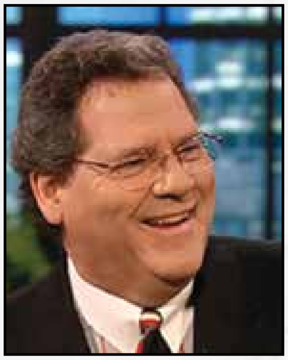

PILLA TALKS TAXES

DAN PILLA'S MONTHLY TAX AND FINANCIAL BULLETIN

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Vol. 33 Issue 6

The Attack On Wealth Targets Trusts

Biden Gets More Aggressive with the Confiscation of Capital

It seems the Biden administration is waging and all-out war on wealth. We already know about the plans to:

1. Raise the top individual income tax rate to 39.6% (43.4% if you include the 3.8% tax on net investment income),
2. Raise the top corporate tax rate to 28%,
3. Tax capital gains and dividend income as if they were ordinary income, and
4. Eliminate the stepped-up basis accorded to assets transferred to heirs upon the death of the owner.

What hasn't been discussed is a provision that's burred in the 114-page document released by the U.S. Treasury in May. The document, General Explanations of the Administration's Fiscal year 2022 Revenue Proposals (the so-called Green Book), broadly explains President Biden's plan to confiscate vast amounts of wealth from citizens.

That portion of the plan was not discussed at all by Biden during his campaign, nor was it mentioned when he released his plans to "tax the rich" in April. If this element of the plan becomes law, there will be a great deal of consternation among people who have used an estate planning strategy regularly for many genera-tions—and not just by the richest 1%.

I'm referring to the use of trusts as vehicles to preserve family wealth over generations. Let me explain.

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ADS

A PRIMER ON TRUSTS

A trust is an entity created by a contract between the grantor (the person setting up the trust) and the trustee (the person who controls the income and assets of the trust). The trustee controls the trust's assets for the benefit of beneficiaries, the people who ultimately receive the income and assets from the trust.

Trusts are used in estate planning as a means of gaining perpetuity of life, but without the public disclosures that accompany both the corporate status and the probate of traditional wills. Families often put investment assets into trust to avoid probate, thus allowing the assets to continue to work and grow without the need to liquidate them upon the death of the owner.

Because trusts can enjoy perpetuity of life (like a corporation), future generations can realize the benefits of income generated by trust assets but without the heavy hand of estate and gift taxes decimating the assets themselves.

For these reasons, trusts can be a very effective part of a comprehensive estate plan. Indeed, American families have used trusts for over 100 years to preserve and grow assets, which in turn generate substantial income for future generations. A core element of the American Dream is that parents who acquire wealth legally and peacefully might pass that wealth to their children and grandchildren so future generations have a better life than their ancestors.

But Biden's team wants to confiscate that wealth. Moreover, they wish to prevent you and your family from enjoying your basic Constitutional right to contract (U.S. Const. Art 1, § 10) in the creation of such a trust to preserve the wealth you created for your descendants.

UNDERSTANDING "STEPPED-UP BASIS"

As we know, Biden intends to eliminate the stepped up basis rule for assets transferred to beneficiaries upon death. Under the plan, beneficiaries will assume the same basis in inherited assets as that of the decedent. In the case of a family home, for example, children may inherit a home with a fair market value of $500,000, but which was purchased by the decedent for a small fraction of that and held for decades.

For example, suppose the home was purchased for $50,000 and $25,000 in capital improvements (new garage; finished basement) were added over time. In that case, the decedent's basis is $75,000. Under current law, the beneficiaries inherit the asset with a basis equal to the fair market value of the property—$500,000. If they sell at that price, there is no capital gain.

Biden's plan will eliminate this so-called "stepped-up basis." That means the beneficiaries will inherit the property at a basis equal to that of the decedent's—in this example, $75,000. When they sell the property at fair market value ($500,000), they are taxed on capital gain of $425,000.

The result is that wealth is transferred, not from parents to children, as it should be. But rather, much of the transfer goes from parents to the government as part of a deliberate plan to destroy the concentration of capital in the hands of private citizens.

THE ATTACK ON TRUSTS

Under current law, trusts can avoid this outcome for a number of reasons. Chief amount them is that trusts don't necessarily "die." But Biden's plan—undisclosed to the public until now—will attack the trust structure directly in two ways.

