

COPY

UNITED STATES TAX COURT

SANCHEZ,

Petitioner,  
v.  
COMMISSIONER OF INTERNAL REVENUE,  
Respondent.

Docket No. 12750-05

DECISION

Pursuant to the stipulation of the parties in this case, and incorporating herein the facts stipulated by the parties as the findings of the court, it is

ORDERED AND DECIDED: That there is no deficiency in income tax due from petitioner for the taxable year 2001 and that there is an overpayment in income tax for the taxable year 2001 in the amount of \$20,756.00, which amount was paid within three years of the filing of the claim, and which claim was filed within three years of the filing of the return; and

That there is no penalty due from petitioner for the taxable year 2001, under the provisions of I.R.C. § 6662(a).

IRS wrote off \$109k and issued \$20k refund instead

Judge.

Entered:

\* \* \* \* \*

It is hereby stipulated that the court may enter the foregoing decision in this case in accordance with the stipulation of the parties submitted herewith.