

Taxpayer Name: **GRA**, LAWRENCE G &
LORNA % AMERICAN
EXPRESS TBS INC

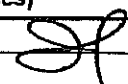
E. min. Feld, Stephen I.

TIN: XXXXXXXXXX 4781

Tax Form: 1040

Date:

Penalty Approval Form

IRC	Penalty	IRM	Assert Penalty		Reference (Section 500)
			Yes	No	
6651(a)(1)	Failure to File	20.1.2.3			
6651(a)(2)	Failure to Pay	20.1.2.4			
6651(f)	Fraudulent Failure To File, Civil	20.1.2.7			
6654	Estimated Tax – Individual	20.1.3.1.1			
6655	Estimated Tax – Corporate	20.1.3.5			
6662(b)(1)	Negligence	20.1.5.7			
6662(b)(2)	Substantial Understatement	20.1.5.8			
6662(b)	Other Accuracy Related	20.1.5.1			
6662(h)	Gross Valuation Misstatement	20.1.5.9	X		
6662A	Accuracy Related Penalty on Understatements with Respect to Reportable Transactions (RT)	New			
6663	Fraud	20.1.5.12			
6707A	Failure to Include RT Information with Return or Statement	New			
6717	Refusal of Entry	New			
6718	Failure to Display Registration	New			
6719	Failure to Register	New			
6725	Failure to Report Information under Section 4101	New			
Other			Assert Penalty		Reference
			Yes	No	(Section 500)
	Alternative Penalty Position	20.1.5.12.2			
	Abatement of Assessed Penalties	20.1.1.3			
Preparer / Promoter / Material Advisor			Consider Penalty		Reference
			Yes	No	(Section 500)
6694(a)	Preparer Penalties - Negligent	20.1.6.3.5			
6694(b)	Preparer Penalties - Willful	20.1.6.3.5			
6700	Promoting Abusive Tax Shelters	20.1.6.1			
6701	Aiding & Abetting understatement of Tax Liability	20.1.6.1			
6707	Failure to Furnish Information regarding RT	20.10			
6708	Failure to Maintain Lists of Advisees with respect to RT (Formerly Failure to Maintain Lists of Investors in Potentially Abusive Tax Shelters)	20.10			
Reason(s) for Assertions/Non-Assertions of Penalty(s): No approval required on non-assertion cases					
<input type="checkbox"/> No Change or Refund Case					
Group Manager Involvement: (Not Required on Automatic Penalties or Non-Assertion Cases)					
<input checked="" type="checkbox"/> Approved		Group Manager Initials:			
<input type="checkbox"/> Disapproved		Date:			

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Comments: