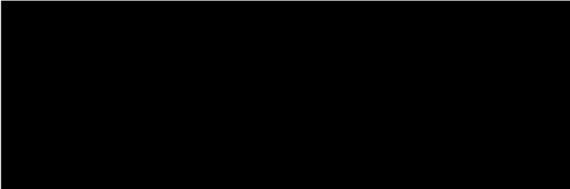




Department of the Treasury
 Internal Revenue Service
 Ogden, Utah 84201

Letter 3219
 Letter Date: 11/26/2025
 Taxpayer Identification Number:
 [REDACTED]
 Person to Contact:
 [REDACTED]
 Contact Telephone Number:
 [REDACTED]
 (A Toll Free Number)
 Hours to Call: M-F 7AM - 3PM MST



Last Day to File a Petition with
 the U.S. Tax Court: 02/24/2026
 (If Outside of U.S.: 04/25/2026)

CERTIFIED MAIL

Tax Year Ended	Dec 31, 2021
Deficiency:	
Increase in tax	\$22,886.00
Penalties	
IRC 6662(a)	\$3,737.20
IRC 6651	\$450.56

Dear Taxpayer:

We have determined that there is a deficiency (increase) in your income tax as shown above. This letter is your NOTICE OF DEFICIENCY, as required by law. The enclosed statement shows how we figured the deficiency.

If you want to contest this determination in court before making any payment, you have until the Last Date to Petition Tax Court (90 days from the date of this letter or 150 days if the letter is addressed to you outside of the United States) to file a petition with the United States Tax Court for a redetermination of the amount of your tax. You can get a petition form and the rules for filing a petition from the Tax Court. You should file the petition with the United States Tax Court, 400 Second Street NW, Washington, D.C. 20217. Attach a copy of this letter to the petition.

The time in which you must file a petition with the court (90 or 150 days as the case may be) is fixed by law and the Court cannot consider your case if your petition is filed late. As required by law, separate notices are sent to spouses. If this letter is addressed to both a husband and wife, and both want to petition the Tax Court, both must sign the petition or each must file a separate, signed petition.

The Tax Court has a simplified procedure for small tax cases when the amount in dispute is \$50,000 or less for any one tax year. You can also get information about this procedure, as well as a petition form you can use, by writing to the Clerk of the United States Tax Court at 400 Second Street NW, Washington, D.C. 20217. You should write promptly if you intend to file a petition with the Tax Court.

If you decide not to file a petition with the Tax Court, please sign and return the enclosed waiver form to us. This will permit us to assess the deficiency

quickly and will limit the accumulation of interest. We've enclosed an envelope you can use. If you decide not to sign and return the waiver and you do not petition the Tax Court, the law requires us to assess and bill you for the deficiency after 90 days from the date of this letter (150 days if this letter is addressed to you outside of the United States)

If you have questions about this letter, you may call the Contact Person whose name and telephone number are shown in the heading of this letter. If this number is outside your local calling area, there will be a long distance charge to you. If you prefer, you can call the Internal Revenue Service (IRS) telephone number in your local directory. An IRS employee there may be able to help you, but the office at the address shown on this letter is most familiar with your case.

When you send information we requested or if you write to us about this letter, please provide a telephone number and the best time for us to call you if we need more information. Please attach this letter to your correspondence to help us identify your case. Keep the copy for your records.

The person whose name and telephone number are shown in the heading of this letter can access your tax information and help get you answers. You also have the right to contact the Taxpayer Advocate. You can call 1-800-829-1040 and ask for Taxpayer Advocate Assistance. Or you can contact the Taxpayer Advocate for the IRS Office that issued this Notice of Deficiency by calling 801-620-7168, or writing to, PO BOX 9941, STOP 1005, OGDEN UT 84409.

Taxpayer Advocate assistance is not a substitute for established IRS procedures such as the formal appeals process. The Taxpayer Advocate is not able to reverse legally correct tax determinations, nor extend the time fixed by law that you have to file a petition in the United States Tax Court. The Taxpayer Advocate can, however, see that a tax matter that may not have been resolved through normal channels gets prompt and proper handling.

