Internal Revenue Service Appeals Office Stop #33 500 Woodward Ave., Suite 1369 Detroit, MI 48226



Department of the Treasury

Date: JAN 0 7 2 14

Contact Person:
Employee ID Number:

Contact Telephone Number:

Fax Number:

Contact Hours:

Re:

Penalty Appeals

Amount of Assessed Penalty(s): \$80.972.00

I.R.C. Section(s):

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

Tax Period(s) Ended:

03/2003 06/2004 09/2004 12/2004 06/2005 09/2005

12/2006 03/2007 06/2007 06/2008 09/2008 12/2008

06/2009 09/2009 12/2009 03/2010

Dear Ms. Andrus:

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) \$29,275.00 of the \$80,972.00 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 \$51,696.00 is sustained for the following reason(s): lack of 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 would be to file a formal suit with either the United States District Court or the United States Court of Federal Claims. To continue the appeal you must:

Pay the balance due on the assessed penalty(s)