



## Personal Liability for Corporate Tax Assessments

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## Administrative Proceedings

- Entity v. Individual
  - Assessment Contest Barred
- Tax Estimation Process
  - May Vastly Overstate Tax
  - Creates Fraud Penalty Facts
  - May Establish Personal Liab.
- Limited Impact in Court

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## Lawsuit



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## Coastal Furnishings, Inc.



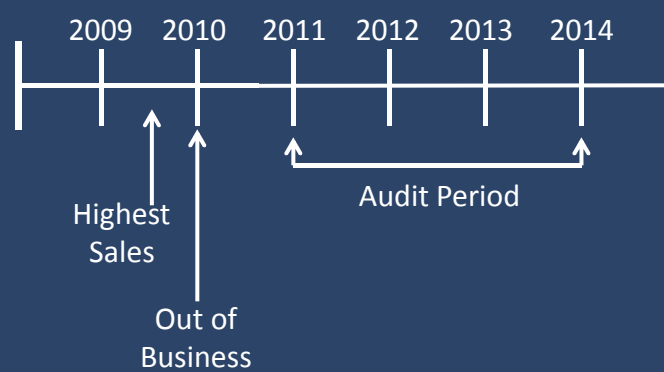
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## Coastal Furnishings, Inc.



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## Timeline



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64<sup>th</sup> Annual Taxation Conference session

"Personal Liability for Corporate Tax Assessments"