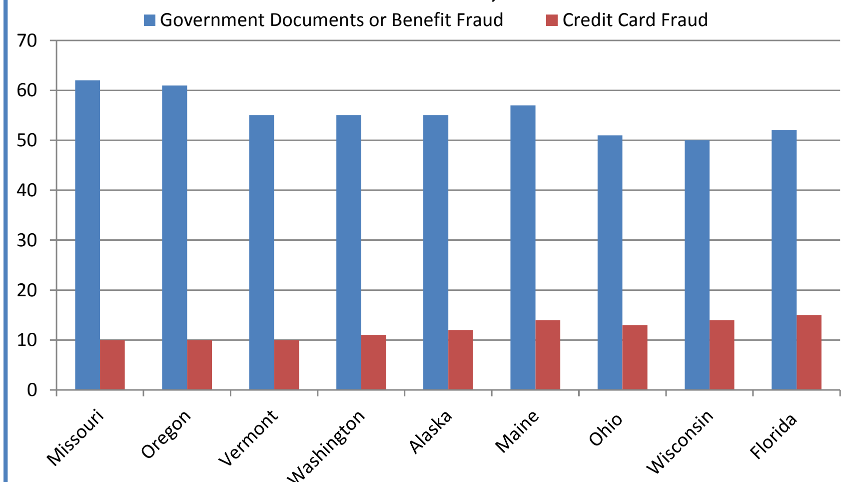
Of note, in Figure 2, is the seasonal trajectory of these cases. The spike in complaints during the first four months of the year may be due to more and more consumers e-filing their returns during this time, and receiving notifications that their returns are not being accepted.

- **There were nine states in which *Government Documents or Benefits Fraud* accounted for 50 percent or more of the registered complaints within that state.**

  According to the individual state analysis within the CSN *Data Book*, these states include: Missouri (62 percent), Oregon (61 percent), Maine (57 percent), Alaska (55 percent), Vermont (55 percent), Washington (55 percent), Florida (52 percent), Ohio (51 percent), and Wisconsin (50 percent). Most significant is the fact that four of these nine states are ranked in the top 10 states for identity theft complaints for 2014.

  When comparing each of the above states' *Government Documents or Benefits Fraud* percentages to the next highest category (*Credit Card Fraud*), we realize the nationwide impact of government-related identity theft. For all nine states, the percentage increase over *Credit Card Fraud* ranged from 3.5 times higher (Florida) all the way up to six times higher (both Missouri and Oregon).

Figure 3: *Government Documents or Benefit Fraud* Comparison to *Credit Card Fraud*, 2014



- **The Military reported 44.7 percent of the identity theft complaints in 2014 involved *Government Documents or Benefit Fraud*, six percent higher than the general consumer population rate of 38.7 percent.**

  It has long been recognized that Military members are easily targeted by identity thieves. As such, in 2011, the Department of Defense began a four-year process of replacing the SSN on military identification cards with a unique DOD number instead. Additionally, the Department of Veterans Affairs (VA) launched a new campaign in mid-2014 to educate Veterans about identity theft prevention. The new campaign, titled [*More Than a Number*][viii], aims to educate

Veterans on the risk of identity theft and how to avoid becoming a victim.

