

**BEFORE THE TAX COMMISSION OF THE STATE OF IDAHO**

In the Matter of the Protest of	)	
	)	DOCKET NO. 18555
[REDACTED],	)	
	)	DECISION
Petitioner.	)	
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	)	

[Redacted] (petitioner) protests the Notice of Deficiency Determination issued by the auditor for the Idaho State Tax Commission (Commission) dated November 15, 2004, asserting additional income tax and interest totaling \$563 for 2000.

The only issue in this docket is whether the petitioner should be required to report income from [Redacted], an S corporation. The auditor asserted that the petitioner owned a 50 percent interest in said S corporation and that, therefore, the petitioner was required to report his proportionate share of the S corporation income.

A protest was filed on behalf of the petitioner indicating that additional documentation would be submitted. A good deal of time has since passed. No further documentation has been received. Therefore, the Commission now renders its determination based upon the information in the file.

[Redacted]. reported a loss for 2000. The corporate return indicated that the petitioner was a 50 percent owner of the corporation. The corporate return was subsequently audited and the income increased, eliminating the loss and reflecting income on the adjusted corporate return. The auditor attributed half of this income to the petitioner. The petitioner has submitted nothing to convince the Commission that the auditor's treatment is incorrect. Therefore, the Commission hereby affirms the auditor's adjustment.

WHEREFORE, the Notice of Deficiency Determination dated November 15, 2004, is

hereby APPROVED, AFFIRMED, AND MADE FINAL.

IT IS ORDERED and THIS DOES ORDER that the petitioner pay the following taxes and interest (calculated to January 31, 2006):

<u>YEAR</u>	<u>TAX</u>	<u>INTEREST</u>	<u>TOTAL</u>
2000	\$454	\$137	\$591

DEMAND for immediate payment of the foregoing amount is hereby made and given.

An explanation of the petitioner's rights to appeal this decision is enclosed with this decision.

DATED this \_\_\_ day of \_\_\_\_\_, 2005.

IDAHO STATE TAX COMMISSION

\_\_\_\_\_  
COMMISSIONER

### **CERTIFICATE OF SERVICE**

I hereby certify that on this \_\_\_ day of \_\_\_\_\_, 2005, a copy of the within and foregoing DECISION was served by sending the same by United States mail, postage prepaid, in an envelope addressed to:

[Redacted]

Receipt No.

[Redacted]

\_\_\_\_\_