From:	Coca, Marcy, TRD
To:	Gomez, Hector, TRD; Brown, Aaron B., TRD; Aragon, Denise M., TRD; Chowning, Heidi E., TRD; McGee, Janice, TRD; Vigil, Laura, TRD; Cubbin, Laurie M., TRD; Romero, Nora J., TRD
Subject:	10 Day Harold"s Grading and Trucking, Inc.
Date:	Friday, September 12, 2014 9:25:55 AM

Good Morning,

I've been assigned the following 10 day:

Harold's Grading and Trucking, Inc.
REDACTEDREDACTEDREDACTED
10 Day Expiration: 9/29/14
TPBORs Expiration: 7/12/14

Thank you,

Marcy Coca
Tax Auditor IV
NM Taxation and Revenue Department
Audit & Compliance Division
Telephone: (505) 841-6486 Fax: (505) 841-6471
Email: marcy.coca@state.nm.us

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From: Dell, William, TRD
Sent: Tuesday, January 27, 2015 2:30 PM
To: Lowe, Kimberle A., TRD
Subject: Account Info
Attachments: ACCTS OVER 50K SPREADSHEET.xlsx

Kimberle,

Attached is my team's accounts over 50k info.

Thanks,

William (Bill) Dell
Revenue Agent Supervisor
Taxation & Revenue Dept.
(505) 841-6459 Direct
(505) 841-6326 Fax
Email: William.Dell@state.nm.us

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From:	Bernardo, Milagros D, TRD
To:	Gonzalez, Rene, TRD
Subject:	RE: Harold"s Grading and Trucking
Date:	Thursday, February 05, 2015 4:06:19 PM

You did great! Thanks for the email conversation.

From: Gonzalez, Rene, TRD
Sent: Thursday, February 05, 2015 4:01 PM
To: Bernardo, Milagros D, TRD
Subject: RE: Harold's Grading and Trucking

Hi,

I actually spoke to the taxpayer in November (they were in collections for a smaller amount so that's why I contacted them). She was already intent to protest the larger amount by then. I attached our email conversation. I told her the assessment dates (resent them to her), told her she had 90 days, etc. but I never advised an exact date.

Let me know if you have any questions or if I did anything improper! Thanks as always!

Respectfully,

Rene Gonzalez
Revenue Agent
New Mexico Taxation & Revenue Dept.
(505) 841-6242 Direct
(505) 841-6326 Fax

From: Bernardo, Milagros D, TRD
Sent: Thursday, February 05, 2015 3:52 PM
To: Gonzalez, Rene, TRD
Subject: RE: Harold's Grading and Trucking

Hi Rene,

A letter was received from the taxpayer. Please give the Protest Office a couple of weeks before collecting on the audit assessmentREDACTED dated 10/30/2014. I noticed you sent a NOITL before the 90 days on . This sometimes reminds the taxpayer to file a protest that they would normally not have filed or have forgotten to file. I noticed that the taxpayer emailed you inquiring about the date the assessments were sent out. Did they not receive the 10/30/2014 assessment? By chance, did you advise her of a date that she must file the protest by? If so, what date did you advise?

Thank you.

Milagros

Milagros D. Bernardo
Auditor
Protest Office
(505) 827-0783 Phone

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From: Gonzalez, Rene, TRD
Sent: Thursday, February 05, 2015 3:13 PM
To: Bernardo, Milagros D, TRD
Subject: Harold's Grading and Trucking

Good Afternoon,

Hi there- I was wondering if you could check to see if this account filed a timely protest? CRS: REDACTED The taxpayer said she did and I just want to verify before any action on my part.

Thanks in advance!

Respectfully,

Rene Gonzalez
Revenue Agent
New Mexico Taxation & Revenue Dept.
(505) 841-6242 Direct
(505) 841-6326 Fax

From: Antoinette Dominguez
To: Gonzalez, Rene, TRD
Subject: Re: NM Taxation and Revenue
Date: Monday, February 23, 2015 11:50:21 AM

Actually Andrea also saw in an email where I asked if I had until Jan 31st and you said yes. She's in the protest office. Her number is 827-9806.

Sent from my iPhone

On Feb 23, 2015, at 11:41 AM, Gonzalez, Rene, TRD <Rene.Gonzalez@state.nm.us> wrote:

> Who is Andrea?
>
> Our emails were sent to the protest office by their request a couple weeks ago. I did not give you a date- I said you have 90 days from the date of assessment.
>
> Please call me at your earliest convenience.
>
> Respectfully,
>
> Rene Gonzalez
> Revenue Agent
> New Mexico Taxation & Revenue Dept.
> (505) 841-6242 Direct
> (505) 841-6326 Fax
>
> ---
>
> **From:** Antoinette Dominguez [mailto:antydom99@aol.com]
> **Sent:** Monday, February 23, 2015 11:35 AM
> **To:** Gonzalez, Rene, TRD
> **Subject:** Re: NM Taxation and Revenue
>
> I spoke with Andrea and she said I needed to submit a protest on the protest because the email communication you and I had it showed I had until the 31st of January not the 30th.
> Antoinette.
>
> Sent from my iPhone
>
> On Feb 23, 2015, at 9:12 AM, Gonzalez, Rene, TRD <Rene.Gonzalez@state.nm.us> wrote:
>
> > Good Morning,
> >
> > The protest was deemed untimely by the protest office and the liability is

now delinquent. We, therefore, need to discuss payment arrangements.

Respectfully,

Rene Gonzalez
Revenue Agent
New Mexico Taxation & Revenue Dept.
(505) 841-6242 Direct
(505) 841-6326 Fax

From:	Gonzalez, Rene, TRD
To:	Lowe, Kimberle A., TRD; McCall, Dennis, TRD
Cc:	Dell, William, TRD
Subject:	Harold"s Grading and Trucking
Date:	Monday, February 23, 2015 4:40:27 PM
Attachments:	RE Revenue Agent for Harold"s Grading and Trucking.msg RE Harold"s Grading and Trucking.msg Re NM Taxation and Revenue.msg

---

Good Afternoon,

Here are the emails for your review.

Respectfully,

Rene Gonzalez
Revenue Agent
New Mexico Taxation & Revenue Dept.
(505) 841-6242 Direct
(505) 841-6326 Fax

From: Bernardo, Milagros D, TRD
Sent: Thursday, February 05, 2015 4:06 PM
To: Gonzalez, Rene, TRD
Subject: RE: Harold's Grading and Trucking

You did great! Thanks for the email conversation.

From: Gonzalez, Rene, TRD
Sent: Thursday, February 05, 2015 4:01 PM
To: Bernardo, Milagros D, TRD
Subject: RE: Harold's Grading and Trucking

Hi,

I actually spoke to the taxpayer in November (they were in collections for a smaller amount so that's why I contacted them). She was already intent to protest the larger amount by then. I attached our email conversation. I told her the assessment dates (resent them to her), told her she had 90 days, etc. but I never advised an exact date.

Let me know if you have any questions or if I did anything improper! Thanks as always!

Respectfully,

Rene Gonzalez
Revenue Agent
New Mexico Taxation & Revenue Dept.
(505) 841-6242 Direct
(505) 841-6326 Fax

From: Bernardo, Milagros D, TRD
Sent: Thursday, February 05, 2015 3:52 PM
To: Gonzalez, Rene, TRD
Subject: RE: Harold's Grading and Trucking

Hi Rene,

A letter was received from the taxpayer. Please give the Protest Office a couple of weeks before collecting on the audit assessment REDACTED REDACTED dated 10/30/2014. I noticed you sent a NOITL before the 90 days on . This sometimes reminds the taxpayer to file a protest that they would normally not have filed or have forgotten to file. I noticed that the taxpayer emailed you inquiring about the date the assessments were sent out. Did they not receive the 10/30/2014 assessment? By chance, did you advise her of a date that she must file the protest by? If so, what date did you advise?

Thank you.

Milagros

Milagros D. Bernardo
Auditor
Protest Office

(505) 897-0583 Phone

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Sent: Thursday, February 05, 2015 3:13 PM
To: Bernardo, Milagros D, TRD
Subject: Harold's Grading and Trucking

Good Afternoon,

Hi there- I was wondering if you could check to see if this account filed a timely protest? CRS: REDACTED The taxpayer said she did and I just want to verify before any action on my part.

Thanks in advance!

Respectfully,

Rene Gonzalez
Revenue Agent
New Mexico Taxation & Revenue Dept.
(505) 841-6242 Direct
(505) 841-6326 Fax

From: Antoinette Dominguez <antydom99@aol.com>
Sent: Monday, February 23, 2015 11:50 AM
To: Gonzalez, Rene, TRD
Subject: Re: NM Taxation and Revenue

Actually Andrea also saw in an email where I asked if I had until Jan 31st and you said yes. She's in the protest office. Her number is 827-9806.

Sent from my iPhone

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> Who is Andrea?
>
> Our emails were sent to the protest office by their request a couple weeks ago. I did not give you a date- I said you have 90 days from the date of assessment.
>
> Please call me at your earliest convenience.
>
> Respectfully,
>
> Rene Gonzalez
> Revenue Agent
> New Mexico Taxation & Revenue Dept.
> (505) 841-6242 Direct
> (505) 841-6326 Fax
>
> ---
>
> **From:** Antoinette Dominguez [mailto:antydom99@aol.com]
> **Sent:** Monday, February 23, 2015 11:35 AM
> **To:** Gonzalez, Rene, TRD
> **Subject:** Re: NM Taxation and Revenue
>
> I spoke with Andrea and she said I needed to submit a protest on the protest because the email communication you and I had it showed I had until the 31st of January not the 30th.
> Antoinette.
>
> Sent from my iPhone
>
> On Feb 23, 2015, at 9:12 AM, Gonzalez, Rene, TRD <Rene.Gonzalez@state.nm.us> wrote:
>
>> Good Morning,
>>
>> The protest was deemed untimely by the protest office and the liability is now delinquent. We, therefore, need to discuss payment arrangements.
>>
>> Respectfully,
>>
>> Rene Gonzalez

Revenue Agent
New Mexico Taxation & Revenue Dept.
(505) 841-6242 Direct
(505) 841-6326 Fax

From: Gonzalez, Rene, TRD
Sent: Tuesday, January 27, 2015 1:51 PM
To: Antoinette Dominguez
Subject: RE: Revenue Agent for Harold's Grading and Trucking

I don't want to give you the wrong information so please ask them at 505-827-9806. Thanks!

Respectfully,

Rene Gonzalez
Revenue Agent
New Mexico Taxation & Revenue Dept.
(505) 841-6242 Direct
(505) 841-6326 Fax

From: Antoinette Dominguez [mailto:antydom99@aol.com]
Sent: Tuesday, January 27, 2015 1:21 PM
To: Gonzalez, Rene, TRD
Subject: Re: Revenue Agent for Harold's Grading and Trucking

Does it need to be received by the date or my postmarked by the date?

Antoinette Dominguez
Harold's Grading & Trucking

-----Original Message-----
From: Gonzalez, Rene, TRD, TRD <Rene.Gonzalez@state.nm.us>
To: Antoinette Dominguez <antydom99@aol.com>
Sent: Tue, Jan 27, 2015 1:19 pm
Subject: RE: Revenue Agent for Harold's Grading and Trucking

Here is the address:

Protest Office
P.O. Box 1671
Santa Fe, NM 87504-1671

Respectfully,

Rene Gonzalez
Revenue Agent
New Mexico Taxation & Revenue Dept.
(505) 841-6242 Direct
(505) 841-6326 Fax

From: Antoinette Dominguez [mailto:antydom99@aol.com]
Sent: Tuesday, January 27, 2015 1:09 PM
To: Gonzalez, Rene, TRD
Subject: Re: Revenue Agent for Harold's Grading and Trucking

Hi again.

Who do I need to turn in my written protest to?

