

**Commissioner of Revenue** 

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December 28, 2023



RE: Request for Revision

In the Matter of

Docket Nos.: 22-146, 22-147, 22-148, 22-149, 22-150, and 22-151



You requested a revision of the administrative decision dated February 8, 2022. 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 essentially repeat the arguments made to the hearing officer.

In your request for revision, you allege that your client was denied due process. The Taxpayer filed a protest of a Notice of Proposed Assessment and requested an administrative hearing in Little Rock. An administrative hearing was held on January 13, 2022 in Little Rock in accordance with the Arkansas Tax Procedure Act. There is no evidence to support this allegation.

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