STATE OF NEW YORK STATE TAX COMMISSION ALBANY, NEW YORK 12227

May 6, 1983

Passport & Visa, Inc. and Benjamin Menegazzi, as Officer 360 Jefferson Rd. Rochester, NY 14623

Gentlemen:

Please take notice of the Decision of the State Tax Commission enclosed herewith.

You have now exhausted your right of review at the administrative level. Pursuant to section(s) 1138 of the Tax Law, any proceeding in court to review an adverse decision by the State Tax Commission can only be instituted under Article 78 of the Civil Practice Laws and Rules, and must be commenced in the Supreme Court of the State of New York, Albany County, within 4 months from the date of this notice.

Inquiries concerning the computation of tax due or refund allowed in accordance with this decision may be addressed to:

> NYS Dept. Taxation and Finance Law Bureau - Litigation Unit Albany, New York 12227 Phone # (518) 457-2070

> > Very truly yours,

STATE TAX COMMISSION

cc: Petitioner's Representative
Robert Hanks
Laverne, Sortino & Noto
707 Executive Office Bldg., 36 Main St. W.
Rochester, NY 14614
Taxing Bureau's Representative

STATE TAX COMMISSION

In the Matter of the Petition of Passport & Visa, Inc. and Benjamin Menegazzi, as Officer

AFFIDAVIT OF MAILING

for Redetermination of a Deficiency or a Revision of a Determination or a Refund of Sales & Use Tax : under Article 28 & 29 of the Tax Law for the Years 1966 & 1967. :

State of New York County of Albany

David Parchuck, being duly sworn, deposes and says that he is an employee of the Department of Taxation and Finance, over 18 years of age, and that on the 6th day of May, 1983, he served the within notice of Decision by certified mail upon Passport & Visa, Inc. and Benjamin Menegazzi, as Officer, the petitioners in the within proceeding, by enclosing a true copy thereof in a securely sealed postpaid wrapper addressed as follows:

Passport & Visa, Inc. and Benjamin Menegazzi, as Officer 360 Jefferson Rd. Rochester, NY 14623

and by depositing same enclosed in a postpaid properly addressed wrapper in a (post office or official depository) under the exclusive care and custody of the United States Postal Service within the State of New York.

That deponent further says that the said addressee is the petitioner herein and that the address set forth on said wrapper is the last known address of the petitioner.

Sworn to before me this 6th day of May, 1983.

David Parchuck

AUTHORIZED TO ADMINISTER OATHS PURSUANT TO TAX LAW SECTION 174

STATE TAX COMMISSION

	In the Matter of the Petition
	of Passport & Visa, Inc.
and	l Benjamin Menegazzi, as Officer

AFFIDAVIT OF MAILING

for Redetermination of a Deficiency or a Revision of a Determination or a Refund of Sales & Use Tax : under Article 28 & 29 of the Tax Law for the Years 1966 & 1967. :

State of New York County of Albany

David Parchuck, being duly sworn, deposes and says that he is an employee of the Department of Taxation and Finance, over 18 years of age, and that on the 6th day of May, 1983, he served the within notice of Decision by certified mail upon Robert Hanks the representative of the petitioners in the within proceeding, by enclosing a true copy thereof in a securely sealed postpaid wrapper addressed as follows:

Robert Hanks Laverne, Sortino & Noto 707 Executive Office Bldg., 36 Main St. W. Rochester, NY 14614

and by depositing same enclosed in a postpaid properly addressed wrapper in a (post office or official depository) under the exclusive care and custody of the United States Postal Service within the State of New York.

That deponent further says that the said addressee is the representative of the petitioner herein and that the address set forth on said wrapper is the last known address of the representative of the petitioner.

Sworn to before me this 6th day of May, 1983.

David Parchuck

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AUTHORIZED TO ADMINÍSTER OATHS PURSUANT TO TAX LAW SECTION 174

STATE TAX COMMISSION

In the Matter of the Petition

of

PASSPORT & VISA, INC. and BENJAMIN MENEGAZZI AS OFFICER

for Revision of a Determination or for Refund : of Sales and Use Taxes under Articles 28 and 29 of the Tax Law for the Period January 17, : 1966 through November 30, 1969.