First, trusts that own property which has "has not been the subject of a recognition event within the prior 90 years" will be forced to pay taxes on all gain not recognized for tax purposes during that period. See: Green Book, pg 62. This will directly confiscate a portion of the capital assets of the trust equal to the capital gain tax rate in effect at the time of the assessment.

For example, suppose a person creates a trust and transfers 1,000 shares of stock into the trust in 1940. The stock was worth $.50 per share when transferred to the trust. Today, the stock is worth $200 per share and produces substantial dividend income. The income is distributed to the trust's beneficiaries, and they pay taxes on the distribution. However, the stock has accumulated substantial capital value that has not been taxed since before the transfer in 1940.

In this case, Biden's plan will impose a capital gains tax on the value of the stock at $199.50 per share. Of course, the tax will be assessed at the currently applicable capital gains rates, which Biden also intends to increase.

Second, "transfers of property into" either a "trust, partnership, or other non-corporate entity" would constitute a taxable event. That is to say, the mere act of transferring property out of one's personal name and into any estate planning device (trust, family limited partnership, LLC, etc.) would be treated as a "sale" of the asset. See: Green Book, pg 62.

For example, suppose one owns stock with current fair market value of $200 per share that was acquired at $50 per share. If the owner were to transfer the stock to a trust (as opposed to holding it until death), the transfer would be considered a sale and the owner would be liable for capital gain tax on the "profit" of $150 per share.

CERTAIN EXCLUSIONS WOULD APPLY

The proposal includes several exclusions, summarized as follows:

1. Transfers to a surviving spouse would carry the decedent's basis to the spouse and would not be taxed until the spouse disposes of the property;
2. Appreciated property transferred to charity would not generate a capital gain;
3. The exclusion of $250,000 under current law for capital gain on the sale of a principal residence would continue to apply, and the exclusion would be "portable to the decedent's surviving spouse, making the exclusion effectively $500,000 per couple" (Green Book, pg 63);
4. The proposal excludes all personal property such as household furnishings and person effects, but NOT collectibles; and
5. The proposal includes a $1 million per-person exclusion from recognition of unrealized capital gains. The exclusion would be indexed for inflation beginning in 2022, and would be portable to the decedent's surviving spouse, effectively creating a $2 million exclusion for married couples.

DECIMATION OF FAMILY BUSINESSES

I expect this proposal, if enacted, to decimate family businesses. Imagine the tax liability created as a result of the death of patriarch of a family-owned business. This will certainly mark the return to the days when the heirs of such a business were forced to sell business assets, or the entire business itself, just to pay the taxes.

And, of course, the Biden administration knows this. Thus, the Green Book discusses a "deferral" scheme that is apparently intended to take the sting out of this insofar as family businesses are concerned. It operates two ways.

First, the tax on family owned and operated businesses (not defined by the plan) "would not be due until the interest in the business is sold or the business ceases to be family-owned and operated." Second, the law would allow "a 15-year fixed-rate payment plan for the tax on appreciated assets transferred at death." The payment plan would not apply to "liquid assets such as publicly traded financial assets." See: Green Book, pg 63.

The 15-year deferral comes at a cost, and not just in the form in interest. The plan calls for the deferral to be "secured." Consider this:

> The Internal Revenue Service (IRS) would be authorized to require security at any time when there is a reasonable need for security to continue this deferral. That security may be provided from any person, and in any form, deemed acceptable by the IRS. Ibid.

Where the IRS is concerned, the word "security" means one thing only: a federal tax lien. The federal tax lien is all-encompassing, attaching to all "property and rights to property" owned by the taxpayer at the time the lien is filed, including all property acquired after the lien is filed. See: Internal Revenue Code § 6321.

A BLIZZARD OF REGULATIONS

Not surprisingly, there are few details spelled in the Green Book. The Biden Administration didn't even talk about this plan in the early days of its reign, never mind give us the gory specifics about exactly how the decimation of private capital will operate. We know the details are mostly a matter of legislation to be worked about by Congress.

Further, assuming legislation is enacted, many details will be subject to IRS regulations. In this regard, the proposal states,

> [T]he Secretary would be granted authority to issue any regulations necessary or appropriate to implement the proposal, including rules and safe harbors for determining the basis of assets in cases where complete records are unavailable, reporting requirements for all transfers of appreciated property including value and basis information, and rules where reporting could be permitted on the decedent's final income tax return. Green Book, pg 64.