Antoinette Dominguez
Harold's Grading & Trucking

----Original Message----
From: Gonzalez, Rene, TRD, TRD <Rene.Gonzalez@state.nm.us>
To: Antoinette Dominguez <antydom99@aol.com>
Sent: Mon, Jan 26, 2015 12:01 pm
Subject: RE: Revenue Agent for Harold's Grading and Trucking

There were two audit assessments:

One for Corporate income tax for a tax due of REDACTED REDACTEDwas done on October 22nd (no longer in protest period) The other was for gross receipts for a tax due of REDACTEDwas done on October 30th. You have 90 days from that date to protest.

Respectfully,

Rene Gonzalez
Revenue Agent
New Mexico Taxation & Revenue Dept.
(505) 841-6242 Direct
(505) 841-6326 Fax

From: Antoinette Dominguez [mailto:antydom99@aol.com]
Sent: Monday, January 26, 2015 11:56 AM
To: Gonzalez, Rene, TRD
Subject: Re: Revenue Agent for Harold's Grading and Trucking

Date of assessment being?

Antoinette Dominguez
Harold's Grading & Trucking
505-264-5224

----Original Message----
From: Gonzalez, Rene, TRD, TRD <Rene.Gonzalez@state.nm.us>
To: Antoinette Dominguez <antydom99@aol.com>
Sent: Mon, Jan 26, 2015 11:54 am
Subject: RE: Revenue Agent for Harold's Grading and Trucking

Here you go.

Yes you have 90 days from the date of the assessment to protest.

Respectfully,

Rene Gonzalez
Revenue Agent
New Mexico Taxation & Revenue Dept.
(505) 841-6242 Direct
(505) 841-6326 Fax

From: Antoinette Dominguez [mailto:antydom99@aol.com]
Sent: Monday, January 26, 2015 11:51 AM
To: Gonzalez, Rene, TRD
Subject: Re: Revenue Agent for Harold's Grading and Trucking

Rene,

Can i have the FYI 400. Per Marcy Coca this was given to us during the audit process. Apparently I have until January 31st to protest the audit, right?

Thank you,
Antoinette Dominguez
Harold's Grading & Trucking

Good Afternoon Ms. Dominguez,

It was determined by management to proceed with the assessment of the audit. The audit was assessed yesterday afternoon. You will be receiving and assessment notice sometime this next week.

In regards to the information you provided, I provided the information you sent to management and they allowed the waiver of penalty. However, the only adjustment to the audit regarding the disallowed deductions for the transactions you specified on the audit workpapers was for the transaction which you indicated was for Vineyard Homes since we were able to verify Deborah Short was the officer for this company. All other transactions are still disallowed. If you are in disagreement you still have the option to protest the audit. Once you receive the assessment notice you will have 90 days to file a written protest with the Protest office. Please refer to FYI 400 which was provided to you by the auditor during the audit process.

Thank you,

Marcy Coca
Tax Auditor IV
NM Taxation and Revenue Department
Audit & Compliance Division
Telephone: (505) 841-6486 Fax: (505) 841-6471
Email: marcy.coca@state.nm.us

----Original Message----
From: Gonzalez, Rene, TRD, TRD <Rene.Gonzalez@state.nm.us>
To: antydom99 <antydom99@aol.com>
Sent: Wed, Nov 26, 2014 2:33 pm
Subject: Revenue Agent for Harold's Grading and Trucking

Hello,

My phone number is 505-841-6242 and fax is 505-841-6326.

Respectfully,

Rene Gonzalez
Revenue Agent
Taxation & Revenue Dept.
(505) 841-6242 Direct
(505) 841-6326 Fax

From: Gonzalez, Rene, TRD
To: Lowe, Kimberle A., TRD; Dell, William, TRD; Dell, William, TRD
Subject: FW: Harolds Grading & Trucking Inc.
Date: Tuesday, February 24, 2015 3:31:50 PM

Good Afternoon,

Please see the below email from the protest office. How should I proceed?

Respectfully,

Rene Gonzalez
Revenue Agent
New Mexico Taxation & Revenue Dept.
(505) 841-6242 Direct
(505) 841-6326 Fax

From: Umpleby, Andrea M., TRD
Sent: Tuesday, February 24, 2015 3:22 PM
To: Gonzalez, Rene, TRD
Cc: Tsabetsaye, Andrick O., TRD
Subject: Harolds Grading & Trucking Inc.

Hi Rene,

I spoke with Andrick regarding Harold's Grading & Trucking Inc REDACTED . As you know, the taxpayer submitted a protest of their audit assessment, but it was two days late. I denied the protest on 2/9/15. I spoke with Antoinette on February 18, 2015. I advised that she would need to submit a protest of my protest denial if she would like to dispute whether the protest was timely or not based on your email. As of today the protest office has not received a protest of the protest denial.

The audit assessment is past 90 days old. It is delinquent. Since it is not in protest, it is up to ACD to proceed with collections. I imagine that when you start collection activity they will submit their protest of the protest denial. If/when the Protest Office receives a protest of the protest denial, then I will add a protest indicator to the liability to pull it out of collections.

Please let me know if you have any questions.

Thanks,
Andrea Umpleby
Protest Office
NM Taxation & Revenue Dept
PO Box 1671
Santa Fe, NM 87504-1671
PH 505-827-9806

Fax 505-827-2487

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From:	Gonzalez, Rene, TRD
To:	Lowe, Kimberle A., TRD
Cc:	Dell, William, TRD
Subject:	In Regards to Harold"s Grading and Trucking
Date:	Thursday, February 26, 2015 8:54:43 AM
Attachments:	RE Revenue Agent for Harold"s Grading and Trucking.msg

---

Good Morning,

This email is in regards to Harold's Grading and Trucking.

I made contact with the taxpayer, whom is represented by the owner's daughter-in-law (TIA on file), in November. At the time there was a delinquent balance unrelated to the larger audit assessment which was still in its 90 day protest period. Antoninette Dominguez was driving at the time so she asked if I could email her my contact information to her email of antydom99@aol.com which I did. Although the conversation was short, I distinctly remember Ms. Dominguez saying that she planned to protest the assessment.

I did not hear back from Ms. Dominguez until late January. At that time she emailed me and asked for a copy of FYI-400 which I promptly gave her. FYI-400 contains the PROTEST PRODCEDURES and her rights as a taxpayer. On that same email she asked "Apparently I have until January 31st to protest the audit, right? " to which I replied "Yes you have 90 days from the date of the assessment to protest."

Ms. Dominguez then asked what was the actual date of assessment. At that time, I pulled the assessment letters from gentax and gave her the assessment date from the letter which was October 30th, 2014. I then clearly wrote "You have 90 **days** from that date to protest" at the end of the email with bolded emphasis on the word "**days**" as to dispel any ambiguous language from my previous email.

In summary, I feel that I was trying to be absolutely helpful to the taxpayer in her questions and concerns. On two separate occasions I advised her via email that she had 90 days to protest the audit and I also provided FYI-400 which clearly outlines Protest procedures and her rights as a taxpayer. I also feel that if my first statement of "Yes you have 90 days from the date of the assessment to protest" was ambiguous, unclear, or grammatically incorrect then my second email statement of "You have 90 **days** from that date to protest" was extremely clear and made up for the first statement.

If you have any questions, please do not hesitate to ask.

Respectfully,

Rene Gonzalez
Revenue Agent
New Mexico Taxation & Revenue Dept.
(505) 841-6242 Direct
(505) 841-6326 Fax

From: Gonzalez, Rene, TRD
To: Antoinette Dominguez
Subject: RE: Revenue Agent for Harold"s Grading and Trucking
Date: Tuesday, January 27, 2015 1:50:00 PM

I don't want to give you the wrong information so please ask them at 505-827-9806. Thanks!

Respectfully,

Rene Gonzalez
Revenue Agent
New Mexico Taxation & Revenue Dept.
(505) 841-6242 Direct
(505) 841-6326 Fax

From: Antoinette Dominguez [mailto:antydom99@aol.com]
Sent: Tuesday, January 27, 2015 1:21 PM
To: Gonzalez, Rene, TRD
Subject: Re: Revenue Agent for Harold's Grading and Trucking

Does it need to be received by the date or my postmarked by the date?

Antoinette Dominguez
Harold's Grading & Trucking

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To: Antoinette Dominguez <antydom99@aol.com>
Sent: Tue, Jan 27, 2015 1:19 pm
Subject: RE: Revenue Agent for Harold's Grading and Trucking

Here is the address:

Protest Office
P.O. Box 1671
Santa Fe, NM 87504-1671

Respectfully,

Rene Gonzalez
Revenue Agent
New Mexico Taxation & Revenue Dept.
(505) 841-6242 Direct
(505) 841-6326 Fax

From: Antoinette Dominguez [mailto:antydom99@aol.com]

Sent: Tuesday, January 27, 2015 1:09 PM
To: Gonzalez, Rene, TRD
Subject: Re: Revenue Agent for Harold's Grading and Trucking

Hi again.

Who do I need to turn in my written protest to?

Antoinette Dominguez
Harold's Grading & Trucking

-----Original Message-----
From: Gonzalez, Rene, TRD, TRD <Rene.Gonzalez@state.nm.us>
To: Antoinette Dominguez <antydom99@aol.com>
Sent: Mon, Jan 26, 2015 12:01 pm
Subject: RE: Revenue Agent for Harold's Grading and Trucking

There were two audit assessments:

One for Corporate income tax for a tax due of REDACTED REDACTED was done on October 22nd (no longer in protest period)
The other was for gross receipts for a tax due of REDACTED was done on October 30th.
You have 90 **days** from that date to protest.

Respectfully,

Rene Gonzalez
Revenue Agent
New Mexico Taxation & Revenue Dept.
(505) 841-6242 Direct
(505) 841-6326 Fax

From: Antoinette Dominguez [mailto:antydom99@aol.com]
Sent: Monday, January 26, 2015 11:56 AM
To: Gonzalez, Rene, TRD
Subject: Re: Revenue Agent for Harold's Grading and Trucking

Date of assessment being?

Antoinette Dominguez
Harold's Grading & Trucking
505-264-5224

-----Original Message-----
From: Gonzalez, Rene, TRD, TRD <Rene.Gonzalez@state.nm.us>
To: Antoinette Dominguez <antydom99@aol.com>
Sent: Mon, Jan 26, 2015 11:54 am

Subject: RE: Revenue Agent for Harold's Grading and Trucking

Here you go.

Yes you have 90 days from the date of the assessment to protest.

Respectfully,

Rene Gonzalez
Revenue Agent
New Mexico Taxation & Revenue Dept.
(505) 841-6242 Direct
(505) 841-6326 Fax

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Thank you,
Antoinette Dominguez
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Good Afternoon Ms. Dominguez,

It was determined by management to proceed with the assessment of the audit. The audit was assessed yesterday afternoon. You will be receiving and assessment notice sometime this next week.

In regards to the information you provided, I provided the information you sent to management and they allowed the waiver of penalty. However, the only adjustment to the audit regarding the disallowed deductions for the transactions you specified on the audit workpapers was for the transaction which you indicated was for Vineyard Homes since we were able to verify Deborah Short was the officer for this company. All other transactions are still disallowed. If you are in disagreement you still have the option to protest the audit. Once you receive the assessment notice you will have 90 days to file a written protest with the Protest office. Please refer to FYI 400 which was provided to you by the auditor during the audit process.

Thank you,

Marcy Coca
Tax Auditor IV
NM Taxation and Revenue Department
Audit & Compliance Division
Telephone: (505) 841-6486 Fax: (505) 841-6471
Email: marcy.coca@state.nm.us

-----Original Message-----
From: Gonzalez, Rene, TRD, TRD <Rene.Gonzalez@state.nm.us>
To: antydom99 <antydom99@aol.com>
Sent: Wed, Nov 26, 2014 2:33 pm
Subject: Revenue Agent for Harold's Grading and Trucking

Hello,

My phone number is 505-841-6242 and fax is 505-841-6326.

Respectfully,

Rene Gonzalez
Revenue Agent
Taxation & Revenue Dept.
(505) 841-6242 Direct
(505) 841-6326 Fax

From: Sourisseau, Kevin, TRD
Sent: Friday, October 17, 2014 2:39 PM
To: Vedamanikam, Lizzy, TRD
Cc: Baxter, Shannon L., TRD
Subject: Harold's Trucking discussion with Secretary Padilla

Lizzy,

The Secretary came by my office today to discuss the audit of Harold's Trucking.
She stated:

- That she believed the discussion and issue has been blown out of proportion.
- That she is only trying to address the issue of penalty
  - This is a change from her initial desire to provide an affidavit as 'other evidence' to support the deductions attesting to fact that she was in possession of the NTTCs in question and that they were destroyed
- That she spoke to Brad Odell and was advised to let ACD proceed with the assessment

There was some additional discussion where she suggested the department do away with NTTCs altogether and allow deductions based on the nature of the transaction so that we are not playing 'gotcha'
I reminded her that the department has provided a better system for tracking NTTCs and that we have adjusted our audit procedures to be favorable to the taxpayer with analysis of NTTCNET.

Respectfully

Kevin Sourisseau
Deputy Director, Audit & Compliance Division
Tel: (505) 841-6333 (Albuquerque)
Tel: (505) 827-0901 (Santa Fe)

From: VanDenzen, Brian, DFA
Sent: Tuesday, March 31, 2015 4:50 PM
To: Odell, Brad, TRD; Monforte, John, TRD
Cc: Tsabetsaye, Andrick O., TRD
Subject: April Tax List
Attachments: Tax Hearings List Final.doc

Please find the tax list attached, current as of 4:00 p.m. this afternoon.

Thanks,

Brian VanDenzen
Chief Hearing Officer
Hearing Bureau
New Mexico Taxation and Revenue Department
P.O. Box 630
Santa Fe, NM 87504-063
Phone: (505) 827-9714
Fax: (505) 827-9732

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NEW MEXICO DEPARTMENT OF TAXATION AND REVENUE
HEARINGS BUREAU

Tax Hearings Scheduled

Atty/Aud	HO	Taxpayer	Date	Time	
REDACTED					
REDACTED					
**BO/TD	DH	Harold's Grading and Trucking Co.	05/29/15	8:30	CRS

Atty/Aud	HQ	Taxpayer	Date	Time	
REDACTED	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
REDACTED	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
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Atty/Aud	HO	Taxpayer	Date	Time	
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Total Protests to be heard: 138

Red-post July 1, 2013 hearings
*Scheduling conference
**Merits post July 1, 2013 hearings
Scheduling conference or Merit

Group A -audit, corporate, lawyer filed protests cases and Group B-PIT, interest and penalty
Week 1-(Group B cases) Tax HO
Week 2-(Group A case) Tax HO
Week 3-Dee Dee
Week 4-(Group B) X
Week 4-Chief

From: VanDenzen, Brian, DFA
Sent: Monday, May 04, 2015 4:30 PM
To: Odell, Brad, TRD; Belles, Julia, TRD; Tsabetsaye, Andrick O., TRD
Subject: Tax Hearing List
Attachments: Tax Hearings List Final.doc

Good afternoon,

Please find the updated Tax Hearing List attached to this email. The list includes all dates for Scheduling Conferences set on Friday, continuance requests received through Friday, and e-requests received today.

Thanks,

Brian VanDenzen
Chief Hearing Officer
Hearing Bureau
New Mexico Taxation and Revenue Department
P.O. Box 630
Santa Fe, NM 87504-063
Phone: (505) 827-9714
Fax: (505) 827-9732

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NEW MEXICO DEPARTMENT OF TAXATION AND REVENUE
HEARINGS BUREAU

Tax Hearings Scheduled

Atty/Aud	HO	Taxpayer	Date	Time	
REDACTED					
**BO/TD	DH	Harold's Grading and Trucking Co.	05/29/15	8:30	CRS
REDACTED					
REDACTED					

Atty/Aud	HQ	Taxpayer	Date	Time
REDACTED				

Atty/Aud	HQ	Taxpayer	Date	Time
REDACTED				
REDACTED				
REDACTED				
REDACTED				
REDACTED				

Atty/Aud	HO	Taxpayer	Date	Time	
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Total Protests to be heard: 133

Red-post July 1, 2013 hearings
*Scheduling conference
**Merits post July 1, 2013 hearings
Scheduling conference or Merit

From: VanDenzen, Brian, TRD
Sent: Monday, May 04, 2015 4:31 PM
To: Monforte, John, TRD
Subject: Tax List

Hi John,

Please find the attached tax list updated through Friday and today.

Thanks,

Brian VanDenzen
Chief Hearing Officer
Hearing Bureau
New Mexico Taxation and Revenue Department
P.O. Box 630
Santa Fe, NM 87504-063
Phone: (505) 827-9714
Fax: (505) 827-9732

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NEW MEXICO DEPARTMENT OF TAXATION AND REVENUE
HEARINGS BUREAU

Tax Hearings Scheduled

Atty/Aud	HO	Taxpayer	Date	Time	
REDACTED					
REDACTED					
REDACTED					
**BO/TD	DH	Harold's Grading and Trucking Co.	05/29/15	8:30	CRS
REDACTED					

Atty/Aud	HO	Taxpayer	Date	Time

REDACTED

REDACTED

REDACTED

REDACTED

REDACTED

Atty/Aud	HQ	Taxpayer	Date	Time

REDACTED

REDACTED

REDACTED

Atty/Aud	HQ	Taxpayer	Date	Time

REDACTED
REDACTED
REDACTED

Total Protests to be heard: 133

Red-post July 1, 2013 hearings
*Scheduling conference
**Merits post July 1, 2013 hearings
Scheduling conference or Merit

From:	VanDenzen, Brian, DFA
To:	Odell, Brad, TRD; Belles, Julia, TRD; Tsabetsave, Andrick O., TRD
Subject:	Tax Hearing List
Date:	Monday, May 04, 2015 4:30:06 PM
Attachments:	Tax Hearings List Final.doc

Good afternoon,

Please find the updated Tax Hearing List attached to this email. The list includes all dates for Scheduling Conferences set on Friday, continuance requests received through Friday, and e-requests received today.

Thanks,

Brian VanDenzen
Chief Hearing Officer
Hearing Bureau
New Mexico Taxation and Revenue Department
P.O. Box 630
Santa Fe, NM 87504-063
Phone: (505) 827-9714
Fax: (505) 827-9732

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NEW MEXICO DEPARTMENT OF TAXATION AND REVENUE
HEARINGS BUREAU

Tax Hearings Scheduled

Atty/Aud	HO	Taxpayer	Date	Time	
REDACTED					
REDACTED					
**BO/TD	DH	Harold's Grading and Trucking Co.	05/29/15	8:30	CRS

Atty/Aud	HO	Taxpayer	Date	Time	
REDACTED					
REDACTED					
REDACTED					
REDACTED					

Atty/Aud	HQ	Taxpayer	Date	Time
REDACTED				

Atty/Aud	HO	Taxpayer	Date	Time
REDACTED				
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REDACTED				

Total Protests to be heard: 138

Red-post July 1, 2013 hearings
*Scheduling conference
**Merits post July 1, 2013 hearings
Scheduling conference or Merit

Group A -audit, corporate, lawyer filed protests cases and Group B-PIT, interest and penalty
Week 1-(Group B cases) Tax HO
Week 2-(Group A case) Tax HO
Week 3-Dee Dee
Week 4-(Group B) X
Week 4-Chief

From: Bernardo, Milagros D, TRD
Sent: Tuesday, May 05, 2015 12:19 PM
To: Tsabetsaye, Andrick O., TRD; Dillon, Thomas, TRD; Pogan, Danny, TRD; Umpleby, Andrea M., TRD; Griego, Mary, TRD; Galewaler, Veronica, TRD; Carlisle, Jennifer, TRD; Varela, Sonya K., TRD; Bernardo, Milagros D, TRD; Odell, Brad, TRD; Wolinsky, Melinda, TRD; Crociata, Frank V, TRD; Belles, Julia, TRD; Terr, Lewis J., TRD; Morgan, Elena, TRD; Breen, Peter, TRD; Friedman, Cordelia, TRD; Bailey, Mary, TRD; Silva, Patricia, TRD; Kaniatobe, Victoria, TRD; Vargas, Theresa, TRD
Subject: FW: Updated Hearings Schedule
Attachments: Tax Hearings List Final.doc

FYI.

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From: Griego, John, TRD
Sent: Tuesday, May 05, 2015 11:14 AM
To: Bernardo, Milagros D, TRD
Subject: RE: Updated Hearings Schedule

Brian sent the current list to Andrick, Brad and Julia yesterday.

John Griego
Legal Assistant
Taxation & Revenue Dept.
Hearing's Bureau

(505)827-0466 phone
(505)827-9732 fax

From: Bernardo, Milagros D, TRD
Sent: Tuesday, May 05, 2015 11:11 AM
To: Griego, John, TRD
Subject: Updated Hearings Schedule

Hi JD:

May I have an update hearings schedule?

Thank you.

Mila

Milagros D. Bernardo
Auditor

Protest Office
Legal Services Bureau
State of New Mexico Taxation & Revenue Department
1100 South St. Francis Dr., Ste 1100
PO Box 1671
Santa Fe NM 87504-1671
(505) 827-0783 Phone
(505) 827-2487 Fax
milagrosd.bernardo@state.nm.us

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NEW MEXICO DEPARTMENT OF TAXATION AND REVENUE
HEARINGS BUREAU

Tax Hearings Scheduled

Atty/Aud	HO	Taxpayer	Date	Time	
REDACTED					
REDACTED					
**BO/TD	DH	Harold's Grading and Trucking Co.	05/29/15	8:30	CRS
REDACTED					

Atty/Aud	HO	Taxpayer	Date	Time
REDACTED				

Atty/Aud	HO	Taxpayer	Date	Time
REDACTED				

Atty/Aud	HO	Taxpayer	Date	Time
REDACTED				

Total Protests to be heard: 133

Red-post July 1, 2013 hearings
*Scheduling conference
**Merits post July 1, 2013 hearings
Scheduling conference or Merit

From: Carlisle, Jennifer, TRD
Sent: Thursday, June 04, 2015 8:35 AM
To: Tsabetsaye, Andrick O., TRD; Umpleby, Andrea M., TRD; Griego, Mary, TRD; Martinez, Jeanette, TRD; Galewaler, Veronica, TRD; Pogan, Danny, TRD; Pacheco, Nicholas A., TRD; Bernardo, Milagros D, TRD; Dillon, Thomas, TRD; Odell, Brad, TRD; Wolinsky, Melinda, TRD; Crociata, Frank V, TRD; Belles, Julia, TRD; Morgan, Elena, TRD; Breen, Peter, TRD; Friedman, Cordelia, TRD; Vargas, Theresa, TRD; Kaniatobe, Victoria, TRD; Bailey, Mary, TRD; Silva, Patricia, TRD
Subject: Hearings List
Attachments: Tax Hearings List Final.doc

Good Morning All,

Attached is an updated hearings list. Have a great day!

~a

NEW MEXICO DEPARTMENT OF TAXATION AND REVENUE
HEARINGS BUREAU

Tax Hearings Scheduled

Atty/Aud	HO	Taxpayer	Date	Time	
REDACTED					
REDACTED					
**BO/TD	DH	Harold's Grading and Trucking Co.	05/29/15	8:30	CRS
REDACTED					
*REDACTED					

Atty/Aud	HQ	Taxpayer	Date	Time
REDACTED				

Atty/Aud	HO	Taxpayer	Date	Time	
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Atty/Aud	HQ	Taxpayer	Date	Time	
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Total Protests to be heard: 137

Red-post July 1, 2013 hearings
*Scheduling conference
**Merits post July 1, 2013 hearings
Scheduling conference or Merit

From: Baxter, Shannon L., TRD
Sent: Monday, May 11, 2015 7:50 AM
To: Scott, Ron, TRD
Subject: FW: Harold's Trucking discussion with Secretary Padilla

The initial update

From: Vedamanikam, Lizzy, TRD
Sent: Monday, October 20, 2014 8:55 AM
To: Sourisseau, Kevin, TRD
Cc: Baxter, Shannon L., TRD
Subject: RE: Harold's Trucking discussion with Secretary Padilla

Thank you, Kevin, for the information.

Lizzy Vedamanikam
Director, Audit & Compliance Division
Tel: (505) 841-6484 (Albuquerque)
Tel: (505) 827-0357 (Santa Fe)

TAXATION & REVENUE
NEW MEXICO

From: Sourisseau, Kevin, TRD
Sent: Friday, October 17, 2014 2:39 PM
To: Vedamanikam, Lizzy, TRD
Cc: Baxter, Shannon L., TRD
Subject: Harold's Trucking discussion with Secretary Padilla

Lizzy,

The Secretary came by my office today to discuss the audit of Harold's Trucking.
She stated:

- That she believed the discussion and issue has been blown out of proportion.
- That she is only trying to address the issue of penalty
  - This is a change from her initial desire to provide an affidavit as 'other evidence' to support the deductions attesting to fact that she was in possession of the NTTCs in question and that they were destroyed
- That she spoke to Brad Odell and was advised to let ACD proceed with the assessment

There was some additional discussion where she suggested the department do away with NTTCs altogether and allow deductions based on the nature of the transaction so that we are not playing 'gotcha'
I reminded her that the department has provided a better system for tracking NTTCs and that we have adjusted our audit procedures to be favorable to the taxpayer with analysis of NTTCNET.

Respectfully

Kevin Sourisseau
Deputy Director, Audit & Compliance Division
Tel: (505) 841-6333 (Albuquerque)
Tel: (505) 827-0901 (Santa Fe)

From:	Griego, John, TRD
To:	Odell, Brad, TRD; Dillon, Thomas, TRD; Scott, Ron, TRD; Herrera, Patricia L., TRD; Romero, Alicia, TRD; Rister, Terry, TRD; Arellano, Amy L., TRD; Richard Anklam
Cc:	Hoxie, DeeDee, TRD; VanDenzen, Brian, TRD
Subject:	**Harold's Grading and Trucking Co. D&O**
Date:	**Monday, June 29, 2015 11:12:05 AM**
Attachments:	Harolds Grading and Trucking Co.DH.pdf

Attached is the Decision & Order in the matter of Harold's Grading and Trucking Co.

John Griego
Legal Assistant
Taxation & Revenue Dept.
Hearing's Bureau

(505)827-0466 phone
(505)827-9732 fax

BEFORE THE HEARING OFFICER
OF THE TAXATION AND REVENUE DEPARTMENT
OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE PROTEST OF
HAROLD'S GRADING AND TRUCKING, CO.,
TO THE DENIAL OF PROTEST ISSUED UNDER
LETTER ID NO. L1708255184

No. 15-20

DECISION AND ORDER

A formal hearing on the above-referenced protest was held May 29, 2015, before Hearing Officer Dee Dee Hoxie. The Taxation and Revenue Department (Department) was represented by Mr. Brad Odell, Chief Legal Counsel. Ms. Andrea Umpleby, Auditor, Mr. Tom Dillon, Auditor, and Mr. Rene Gonzalez also appeared on behalf of the Department. Ms. Antoniette Dominguez, Officer Manager, and Ms. Sharon Domingez, Owner, appeared on behalf of Harold's Grading and Trucking, Co. (Taxpayer). Ms. Antointte Dominguez represented the Taxpayer. All references to Ms. Dominguez in the body of this decision refer to Ms. Antoinette Dominguez. The Hearing Officer took notice of all documents in the administrative file. Based on the evidence and arguments presented, IT IS DECIDED AND ORDERED AS FOLLOWS:

FINDINGS OF FACT

1. On October 30, 2014, the Department assessed the Taxpayer for gross receipts tax, penalty, and interest.
2. The Taxpayer received that notice of assessment on October 31, 2014.
3. On January 30, 2015, per the postmark, the Taxpayer filed a formal protest letter.
4. On February 9, 2015, the Department denied the Taxpayer's protest as it was not filed timely.

5. Ninety days from the assessment on October 30, 2014 was January 28, 2015. Ninety days from the service on October 31, 2014 was January 29, 2015.

6. On March 6, 2015, the Taxpayer filed a protest to the denial of the protest to the assessment.

7. On March 25, 2015, the Department filed a Request for Hearing asking that the Taxpayer's protest be scheduled for a formal administrative hearing.

8. On March 27, 2015, the Hearings Bureau issued a notice of hearing. The hearing date was set within ninety days of the protest.

9. Ms. Dominguez corresponded with the Department on behalf of the Taxpayer regarding the assessment. Ms. Dominguez believed that they had until January 31, 2015 to file a protest to the assessment.

10. Ms. Dominguez asked Mr. Gonzalez in an email if they had until January 31, 2015 to file a protest.

11. Mr. Gonzalez responded by saying yes and that the protest had to be filed within 90 days of the assessment.

12. Ms. Dominguez replied and asked for clarification on the date of the assessment.

13. Mr. Gonzalez replied that the date of the assessment was October 30, 2014, and that the protest had to be filed within 90 days of that date.

14. The Department provided a signed certified return receipt from the mailing of the assessment that showed that the assessment was delivered to the Taxpayer on October 31, 2014.

15. Ms. Dominguez did not understand how to calculate the 90 days and believed that they had until January 31, 2015.

16. Ms. Dominguez felt that by replying yes to her question regarding January 31, 2015, the Department had misled her as to the deadline and should be estopped from asserting the 90-day deadline.

DISCUSSION

The issue to be decided is whether the Taxpayer's protest was properly denied as it was filed more than 90 days after the assessment.

Deadline to file a protest.

"Any protest by a taxpayer *shall* be filed within ninety days of the date of the mailing to or service upon the taxpayer by the department of the notice of assessment". NMSA 1978, § 7-2-24 (C) (emphasis added). The word "shall" indicates that the provision is mandatory, not discretionary. *See Marbob Energy Corp. v. N.M. Oil Conservation Comm'n.*, 2009-NMSC-013, ¶ 22, 146 N.M. 24. Any protest that is not filed within the time will not be accepted and divests the Department of authority to consider the protest. *See* 3.1.7.10 and 3.1.7.11 NMAC. When a taxpayer fails to file a protest within that deadline, consideration of the protest is properly denied. *See Lopez v. N.M. Dep't. of Taxation and Revenue*, 1997-NMCA-115, ¶ 6-10, 124 N.M. 270. *See also Associated Petroleum Transp. v. Shephard*, 1949-NMSC-002, ¶ 6-11, 53 N.M. 52 (holding that a protest filed two days after the statutory deadline for filing was not timely and that there was no jurisdiction to hear the protest). *See also Chan v. Montoya*, 2011-NMCA-072, ¶ 7, 150 N.M. 44 (holding that a complaint that was not filed within the statutory deadline for filing was not timely and should be denied).

The Taxpayer failed to file the protest within 90 days of the service of the assessment. The Taxpayer's protest was filed one day late. Therefore, the protest was properly denied.

Estoppel.

For statutory estoppel to apply, a taxpayer must establish that their actions were done "in accordance with any ruling addressed to the party personally and in writing by the secretary". NMSA 1978, §7-1-60 (1993). Rulings must be written statements of the secretary that interpret the statutes to which they relate. *See* NMSA 1978, § 9-11-6.2 (B) (1995). In order to be effective, rulings must be reviewed by the attorney general or the Department's legal counsel and the fact of the review must be indicated on the ruling. *See* NMSA 1978, § 9-11-6.2 (C) (1995). Mr. Gonzalez's emails to the Taxpayer do not constitute a ruling and statutory estoppel does not apply.

To the extent that the Taxpayer's arguments might encompass equitable estoppel, they are overruled as hearing officers cannot grant equitable estoppel. *See AA Oilfield Service v. New Mexico State Corp. Comm'n*, 118 N.M. 273, 881 P.2d 18 (1994) (holding that an administrative agency cannot grant the equitable remedy of estoppel because that power is held exclusively by the judiciary). Moreover, Mr. Gonzalez's initial reply to the Taxpayer's question might be somewhat ambiguous since he prefaced his reply with "yes", but his email sent a few minutes later clarified the requirement that the protest must be filed within 90 days of the October 30, 2014 assessment.

CONCLUSIONS OF LAW

A. The Taxpayer filed a timely written protest to the denial of protest issued under Letter ID number L1708255184, and jurisdiction lies over the parties and the subject matter of this protest.

B. The Taxpayer filed its protest to the assessment more than 90 days after the notice of assessment was served. Therefore, the Taxpayer failed to file a timely protest to the assessment. *See* NMSA 1978, § 7-1-24.

C. The protest was properly denied. *See id. See* 3.1.7.10 and 3.1.7.11 NMAC. *See Lopez v. N.M. Dep't. of Taxation and Revenue*, 1997-NMCA-115.

For the foregoing reasons, the Taxpayer's protest **is DENIED**.

DATED: June 29, 2015.

Dee Dee Hoxie

DEE DEE HOXIE
Hearing Officer
Taxation & Revenue Department
Post Office Box 630
Santa Fe, NM 87504-0630

From: Vargas, Theresa, TRD
Sent: Wednesday, July 01, 2015 4:04 PM
To: Bailey, Mary, TRD; Bearden, Ian, TRD; Belles, Julia, TRD; Bernardo, Milagros D, TRD; Breen, Peter, TRD; Carlisle, Jennifer, TRD; Crociata, Frank V, TRD; Dicken, John, TRD; Dillon, Thomas, TRD; Friedman, Cordelia, TRD; Galewaler, Veronica, TRD; Griego, Mary, TRD; Kaniatobe, Victoria, TRD; Martinez, Jeanette, TRD; Morgan, Elena, TRD; Odell, Brad, TRD; Pacheco, Nicholas A., TRD; Pogan, Danny, TRD; Silva, Patricia, TRD; Terr, Lewis J., TRD; Tsabetsaye, Andrick O., TRD; Umpleby, Andrea M., TRD; Varela, Sonya K., TRD; Wolinsky, Melinda, TRD
Subject: Harold's Grading and Trucking, Co.
Attachments: Decision and Order - Harold's Grading and Trucking, Co..pdf

Please see attached.

Theresa L. Vargas, Paralegal/Legal Assistant

Legal Services Bureau
NM Taxation & Revenue Department
Post Office Box 630
1100 South St. Francis Drive, Suite 1100
Joseph Montoya Building
Santa Fe, New Mexico 87504-0630

Phone:(505) 476-3163
Fax: (505) 827-0684

TAXATION & REVENUE
NEW MEXICO

BEFORE THE HEARING OFFICER
OF THE TAXATION AND REVENUE DEPARTMENT
OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE PROTEST OF
HAROLD'S GRADING AND TRUCKING, CO., **No. 15-20**
TO THE DENIAL OF PROTEST ISSUED UNDER
LETTER ID NO. L1708255184

DECISION AND ORDER

A formal hearing on the above-referenced protest was held May 29, 2015, before Hearing Officer Dee Dee Hoxie. The Taxation and Revenue Department (Department) was represented by Mr. Brad Odell, Chief Legal Counsel. Ms. Andrea Umpleby, Auditor, Mr. Tom Dillon, Auditor, and Mr. Rene Gonzalez also appeared on behalf of the Department. Ms. Antoniette Dominguez, Officer Manager, and Ms. Sharon Domingez, Owner, appeared on behalf of Harold's Grading and Trucking, Co. (Taxpayer). Ms. Antointte Dominguez represented the Taxpayer. All references to Ms. Dominguez in the body of this decision refer to Ms. Antoinette Dominguez. The Hearing Officer took notice of all documents in the administrative file. Based on the evidence and arguments presented, IT IS DECIDED AND ORDERED AS FOLLOWS:

FINDINGS OF FACT

1. On October 30, 2014, the Department assessed the Taxpayer for gross receipts tax, penalty, and interest.
2. The Taxpayer received that notice of assessment on October 31, 2014.
3. On January 30, 2015, per the postmark, the Taxpayer filed a formal protest letter.
4. On February 9, 2015, the Department denied the Taxpayer's protest as it was not filed timely.