Petitioners, Passport & Visa, Inc., 360 Jefferson Road, Rochester, New York 14623, and Benjamin Menegazzi, 514 Culver Parkway, Rochester, New York 14609 filed a petition for revision of a determination or for refund of sales and use taxes under Articles 28 and 29 of the Tax Law for the period January 17, 1966 through November 30, 1969 (File No. 11120).

DECISION

A formal hearing was held before Michael Alexander, Hearing Officer, at the offices of the State Tax Commission, Building #9, State Campus, Albany, New York, on August 30, 1976 at 9:15 A.M. and was continued to conclusion at the same offices on September 28, 1976. Petitioners appeared by Laverne, Sortino, Hanks & Krol, Esqs. (Robert Hanks, Esq., of counsel). The Audit Division appeared by Peter Crotty, Esq. (Alexander Weiss, Esq., of counsel).

ISSUE

I. Whether the sales and use tax liability of petitioners is properly reflected in the Notices issued against them.

II. Whether a refund is due petitioner Passport & Visa, Inc.

FINDINGS OF FACT

1. An audit was conducted of the books and records of Passport and Visa, Inc. ("Passport") for the period January 17, 1966 through August 31, 1967. On November 9, 1967, Passport executed a Consent and Waiver, listing the tax due for such period as \$26,978.66. On January 23, 1968, the consent was rejected by the Audit Division and a Notice of Determination and Demand for Payment of Sales and Use Taxes Due (notice #90,753,964) was issued to Passport in the amount of \$26,978.66 plus penalty and interest. No protest of this assessment or request for hearing on this assessment was immediately filed.

 A Notice of Determination and Demand under Jeopardy for Payment of Sales and Use Taxes Due (notice #90,451,157) was issued to Passport on May 23, 1969 covering the periods ended May 31, 1968, August 31, 1968 and February 28, 1969. This assessment was based on non-filing of returns.¹

3. A Notice of Determination and Demand for Payment of Sales and Use Taxes Due (notice #90,451,549) was issued on November 29, 1971 to Benjamin Menegazzi. This assessment, covering the periods ended May 31, 1968, August 31, 1968, February 28, 1969, May 31, 1969, August 31, 1969 and November 30, 1969, was issued to Mr. Menegazzi individually as a responsible officer of Passport. This assessment was protested February 25, 1972.

The aforesaid notice to Mr. Menegazzi was the result of the following:

- a.) returns had been filed without remittances for the periods ended May 31, 1968, August 31, 1968 and February 28, 1969;
- b.) the return for the period ended May 31, 1969 had been filed with a check returned by Passport's bank for insufficient funds;
- c.) returns for the periods ended August 31, 1969 and November 30, 1969 were not filed.

Tax was estimated at \$1,000.00 per quarter for each of the periods in which no return was filed.

Returns for these period were subsequently filed.

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4. A Notice and Demand for Payment of Sales and Use Taxes Due, (notice #90,451,156) in the amount of \$1,126.85 was issued on May 23, 1969 to Passport, for the period ended November 30, 1968. The return for this period had been filed late on May 21, 1969, without payment. Full payment was received on this assessment on June 5, 1969.

5. A Notice and Demand for Payment of Sales and Use Taxes Due (notice #92,400,064) in the amount of \$2,157.55 plus penalty and interest was issued to Passport on August 29, 1969. This notice resulted from a check issued in the amount of \$2,157.55 which was returned by Passport's bank due to insufficient funds, and pertains to the period ended May 31, 1969, for which a timely return had been filed.

6. A Notice and Demand for Payment of Sales and Use Taxes Due (notice #91,400,240) in the amount of \$303.00 was issued on April 30, 1969 to Passport. The notice resulted from a check dated March 13, 1969, in the amount of \$300.00 which had been returned by Passport's bank, bearing the notation "account closed". The check was in part payment of the notice against Passport dated January 23, 1968 (see Finding of Fact "1"). This same check formed the basis for a Notice of Determination and Demand for Payment of Sales and Use Taxes Due (notice #90,451,550) in the amount of \$300.00 plus penalty and interest issued against Benjamin Menegazzi individually and as an officer, on November 29, 1971.