I expect a blizzard of regulations to implement what promises to be broad, sweeping changes to how the federal government will confiscate the wealth honest citizens earned over their lifetimes.

IRS Guidance On Deduction For Meals

New Rules for Business Meals

The Taxpayer Certainty and Disaster Tax Relief Act of 2020 was passed as part of the massive Consolidated Appropriations Act (enacted December 27, 2020). Section 210 of the former was a provision related to the deductibility of business meals. It's an important—albeit temporary—rule change for all businesses.

Internal Revenue Code § 274 is the widely verbose section of law that controls the deduction for business meals, travel and entertainment. Very generally speaking, business meal expenses (there's no discussion in this article relative to entertainment) are deductible only when the business establishes that the meal occurred with an actual or perspective customer, client or patient, and that a bona fide business discussion was had either before, during or after the meal. Please see chapter 13 of my book, ***Dan Pilla's Small Business Tax Guide*** for an exhaustive discussion of these concepts.

Section 275(n)(1) provides that the deduction for business meals is limited to 50% of the amount incurred. This is simple enough: if your business spends $1,000 on legitimate business meals over the course of the year, you can deduct $500.

Section 210 of the Taxpayer Certainty Act temporarily suspended the 50% limitation. That means that businesses now get a 100% deduction for legitimate business meals. The period during which the 100% rule applies begins January 1, 2021, and continues through December 21, 2023. See: code § 274(n)(1)(D). As such, businesses have three full years during which they may deduct 100% of all qualified business meals.

The IRS issued clarification on the deduction with its Notice 2021-25. At issue is the language in § 274(n)(1)(D)(1) providing that the 100% rule applies to "food or beverages provided by a restaurant." The IRS's guidance defines what constitutes a "restaurant."

Per Notice 2021-25, the term "restaurant" means:

> [A] business that prepares and sells food or beverages to retail customers for immediate consumption, regardless of whether the food or beverages are consumed on the business's premises. However, a restaurant does not include a business that primarily sells pre-packaged food or beverages not for immediate consumption, such as a grocery store; specialty food store; beer, wine, or liquor store; drug store; convenience store; newsstand; or a vending machine or kiosk. Notice 2021-25, pg 3.

Note that this limits the 100% deduction to food and beverages purchased "for immediate consumption." The 50% limit expressed in § 274(n)(1) continues to apply to all other food and beverage purchases, unless some other exception applies. In chapter 13 of ***Dan Pilla's Small Business Tax Guide*** I provide a literal laundry list of the exceptions that bear on the deductibility of meals.

The recordkeeping requirements for deducting business meals are very strict. The fact that the amount of the deduction was increased from 50% to 100% does not change the burden of proof on the issue. Study chapter 13 of the ***Small Business Tax Guide*** to understand how to meet that burden of proof.

LOCATION:

Embassy Suites by Hilton, Nashville South, Cool Springs, Tennessee.

DATES:

Sunday Evening November 7
– TDI/TFI Members Only Business and Networking Meeting.
Monday and Tuesday November 8 & 9
– Taxpayers Defense Conference.

COST:

More details will follow on cost but it looks like the room cost is $149 a night which includes breakfast. Those who stay at the hotel will get an additional discount off the conference registration fee. The retail cost of the conference will be at least $795. For our current members, the cost will be $595 at most.

PLEASE EMAIL JEAN DIRECTLY

at *jean@taxhelponline.com* to say whether you are planning to attend in person. We are also planning to host it virtually (like we did last year) so let Jean know if that is what you are planning.

DEFENSE CONFERENCE THEME and TOPICS:

The IRS has made it perfectly clear that it intends to launch an attack on businesses. Because of that, our 2021 Defense Conference theme is Business Tax Audits. The topics include:

- An analysis of how this attack will look
- How the IRS attacks a business's reported income and deductions
- The law regarding the burden of proof on underreported income
- 6 ways to prove deductions
- An analysis of procedures relating to Notice CP2000 and ASFRs
- 2 ethics sessions to include billing practices and the essential elements of competency of counsel
- And don't forget our very educational live role playing and group debriefing sessions
- Finally, as always, we will have our popular and informative moderated discussion where all topics and problems are fair game.

The Taxpayers Defense Conference is widely regarded as simply the best tax seminar in the country—and for good reason. There is no place else you can go to get the up-to-date, cutting edge information you need to effectively represent your clients in taxpayers' rights and problems resolution issues. And that's a fact.