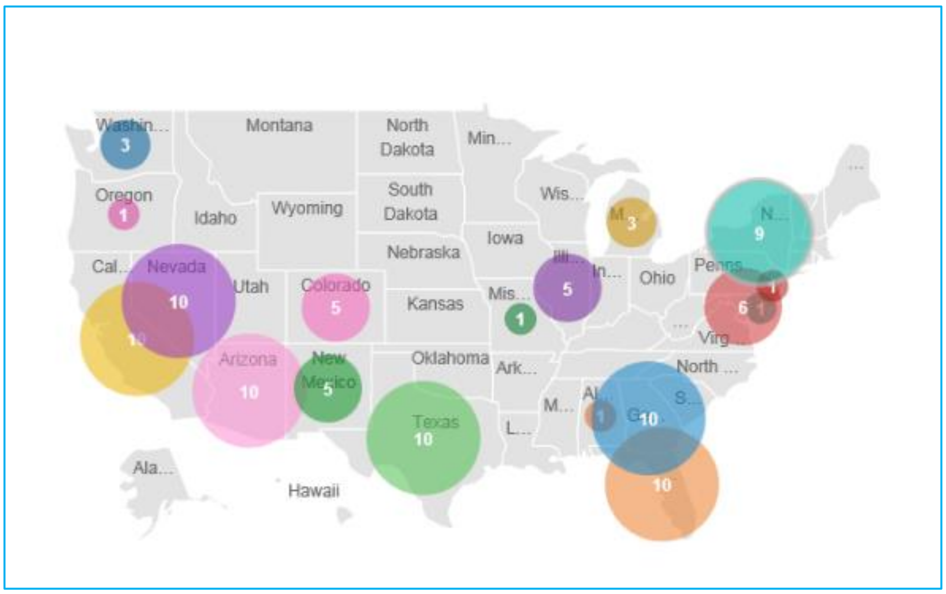
Efforts should be made to continue to hone all education and awareness campaigns focusing on military personnel, so as to aid in the reduction of this crime among our armed forces.

LONG TERM TRENDS

Six states have consistently ranked in the top 10 in identify theft complaints during the 10 years that data has been collected.

Florida, Arizona, Nevada, California, Texas, and Georgia have all remained in the top 10 states for highest rate of per capita complaints since 2005. Figure 4 below illustrates the number of times each state has appeared in the list of top 10 most affected states over the last 10 years.

Figure 4: Top 10 Most Affected States over the Last 10 Years



Note: CSN rankings specifically account for the reporting of complaints from state-specific data contributors by excluding these contributors when calculating the rating.

This raises the question: do the states that have historically been the most affected need special consideration regarding remediation strategies and education/awareness programs?

Education and awareness campaigns may be having a positive impact as consumers begin to understand how to categorize and report their experiences. For this reason, states and MSAs with robust awareness may demonstrate higher reporting numbers. Just as we have asked the question regarding special consideration for the most heavily impacted states, we need to contemplate additional considerations for the least impacted states as well. As such, are the states in the bottom rankings in need of more educational outreach to ensure those consumers understand what has occurred if/when they are victimized, know where to report the incidents, and how to find appropriate resources?

An additional issue to contemplate: could a previous lack of education and awareness be the factors that moved two states, which had never before been in the top 10, to the ranking of 3nd (Oregon) and 4th (Missouri)? What else may have contributed to this dramatic change? Interestingly, both states are also in the top 5 states over the last 5 years to have reported the highest growth in *Government Documents or Benefits Fraud*. Missouri and Oregon both suffered *an increase of 49 percentage points in this category since 2010.*

GROWTH IN GOVERNMENT DOCUMENTS OR BENEFITS FRAUD

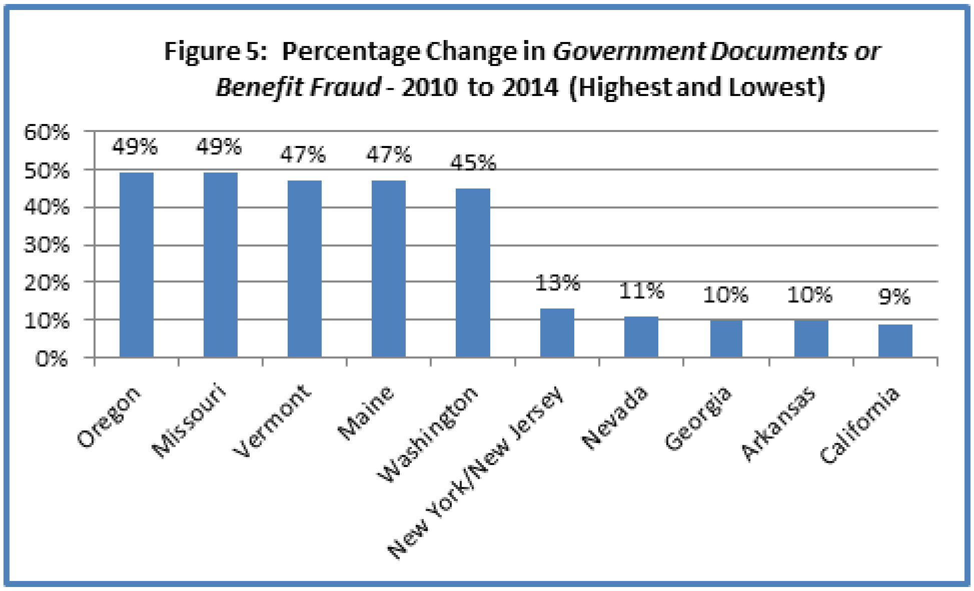
By 2009, *Government Documents or Benefits Fraud* complaints reported to the FTC had doubled since 2003.

