



<u>Agenda</u>

Office of Tax Appeals Hearings Monday, February 26, 2018, 1:00 p.m. 400 R Street Hearing Room Sacramento, CA 95811

Agenda updated as of 02/13/18, 8:00 a.m.

Corporate Franchise and Personal Income Tax Appeals Hearings

Ahmad Skouti and Faten Kour, 18011162

Panel Lead:	Andrew Kwee
Panel Members:	Jeffrey Margolis
	Michael Geary
Appearing for Taxpayer:	Ahmad Skouti, Taxpayer
	Joseph J. Doerr, Attorney
	Jim Betts, Witness
	Dr. Richard Nordstrom, Witness
Appearing for Franchise Tax Board:	David Hunter, Tax Counsel
	Adam Susz, Tax Counsel

Issues: The issues in this appeal are: (1) whether \$3,260,166 from a judgment awarded to taxpayer in 2007 constitutes ordinary income or qualifies for nonrecognition of gain under I.R.C. Section 1033; and (2) whether taxpayer is liable for the accuracy-related penalty and interest.

The hearing location is accessible to people with disabilities. Please contact Liz Asselin at (916)215-8662, or email <u>Elizabeth.Asselin@ota.ca.gov</u> if you require special assistance.

Note: The above case description is intended simply to inform the public and the press as to the general subject matter of the case. The description does not necessarily define the specific issues that will be addressed at the hearing.