7. In a letter from Steffan & Company (Passport's accountants) to the Audit Division dated May 20, 1970, the topic of a hearing or reaudit of Passport was first mentioned. Thereafter, on October 28, 1970, Passport filed an application for a refund for the periods January 17, 1966 through November 30, 1969, claiming an overpayment of \$9,403.66.

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8. On November 30, 1970, the Audit Division sent a card to Passport acknowledging receipt of the claim for refund. On December 18, 1970, the Sales Tax Approval and Review Unit of the Audit Division, in responding to a telegram from Passport, stated that the file was being forwarded to the Rochester District Office for an audit of Passport's corporate records to determine the validity of the refund.

9. On May 15, 1974, petitioners' representative wrote to the Rochester District Office concerning the various meetings which had been held with respect to the taxpayers' problems, mentioning the loss or destruction of records which would make complete substantiation impossible, and requesting a determination.

10. The application for refund for the periods January, 1966 through August, 1977, and September, 1968 through December, 1968 was based upon reconstructed corporate books. It was argued that the reconstruction was necessitated due to a bookkeeping error involving an overstatement of the account labelled "sales tax collected", which account provided the source of the amounts reported as due to the State on Passport's returns. The record is unclear as to the basis of the refund for the remaining periods.

11. Sales and Use tax returns filed by Passport showed amounts due to the State which were equal to the amount arrived at by applying the tax rate to the amount of taxable sales.

12. The hearing in this matter was scheduled upon a request of the Law Bureau made prior to the July 1, 1976 effective date of the State Tax Commission Rules of Practice and Procedure, and therefore formal petitions and answers

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were not required. The Notice of Hearing was in the name of Passport and Visa, Inc. and it was stated to be for the period January 1, 1966 through August 31, 1977. On the record a motion was made by Mr. Hanks that the hearing notice be amended to include the period September 1, 1967 through November 30, 1969 as well as the individual assessments against Mr. Menegazzi, and the periods included therein.

13. No issues were raised as to penalties or interest.

CONCLUSIONS OF LAW

A. That section 1138(a) of the Tax Law provides in relevant part, with respect to a Notice of Determination that:

"Such determination shall finally and irrevocably fix the tax unless the person against whom it is assessed, within ninety days after giving of notice of such determination, shall apply to the tax commission for a hearing...".

Since a hearing was not requested within ninety days of Notice of Determination and Demand number 90,753,964 as described in Finding of Fact "1", said determination irrevocably fixed the tax for the periods listed therein.

B. That section 1138(b) of the Tax Law provides that a Notice of Determination under Jeopardy issued against the person liable must be issued "prior to the filing of his return and prior to the date when his return is required to be filed". Jeopardy notice number 90,451,157 as referred to in Finding of Fact "2", was issued against Passport after the due dates of the returns and accordingly is null and void.

C. That there was a timely request for a hearing on Notice of Determination and Demand number 90,451,549 as described in Finding of Fact "3", against Benjamin Menegazzi. Furthermore, the motion made to amend the notice of

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hearing to include such determination, as described in Finding of Fact "12", is granted.

D. That pursuant to <u>Parsons v. State Tax Commission</u>, 34 N.Y.2d 190, the State Tax Commission has no authority to hold a hearing where a return has been filed and payment of the tax was not made. Therefore, that portion of Notice of Determination and Demand number 90,451,549 relative to the periods ended May 31, 1968, August 31, 1968, February 28, 1969 and May 31, 1969 is barred from Commission review. Additionally, Notice of Determination and Demand number 90,451,550 as described in Finding of Fact "6", against Benjamin Menegazzi, and the Notices and Demand numbers 90,451,156; 92,400,064 and 91,400,240; as described in Findings of Fact "4", "5" and "6" respectively, are barred from Commission review.²

E. That section 1139(a) of the Tax Law provides that an application for refund of sales or use tax must be made within three years after the date the tax was payable. The application for refund as described in Finding of Fact "7" was not timely filed for the tax periods prior to September 1, 1967.

F. That Passport failed to sustain the burden of proof to show that it overstated the tax due reported on its sales and use tax returns for the periods after September 1, 1967.

G. That the petition of Passport & Visa, Inc. and Benjamin Menegazzi is granted to the extent indicated in Conclusions of Law "B" and "C" above. The Audit Division is hereby directed to cancel the Notice of Determination and

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² The periods at issue herein are prior to the January 1, 1980 effective date of section 121 (Twenty-first) of the Tax Law.