In 2009, this category ranked anywhere from 1st to 5th in state specific rankings of complaints, most typically behind *Credit Card Fraud* or *Phone or Utilities Fraud*. In 2010, all but five states reported increases in this category. In 2011, 47 states reported increases over the 2010 figures, followed in 2012 by all 50 states reporting increases. While 2013 reflected decreases in nearly every state (47 states), 2014 again saw increases in all but four states.

Also in 2014, *Government Documents or Benefit Fraud* ranked as the number one category in all 50 states and the District of Columbia.

According to FTC data, the five states with the largest percentage of change in *Government Documents or Benefits Fraud,* over the past five years, are Oregon, Missouri, Vermont, Maine and Washington.

As illustrated in Figure 4 below, these states reported sizeable increases over 2010 figures, up by 45 to 49 percentage points in 2014. Also depicted in Figure 5 are the states with the lowest percentage of growth since 2010, only nine percent to 13 percent higher in 2014.



What do these numbers tell us about the level of government identity fraud occurring in these states? Are those states with higher percentages doing more to educate consumers about this type of identity crime? Implementing more awareness campaigns to educate victims about the reporting process? These extremes beg the question: is there actually that much less government fraud occurring in the states with the lowest percentage changes or does there need to be more done in the area of education and awareness?

Ongoing Efforts Being Made by the IRS

To provide relief to victims of identity theft, the IRS began issuing Identity Protection Personal Identification Numbers (IP PIN) to eligible taxpayers in Fiscal Year 2011. Use of an IP PIN provides relief to taxpayers because it allows the IRS to process their tax returns without delay and helps prevent the misuse of taxpayers' Social Security Numbers on fraudulent tax returns. For Processing Year 2013, the IRS issued over 770,000 IP PIN notices to taxpayers for use in filing their tax returns. This number increased to more than 1.2 million for Processing Year 2014. In addition, the IRS also started a limited pilot in January 2014 whereby taxpayers who obtained an electronic filing PIN through an IRS authentication website and live in the District of Columbia, Florida, or Georgia were provided with an opportunity to obtain an IP PIN[ix].

Another tool which was developed and implemented for the tax payer authentication process was the use of an electronic filing PIN. If you e-file using online filing software, you must sign your tax return using the self-select PIN (personal identification number) signature method. The self-select PIN signature method allows taxpayers to sign their individual income tax return electronically by selecting a five-digit PIN. The PIN is any five numbers (except all zeros) that you choose to enter as your electronic signature. If you file a joint return, you will each need to enter a self-select PIN and you may each choose any five numbers. As part of the authentication process, you will enter your date of birth and either your adjusted gross income (AGI) as shown on your original prior year return or your prior year self-select PIN[x].

Additionally, according to the Treasury Inspector General for Tax Administration Report issued on September 19, 2014, the number of identity theft filters used to detect potentially fraudulent tax returns was increased from 80 filters, to 114 filters.[xi]

CONCLUSION

The FTC's *2014 Consumer Sentinel Network Data Book* raises interesting points to consider about a number of issues.

How are identities initially being compromised?

Since the CSN identity theft complaints are almost entirely self-reported, this tool is not the right one to use for us to answer this question. According to the FTC, the CSN *Data Book* is a tool that provides law enforcement members with access to millions of consumer complaints. The FTC produces the *Data Book* annually using CSN complaints consumers made directly to the FTC, as well as complaints received by state and federal law enforcement agencies, national consumer protection organizations and non-governmental organizations. Stakeholders use the *Data Book* to identify trends and the scope of fraud complaints. Unfortunately, industry stakeholders remain stymied in their efforts to actually determine the root causes or vulnerable access points that allow thieves to commit identity theft.

In the ITRC's experience, it is rare that a victim can point to a specific instance that is likely, and logically, the vulnerable access point that triggered an identity theft. The ITRC call center advisors have talked with hundreds of individuals who request assistance upon receipt of a data breach notification letter. Only upon receipt of their credit reports do they discover they are already victims of identity theft. They may have assumed the breach was the catalyst for the theft, but we sometimes find the theft has been ongoing for quite some time, making the recent data breach incident a less likely culprit.

Generally speaking, victims discover an identity theft when they are trying to move forward in their lives in some manner, and the theft incidents create a barrier. Perhaps they are trying to obtain a car, home, or student loan, but are unable to do so because of unknown bad credit. Perhaps they are trying to obtain a job and they fail a background check due to negative or fraudulent activities of which they were unaware.

Bottom line: Victims are probably not the appropriate audience to ask the "How was the information compromised" question. But if they are not the right audience for this question, who is? Which stakeholders should we query on a more targeted level in order to make better progress in answering this question?

Why is government tax/identity fraud so prevalent in the top states?
Concrete reasons as to why certain states have higher incidences of *Government Documents or Benefits Fraud* remain unobtainable. Potential contributory factors

could be varying demographics, increased data breaches that include SSNs, and the focus that both the mainstream media and Washington, D.C., have placed on education and outreach of identity theft and related issues.

Demographics could also play a role because states which report higher rates of *Government Documents or Benefits Fraud* (Government ID theft) sometimes have larger populations of elderly individuals, military members, and increased levels of organized financial crime. The senior citizen population is vulnerable for several reasons. Often they do not make effective use of the protections in place in an online environment. This stems from both a lack of knowledge about the importance of protecting their information, as well as an increased inherent trust of people. This could result in them falling for social engineering scams and telephone solicitations asking them for their personal information. Military members are frequently targeted as they are often overseas and unable to closely monitor any sensitive correspondence or mail they may receive. Lastly, more organized crime rings are beginning to take notice of this lucrative crime, and are often found operating in many of the states with the highest identity theft rates.

Data breaches and increased attention from the mainstream media may have also contributed because consumers are now more aware of breaches that include the loss of Social Security Numbers, not just credit card numbers. The coverage provided by the mainstream media concerning all types of data breaches has brought increased awareness and understanding of identity theft issues on the whole, and could in turn translate into more self-reporting of all types of identity theft.

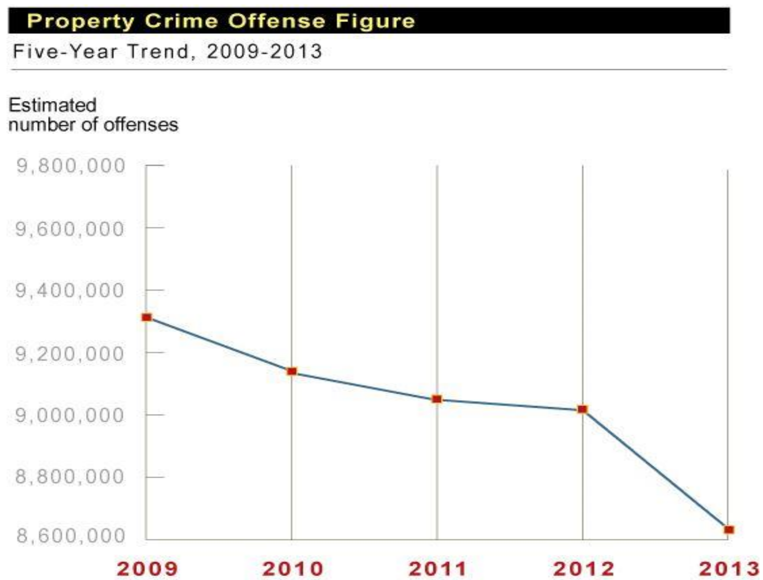
Call to Action: Work together to develop innovative programs and provide a universal narrative.

