

Internal Revenue Service
Appeals Office
211 W. Wisconsin Ave. Ste. 703
Milwaukee, WI 53203-2303

Department of the Treasury

Date: OCT 14 2014

Contact Person:

Employee ID Number:

Contact Telephone Number:

Fax Number:

Contact Hours:

7:00 - 3:30

Re:

Penalty Appeals

Amount of Assessed Penalty(s):

\$248,038

I.R.C. Section(s):

6651(a)(1), 6651(a)(2), 6656

Tax Period(s) Ended:

**03/2001 06/2001 09/2001
12/2001**

**03/2002 06/2002 09/2002
12/2002**

**03/2003 06/2003 09/2003
12/2003**

**03/2004 06/2004 09/2004
12/2004**

**03/2005 06/2005 09/2005
12/2005**

EDEN WI 53019-



Dear Taxpayer:

I completed my review of your request to adjust the penalty(s) assessed against you. Based on the information submitted, I am pleased to advise you my recommendation is to abate (remove) \$12,273 of the \$248,038 penalty stated above and your case is closed in Appeals. When this action has been completed, you will receive an adjustment notice from the IRS Service Center which originally assessed the penalty. The remaining penalty of \$235,765 is sustained for the following reason(s): Based upon case law, the information submitted does not meet reasonable cause.

Payment Information

Interest and penalties continue to accrue on the balance due until date of payment. If you have not paid the balance due in full, you may send your payment to the Internal Revenue Service Center address listed on your notice. Please make your check, money order or cashier's check payable to the U.S. Treasury.

What To Do If You Don't Agree

If you do not agree with this determination, your next level of appeal of the penalties