



Department of the Treasury
 Internal Revenue Service
 OGDEN UT 84201-0039

For assistance, call:
 01-215-516-2000
 (Not Toll-Free)

Notice Number: CP215
 Date: [REDACTED]

Taxpayer Identification Number:

Tax Form: C-VL PEN
 Tax Period



Notice of Penalty Charge 599

You have been charged a penalty under Section 6038 of the Internal Revenue Code for the following reason:

Failure to File Form 5471
 Tax Statement

Prior Balance	\$0.00
Penalty Assessment	\$20,000.00
Interest Charged	\$0.00
Other Charges	\$0.00
Total Amount You Owe	\$20,000.00

We have charged you a penalty of \$10,000 under IRC Section 6038(b)(1) for each Form 5471 required to be filed under IRC Section 6038(a) which was incomplete or not timely filed.

Form 5471 is titled Information Return of U.S. Persons with Respect to Certain Foreign Corporations.

If you agree with the assessment of this penalty, please pay the balance due within ten (10) days from the date of this notice.

If reasonable cause exists for failure to file a complete and timely Form 5471, and you believe this penalty should not be imposed, please submit your reasonable cause statement within ten (10) days from the date of this notice to the following address: Internal Revenue Service, 11601 Roosevelt Blvd, DP N-441, Philadelphia, PA 19154. For assistance, you can call 215-516-2000 (not toll free). However, your request for penalty abatement cannot be considered by telephone, it must be submitted in writing. Please refer to the provisions of Treasury Regulations 1.6038-2(k)(3).

This penalty does not include, with respect to each foreign business entity, the 10 percent reduction, required by IRC section 6038(c), of foreign tax credits under IRC sections 901, 902, and 960, subject to the limitations under IRC section 6038(c)(2), as required by IRC section 6038(c).