

OFFICE OF THE CHIEF COUNSEL

DEPARTMENT OF THE TREASURY

INTERNAL REVENUE SERVICE OFFICE OF DIVISION COUNSEL SMALL BUSINESS/SELF-EMPLOYED 24000 AVILA ROAD, SUITE 4404 MAIL STOP 8800 LAGUNA NIQUEL, CA 92677 (949) 360-2681 FAX: (949) 360-2675

<u>Via Facsimile</u>

Pedram Ben-Cohen, Esq. Ben-Cohen Law Firm 1801 Avenue of the Stars, Suite 1025 Los Angeles, California 90067-5809

Re:

Dear Mr. Ben-Cohen:

This letter concerns your client **Sectors** request for relief from joint and several liability under I.R.C. § 6015. As you are well aware, case number 16829-10 is set for trial on the Tax Court's September 12, 2011, calendar, and cases 9258-10S and 20554-10S are set for trial on the Court's October 17, 2011, calendar. I am writing you to inform you that the IRS has granted **Sectors** relief from joint and several liability, in full, under I.R.C. § 6015(c). Regarding your question whether the Tax Court has jurisdiction over any challenge **Sectors** may raise to the IRS's granting of innocent spouse relief to your client, please see *Corson v. Commissioner*, 114 T.C. No. 24 (2000).

Please call me at **Sincerely**, By: