

CASE NUM: 17311-99 TYPE: REGULAR SUBTYPE:
OPENING DATE: 11/17/1999 STATUS: DEC'N-SETTLEMENT STATUS DATE: 10/02/2000
NAME: PUERTO QUETZAL POWER CORP ATTY: JRB BALBONI JANET R

AMOUNT OF TAX: 535368
AMOUNT OF PENALTY: 0
AMOUNT OF OVERPAYMENT: 20600
IN DISPUTE ON DECISION

DECISION ENTERED DATE: 09/28/2000 DECISION RESULT L FAV'BLE T/P
IS THIS A SETTLEMENT? Y
IF YES ENTER DECISION RECEIPT DATE: 10/02/2000
DATE ASSESSMENT MUST BE MADE: 02/23/2001 DATE NOTIF TO ASSESS:
ROND FILED BY PETITIONER? DATE OF NOTIF BY JUSTICE OF DECISION:
REMARKS: N

PROCESSING COMPLETE - CONTINUE

(XMIT

41 > 0 1,59

CLOSED CASES

7 days = 10-10-00

100 days =

(tried dismissed settled/no waiver

CTRS/ATTY INFO
grade 19 hrs

BOD CODE (Please check appropriately

- PRIMARY: LM-Large-Mid Size Bus., SB-Small Business, TE-Tax Exempt & Gov't Ent, I-Wage & Investment Inc.
SECONDARY: LM2, SB2, TE2, WT2, CT2

FOR CLOSING

DATE TO APPEALS

OCT 10 2000

ATTACHMENTS:

admin file. . . yes no
2 cc entered decision OR order of dismissal

5402 5278 OR 0 + 2cc counsel settlement memo

audit statement schedule of asjustments statement of account

Senate Finance Committee
EXHIBIT 42

TRANSMITTAL MEMORANDUM

OCT 10 2000

To: Chief, Appeals Office

Office

From: District Counsel

Office

Subject: Docket No. TL-17311-99

There are transmitted herewith for: check applicable boxes

<input type="checkbox"/>	Consideration	<input type="checkbox"/>	Rule 155 computation
<input type="checkbox"/>	Settlement computation	<input checked="" type="checkbox"/>	Closing
<input type="checkbox"/>	Obtaining adm. file and for forwarding to this office	<input type="checkbox"/>	Other (Specify)

<input checked="" type="checkbox"/>	Adm. file	<input type="checkbox"/>	Criminal Investigation file
<input type="checkbox"/>	Copy of petition	<input type="checkbox"/>	Copy of answer
<input type="checkbox"/>	Settlements documents	<input type="checkbox"/>	Legal file
<input type="checkbox"/>	Court's opinion dated	<input type="checkbox"/>	Decision dated
<input type="checkbox"/>	DJ Settlement offer	<input type="checkbox"/>	Counsel Settlement Memorandum
<input type="checkbox"/>	Other (Specify)		

The following action has been taken on this case:

<input type="checkbox"/>	Case has been settled by Counsel Settlement Memorandum
<input type="checkbox"/>	Case has been settled pursuant to Tax Court's decision
<input type="checkbox"/>	Settlement by Appeals has been processed
<input type="checkbox"/>	See attached memorandum

Pre-90-day memorandum

Elimination of penalty

 Other (Specify)

Remarks

ERIS Information:

1. TEFRA, S corp. etc, (non-taxable cases only) Counsel adjustment amount (Item 22) \$ _____
2. Tax Court cases where claims for refund have been filed: (this item applies only if the case is settled or tried by Counsel, not Appeals)
 - A. The total amount of Exam's unagreed claims that is disallowed by both Appeals and District Counsel (Item 25) \$ _____
 - B. Claims filed direct with Appeals and/or District Counsel:
 - 1) amount of claim (Item 26) \$ _____
 - 2) The total amount disallowed by both Appeals and District Counsel (Item 27) \$ _____
3. Average employee grade (Item 23): 14
4. Total Counsel hours worked (Item 24): 28