5. Ninety days from the assessment on October 30, 2014 was January 28, 2015. Ninety days from the service on October 31, 2014 was January 29, 2015.

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9. Ms. Dominguez corresponded with the Department on behalf of the Taxpayer regarding the assessment. Ms. Dominguez believed that they had until January 31, 2015 to file a protest to the assessment.

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14. The Department provided a signed certified return receipt from the mailing of the assessment that showed that the assessment was delivered to the Taxpayer on October 31, 2014.

15. Ms. Dominguez did not understand how to calculate the 90 days and believed that they had until January 31, 2015.

16. Ms. Dominguez felt that by replying yes to her question regarding January 31, 2015, the Department had misled her as to the deadline and should be estopped from asserting the 90-day deadline.

DISCUSSION

The issue to be decided is whether the Taxpayer's protest was properly denied as it was filed more than 90 days after the assessment.

Deadline to file a protest.

"Any protest by a taxpayer *shall* be filed within ninety days of the date of the mailing to or service upon the taxpayer by the department of the notice of assessment". NMSA 1978, § 7-2-24 (C) (emphasis added). The word "shall" indicates that the provision is mandatory, not discretionary. *See Marbob Energy Corp. v. N.M. Oil Conservation Comm'n.*, 2009-NMSC-013, ¶ 22, 146 N.M. 24. Any protest that is not filed within the time will not be accepted and divests the Department of authority to consider the protest. *See* 3.1.7.10 and 3.1.7.11 NMAC. When a taxpayer fails to file a protest within that deadline, consideration of the protest is properly denied. *See Lopez v. N.M. Dep't. of Taxation and Revenue*, 1997-NMCA-115, ¶ 6-10, 124 N.M. 270. *See also Associated Petroleum Transp. v. Shephard*, 1949-NMSC-002, ¶ 6-11, 53 N.M. 52 (holding that a protest filed two days after the statutory deadline for filing was not timely and that there was no jurisdiction to hear the protest). *See also Chan v. Montoya*, 2011-NMCA-072, ¶ 7, 150 N.M. 44 (holding that a complaint that was not filed within the statutory deadline for filing was not timely and should be denied).

The Taxpayer failed to file the protest within 90 days of the service of the assessment. The Taxpayer's protest was filed one day late. Therefore, the protest was properly denied.

Estoppel.

For statutory estoppel to apply, a taxpayer must establish that their actions were done "in accordance with any ruling addressed to the party personally and in writing by the secretary". NMSA 1978, §7-1-60 (1993). Rulings must be written statements of the secretary that interpret the statutes to which they relate. *See* NMSA 1978, § 9-11-6.2 (B) (1995). In order to be effective, rulings must be reviewed by the attorney general or the Department's legal counsel and the fact of the review must be indicated on the ruling. *See* NMSA 1978, § 9-11-6.2 (C) (1995). Mr. Gonzalez's emails to the Taxpayer do not constitute a ruling and statutory estoppel does not apply.

To the extent that the Taxpayer's arguments might encompass equitable estoppel, they are overruled as hearing officers cannot grant equitable estoppel. *See AA Oilfield Service v. New Mexico State Corp. Comm'n*, 118 N.M. 273, 881 P.2d 18 (1994) (holding that an administrative agency cannot grant the equitable remedy of estoppel because that power is held exclusively by the judiciary). Moreover, Mr. Gonzalez's initial reply to the Taxpayer's question might be somewhat ambiguous since he prefaced his reply with "yes", but his email sent a few minutes later clarified the requirement that the protest must be filed within 90 days of the October 30, 2014 assessment.

CONCLUSIONS OF LAW

A. The Taxpayer filed a timely written protest to the denial of protest issued under Letter ID number L1708255184, and jurisdiction lies over the parties and the subject matter of this protest.

B. The Taxpayer filed its protest to the assessment more than 90 days after the notice of assessment was served. Therefore, the Taxpayer failed to file a timely protest to the assessment. *See* NMSA 1978, § 7-1-24.

C. The protest was properly denied. *See id.* *See* 3.1.7.10 and 3.1.7.11 NMAC. *See Lopez v. N.M. Dep't. of Taxation and Revenue*, 1997-NMCA-115.

For the foregoing reasons, the Taxpayer's protest is **DENIED**.

DATED: June 29, 2015.

Dee Dee Hoxie

DEE DEE HOXIE
Hearing Officer
Taxation & Revenue Department
Post Office Box 630
Santa Fe, NM 87504-0630

From: Vedamanikam, Lizzy, TRD
Sent: Wednesday, December 10, 2014 5:12 PM
To: Padilla, Demesia, TRD
Cc: Monforte, John, TRD; Sourisseau, Kevin, TRD
Subject: Audit in Progress Report

Demesia,

As per your request, audit in progress report is attached.

Lizzy Vedamanikam
Director, Audit & Compliance Division
Tel: (505) 841-6484 (Albuquerque)
Tel: (505) 827-0357 (Santa Fe)

TAXATION & REVENUE
NEW MEXICO

Case ID	Owner	Active	In State	Name	State	Identification Number	Stage	Audit Start	Final Records Letter	Extension Request End	All Received Letter	Final Request Expires	Supervisor Review	Audit ATSS Deadline	Audit Staged To ATSS	ATSS	Audit Assessment Deadline	Case Closed	Closed Reason	Case Count
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From: Cubbin, Laurie M., TRD

To: Bellicini, Joseph M., TRD; Brown, Aaron B., TRD; Campbell, Deborah, TRD; Castro, Priscilla, TRD; Chowning, Heidi E., TRD; Dominguez, Melinda R., TRD; Earnest, Nathan, TRD; Johnson, Dorian, TRD; Jost, L, Kathryn , TRD; Kenney, Robert, TRD; Lopez, Joe L., TRD; Ludberg, Charles A., TRD; McGee, Janice, TRD; Montgomery, Leslie, TRD; Pichette, Julia M., TRD; Romero, Nora J., TRD; Sanchez, Cabrini K., TRD; Saylor, Maria E., TRD; Scott, Ron, TRD; Smith, Natalie K., TRD; Sourisseau, Kevin, TRD; Spitzer, Duane R., TRD; Vedamanikam, Lizzy, TRD; Wittig, Joan M., TRD; Acosta, Rebecca A., TRD; Rico, Kathryn, TRD; Anderson, Stephanie, TRD; Andrews, Margo, TRD; Armer, Daniel M., TRD; Beach, Ruth, TRD; Beans, Sarah, TRD; Begay, Veryl, TRD; Beltran, Alicia, TRD; Brown, Selma O., TRD; Cabrera, Mayra, TRD; Caputo, Vincent, TRD; Chavez, Joseph, TRD; Coleman, Joseph, TRD; Cruz, Robin A., TRD; Duffney, Trent, TRD; Duran, Steve, TRD; Escalante, Rusvelina, TRD; Florence, Elizabeth, TRD; Flores, Jetara, TRD; Gage, Laura D., TRD; Galewaler, Richard, TRD; Germain, Marjorie, TRD; Gomez, Hector, TRD; Gonzales, Jenelle, TRD; Gonzales, Michelle R, TRD; Hernandez, Angella, TRD; Howze, Stacy, TRD; Jaramillo, Irene B., TRD; Jordan, Louann, TRD; Kohlasch, Jackie O., TRD; Larranaga, Julie, TRD; Li, Shurong, TRD; Lujan, Laura, TRD; Madrid, Nancy, TRD; Maestas, Veronica, TRD; Mariano, Justin, TRD; Martinez, Jacqueline J, TRD; Martinez, WFrancisco, TRD; Mayfield, Jonette, TRD; McIntyre, Alicia, TRD; Mehta, Simone, TRD; NonnenKamp, Marc E., TRD; Nuanes, Lillian R., TRD; Olszewski, Steven, TRD; Orozco, Gerardo, TRD; Palady, Gayla, TRD; Paz, Kevin, TRD; Pazand, Ali, TRD; Pell, James M, TRD; Prada, Andre R., TRD; Richards, Alicia, TRD; Ringo, Jessica, TRD; Rivera, Lizette, TRD; Rodriguez, Martha, TRD; Romero, George, TRD; Segura, Tracy, TRD; Teague, Debra, TRD; Turnbull, Kamie, TRD; Urrea, David , TRD; valenzuela, Steven, TRD; Vigil, Carla R., TRD; Wirsching, Shannon, TRD; Zhang, Tricia, TRD; Alejandro, Joe, TRD; Coca, Marcy, TRD; Macinica, Mariana, TRD; Wachter, Mark, TRD

Cc: Aragon, Denise M., TRD; Vialpando, Naomi, TRD; Vigil, Laura, TRD

Subject: ATSS reports

Date: Tuesday, September 02, 2014 2:14:11 PM

Attachments: ATSS REVIEW TRACKING REPORT 9.2.14.xls
ATSS PROJECTED ASSESSMENTS 9.2.14.xlsx
Assessments by Auditor 7.1.14-8.31.14.xlsx

For your information.

Laurie Cubbin
Audit Supervisor
ATSS - Audit Technical Support Services
(505) 222-6663

WEEKLY ATSS AUDIT TRACKING REPORT 9/2/14

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ATSS PROJECTED ASSESSMENTS 9/2/14

ATSS RCVD	WAIVER	TPBOR	AUDITOR	ID#	TAXPAYER	PROJECTED ASSESSMENT CRS/WDT/TPT	CIT/PIT	WKC
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ATSS PROJECTED ASSESSMENTS 9/2/14

