

State of California Office of Tax Appeals

Agenda

Office of Tax Appeals Hearings Thursday, April 25, 2024, 9:30 a.m. Virtual Hearings

(Agenda updated as of 04/22/24, 11:10 a.m.)

Franchise and Income Tax Appeals Hearings

A. Mogos, 230713904

Panel: Veronica Long

Appearing for Taxpayer: A. Mogos, Taxpayer

Nikhita Pais, Representative

Appearing for Franchise Tax Board: Ariana Macedo, Attorney

Brad Coutinho, Attorney

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

penalty for the 2020 tax year.

R. Calabria and C. Stewart, 220911359

Panel Lead: Veronica Long Panel Members: John Johnson

Lauren Katagihara

Appearing for Taxpayer: Kevin Lawrence, Representative

Appearing for Franchise Tax Board: Peter Kwok, Attorney

Christopher Davis, Attorney

Issue: Whether appellants have shown that they are entitled to a deduction for taxes

paid to a foreign jurisdiction on their California tax returns.

1:00 p.m. Session

A. Maleh and S. Maleh, 230513239

Panel Lead: Asaf Kletter
Panel Members: Joshua Lambert

Mike Le

Appearing for Taxpayer: David Neuman, Attorney
Appearing for Franchise Tax Board: Leoangelo Cristobal, Attorney

Maria Brosterhous, Attorney

Issues: Whether appellants have shown reasonable cause to abate the late payment penalty for the 2021 tax year; whether the estimated tax penalty for the 2021 tax year may be waived or abated; and, whether appellants are entitled to interest abatement.

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J. Chao and E. Chao, 220811012

Panel Lead: Suzanne Brown

Panel Members: Mike Le
Keith Long

Appearing for Taxpayer: Sang Hoon Jang, Representative

Paul McGovern, Representative

Appearing for Franchise Tax Board: Alisa Pinarbasi, Attorney

Maria Brosterhous, Attorney

Issue: Whether appellants have established reasonable cause to abate the late payment penalty imposed under Revenue and Taxation Code section 19132 for the 2020 tax year.

The following cases were removed from this agenda:

D. Anderson, 21108757 Taxpayer did not respond to the hearing

notice.

Corundum Diversified Apartment Fund IV QP, Taxpayer and FTB requested a deferral of

220811117 this case.

J. Chao and E. Chao, 220811012 Taxpayers and FTB requested a deferral of

this case.

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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