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January 23, 2024



RE: Request for Revision In the Matter of Docket No.: 19-523

You requested a revision of the administrative decision dated May 4, 2020. You timely filed the request. You allege specific errors of fact or law made by the hearing officer, but the points of error you allege simply repeat the arguments made to the hearing officer. The Taxpayer did not meet its burden of proving that certain natural-gas-related costs were deductible marketing costs.

Upon review of the revision request letter, the administrative decision, and the documentation contained in the file, I am sustaining the administrative decision in full. This concludes the Taxpayer's administrative remedies under the Arkansas Tax Procedure Act. The Taxpayer may seek relief from this decision according to the procedure set forth in Ark. Code Ann. § 26-18-406.

Sincerely,

Charles S. Collins Commissioner of Revenue