Watch your email and check the TDI/TFI website for more details.

The Taxability of Crowdsourcing Revenue

Is my "Go Fund Me" Money Taxable?

BY SCOTT MACPHERSON

Nine years ago former President Obama signed into the law the JOBS Act, Pub. L. 112–106. This law contained numerous changes to statutes and regulations regarding the way start-up companies and existing private companies could go public and raise private capital.

With the subsequent proliferation of crowdsourcing campaigns, e.g. "Go Fund Me" and "Kickstart," etc., you have probably wondered what is the tax consequence of donations to those campaigns. For example:

1. 1. "My wife/brother/mother has cancer and we need money for treatments and hospitalization. Please send money."
1. 2. "I'm starting a new business. Let me tell you all about it. I need to raise capital. Please send money."

In either of those scenarios, if I send money, does the recipient have taxable income? And if I send money, do I get a charitable deduction?

The starting place for whether this is this taxable income is always § 61(a) of the Internal Revenue Code. It provides:

> Except as otherwise provided in this subtitle, gross income means all income from whatever source derived, including …" [The statute goes on to list a litany of receipts that constitute income for tax purposes.]

That phrase "whatever source derived" couldn't be more clear, or more all-encompassing. But, there are at least three exceptions in this context, the first being that it's not income until you receive it.

Treasury Regulation § 1.451-2(a) reads:

> Income although not actually reduced to a taxpayer's possession is constructively received by him in the taxable year during which it is credited to his account, set apart for him, or otherwise made available so that he may draw upon it at any time, or so that he could have drawn upon it during the taxable year if notice of intention to withdraw had been given. However, income is not constructively received if the taxpayer's control of its receipt is subject to substantial limitations or restrictions.

This applies to crowdfunding because the particular platform (e.g., Go Fund Me) will hold for some period of time all of the donations, before passing the money to the beneficiary. This means that the millions (or thousands or hundreds) of dollars donated for your cancer bills is not your income until it reaches your bank account.

And now you say, that's really not helpful because of course we are assuming that the recipient eventually receives the money. Fair enough, and on that note, we have the second exception: It's not income if it's a gift, per § 102 ("Gross income does not include the value of property acquired by gift, bequest, devise, or inheritance.").

The Supreme Court defined a "gift" for tax purposes in *Commissioner v. Duberstein*, 363 U.S. 278 (1960). A gift results from "detached and disinterested generosity," the Court said. It is often given out of "affection, respect, admiration, charity, or like impulses." One very important key to whether a payment is a gift is whether the payer had any expectation of financial gain or remuneration in exchange for the gift. If not, if the money is given with no expectation of return but purely out a charitable spirit, the money is not income to the recipient.

Donations for the medical bills of the hypothetical cancer patient with a "Go Fund Me" account undoubtably fall into that category. I cannot imagine an IRS revenue agent arguing otherwise. We could easily identify numerous other examples of pleas for donations based on a specific need, for which donations are made from pure generosity with no anticipation of financial benefit in return.

Further, I assert that the scenario addressed in Revenue Ruling 99-44 is analogous to that of crowdsourcing. The scenario in that Revenue Ruling is that Taxpayer O donates money toward a charitable fund established by Congress that is distributed to other taxpayers based on their need, as defined in the pertinent statute. Taxpayer A is one of the recipients. The IRS is asked whether the donation from O to A is taxable income to the recipient. The answer is no, it is not taxable income. The Revenue Ruling states in part:

> In general, a payment made by a charity to an individual that responds to the individual's needs, and does not proceed from any moral or legal duty, is motivated by detached and disinterested generosity. … These facts indicate that O selected A to be a project participant [that is, the recipient of the donation] and paid the parallel funds on behalf of A out of charitable and like impulses, and detached and disinterested generosity. Therefore, O's payment of the parallel funds [the donation money] is excluded from A's gross income as a gift under § 102. Id. at p. 6-7.

In my analogy, Taxpayer A is the person who sets up the "Go Fund Me" account to pay for (pick something) from funds donated through purely detached and disinterested generosity with no expectation of financial return or remuneration of any kind. Those donations are excluded from income per § 102 and that Revenue Ruling.