The findings in the CSN *Data Book* are by no means indicative of a new narrative on the subject of identity theft. However, they are still very significant when viewed as a tool. The FTC represents a nearly unimpeachable source when it comes to collection and dissemination of this complaint data. They have no commercial motives to either inflate or diminish the severity and prevalence of this crime, and have strict controls in place to ensure the data they compile is as accurate as possible.

Second, it is yet another reminder that whether young or old, consumers are at risk of becoming a victim of identity theft. People from all demographics should be concerned about and take proactive measures to help minimize their chances of identity theft.

Lastly, it is important to note that that the numbers of identity theft occurrences measured by the CSN are not included in the overall metrics that we use to measure occurrences of property crimes. The Uniform Crime Report[xii], disseminated annually by the Department of Justice through the FBI, is a tool often used by the media to provide a narrative of the crime rate to the nation.

Figure 6: 5-Year Property Crime Measurement According to the Uniform Crime Report



If incidents of identity theft (and fraud in general) were incorporated into this tool, the rate of property crimes would be showing an increase, not a decrease. The national media should be providing a comprehensive report which includes these rates of victimization so that a more accurate narrative for public education and awareness can be created. Instead, reports that depict an overall decrease in property crime rates give the public a false sense of security and lead to confusion regarding the true scope of this problem.

This last suggestion is to help all stakeholders to continue to build public awareness, which in turn could lead to a greater understanding of risks, prevention, and detection methods. The overall goal should be that this crime becomes more difficult for perpetrators to accomplish, and therefore less financially and emotionally damaging to victims.

The Federal Trade Commission has taken an active role in building new partnerships and developing targeted communication/education campaigns using unique platforms. Most recently, the FTC co-hosted its Tax Identity Theft Awareness Week Twitter Chat with the ITRC, which resulted in more than 6 million impressions and reached more than 469,000 accounts in just one hour. The FTC also announced its new *Start with Security* campaign, during which they will provide nationwide presentations to corporate groups on specific data security topics and best practices.

Recently, the United States Senate Committee on Finance heard testimony from Mike Alley, Commissioner of the Indiana Department of Revenue. In written testimony submitted to the committee, Alley cited: "*The Identity Theft Resource Center, in their 2014 Annual Report, created a diagram that effectively illustrates the interrelationship of the criminal activity and our oftentimes disjointed responses. We must develop a coordinated effort to battle ID theft and mitigate the risks of misuse."* The written testimony went on to identify collaboration as one of the lessons learned, "C*ollaboration: No one has all of the answers. The perpetrators are sophisticated and agile, moving from one vulnerability to the next."* It is important to note that his department saved $88 million dollars in fraudulent refund payouts to thieves in a single tax year.[xiii]

The ITRC encourages all stakeholders to continue to embrace this less compartmentalized approach of addressing the problem by developing communication aimed at a cross section of population along with innovative programs and partnerships. This is more than just a good idea, it is absolutely necessary if we are to take this fight against identity theft and the related issues to a new level.   The ITRC applauds this holistic approach and feels that it is not just the best way, it is in fact the only way for all stakeholders to make meaningful progress in the future and discover solutions for those who are affected, which for now includes everyone.