Thank you for your cooperation.

Sincerely yours,

Commissioner

By



Director,
Return Integrity Verification Operations

Enclosures:

Copy of this letter

Waiver

Envelope

Instructions for Form 5564

Note:

If you consent to the assessment of the deficiencies shown in this waiver, please sign and return this form to limit the interest charge and expedite our bill to you. Please do not sign and return any prior notices you may have received. Your consent signature is required on this waiver, even if fully paid.

Your consent will not prevent you from filing a claim for refund (after you have paid the tax) if you later believe you are so entitled; nor prevent us from later determining, if necessary, that you owe additional tax; nor extend the time provided by law for either action.

If you later file a claim and the Service disallows it, you may file suit for refund in a District Court or in the United States Claims Court, but you may not file a petition with the United States Tax Court.

Who must Sign:

If you filed jointly, both you and your spouse must sign. Your attorney or agent may sign this waiver provided that action is specifically authorized by a power of attorney which, if not previously filed, must accompany this form.

If this waiver is signed by a person acting in a fiduciary capacity (for example, an executor, administrator, or a trustee), Form 56, Notice Concerning Fiduciary Relationship, should, unless previously filed, accompany this form.

Optional Paragraphs:

A check in the block to the left of a paragraph below indicates that the paragraph applies to your situation.

- The amount shown as the deficiency may not be billed, since all or part of the refund due has been held to offset all or a portion of the amount of the deficiency. The amount that will be billed, if any, is shown on the attached examination report.
- The amount shown as a deficiency may not be billed, since the refund due will be reduced by the amount of the deficiency. The net refund due is shown on the attached examination report.

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Form **4549**
(December 2020)

Department of the Treasury-Internal Revenue Service

Report of Income Tax Examination Changes

Name and address of taxpayer		Taxpayer identification number	Return form number	
[REDACTED]		[REDACTED]	1040	
		Person with whom examination changes were discussed.	Name and title	
			[REDACTED]	
		Period Ended	Period Ended	Period Ended
		12/31/2021		
1. Adjustments to income				
a. Other Income		170,414.00		
b.				
c.				
d.				
e.				
f.				
g.				
h.				
i.				
j.				
k.				
l.				
m.				
n.				
o.				
p.				
2. Total adjustments		170,414.00		
3. Taxable income per return or as previously adjusted		(25,008.00)		
4. Corrected taxable income		145,406.00		
Tax method		TAX RATE		
Filing status		Joint		
5. Tax		23,486.00		
6. Additional taxes/Alternative minimum tax				
7. Corrected tax liability		23,486.00		
8. Less				
a. Nonrefundable CTC/ODC		1,000.00		
credits b.				
c.				
d.				
9. Balance (line 7 less lines 8a through 8d)		22,486.00		
10. Plus				
other a.				
taxes b.				
c.				
d.				
11. Total corrected tax liability (line 9 plus lines 10a through 10d)		22,486.00		
12. Total tax shown on return or as previously adjusted		0.00		
13. Adjustments to:				
a.				
b.				
c. Addnl Child Tax Credit		(400.00)		
14. Deficiency-Increase in tax or (overassessment-decrease in tax) (line 11 less line 12 adjusted by lines 13a through 13c)		22,886.00		
15. Adjustments to prepayment credits - increase (decrease) See Attached		4,200.00		
16. Balance due or (overpayment) - (line 14 adjusted by line 15) (excluding interest and penalties)		18,686.00		

The Internal Revenue Service has agreements with state tax agencies under which information about federal tax, including increases or decreases, is exchanged with the states. If this change affects the amount of your state income tax, you should amend your state return by filing the necessary forms.

You may be subject to backup withholding if you underreport your interest, dividend, or patronage dividend income you earned and do not pay the required tax. The IRS may order backup withholding (withholding of a percentage of your dividend and/or interest payments) if the tax remains unpaid after it has been assessed and four notices have been issued to you over a 120-day period.

Name of taxpayer [REDACTED]	Taxpayer identification number [REDACTED]	Return form number 1040	
17. Penalties, additions to tax, and additional amounts – IRC sections	Period Ended 12/31/2021	Period Ended	Period Ended
a. Delq-IRC 6651 (a) (2)	450.56		
b. Delq-IRC 6651 (a) (1)	460.80		
c. Accuracy-IRC 6662	3,737.20		
d.			
e.			
f.			
g.			
h.			
i.			
j.			
k.			
l.			
m.			
n.			
18. Total penalties, additions to tax, and additional amounts	4,648.56		
19. Summary of taxes, penalties and interest			
a. Balance due or (overpayment) taxes - (line 16, page 1)	18,686.00		
b. Penalties and additions (line 18) - computed to 11/26/2025	4,648.56		
c. Interest** (IRC § 6601) - estimated and computed to 12/26/2025	6,721.77		
d. Amount due or (refund) - (sum of lines a, b, and c)	30,056.33		

**Interest, as provided by law, will be charged on any unpaid amount until it is paid in full.

Other information

Examiner's signature TAX EXAMINER	Employee ID [REDACTED]	Office [REDACTED]	Date 11/26/2025
--------------------------------------	---------------------------	----------------------	--------------------

Consent to Assessment and Collection- I do not wish to exercise my appeal rights with the Internal Revenue Service or to contest in the United States Tax Court the findings in this report. Therefore, I give my consent to the immediate assessment and collection of any increase in tax and penalties, and accept any decrease in tax and penalties shown above, plus additional interest as provided by law. It is understood that this report is subject to acceptance by the Area Director, Area Manager, Specialty Tax Program Chief, or Director of Field Operations.

Note: If a joint return was filed, BOTH taxpayers must sign.

Signature of taxpayer	Date	Signature of taxpayer	Date
By	Title		Date

Form 886-A (May 2017)	Department of the Treasury - Internal Revenue Service Explanation of Items	Schedule number or exhibit
Name of taxpayer [REDACTED]	Tax Identification Number (last 4 digits) [REDACTED]	Year/Period ended

Adjustment(s) to Prepayment Credit(s) Subject to Deficiency (Form 4549 series Line 13a or Form 5278 Line 20a): 2021

Total Adjustment Amount:

Adjustment(s) to Prepayment Credit(s) Not Subject to Deficiency (Form 4549 series Line 15 or Form 5278 Line 22): 2021

Frozen refunds 4,200.00

Total Adjustment Amount: 4,200.00

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Name of Taxpayer:
Identification Number:

[REDACTED]
[REDACTED] Total

11/26/2025
26.20.00

2021 - Child Tax Credit and Credit for Other Dependents

A. Number of qualifying children under age 18	1
B. Number of qualifying children under age 6	0
C. Number of qualifying children over age 5	1
D. Number of other dependents	0
1. Modified AGI	170,506.00
2. Amount of credit based on qualifying children (amount from line 12 of Line 2 Worksheet)	2,000.00
3. Amount of credit based on qualifying other dependents (multiply line D by \$500)	0.00
4. Total of line 2 and 3	2,000.00
5. Filing status amount (\$ 400,000 if married filing jointly; \$ 200,000 all other filing statuses)	400,000.00
6. Subtract line 5 from line 1 (if zero or less, enter -0-)	0.00
7. Multiply line 6 by .05	0.00
8. Subtract line 7 from line 4 (if zero or less, enter -0-)	2,000.00
<i>Nonrefundable: skip lines 9a through 9i and go to line 10a</i>	
9a. Smaller of line 3 or line 8	
9b. Subtract line 9a from line 8	
9c. If line 9a is zero, enter -0-, otherwise enter credit limit amount	
9d. Smaller of line 9a or line 9c	
9e. Add lines 9b and 9d	
9f. Amount of advance child tax credit payments received for current year	
9g. Subtract line 9f from line 9e (if zero or less, enter -0-)	
9h. Credit for other dependents. Smaller of line 9d or line 9g	
9i. Refundable child tax credit. Subtract line 9h from line 9g	
10a. Credit limit amount	23,486.00
10b. Smaller of line 8 or line 10a	2,000.00
10c. Additional child tax credit (amount from line 22 below)	0.00
10d. Add lines 10b and 10c	2,000.00
10e. Amount of advance child tax credit payments received for current year	1,000.00
10f. Subtract line 10e from line 10d (if zero or less, enter -0-)	1,000.00
10g. Nonrefundable child tax credit and credit for other dependents. Smaller of line 10b or line 10f	1,000.00
10h. Additional child tax credit. Subtract line 10g from line 10f	0.00

Line 2 Worksheet

1. Multiply line B from section above by \$ 3,600	0.00
2. Multiply line C from section above by \$ 3,000	3,000.00
3. Add lines 1 and 2	3,000.00
4. Multiply line A from section above by \$ 2,000	2,000.00
5. Subtract line 4 from line 3	1,000.00
6. Filing status amount (\$ 12,500 if married filing jointly; \$ 2,500 if qualifying widow(er); \$ 4,375 if head of household; \$ 6,250 for all other filing statuses)	12,500.00
7. Smaller of line 5 or line 6	1,000.00
8. Filing status amount (\$ 150,000 if married filing jointly or qualifying widow(er); \$ 112,500 if head of household; \$ 75,000 for all other filing statuses)	150,000.00
9. Subtract line 8 from line 1 of section above (if zero or less, enter -0-) (if more than zero, enter the next multiple of \$1,000)	21,000.00
10. Multiply line 9 by 5%	1,050.00
11. Smaller of line 7 or line 10	1,000.00
12. Subtract line 11 from line 3	2,000.00

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Name of Taxpayer:
Identification Number:

[REDACTED]
[REDACTED] Total

11/26/2025
26.20.00

Additional Child Tax Credit

- 11a. Subtract line 10b from line 8 (if zero or less, enter -0-)
- 11b. Amount of credit based on qualifying children under age 18
- 12. Smaller of line 11a or line 11b
- 13a. Earned income
- 13b. Nontaxable combat pay
- 14. If the amount on line 13a is more than , subtract from line 13a
(if line 13a is less than , then line 14 equals zero)
- 15. Multiply the amount on line 14 by
- 16. Total of withheld social security, Medicare, and Additional Medicare taxes
- 17. Deductible part of self-employment tax, plus FICA tax on tips and uncollected social security, Medicare, or RRTA taxes
- 18. Add lines 16 and 17
- 19. Earned income credit and excess social security and RRTA taxes withheld
- 20. Subtract line 19 from line 18 (if zero or less, enter -0-)
- 21. Larger of line 15 or line 20
- 22. Additional child tax credit. Smaller of line 12 or line 21

Additional Tax

- 23a. Amount from line 9f or line 10e 1,000.00
- 23b. Amount from line 9e or line 10d 2,000.00
- 24. Excess advance child tax credit payments. Subtract line 23b from line 23a 0.00
- 25a. Number of qualifying children for annual advance payment amount
- 25b. Number of qualifying children under age 18 for current year
- 26. Smaller of line 25a or line 25b
- 27. Subtract line 26 from line 25a
- 28. Filing status amount (if married filing joint or qualifying widow(er);
if head of household; all other filing statuses)
- 29. Subtract line 28 from line 1. If zero or less, enter -0-
- 30. Amount from line 28
- 31. Divide line 29 by line 30. If more than 1.000 enter 1.000
- 32. Multiply line 27 by
- 33. Multiply line 32 by line 31
- 34. Subtract line 33 from line 32
- 35. **Additional tax.** Subtract line 34 from line 24 (if zero or less, enter -0-)

Name of Taxpayer:
Identification Number:



Total

11/26/2025
26.20.00

EXPLANATION OF THE DELINQUENCY PENALTY

Since your income tax return was not filed within the time limit prescribed by law and/or the tax was not paid, and you have not shown that such failure was due to reasonable cause, an addition to the tax is charged as shown below, in accordance with Section 6651(a)(1) and/or Section 6651(a)(2) of the Internal Revenue Code.