Now, what if the Go Fund Me account solicits start-up capital for a new business? This is the third exception to the general rule of § 61, and an IRS Chief Counsel opinion addresses it as follows:

> What that means is that crowdfunding revenues generally are includible in income if they are not 1) loans that must be repaid, 2) capital contributed to an entity in exchange for an equity interest in the entity, or 3) gifts made out of detached generosity and without any "quid pro quo." However, a voluntary transfer without a "quid pro quo" is not necessarily a gift for federal income tax purposes. In addition, crowdfunding revenues must generally be included in income to the extent they are received for services rendered or are gains from the sale of property. Chief Counsel Opinion No. 2016-0036.

Restated, if I contribute money to your business start-up campaign and receive nothing in return, that would be gift to you. If I instead receive an ownership interest (shares of stock) in the new company, then I did not make a gift to you but rather I made a capital contribution entitles me to a return on my investment. That is exception 2 in the Chief Counsel's list.

Furthermore, a capital contribution is not a taxable event per § 118(a). That section provides that "In the case of a corporation, gross income does not include any contribution to the capital of the taxpayer [business]." See also *Nathel v. Commissioner*, 131 T.C. 262, 267 (2008) (capital contributions are not included in the income of a corporation); *Commissioner v. Fink*, 483 U.S. 89, 94 (1987) ("It is settled that a shareholder's voluntary contribution to the capital of the corporation has no immediate tax consequences.")

Treas. Reg. § 1.118-1 clarifies that "the exclusion does not apply to any money or property transferred to the corporation in consideration for goods or services rendered." We can presume in the context of crowdfunding that no goods or services were rendered to the person contributing funds.

Where a start-up is seeking capital contributions, the transactions might have to be handled by an entity licensed by the Securities and Exchange Commission (SEC). The JOBS Act addressed this matter but it is beyond the narrow scope of this article.

More likely, our common, everyday clients established a "Go Fund Me" account or similar, which was processed through a third-party settlement agency such as PayPal. That client may receive IRS Form 1099-K from the agent that handled the money. IRS rules for processing entities are very clear regarding the requirement to issue a 1099-K.

The rules provide that if your crowdfunding account received gross payments exceeding $20,000 and from more than 200 transactions (donations), then they must issue a 1099-K. Notice the word "and" in the sentence. That is to say, there must be at least $20,000 in revenue and more than 200 donations in a calendar year for the reporting requirement to kick in.

Both the IRS and the organizer (the person pleading for donations) must receive a copy of the 1099-K. A 1099-K is not a determination that you earned taxable income. It simply reports that you exceeded the threshold of transactions and payments. Ostensibly, the purpose of the form is to keep online-auction sellers and other small businesses from evading taxes on transactions that previously went under the radar.

If your crowdfunding income is not taxable, as discussed above, then you do not have to pay tax on the amount reported on the 1099-K. However, the IRS could request additional information about why the income was not taxable. Therefore, keep accurate records so you can provide supporting documentation if necessary.

In addition, you would be well-served to use IRS Form 8275, *Disclosure Statement*, with your return if you: a) received a Form 1099-K, and b) the proceeds shown on the form are not taxable income. A *Disclosure Statement* allows you explain to the IRS why the proceeds are not reported as income on the tax return. For more information on Form 8275, please see Dan's book, ***The IRS Problem Solver.*** See sample Form 8275, reproduced below.

The second of the two questions I asked in the introduction to this article is whether the donor to a Go Fund Me campaign can get a charitable contribution deduction for the gift to the needy person. The answer to that question is controlled by code § 170. That section provides that contributions which meet certain requirements are deductible in the year given. The specific conditions are set forth in § 170(c).

Section 170(c) lists five broad categories of organizations the contributions to which are tax deductible. Very generally, the five categories are: 1) government agencies (state, federal and local), 2) churches and charitable organizations recognized as tax exempt under code § 501(c), 3) certain veteran's organizations, 4) certain fraternal organizations, and 5) certain cemetery organizations. As you can plainly see, none of those five categories includes an individual person, however great the need may be.

The common denominator to all these exempt organizations, including churches, is that no part of the net earnings of such organization may "inure to the benefit of any private shareholder or individual." Rather, the payments must be used by the organization expressly and exclusive to serve their stated exempt purpose, whatever that may be.

Your personal gift to a private person does not meet the requirements of a tax deductible gift under § 170(a). So while it remains true that the *recipient* of the gift is not required to pay taxes on the gift (it's not considered income), it's also true that the *donor* doesn't get to claim a tax deduction for the gift.