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From:	Cubbin, Laurie M., TRD
To:	Bellicini, Joseph M., TRD; Brown, Aaron B., TRD; Campbell, Deborah, TRD; Castro, Priscilla, TRD; Chowning, Heidi E., TRD; Dominguez, Melinda R., TRD; Earnest, Nathan, TRD; Johnson, Dorian, TRD; Jost, L. Kathryn , TRD; Lopez, Joe L., TRD; Ludberg, Charles A., TRD; McGee, Janice, TRD; Montgomery, Leslie, TRD; Pichette, Julia M., TRD; Romero, Nora J., TRD; Sanchez, Cabrini K., TRD; Saylor, Maria E., TRD; Scott, Ron, TRD; Smith, Natalie K., TRD; Spitzer, Duane R., TRD; Vedamanikam, Lizzy, TRD; Wittig, Joan M., TRD; Acosta, Rebecca A., TRD; Rico, Kathryn, TRD; Anderson, Stephanie, TRD; Andrews, Margo, TRD; Armer, Daniel M., TRD; Beach, Ruth, TRD; Beans, Sarah, TRD; Begay, Veryl, TRD; Beltran, Alicia, TRD; Bennett, Sarah, TRD; Brown, Selma O., TRD; Cabrera, Mayra, TRD; Caputo, Vincent, TRD; Chavez, Joseph, TRD; Coleman, Joseph, TRD; Cruz, Robin A., TRD; Duffney, Trent, TRD; Duran, Steve, TRD; Escalante, Rusvelina, TRD; Florence, Elizabeth, TRD; Flores, Jetara, TRD; Gage, Laura D., TRD; Galewaler, Richard, TRD; Germain, Marjorie, TRD; Gomez, Hector, TRD; Gonzales, Jenelle, TRD; Gonzales, Michelle R, TRD; Hernandez, Angella, TRD; Howze, Stacy, TRD; Jaramillo, Irene B., TRD; Jordan, Louann, TRD; Kohlasch, Jackie O., TRD; Larranaga, Julie, TRD; Li, Shurong, TRD; Lujan, Laura, TRD; Madrid, Nancy, TRD; Maestas, Veronica, TRD; Mariano, Justin, TRD; Martinez, Jacqueline J, TRD; Martinez, WFrancisco, TRD; Mayfield, Jonette, TRD; McIntyre, Alicia, TRD; Mehta, Simone, TRD; NonnenKamp, Marc E., TRD; Nuanes, Lillian R., TRD; Olszewski, Steven, TRD; Orozco, Gerardo, TRD; Palady, Gayla, TRD; Paz, Kevin, TRD; Pazand, Ali, TRD; Pell, James M, TRD; Prada, Andre R., TRD; Richards, Alicia, TRD; Ringo, Jessica, TRD; Rivera, Lizette, TRD; Rodriguez, Martha, TRD; Romero, George, TRD; Segura, Tracy, TRD; Teague, Debra, TRD; Turnbull, Kamie, TRD; Urrea, David , TRD; valenzuela, Steven, TRD; Vigil, Carla R., TRD; Wirsching, Shannon, TRD; Zhang, Tricia, TRD; Alejandro, Joe, TRD; Coca, Marcy, TRD; Macinica, Mariana, TRD; Wachter, Mark, TRD
Cc:	Vigil, Laura, TRD; Vialpando, Naomi, TRD
Subject:	ATSS audit tracking report
Date:	Wednesday, August 13, 2014 7:34:58 AM
Attachments:	ATSS REVIEW TRACKING REPORT 8.12.14.xls

Laurie Cubbin
Audit Supervisor
ATSS - Audit Technical Support Services
(505) 222-6663

WEEKLY ATSS AUDIT TRACKING REPORT 8/12/14

ATSS RCVD DATE	ATSS REVIEW DATE	10-DAY EXPIRE DATE	10-DAY EXTEND DATE	AUDITOR	REVIEWER	ID#	TAXPAYER	COMMENTS
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WEEKLY ATSS AUDIT TRACKING REPORT 8/12/14

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WEEKLY ATSS AUDIT TRACKING REPORT 8/12/14

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From:	Cubbin, Laurie M., TRD
To:	Bellicini, Joseph M., TRD; Brown, Aaron B., TRD; Campbell, Deborah, TRD; Castro, Priscilla, TRD; Chowning, Heidi E., TRD; Dominguez, Melinda R., TRD; Earnest, Nathan, TRD; Johnson, Dorian, TRD; Jost, L, Kathryn , TRD; Lopez, Joe L., TRD; Ludberg, Charles A., TRD; McGee, Janice, TRD; Montgomery, Leslie, TRD; Pichette, Julia M., TRD; Romero, Nora J., TRD; Sanchez, Cabrini K., TRD; Saylor, Maria E., TRD; Scott, Ron, TRD; Smith, Natalie K., TRD; Sourisseau, Kevin, TRD; Spitzer, Duane R., TRD; Vedamanikam, Lizzy, TRD; Wittig, Joan M., TRD; Acosta, Rebecca A., TRD; Rico, Kathryn, TRD; Anderson, Stephanie, TRD; Andrews, Margo, TRD; Armer, Daniel M., TRD; Beach, Ruth, TRD; Beans, Sarah, TRD; Begay, Veryl, TRD; Beltran, Alicia, TRD; Brown, Selma O., TRD; Cabrera, Mayra, TRD; Caputo, Vincent, TRD; Chavez, Joseph, TRD; Coleman, Joseph, TRD; Cruz, Robin A., TRD; Duffney, Trent, TRD; Duran, Steve, TRD; Escalante, Rusvelina, TRD; Florence, Elizabeth, TRD; Flores, Jetara, TRD; Gage, Laura D., TRD; Galewaler, Richard, TRD; Germain, Marjorie, TRD; Gomez, Hector, TRD; Gonzales, Jenelle, TRD; Gonzales, Michelle R, TRD; Hernandez, Angella, TRD; Howze, Stacy, TRD; Jaramillo, Irene B., TRD; Jordan, Louann, TRD; Kohlasch, Jackie O., TRD; Larranaga, Julie, TRD; Li, Shurong, TRD; Lujan, Laura, TRD; Madrid, Nancy, TRD; Maestas, Veronica, TRD; Mariano, Justin, TRD; Martinez, Jacqueline J, TRD; Martinez, WFrancisco, TRD; Mayfield, Jonette, TRD; McIntyre, Alicia, TRD; Mehta, Simone, TRD; NonnenKamp, Marc E., TRD; Nuanes, Lillian R., TRD; Olszewski, Steven, TRD; Orozco, Gerardo, TRD; Palady, Gayla, TRD; Paz, Kevin, TRD; Pazand, Ali, TRD; Pell, James M, TRD; Prada, Andre R., TRD; Richards, Alicia, TRD; Ringo, Jessica, TRD; Rivera, Lizette, TRD; Rodriguez, Martha, TRD; Romero, George, TRD; Segura, Tracy, TRD; Teague, Debra, TRD; Turnbull, Kamie, TRD; Urrea, David , TRD; valenzuela, Steven, TRD; Vigil, Carla R., TRD; Wirsching, Shannon, TRD; Zhang, Tricia, TRD; Alejandro, Joe, TRD; Coca, Marcy, TRD; Macinica, Mariana, TRD; Wachter, Mark, TRD
Cc:	Vialpando, Naomi, TRD
Subject:	ATSS audit tracking report
Date:	Wednesday, August 20, 2014 6:54:44 AM
Attachments:	ATSS REVIEW TRACKING REPORT 8.19.14.xls

Laurie Cubbin
Audit Supervisor
ATSS - Audit Technical Support Services
(505) 222-6663

WEEKLY ATSS AUDIT TRACKING REPORT 8/19/14

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WEEKLY ATSS AUDIT TRACKING REPORT 8/19/14

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WEEKLY ATSS AUDIT TRACKING REPORT 8/19/14

ATSS RCVD DATE	ATSS REVIEW DATE	10-DAY EXPIRE DATE	10-DAY EXTEND DATE	AUDITOR	REVIEWER	ID#	TAXPAYER	COMMENTS
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From:	Cubbin, Laurie M., TRD
To:	Bellicini, Joseph M., TRD; Brown, Aaron B., TRD; Campbell, Deborah, TRD; Castro, Priscilla, TRD; Chowning, Heidi E., TRD; Dominguez, Melinda R., TRD; Earnest, Nathan, TRD; Johnson, Dorian, TRD; Jost, L. Kathryn , TRD; Kenney, Robert, TRD; Lopez, Joe L., TRD; Ludberg, Charles A., TRD; McGee, Janice, TRD; Montgomery, Leslie, TRD; Pichette, Julia M., TRD; Romero, Nora J., TRD; Sanchez, Cabrini K., TRD; Saylor, Maria E., TRD; Scott, Ron, TRD; Smith, Natalie K., TRD; Sourisseau, Kevin, TRD; Spitzer, Duane R., TRD; Vedamanikam, Lizzy, TRD; Wittig, Joan M., TRD; Acosta, Rebecca A., TRD; Rico, Kathryn, TRD; Anderson, Stephanie, TRD; Andrews, Margo, TRD; Armer, Daniel M., TRD; Beach, Ruth, TRD; Beans, Sarah, TRD; Begay, Veryl, TRD; Beltran, Alicia, TRD; Brown, Selma O., TRD; Cabrera, Mayra, TRD; Caputo, Vincent, TRD; Chavez, Joseph, TRD; Coleman, Joseph, TRD; Cruz, Robin A., TRD; Duffney, Trent, TRD; Duran, Steve, TRD; Escalante, Rusvelina, TRD; Florence, Elizabeth, TRD; Flores, Jetara, TRD; Gage, Laura D., TRD; Galewaler, Richard, TRD; Germain, Marjorie, TRD; Gomez, Hector, TRD; Gonzales, Jenelle, TRD; Gonzales, Michelle R, TRD; Hernandez, Angella, TRD; Howze, Stacy, TRD; Jaramillo, Irene B., TRD; Jordan, Louann, TRD; Kohlasch, Jackie O., TRD; Larranaga, Julie, TRD; Li, Shurong, TRD; Lujan, Laura, TRD; Madrid, Nancy, TRD; Maestas, Veronica, TRD; Mariano, Justin, TRD; Martinez, Jacqueline J, TRD; Martinez, WFrancisco, TRD; Mayfield, Jonette, TRD; McIntyre, Alicia, TRD; Mehta, Simone, TRD; NonnenKamp, Marc E., TRD; Nuanes, Lillian R., TRD; Olszewski, Steven, TRD; Orozco, Gerardo, TRD; Palady, Gayla, TRD; Paz, Kevin, TRD; Pazand, Ali, TRD; Pell, James M, TRD; Prada, Andre R., TRD; Richards, Alicia, TRD; Ringo, Jessica, TRD; Rivera, Lizette, TRD; Rodriguez, Martha, TRD; Romero, George, TRD; Segura, Tracy, TRD; Teague, Debra, TRD; Turnbull, Kamie, TRD; Urrea, David , TRD; valenzuela, Steven, TRD; Vigil, Carla R., TRD; Wirsching, Shannon, TRD; Zhang, Tricia, TRD
Cc:	Vialpando, Naomi, TRD; Aragon, Denise M., TRD; Vigil, Laura, TRD; Alejandro, Joe, TRD; Coca, Marcy, TRD; Macinica, Mariana, TRD; Wachter, Mark, TRD
Subject:	ATSS audit tracking report
Date:	Tuesday, September 09, 2014 3:47:52 PM
Attachments:	ATSS REVIEW TRACKING REPORT 9.9.14.xls

Laurie Cubbin
Audit Supervisor
ATSS - Audit Technical Support Services
(505) 222-6663

WEEKLY ATSS AUDIT TRACKING REPORT 9/9/14

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WEEKLY ATSS AUDIT TRACKING REPORT 9/9/14

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From: Cubbin, Laurie M., TRD

To: Bellicini, Joseph M., TRD; Brown, Aaron B., TRD; Campbell, Deborah, TRD; Castro, Priscilla, TRD; Chowning, Heidi E., TRD; Dominguez, Melinda R., TRD; Earnest, Nathan, TRD; Johnson, Dorian, TRD; Jost, L. Kathryn , TRD; Kenney, Robert, TRD; Lopez, Joe L., TRD; Ludberg, Charles A., TRD; McGee, Janice, TRD; Montgomery, Leslie, TRD; Pichette, Julia M., TRD; Romero, Nora J., TRD; Sanchez, Cabrini K., TRD; Saylor, Maria E., TRD; Scott, Ron, TRD; Smith, Natalie K., TRD; Sourisseau, Kevin, TRD; Spitzer, Duane R., TRD; Vedamanikam, Lizzy, TRD; Wittig, Joan M., TRD; Acosta, Rebecca A., TRD; Rico, Kathryn, TRD; Anderson, Stephanie, TRD; Andrews, Margo, TRD; Armer, Daniel M., TRD; Beach, Ruth, TRD; Beans, Sarah, TRD; Begay, Veryl, TRD; Beltran, Alicia, TRD; Brown, Selma O., TRD; Cabrera, Mayra, TRD; Caputo, Vincent, TRD; Chavez, Joseph, TRD; Coleman, Joseph, TRD; Cruz, Robin A., TRD; Duffney, Trent, TRD; Duran, Steve, TRD; Escalante, Rusvelina, TRD; Florence, Elizabeth, TRD; Flores, Jetara, TRD; Gage, Laura D., TRD; Galewaler, Richard, TRD; Germain, Marjorie, TRD; Gomez, Hector, TRD; Gonzales, Jenelle, TRD; Gonzales, Michelle R, TRD; Hernandez, Angella, TRD; Howze, Stacy, TRD; Jaramillo, Irene B., TRD; Jordan, Louann, TRD; Kohlasch, Jackie O., TRD; Larranaga, Julie, TRD; Li, Shurong, TRD; Lujan, Laura, TRD; Madrid, Nancy, TRD; Maestas, Veronica, TRD; Mariano, Justin, TRD; Martinez, Jacqueline J, TRD; Martinez, WFrancisco, TRD; Mayfield, Jonette, TRD; McIntyre, Alicia, TRD; Mehta, Simone, TRD; NonnenKamp, Marc E., TRD; Nuanes, Lillian R., TRD; Olszewski, Steven, TRD; Orozco, Gerardo, TRD; Palady, Gayla, TRD; Paz, Kevin, TRD; Pazand, Ali, TRD; Pell, James M, TRD; Prada, Andre R., TRD; Richards, Alicia, TRD; Ringo, Jessica, TRD; Rivera, Lizette, TRD; Rodriguez, Martha, TRD; Romero, George, TRD; Segura, Tracy, TRD; Teague, Debra, TRD; Turnbull, Kamie, TRD; Urrea, David , TRD; valenzuela, Steven, TRD; Vigil, Carla R., TRD; Wirsching, Shannon, TRD; Zhang, Tricia, TRD; Alejandro, Joe, TRD; Coca, Marcy, TRD; Macinica, Mariana, TRD; Wachter, Mark, TRD