2021 - DELINQUENCY PENALTY

1. Delinquency penalty abated		0.00
2. Date return due	04/18/2022	
3. Date return filed	03/01/2023	
4. Failure to File penalty rate	0.225	
5. Failure to Pay penalty rate	0.220	
6. Total corrected tax liability less Shared Responsibility Payment (SRP)		22,486.00
7. Allowable payments on or prior to due date of return		20,438.00
8. Net Amount Due (line 6 less line 7)		2,048.00
9. Failure to File Penalty - line 8 multiplied by line 4		460.80
10. Minimum penalty if over 60 days delinquent		435.00
11. Failure to File Penalty - Greater of line 9 or line 10		460.80
12. Previously assessed/previously agreed Failure to File Penalty		0.00
13. Net Failure to File Penalty - line 11 less line 12		460.80
14. Failure to Pay Penalty - line 8 multiplied by line 5		450.56
15. Previously assessed/previously agreed Failure to Pay Penalty		0.00
16. Net Failure to Pay Penalty - line 14 less line 15*		450.56
17. Total Delinquency Penalty - Sum of line 13 and 16		911.36

- If an amount appears as the Failure to Pay Penalty, the amount only reflects the addition to tax under Internal Revenue Code section 6651(a)(2) through the date of this notice. The addition to tax will continue to accrue from the due date of the return at a rate of 0.5 percent each month, or fraction thereof, of nonpayment, not exceeding 25 percent.

Accuracy-Related Penalties under IRC 6662

20 Percent Penalty -- Internal Revenue Code Section 6662(a)

It has been determined that the underpayment of tax shown on line 5 below is attributable to one or more of the following:

- (1) Negligence or disregard of rules or regulations;
- (2) Substantial understatement of income tax;
- (3) Substantial valuation misstatement (overstatement);
- (4) Transaction lacking economic substance.

Therefore, an addition to tax is imposed as provided by Section 6662(a) of the Internal Revenue Code.

1. Total underpayment, excluding underpayment attributable to Section 6662A and/or Section 6676 penalty issues, if any	18,686.00
2. Less: Underpayment attributable to non-penalty issues	0.00
3. Less: Underpayment attributable to 40% Section 6662 penalty issues	0.00
4. Less: Underpayment attributable to civil fraud penalty issues	0.00
5. Underpayment to which Section 6662(a) applies (Line 1 less the sum of lines 2, 3, and 4)	18,686.00
6. Applicable penalty rate	20.00%
7. Section 6662(a) accuracy-related penalty (Line 5 times line 6)	3,737.20
8. Less: Previously assessed/previously agreed Section 6662(a) penalty	0.00
9. Total section 6662(a) accuracy-related penalty (Line 7 less line 8)	<u>3,737.20</u>

40 Percent Penalty -- Internal Revenue Code Section 6662(h); 6662(i); 6662(j)

It has been determined that the underpayment of tax shown on line 5 below is attributable to one or more of the following:

- (1) Gross valuation misstatement (overstatement);
- (2) Non-disclosed transaction lacking economic substance;
- (3) Undisclosed foreign financial assets.

Therefore, an addition to tax is imposed as provided by Section 6662(h); 6662(i); or 6662(j) of the Internal Revenue Code.

1. Total underpayment, excluding underpayment attributable to Section 6662A and/or Section 6676 penalty issues, if any	18,686.00
2. Less: Underpayment attributable to non-penalty issues	0.00
3. Less: Underpayment attributable to 20% Section 6662 penalty issues	18,686.00
4. Less: Underpayment attributable to civil fraud penalty issues	0.00
5. Underpayment to which 40% Section 6662 penalty applies (Line 1 less the sum of lines 2, 3, and 4)	0.00
6. Applicable penalty rate	40.00%
7. 40% Section 6662 accuracy-related penalty (Line 5 times line 6)	0.00
8. Less: Previously assessed/previously agreed 40% Section 6662 penalty	0.00
9. Total 40% section 6662 accuracy-related penalty (Line 7 less line 8)	<u>0.00</u>

Name of Taxpayer:
Identification Number:



Total

11/26/2025
26.20.00

HOW TO PAY YOUR TAXES

If you agree with the adjustments and balance due on Form 4549 – Income Tax Changes, please return a signed copy including pages 1 and 2. The enclosed report does not reflect any balance currently due on your account.

