

DEPARTMENT OF TAXATION AND FINANCE

To Tax Comm. of NY

MEMORANDUM

TO : Commissioner Procaccino
Att: Mr. Edward Rook

FROM : John F. Donovan

SUBJECT: John Carras and Athina Carras
22 Avenue Eglantine
Lausanne, Switzerland

OFFICE: Income Tax Bureau

DATE : April 25, 1974

Warrant #MA-497333, LN-461020
1956 Assessment AB-TF345910

A Tax Commission Determination, dated November 29, 1972, sustained the imposition of additional tax of \$32,378.04 in the above assessment plus statutory charges for late payment of the assessment.

The taxpayers' attorney has offered to pay the basic tax of \$32,378.04 if all penalty and interest charges are waived. These charges now amount to \$13,922.54.

The requested waiver of penalty and interest is based on statements that the taxpayers (1) have not resided in the United States since 1962, (2) do not conduct business in New York and (3) have no assets in New York.

In view of the difficulties we would encounter in enforcing collection in this case, I recommend acceptance of the requested waiver of penalty and interest. However as the amount of penalty and interest sought to be waived is more than \$2,500.00, I am referring the matter for Tax Commission approval, pursuant to Memo E-94.1.

The taxpayers file is attached.

John F. Donovan
John F. Donovan
Director

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M. Koenig 4/29/74*
*Approved
M. Koenig 4/30/74*
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M. Koenig 4/30/74*
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M. Koenig 4/30/74*