Cc: Aragon, Denise M., TRD; Vigil, Laura, TRD; Vialpando, Naomi, TRD

Subject: ATSS audit tracking report

Date: Wednesday, August 27, 2014 8:51:48 AM

Attachments: ATSS REVIEW TRACKING REPORT 8.26.14.xls

Laurie Cubbin
Audit Supervisor
ATSS - Audit Technical Support Services
(505) 222-6663

WEEKLY ATSS AUDIT TRACKING REPORT 8/26/14

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WEEKLY ATSS AUDIT TRACKING REPORT 8/26/14

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From: Cubbin, Laurie M., TRD

To: Bellicini, Joseph M., TRD; Brown, Aaron B., TRD; Campbell, Deborah, TRD; Castro, Priscilla, TRD; Chowning, Heidi E., TRD; Dominguez, Melinda R., TRD; Earnest, Nathan, TRD; Johnson, Dorian, TRD; Jost, L., Kathryn , TRD; Kenney, Robert, TRD; Lopez, Joe L., TRD; Ludberg, Charles A., TRD; McGee, Janice, TRD; Montgomery, Leslie, TRD; Pichette, Julia M., TRD; Romero, Nora J., TRD; Sanchez, Cabrini K., TRD; Saylor, Maria E., TRD; Scott, Ron, TRD; Smith, Natalie K., TRD; Sourisseau, Kevin, TRD; Spitzer, Duane R., TRD; Vedamanikam, Lizzy, TRD; Wittig, Joan M., TRD; Acosta, Rebecca A., TRD; Rico, Kathryn, TRD; Anderson, Stephanie, TRD; Andrews, Margo, TRD; Armer, Daniel M., TRD; Beach, Ruth, TRD; Beans, Sarah, TRD; Begay, Veryl, TRD; Beltran, Alicia, TRD; Brown, Selma O., TRD; Cabrera, Mayra, TRD; Caputo, Vincent, TRD; Chavez, Joseph, TRD; Coleman, Joseph, TRD; Cruz, Robin A., TRD; Duffney, Trent, TRD; Duran, Steve, TRD; Escalante, Rusvelina, TRD; Florence, Elizabeth, TRD; Flores, Jetara, TRD; Gage, Laura D., TRD; Galewaler, Richard, TRD; Germain, Marjorie, TRD; Gomez, Hector, TRD; Gonzales, Jenelle, TRD; Gonzales, Michelle R., TRD; Hernandez, Angelia, TRD; Howze, Stacy, TRD; Jaramillo, Irene B., TRD; Jordan, Louann, TRD; Kohlasch, Jackie O., TRD; Larranaga, Julie, TRD; Li, Shurong, TRD; Lujan, Laura, TRD; Madrid, Nancy, TRD; Maestas, Veronica, TRD; Mariano, Justin, TRD; Martinez, Jacqueline J, TRD; Martinez, WFrancisco, TRD; Mayfield, Jonette, TRD; McIntyre, Alicia, TRD; Mehta, Simone, TRD; NonnenKamp, Marc E., TRD; Nuanes, Lillian R., TRD; Olszewski, Steven, TRD; Orozco, Gerardo, TRD; Palady, Gavia, TRD; Paz, Kevin, TRD; Pazand, Ali, TRD; Pell, James M, TRD; Prada, Andre R., TRD; Richards, Alicia, TRD; Ringo, Jessica, TRD; Rivera, Lizette, TRD; Rodriguez, Martha, TRD; Romero, George, TRD; Segura, Tracy, TRD; Teague, Debra, TRD; Tumbull, Kamie, TRD; Urrea, David , TRD; valenzuela, Steven, TRD; Vigil, Carla R., TRD; Wirsching, Shannon, TRD; Zhang, Tricia, TRD; Alejandro, Joe, TRD; Coca, Marcy, TRD; Macinica, Mariana, TRD; Wachter, Mark, TRD

Cc: Vialpando, Naomi, TRD; Vigil, Laura, TRD; Aragon, Denise M., TRD

Subject: ATSS audit tracking report

Date: Wednesday, September 17, 2014 9:11:07 AM

Attachments: ATSS REVIEW TRACKING REPORT 9.17.14.xls

Laurie Cubbin
Audit Supervisor
ATSS - Audit Technical Support Services
(505) 222-6663

WEEKLY ATSS AUDIT TRACKING REPORT 9/17/14

ATSS RCVD DATE	ATSS REVIEW DATE	10-DAY EXPIRE DATE	10-DAY EXTEND DATE	AUDITOR	REVIEWER	ID#	TAXPAYER	COMMENTS
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WEEKLY ATSS AUDIT TRACKING REPORT 9/17/14

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From: Sourisseau, Kevin, TRD
Sent: Thursday, October 02, 2014 5:14 PM
To: Vedamanikam, Lizzy, TRD
Subject: draft email regarding section 7-9-43 E

Lizzy below is my draft for your review:

Secretary Padilla,

I have reviewed the NTTC issue for the audit of Harold's Grading and trucking.
In response to your questions regarding the use of 'other evidence' to support the deductions taken by the taxpayer I present the following analysis:

Section 7-9-43 (E) NMSA 1978 does allow for 'other evidence' to support deductions
However the statutes limits this remedy to deductions allowable under Section 7-9-47 NMSA 1978, the deductions in question appear to fall under section 7-9-51 and 7-9-52
3.2.201.10 (C) NMAC further clarifies the use of 'other evidence' for deductions allowable under Section 7-9-47 NMSA 1978

REDACTED

Unless additional relevant information can be obtained from the taxpayer this audit is ready for final review and assessment.

Respectfully

Kevin Sourisseau
Deputy Director, Audit & Compliance Division
Tel: (505) 841-6333 (Albuquerque)
Tel: (505) 827-0901 (Santa Fe)

Description: footerLogo

From: Sourisseau, Kevin, TRD
Sent: Wednesday, October 15, 2014 5:19 PM
To: Vedamanikam, Lizzy, TRD
Subject: Harold's Trucking Audit

Lizzy,

I would like to follow up on yesterday's discussion with Secretary Padilla regarding the audit of Harold's Trucking.

- ATSS will move forward to complete the assessment of the audit, per the Secretary's request
- No changes have been made to the audit
- The taxpayer will have the right to protest once the assessment is completed

This audit has not received any special consideration from the audit staff.
Thank you for your support with this difficult and uncomfortable issue.

Kevin Sourisseau
Deputy Director, Audit & Compliance Division
Tel: (505) 841-6333 (Albuquerque)
Tel: (505) 827-0901 (Santa Fe)

TAXATION
REVENUE
NEW MEXICO

From: Sourisseau, Kevin, TRD
Sent: Friday, October 17, 2014 2:39 PM
To: Vedamanikam, Lizzy, TRD
Cc: Baxter, Shannon L., TRD
Subject: Harold's Trucking discussion with Secretary Padilla

Lizzy,

The Secretary came by my office today to discuss the audit of Harold's Trucking.
She stated:

- That she believed the discussion and issue has been blown out of proportion.
- That she is only trying to address the issue of penalty
  - This is a change from her initial desire to provide an affidavit as 'other evidence' to support the deductions attesting to fact that she was in possession of the NTTCs in question and that they were destroyed
- That she spoke to Brad Odell and was advised to let ACD proceed with the assessment

There was some additional discussion where she suggested the department do away with NTTCs altogether and allow deductions based on the nature of the transaction so that we are not playing 'gotcha'
I reminded her that the department has provided a better system for tracking NTTCs and that we have adjusted our audit procedures to be favorable to the taxpayer with analysis of NTTCNET.

Respectfully

Kevin Sourisseau
Deputy Director, Audit & Compliance Division
Tel: (505) 841-6333 (Albuquerque)
Tel: (505) 827-0901 (Santa Fe)

TAXATION
REVENUE
NEW MEXICO

From: Cubbin, Laurie M., TRD
Sent: Monday, December 01, 2014 1:50 PM
To: Armer, Daniel M., TRD; Bellicini, Joseph M., TRD; Brown, Aaron B., TRD; Campbell, Deborah, TRD; Castro, Priscilla, TRD; Chowning, Heidi E., TRD; Dominguez, Melinda R., TRD; Earnest, Nathan, TRD; Johnson, Dorian, TRD; Jost, L. Kathryn , TRD; Kenney, Robert, TRD; Lopez, Joe L., TRD; Ludberg, Charles A., TRD; McGee, Janice, TRD; Montgomery, Leslie, TRD; Pichette, Julia M., TRD; Romero, Nora J., TRD; Sanchez, Cabrini K., TRD; Saylor, Maria E., TRD; Scott, Ron, TRD; Smith, Natalie K., TRD; Sourisseau, Kevin, TRD; Spitzer, Duane R., TRD; Vedamanikam, Lizzy, TRD; Wittig, Joan M., TRD; Acosta, Rebecca A., TRD; Amador, Alma, TRD; Rico, Kathryn, TRD; Anderson, Stephanie, TRD; Andrews, Margo, TRD; Beach, Ruth, TRD; Beans, Sarah, TRD; Begay, Veryl, TRD; Beltran, Alicia, TRD; Brown, Selma O., TRD; Cabrera, Mayra, TRD; Caputo, Vincent, TRD; Chavez, Joseph, TRD; Coleman, Joseph, TRD; Cruz, Robin A., TRD; Duffney, Trent, TRD; Duran, Steve, TRD; Escalante, Rusvelina, TRD; Florence, Elizabeth, TRD; Flores, Jetara, TRD; Gage, Laura D., TRD; Galewaler, Richard, TRD; Germain, Marjorie, TRD; Gomez, Hector, TRD; Gonzales, Jenelle, TRD; Gonzales, Kristi D, TRD; Gonzales, Michelle R, TRD; Hernandez, Angella, TRD; Howze, Stacy, TRD; Jaramillo, Irene B., TRD; Jordan, Louann, TRD; Kohlasch, Jackie O., TRD; Li, Shurong, TRD; Lujan, Laura, TRD; Madrid, Nancy, TRD; Maestas, Veronica, TRD; Mariano, Justin, TRD; Martinez, Jacqueline J, TRD; Martinez, JoseRay, TRD; Martinez, WFrancisco, TRD; Mayfield, Jonette, TRD; Mehta, Simone, TRD; Montano, Michael, TRD; Muniz, Alicia, TRD; NonnenKamp, Marc E., TRD; Nuanes, Lillian R., TRD; Olszewski, Steven, TRD; Orozco, Gerardo, TRD; Palady, Gayla, TRD; Paz, Kevin, TRD; Pazand, Ali, TRD; Pell, James M, TRD; Prada, Andre R., TRD; Ringo, Jessica, TRD; Rivera, Lizette, TRD; Rodriguez, Martha, TRD; Romero, George, TRD; Segura, Tracy, TRD; Teague, Debra, TRD; Turnbull, Kamie, TRD; Urrea, David , TRD; valenzuela, Steven, TRD; Vigil, Carla R., TRD; Vigil-Bell, Brandi, TRD; Wirsching, Shannon, TRD; Zhang, Tricia, TRD; Alejandro, Joe, TRD; Coca, Marcy, TRD; Macinica, Mariana, TRD; Wachter, Mark, TRD
Cc: Konz, Carolyn M., TRD; Serna, Laura, TRD; Aragon, Denise M., TRD; Vigil, Laura, TRD; Vialpando, Naomi, TRD
Subject: Audits by Auditor FY15 ME November
Attachments: Audits by Auditor FY ME November.xlsx