You have payment options for your tax liability. Please note that interest and applicable penalties will accrue until your balance is paid in full. Paying now will decrease or stop future interest charges and prevent assessment of failure to pay penalties.

Payment options include the following:

- Pay now by including a check or money order payable to the United States Treasury with your signed copy of Form 4549.
- Download the IRS2Go Mobile App and make a payment whenever you like from your mobile device. (Processing fees may apply.)
- If you can pay the full amount within 120 days, return the signed agreement now and submit the balance due when you receive the bill.

Additional payment options are available by visiting www.irs.gov/payments:

- Apply for a payment plan. (Fees may apply.) You may also apply by completing the section below, "Payment Plan Request."
- Pay online via a checking/savings account.
- Locate retail partners for cash payments. (Processing fees apply.)
- Pay by credit card. (Processing fees apply.)

Payment Plan Request

Submit your written request or check the box below and return this flyer with your signed agreement.

I would like to pay \$ _____ per month. (Make your payments as large as possible to limit penalty and interest.)

I would like my payment to be due on the ____ of the month. (Please indicate a date between the 1st and 28th of the month.)

You will be charged a fee if your request is approved. DO NOT include the fee with this flyer. We will send you a bill for the fee when we approve your request.

Please provide a telephone number where we can contact you regarding your request.

Home: () _____

Work: () _____

Name Of Taxpayer: [REDACTED]
Identification Number [REDACTED] Total

11/26/2025
26.20.00

2021 TAX YEAR INTEREST COMPUTATION

Interest computed to		12/26/2025
Total Tax Deficiency		\$18,686.00
Plus Penalties*		
Failure to File - IRC 6651	\$460.80	
Accuracy Related Penalty - IRC 6662	\$3,737.20	
Accuracy Related Penalty - IRC 6662A	\$.00	
Civil Fraud - IRC 6663	\$.00	
Manually Computed Penalty	\$.00	
Total Penalties Subject to Interest		\$4,198.00
Tax Deficiency and Penalties Subject to Interest		\$22,884.00

Type	Effective Dates	Days	Rate	Interest
Compound	04/15/2022--06/30/2022	76	4%	\$189.99
Compound	07/01/2022--09/30/2022	92	5%	\$292.62
Compound	10/01/2022--12/31/2022	92	6%	\$356.04
Compound	01/01/2023--09/30/2023	273	7%	\$1,274.99
Compound	10/01/2023--12/31/2023	92	8%	\$509.12
Compound	01/01/2024--12/31/2024	366	8%	\$2,124.14
Compound	01/01/2025--12/26/2025	360	7%	\$1,974.87

Total Interest \$6,721.77

Interest on penalties is computed from the due date of the return (including extensions) until the date of payment. The interest shown on this report is estimated. Interest is computed from the due date of the return (including extensions) and will continue to accrue until the date paid in full. Interest on the failure to pay penalty is computed from the date of assessment and is therefore not considered in this report.

Explanation of Items

Name of taxpayer	Tax Identification Number (last 4 digits)	Year/Period ended
[REDACTED]	[REDACTED]	2021

Frozen Refund

Tax Period	Per Return	Per Exam	Adjustment
2021	(\$4,200.00)	\$0.00	\$4,200.00

A portion or all of your overpayment is being withheld pending the outcome of this examination. If at the conclusion of the examination a deficiency in tax is determined, the overpayment will be applied to the tax deficiency. If the overpayment is less than the deficiency in tax, you will be sent a separate bill for the balance due, including any applicable interest and penalties. Any remaining overpayment will be refunded to you if there are no other taxes or other outstanding legally enforceable debts owed.

Other Income

Tax Period	Per Return	Per Exam	Adjustment
2021	(\$170,414.00)	\$0.00	\$170,414.00

We recently received your original return for the tax year shown above and are processing your return. However, due to questionable issues and/or omissions of income, we are proposing to adjust the tax return you filed as shown in this report.