END NOTES

[i] The Identity Theft Resource Center (ITRC) is a nonprofit, grant, and donation-funded organization that focuses exclusively on the issues surrounding identity theft and in providing assistance to victims without charge, from the moment of discovery through final resolution. www.idtheftcenter.org. Email: itrc@idtheftcenter.org, 858-693-7935. Victim Hotline: 888-400-5530

[ii] The Federal Trade Commission Consumer Sentinel Network (CSN) is a secure online database of millions of consumer complaints available only to law enforcement. In addition to storing complaints received by the FTC, the CSN also includes complaints filed with state law enforcement organizations such as the Hawaii Office of Consumer Protection, the Montana, North Carolina and Oregon Departments of Justice, the South Carolina Department of Consumer Affairs, the Tennessee Division of Consumer Affairs, and the Offices of the Attorneys General for Alaska, California, Colorado, Idaho, Indiana, Iowa, Louisiana, Maine, Massachusetts, Michigan, Mississippi, Nevada, Ohio and Washington. Federal agencies, including the Consumer Financial Protection Bureau and the FBI's Internet Crime Complaint Center, contribute data. In 2014, the U.S. Departments of Defense, Education, and Veterans Affairs began contributing educational institution and student lending complaints from military members and their dependents. The Commission also receives complaints from the Canadian Anti-Fraud Centre. Non-governmental organizations also provide complaint data to the FTC. The Council of Better Business Bureaus, consisting of all North American BBBs, is a major contributor of complaint data. Other organizations include the following: Green Dot, the Lawyers' Committee for Civil Rights Under Law, MoneyGram International, the National Fraud Information Center, PrivacyStar, and Western Union. https://www.ftc.gov/system/files/documents/reports/consumer-sentinel-network-data-book-january-december-2014/sentinel-cy2014.pdf

[iii] All statistics quoted in the reported are taken from the 2014 Federal Trade *Commission Consumer Sentinel Network Databook* and previously published CSN data books unless otherwise noted. https://www.ftc.gov/system/files/documents/reports/consumer-sentinel-network-data-book-january-december-2014/sentinel-cy2014.pdf

[iv] Before identity theft became a federal crime, identity fraud had been established as a crime in the False Identification Crime Control Act of 1982 (P.L. 97-398). However, the identity fraud statute did not contain a specific theft provision.

[v] 18 From remarks by James Bauer, Deputy Assistant Director, Office of Investigations, U.S. Secret Service, before the U.S. Congress, Senate Committee on the Judiciary, Subcommittee on Technology, Terrorism, and Government Information, *The Identity Theft and Assumption Deterrence Act*, 105th Cong., 2nd sess., May 20, 1998.

[vi] http://ojp.gov/ovc/pubs/ID_theft/idtheftlaws.html Publication Date October 2010

[vii] The category of Total Financial – the combination of *Credit Card Fraud, Bank Fraud* and *Loan Fraud* complaints – was created by the ITRC for comparison purposes to illustrate the significant growth in *Government Documents or Benefits Fraud*.

[viii] http://www.va.gov/identitytheft/

[ix] Highlights of Report Number: 2014-40-086 to the IRS Deputy Commissioner for Operations Support and the Commissioner for the Wage and Investment Division. TIGTA Issued on September 24, 2014.

[x] Topic 255 – Self-Select PIN Signature Method www.irs.gove/taxtopics/tc255.html

[xi] Treasury Inspector General For Tax Administration (TIGTA), Key Tax Provision Were Implemented Correctly for the 2014 Filing Season, September 19, 2014, Reference Number 2014-40-077

[xii] ***Crime in the United States***
An annual publication in which the FBI compiles the volume and rate of violent and property crime offenses for the nation and by state. Individual law enforcement agency data are also provided for those contributors supplying 12 months complete offense data. This report also includes arrest, clearance, and law enforcement employee data. Use the new online UCR Data Tool to research crime statistics for the nation, by state, and by individual law enforcement agency. http://www.fbi.gov/about-us/cjis/ucr/crime-in-the-u.s/2013/crime-in-the-u.s.-2013/property-crime/property-crime-topic-page/propertycrimemain_final

[xiii] Testimony of Mike Alley, Commissioner, Indiana Dept. Revenue to the United States Senate Committee on Finance, March 12, 2015.