Laurie Cubbin
Audit Supervisor
ATSS - Audit Technical Support Services
(505) 222-6663

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From:	McGee, Janice, TRD
To:	Sourisseau, Kevin, TRD
Cc:	Chowning, Heidi E., TRD
Subject:	report of audits in process
Date:	Thursday, December 11, 2014 2:25:30 PM
Attachments:	FYE 15 Unit Production Audits in process 12-10-14.xls image001.png

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Find attached is the report by unit of what I have so far. I am still waiting on Sarah Beans and Irene Jaramillo's numbers since Chuck is out today. Please let me know if this is what Lizzy is looking for or would you like me to combine into one spreadsheet?

Janice McGee
Bureau Chief - Audit Bureau B
Phone (505) 841-6249

TAXATION & REVENUE
NEW MEXICO

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The foregoing is an informal analysis of the facts presented in your email. Please be advised that this email does not constitute a ruling issued pursuant to NMSA 1978, Section 9-11-6.2, and does not stop the Department from taking a contrary position in the future.
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ID #	Company	CASE #	Auditor	State	Assign Date	Audit Start Date	Earliest Date - Final Request for Records or All Records Received
Robin Cruz							
	Field Audits						
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Jenelle Gonzales

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Sarah Beans

Latest Date Final Request for Records or All Records Received	Latest Date Audit must be in ATSS for Review	Case #	Date Sent to ATSS for Review	Latest Date Audit Must be Assessed	10 Day Date	Assessed Date	Assessed Amount	Total Audit Hrs.	Auditor Hrs.
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From: Cubbin, Laurie M., TRD
Sent: Monday, January 05, 2015 9:49 AM
To: Armer, Daniel M., TRD; Bellicini, Joseph M., TRD; Brown, Aaron B., TRD; Campbell, Deborah, TRD; Castro, Priscilla, TRD; Chowning, Heidi E., TRD; Dominguez, Melinda R., TRD; Earnest, Nathan, TRD; Johnson, Dorian, TRD; Jost, L. Kathryn , TRD; Kenney, Robert, TRD; Lopez, Joe L., TRD; Ludberg, Charles A., TRD; McGee, Janice, TRD; Montgomery, Leslie, TRD; Romero, Nora J., TRD; Sanchez, Cabrini K., TRD; Saylor, Maria E., TRD; Scott, Ron, TRD; Smith, Natalie K., TRD; Sourisseau, Kevin, TRD; Spitzer, Duane R., TRD; Vedamanikam, Lizzy, TRD; Wittig, Joan M., TRD; Acosta, Rebecca A., TRD; Amador, Alma, TRD; Rico, Kathryn, TRD; Anderson, Stephanie, TRD; Andrews, Margo, TRD; Beach, Ruth, TRD; Beans, Sarah, TRD; Begay, Veryl, TRD; Beltran, Alicia, TRD; Brown, Selma O., TRD; Cabrera, Mayra, TRD; Carrillo, Leann, TRD; Chavez, Joseph, TRD; Coleman, Joseph, TRD; Cruz, Robin A., TRD; Duffney, Trent, TRD; Duran, Steve, TRD; Escalante, Rusvelina, TRD; Florence, Elizabeth, TRD; Flores, Jetara, TRD; Gage, Laura D., TRD; Galewaler, Richard, TRD; Germain, Marjorie, TRD; Gomez, Hector, TRD; Gonzales, Jenelle, TRD; Gonzales, Kristi D, TRD; Gonzales, Michelle R, TRD; Hernandez, Angella, TRD; Herrera, Natalie, TRD; Howze, Stacy, TRD; Issa, Mohammad, TRD; Jaramillo, Irene B., TRD; Jaramillo, Maria, TRD; Jordan, Louann, TRD; Kohlasch, Jackie O., TRD; Li, Shurong, TRD; Lujan, Laura, TRD; Madrid, Nancy, TRD; Mariano, Justin, TRD; Martinez, Jacqueline J, TRD; Martinez, JoseRay, TRD; Martinez, WFrancisco, TRD; Mayfield, Jonette, TRD; Mehta, Simone, TRD; Montano, Michael, TRD; Muniz, Alicia, TRD; Ngo, Lan, TRD; NonnenKamp, Marc E., TRD; Nuanes, Lillian R., TRD; Olszewski, Steven, TRD; Orozco, Gerardo, TRD; Paz, Kevin, TRD; Pazand, Ali, TRD; Pell, James M, TRD; Prada, Andre R., TRD; Ringo, Jessica, TRD; Rivera, Lizette, TRD; Rodriguez, Martha, TRD; Romero, George, TRD; Romero, Pauline D, TRD; Segura, Tracy, TRD; Sloan, Stephen, TRD; Solorzano, Roberto, TRD; Teague, Debra, TRD; Turnbull, Kamie, TRD; Urrea, David , TRD; valenzuela, Steven, TRD; Vigil, Carla R., TRD; Vigil-Bell, Brandi, TRD; Wirsching, Shannon, TRD; Zhang, Tricia, TRD; Alejandro, Joe, TRD; Coca, Marcy, TRD; Macinica, Mariana, TRD; Wachter, Mark, TRD
Subject: Audits by Auditor report
Attachments: Audit by Auditor FY ME 12.14.xlsx

Laurie Cubbin
Audit Supervisor
ATSS - Audit Technical Support Services
(505) 222-6663

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From: Dell, William, TRD
Sent: Tuesday, January 27, 2015 2:30 PM
To: Lowe, Kimberle A., TRD
Subject: Account Info
Attachments: ACCTS OVER 50K SPREADSHEET.xlsx

Kimberle,

Attached is my team's accounts over 50k info.

Thanks,

William (Bill) Dell
Revenue Agent Supervisor
Taxation & Revenue Dept.
(505) 841-6459 Direct
(505) 841-6326 Fax
Email: William.Dell@state.nm.us

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From:	McGee, Janice, TRD
To:	Vedamanikam, Lizzy, TRD; Sourisseau, Kevin, TRD
Cc:	Chowning, Heidi E., TRD
Subject:	progress report
Date:	Thursday, December 11, 2014 4:03:54 PM
Attachments:	FYE 15 Unit Production Audits in process 12-10-14.xls image001.png

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Lizzy & Kevin,
Find attached the auditor progress report. I have listed each audit unit by supervisor and will work on ensuring in the future we have one format that everyone is using to track auditor work. The only unit missing is Chuck's but his auditors are accounted for by the supervisor they have been reporting to.
Thank you.

Janice McGee
Bureau Chief - Audit Bureau B
Phone (505) 841-6249

TAXATION & REVENUE
NEW MEXICO

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The foregoing is an informal analysis of the facts presented in your email. Please be advised that this email does not constitute a ruling issued pursuant to NMSA 1978, Section 9-11-6.2, and does not stop the Department from taking a contrary position in the future.
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NEW MEXICO TAXATION & REVENUE DEPARTMENT
TAXPAYE Harold's Grading and Trucking Inc.
NM CRS
CASE ID#

AUDITOR:
CREATE DATE:
REVISED:
FILE:

AUDIT & COMPLIANCE DIVISION
Hector Gomez
10/12/10
9/3/15
H2.1

OTHER COMPENSATING TAX DOCUMENTATION
Nontaxable Transaction Certificates (NTTCs) Executed by Taxpayer
SOURCE:

List For Buyer/Lessee

Business Name : HAROLDS GRADING & TRUCKING I CRS ID :

Print/View	Certificate	Type	Status	Seller Business Name	Seller/Lessor CRS	Date Issued	Date Expirated
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From: McGee, Janice, TRD
To: Sourisseau, Kevin, TRD
Cc: Chowning, Heidi E., TRD
Subject: report of audits in process
Date: Thursday, December 11, 2014 2:25:30 PM
Attachments: FYE 15 Unit Production Audits in process 12-10-14.xls
image001.png

Find attached is the report by unit of what I have so far. I am still waiting on Sarah Beans and Irene Jaramillo's numbers since Chuck is out today. Please let me know if this is what Lizzy is looking for or would you like me to combine into one spreadsheet?

Janice McGee
Bureau Chief - Audit Bureau B
Phone (505) 841-6249

TAXATION & REVENUE
NEW MEXICO

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ID #	Company	CASE #	Auditor	State	Assign Date	Audit Start Date	Earliest Date - Final Request for Records or All Records Received	Latest Date - Final Request for Records or All Records Received	Latest Date Audit must be in ATSS for Review	Case #	Date Sent to ATSS for Review	Latest Date Audit Must be Assessed	10 Day Date	Assessed Date	Assessed Amount
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ID #	Company	CASE #	Auditor	State	Assign Date	Audit Start Date	Earliest Date - Final Request for Records or All Records Received	Latest Date - Final Request for Records or All Records Received	Latest Date Audit must be in ATSS for Review	Case #	Date Sent to ATSS for Review	Latest Date Audit Must be Assessed	10 Day Date	Assessed Date	Assessed Amount
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Nancy Madrid

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Hector Gomez

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REDACTED	Harold's Grading & Trucking, Inc.	REDACTED	HG	NM		08/13/13	10/13/13	02/09/14	01/13/14	05/13/14	07/18/14	07/12/14		10/22/14	REDACTED
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ID #	Company	CASE #	Auditor	State	Assign Date	Audit Start Date	Earliest Date - Final Request for Records or All Records Received	Latest Date - Final Request for Records or All Records Received	Latest Date Audit must be in ATSS for Review	Case #	Date Sent to ATSS for Review	Latest Date Audit Must be Assessed	10 Day Date	Assessed Date	Assessed Amount
REDACTED	REDACTED	REDACTED	REDACTED	REDACTED		REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED		REDACTED	REDACTED
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Jenelle Gonzales

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Sarah Beans

Total Audit Hrs.	Auditor Hrs.	% of Audit	% of Assessed Amount	Compliance Amount	Status	Payments rec by Auditor	Type	
REDACTED				REDACTED				
				REDACTED				
REDACTED								
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REDACTED	REDACTED	REDACTED						

Total Audit Hrs.	Auditor Hrs.	% of Audit	% of Assessed Amount	Compliance Amount	Status	Payments rec by Auditor	Type	
REDACTED	REDACTED		REDACTED		REDACTED	REDACTED	REDACTED	
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REDACTED	REDACTED 76.9369%	FYE 06/30/15	REDACTED				
REDACTED	REDACTED	REDACTED	REDACTED				

Total Audit Hrs.	Auditor Hrs.	% of Audit	% of Assessed Amount	Compliance Amount	Status	Payments rec by Auditor	Type	
REDACTED	REDACTED		REDACTED	REDACTED				
REDACTED	REDACTED		REDACTED	REDACTED				

REDACTED	REDACTED	REDACTED		REDACTED				
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