Demand Under Jeopardy for Payment of Sales and Use Taxes Due issued May 23, 1969. Except as so granted, the petition is in all other respects denied. DATED: Albany, New York STATE TAX COMMISSION

MAY 0 6 1983

<u>fusClin</u> PRESIDENT COMMISSIONER

COMMISSIONER

P 481 - 207 731 RECEIPT FOR CERTIFIED MAIL

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NO INSURANCE COVERAGE PROVIDED-NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to PASSOORI + Uish Street and Nozand Beujo Meneazzi + 2 of P.O., Statelind ZIP Code Re BO Jetterson Re Rochester Ny	Inc inin ficer
Postage	\$
Certified Fee	н -
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	
TOTAL Postage and Fees Postmark or Date	2

P 481 207 732

RECEIPT FOR CERTIFIED MAIL

1.0 INSURANCE COVERAGE PROVIDED-NOT FOR INTERNATIONAL MAIL

(See Reverse)

Brech	5400 13	<u></u>	014
Postage		\$	
Certified Fee			1
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Return Receipt S Date, and Addre	-		
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Postmark or D	ste		
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STATE OF NEW YORK STATE TAX COMMISSION ALBANY, NEW YORK 12227

May 6, 1983

Passport & Visa, Inc. and Benjamin Menegazzi, as Officer 360 Jefferson Rd. Rochester, NY 14623

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Inquiries concerning the computation of tax due or refund allowed in accordance with this decision may be addressed to:

NYS Dept. Taxation and Finance Law Bureau - Litigation Unit Albany, New York 12227 Phone # (518) 457-2070

Very truly yours,

STATE TAX COMMISSION

cc: Petitioner's Representative Robert Hanks Laverne, Sortino & Noto 707 Executive Office Bldg., 36 Main St. W. Rochester, NY 14614 Taxing Bureau's Representative

STATE TAX COMMISSION

In the Matter of the Petition

of

PASSPORT & VISA, INC. and BENJAMIN MENEGAZZI AS OFFICER

for Revision of a Determination or for Refund of Sales and Use Taxes under Articles 28 and 29 of the Tax Law for the Period January 17, 1966 through November 30, 1969.

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DECISION

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ISSUE

I. Whether the sales and use tax liability of petitioners is properly reflected in the Notices issued against them.

II. Whether a refund is due petitioner Passport & Visa, Inc.

FINDINGS OF FACT

1. An audit was conducted of the books and records of Passport and Visa, Inc. ("Passport") for the period January 17, 1966 through August 31, 1967. On November 9, 1967, Passport executed a Consent and Waiver, listing the tax due for such period as \$26,978.66. On January 23, 1968, the consent was rejected by the Audit Division and a Notice of Determination and Demand for Payment of Sales and Use Taxes Due (notice #90,753,964) was issued to Passport in the amount of \$26,978.66 plus penalty and interest. No protest of this assessment or request for hearing on this assessment was immediately filed.

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7. In a letter from Steffan & Company (Passport's accountants) to the Audit Division dated May 20, 1970, the topic of a hearing or reaudit of Passport was first mentioned. Thereafter, on October 28, 1970, Passport filed an application for a refund for the periods January 17, 1966 through November 30, 1969, claiming an overpayment of \$9,403.66.

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9. On May 15, 1974, petitioners' representative wrote to the Rochester District Office concerning the various meetings which had been held with respect to the taxpayers' problems, mentioning the loss or destruction of records which would make complete substantiation impossible, and requesting a determination.

10. The application for refund for the periods January, 1966 through August, 1977, and September, 1968 through December, 1968 was based upon reconstructed corporate books. It was argued that the reconstruction was necessitated due to a bookkeeping error involving an overstatement of the account labelled "sales tax collected", which account provided the source of the amounts reported as due to the State on Passport's returns. The record is unclear as to the basis of the refund for the remaining periods.

11. Sales and Use tax returns filed by Passport showed amounts due to the State which were equal to the amount arrived at by applying the tax rate to the amount of taxable sales.

