

BEFORE THE TAX COMMISSION OF THE STATE OF IDAHO

In the Matter of the Protest of)	
)	DOCKET NO. 0-012-583-936
)	
Petitioner.)	DECISION
<hr style="width: 45%; margin-left: 0;"/>)	

(Petitioner) protested the Notice of Refund Determination (Notice) issued by the Revenue Operations division of the Idaho State Tax Commission (Tax Commission) dated April 8, 2022. The Notice reduced Petitioner’s refund for tax year 2021 from \$2,801 to \$290.

Petitioner timely filed her 2021 individual income tax return showing estimated payments in the amount of \$2,511.¹ Revenue Operations, as part of their normal procedures, checked Tax Commission records for receipt of payments totaling this amount. Revenue Operations located a payment in this amount, but it had been applied to Petitioner’s 2020 tax liability. Therefore, Revenue Operations made an adjustment to remove the unsubstantiated payment shown on the return and sent Petitioner a Notice, showing the tax effect of the adjustment.

Petitioner responded to the Notice, providing a copy of a cancelled check in the amount of \$2,511, dated March 10, 2021, with the words “Enter 1220” written near the memo line. Revenue Operations acknowledged Petitioner’s protest and forwarded the file to the Tax Commission’s Appeals unit (Appeals) for administrative review.

Appeals reached out to Petitioner again explaining the adjustment made to her 2021 return and the alternatives available for redetermining a protested Notice. Petitioner responded but did not request a hearing.

¹ Estimated payments are payments received prior to the due date of the return and along with Idaho withholdings, reduce the amount of individual income tax due.

There is no question the Tax Commission received and deposited a check from Petitioner in the amount of \$2,511. The question is, in what tax year was Petitioner given credit for this payment?

The Tax Commission received Petitioner's 2020 individual income tax return on March 1, 2021. This return showed a tax due of \$2,511. On March 12, 2021, the Tax Commission received a check, in the amount of \$2,511 with the notation, 1220 which in filing period terminology means, December 2020. The Tax Commission applied this payment to Petitioner's 2020 tax liability.

On February 22, 2022, the Tax Commission received Petitioner's 2021 individual income tax return, showing a \$2,511 estimated payment. However, as mentioned previously, the Tax Commission applied Petitioner's \$2,511 payment to her 2020 income tax liability. Tax Commission records show no other payments. Petitioner has not substantiated the estimated payment amount shown on her 2021 individual income tax return.

THEREFORE, the Notice dated April 8, 2022, and directed to _____ is hereby APPROVED and MADE FINAL.

Petitioner's refund was reduced, therefore, no demand for payment is made or necessary.

An explanation of Petitioner's right to appeal this decision is enclosed.

DATED this _____ day of _____ 2022.

IDAHO STATE TAX COMMISSION

CERTIFICATE OF SERVICE

I hereby certify that on this _____ day of _____ 2022,
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:

Receipt No.
