



## **Agenda**

Office of Tax Appeals Hearings Friday, January 27, 2023, 9:30 a.m. Virtual Hearings

(Agenda updated as of 01/23/23, 2:20 p.m.)

## Franchise and Income Tax Appeals Hearings

T. and S. McMullen, 21129310

Panel: Teresa Stanley

Appearing for Taxpayer: T. McMullen, Taxpayer

Appearing for Franchise Tax Board: Paige Chang, Tax Counsel

Cynthia Kent, Tax Counsel

Issues: Whether appellants have established that their claim for refund for the 2015 taxable year is not barred by the statute of limitations, and whether appellants have established that the statute of limitations has been tolled due to financial disability.

RJRSJ Properties, LLC, 21088430

Panel Lead: Asaf Kletter
Panel Members: Tommy Leung

Veronica Long

Appearing for Taxpayer: Zachary Fisher, Representative

D. Coward, Representative

Appearing for Franchise Tax Board: Christopher Tuttle, Tax Counsel

Issue: Whether appellant has demonstrated reasonable cause to abate the late filing

and late-payment penalties for the 2017 tax year.

## 1:00 p.m. Session

O. Gelikman and G. Fisch, 21088442

Panel: Mike Le

Appearing for Taxpayer:

Appearing for Franchise Tax Board:

O. Gelikman, Taxpayer

Eric Yadao, Tax Counsel

Issue: Whether appellants have established reasonable cause to abate the late-

payment penalty.

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## State of California Office of Tax Appeals

C. Goldfarb, 21098546

Panel Lead: Sara Hosey
Panel Members: Suzanne Brown

Ovsep Akopchikyan

Appearing for Taxpayer: C. Goldfarb, Taxpayer

Appearing for Franchise Tax Board: Camille Dixon, Tax Counsel

Christopher Tuttle, Tax Counsel

Issue: Whether the claim for refund for the 2016 tax year is barred by the statute of

limitations.

The following cases were removed from this agenda:

FS Health Systems, LLC, 21098581 Taxpayer did not respond to the hearing notice.

J. Buss, 21078276 Taxpayer did not respond to the hearing notice.

T. and S. McMullen, 21129310 Taxpayers withdrew appeal.

The hearing location is accessible to people with disabilities. Please contact Nia Vaughan at (916)926-3048, or email Nia.Vaughan@ota.ca.gov 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.

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