12. The hearing in this matter was scheduled upon a request of the Law Bureau made prior to the July 1, 1976 effective date of the State Tax Commission Rules of Practice and Procedure, and therefore formal petitions and answers

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were not required. The Notice of Hearing was in the name of Passport and Visa, Inc. and it was stated to be for the period January 1, 1966 through August 31, 1977. On the record a motion was made by Mr. Hanks that the hearing notice be amended to include the period September 1, 1967 through November 30, 1969 as well as the individual assessments against Mr. Menegazzi, and the periods included therein.

13. No issues were raised as to penalties or interest.

CONCLUSIONS OF LAW

A. That section 1138(a) of the Tax Law provides in relevant part, with respect to a Notice of Determination that:

"Such determination shall finally and irrevocably fix the tax unless the person against whom it is assessed, within ninety days after giving of notice of such determination, shall apply to the tax commission for a hearing...".

Since a hearing was not requested within ninety days of Notice of Determination and Demand number 90,753,964 as described in Finding of Fact "1", said determination irrevocably fixed the tax for the periods listed therein.

B. That section 1138(b) of the Tax Law provides that a Notice of Determination under Jeopardy issued against the person liable must be issued "prior to the filing of his return and prior to the date when his return is required to be filed". Jeopardy notice number 90,451,157 as referred to in Finding of Fact "2", was issued against Passport after the due dates of the returns and accordingly is null and void.

C. That there was a timely request for a hearing on Notice of Determination and Demand number 90,451,549 as described in Finding of Fact "3", against Benjamin Menegazzi. Furthermore, the motion made to amend the notice of

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hearing to include such determination, as described in Finding of Fact "12", is granted.

D. That pursuant to <u>Parsons v. State Tax Commission</u>, 34 N.Y.2d 190, the State Tax Commission has no authority to hold a hearing where a return has been filed and payment of the tax was not made. Therefore, that portion of Notice of Determination and Demand number 90,451,549 relative to the periods ended May 31, 1968, August 31, 1968, February 28, 1969 and May 31, 1969 is barred from Commission review. Additionally, Notice of Determination and Demand number 90,451,550 as described in Finding of Fact "6", against Benjamin Menegazzi, and the Notices and Demand numbers 90,451,156; 92,400,064 and 91,400,240; as described in Findings of Fact "4", "5" and "6" respectively, are barred from Commission review.²

E. That section 1139(a) of the Tax Law provides that an application for refund of sales or use tax must be made within three years after the date the tax was payable. The application for refund as described in Finding of Fact "7" was not timely filed for the tax periods prior to September 1, 1967.

F. That Passport failed to sustain the burden of proof to show that it overstated the tax due reported on its sales and use tax returns for the periods after September 1, 1967.

G. That the petition of Passport & Visa, Inc. and Benjamin Menegazzi is granted to the extent indicated in Conclusions of Law "B" and "C" above. The Audit Division is hereby directed to cancel the Notice of Determination and

-6-

² The periods at issue herein are prior to the January 1, 1980 effective date of section 121 (Twenty-first) of the Tax Law.

Demand Under Jeopardy for Payment of Sales and Use Taxes Due issued May 23, 1969. Except as so granted, the petition is in all other respects denied. DATED: Albany, New York STATE TAX COMMISSION

MAY 0 6 1983

avelu PRESIDENT

ISSIONER COMMISSIONER

TA-36 (9/76) State of New York - Department of Taxation and Finance Tax Appeals Bureau

REQUEST FOR BETTER ADDRESS

Requested by lax Appeals Bureau	Unit	Date of Request
Room 107 - Bidg. #9		
State Campus		5/12/33
Albany, New York 12227		3/12/85

Please find most recent address of taxpayer described below; return to person named above.

Date of Petition Social Security Number Junul. Bassport & Visa, Inc. and Benjamin Menegazzi, as Officer Address 360 fefferson Rd. Rochester, N. Y. 14623

Results of search by Files

NIF ALA biles AR hot slisters NIF Orners NIF Strokes NIF Strokes AR hot slisters NIF Orners NIF Strokes NIF Strokes New address:

Same as above, no better address

463960

Searched by Date of Search Section 5/13/83

PERMANENT RECORD

FOR INSERTION IN TAXPAYER'S FOLDER







