

Proposed Assessment of Trust Fund Recovery Penalty
(Sec. 6672, Internal Revenue Code, or corresponding provisions of prior internal revenue laws)

Report of Business Taxpayer's Unpaid Tax Liability

Name and address of business



Tax Return Form Number	Tax Period Ended	Date Return Filed	Date Tax Assessed	Identifying Number	Amount Outstanding	Penalty
941	06/30/2017	12/06/2017	04/09/2018		\$1,892,155.54	\$1,238,706.50
941	09/30/2017	10/31/2017	12/11/2017		\$1,216,991.11	\$1,013,708.63
941	03/31/2018	10/15/2018	11/26/2018		\$1,923,340.66	\$997,162.22
941	06/30/2018	10/15/2018	11/26/2018		\$3,878,873.39	\$1,814,922.32
941	09/30/2018	10/31/2018	11/26/2018		\$1,174,017.78	\$644,958.02
Totals:					\$10,085,378.48	\$5,709,457.69

Agreement to Assessment and Collection of Trust Fund Recovery Penalty

Name, address, and social security number of person responsible



I consent to the assessment and collection of the penalty shown for each period, which is equal either to the amount of federal employment taxes withheld from employees' wages or to the amount of federal excise taxes collected from patrons or members, and which was not paid over to the Government by the business named above. I waive the 60 day restriction on notice and demand set forth in Internal Revenue Code Section 6672(b).

Signature of person responsible

Date





Department of the Treasury
Internal Revenue Service
Independent Office of Appeals

[Redacted]

[Redacted]

Date:

SEP 29 2020

Person to contact:

[Redacted]

Re:

Trust Fund Recovery Penalty

Tax periods ended:

06/2017 09/2017 03/2018 06/2018
09/2018

For trust funds due from:

[Redacted]

Employer ID number:

[Redacted]

Dear [Redacted]

We considered your protest along with your evidence and arguments against the Trust Fund Recovery Penalty (TFRP) assessment.

We determined that the IRS should not hold you personally liable for the non-payment of the trust fund liabilities for the tax periods shown above. We are returning your case file to Collection with a non-assertion determination.

Please note, the Department of Justice can reopen this case before the assessment limitation period expires if it decides to join all potentially responsible persons in a refund suit.

If you have questions, you can call me at the phone number above.

At the conclusion of the Appeals process, we may ask you to participate in an Appeals customer satisfaction survey. Participation is voluntary and the survey won't ask for personal or financial information of any kind. We'll use the results of the survey to improve the Appeals process and service to our customers.

Thank you for your cooperation.

Sincerely

[Redacted Signature]

cc: Tyler H Dewitt

[Redacted]