Scott MacPherson *is a second-generation TFI/TDI member. He's licensed to practice law in AZ and CA, and is a member of the MacPherson Group with his father Mac and brother Nathan. You can contact Scott directly at 310-773-2042.*

Form **8275**

(Rev. August 2013)

Department of the Treasury
Internal Revenue Service

Disclosure Statement

Do not use this form to disclose items or positions that are contrary to Treasury regulations. Instead, use Form 8275-R, Regulation Disclosure Statement.

▶ Information about Form 8275 and its separate instructions is at *www.irs.gov/form8275*.

▶ Attach to your tax return.

OMB No. 1545-0889

Attachment Sequence No. **92**

Name(s) shown on return | **Identifying number shown on return**

If Form 8275 relates to an information return for a foreign entity (for example, Form 5471), enter:

Name of foreign entity ▶

Employer identification number, if any ▶

Reference ID number (see instructions) ▶

Part I **General Information** (see instructions)

(a) Rev. Rul., Rev. Proc., etc.	(b) Item or Group of Items	(c) Detailed Description of Items	(d) Form or Schedule	(e) Line No.	(f) Amount
1					
2					
3					
4					
5					
6					

Part II **Detailed Explanation** (see instructions)

1

2

3

4

5

6

Part III **Information About Pass-Through Entity.** To be completed by partners, shareholders, beneficiaries, or residual interest holders.

Complete this part only if you are making adequate disclosure for a pass-through item.

Note: *A pass-through entity is a partnership, S corporation, estate, trust, regulated investment company (RIC), real estate investment trust (REIT), or real estate mortgage investment conduit (REMIC).*

1 Name, address, and ZIP code of pass-through entity

2 Identifying number of pass-through entity

3 Tax year of pass-through entity

to

4 Internal Revenue Service Center where the pass-through entity filed its return

For Paperwork Reduction Act Notice, see separate instructions. Form **8275** (Rev. 8-2013)

ISA

Part IV **Explanations** *(continued from Parts I and/or II)*

How You Can Ask Dan Pilla a Question

If you have questions or problems you'd like Dan Pilla to address, please write to Dan at:

215 W. Myrtle Street
Stillwater, MN 55082

or e-mail to:

expert@taxhelponline.com

Write the word "newsletter" in the subject line.

Tax Freedom Institute Consulting Members

Name	Ability Level	Territory (City located)	Phone	Email
MacPherson Group	Attorney	AZ (Glendale)	800-BEAT IRS	mac@beatirs.com
Donald MacPherson	Attorney	S California	800-BEAT IRS	mac@beatirs.com
Lawrence Stephens	CPA	CA:Northern (Modesto)	(209) 543-0490	lhs@saccon.com
James Olson	CPA	CO (Golden)	(720) 328-8624	financial.forensics.llc@comcast.net
Julius Janusz	Enrolled Agent	CT (New Britain)	(860) 225-2867	tax@jjtax.com
Steven Klitzner	Attorney	FL (Miami)	(305) 682-1118	Steve@FloridaTaxSolvers.com
Darrin Mish	Attorney	FL (Tampa)	(813) 229-7100	dmishesq@getirshelp.com
Patricia Gentile	Attorney, CPA	MA, NH (Nashua, NH)	(800) 880-8388	PGentileCPA@comcast.net
Charles Markham	Enrolled Agent	MA (Norwell)	(781) 659-6600	charles@markhamandcompany.com
Manuel Mendoza	Enrolled Agent	MD (Bethesda)	(301) 962-1700	mendoza@mendozaco.com
Daniel J Pilla	EA, US Tax Court	MN (Stillwater)	(800) 553-6458	support@taxhelponline.com
Chris Churchwell	CPA	MO (Joplin)	(417) 781-1829	chris@chtaxgroup.com
Tom Zeiders	Attorney	OK, Tulsa	(918) 743-2000	tom@tax-amnesty.com
Robyn McQuown	CPA	OK, Norman	(702) 265-1159	mcquown@cox.net
Mitchell Gerstein	CPA	PA (Bala Cynwyd))	(484) 434-2041	mgerstein@isdanerllc.com
Kenneth Eichner	CPA	TX (Houston)	(713) 781-8892	kde@kdepc.com
Dionne Cheshier	Enrolled Agent	TX (Dallas)	(972) 514-1424	dionne@cheshiertaxresolution.com
Frank Rooney	Attorney	VA (Arlington), MD & DC	(703) 527-2660	rooneyf@irsequalizer.com