



DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224
July 16, 1999

OFFICE OF
CHIEF COUNSEL

Number: **199943004**

Release Date: 10/29/1999

CC:EL:GL:Br3

GL-704489-99

UILC: 75.04.06-00
9999.98-00

MEMORANDUM FOR REID M. HUEY
DISTRICT COUNSEL,

FROM: Lawrence H. Schattner
Chief, Branch 3 (General Litigation)

SUBJECT:

This responds to your memorandum dated July 1, 1999. This document is not to be cited as precedent.

Issue

Whether the Department of Justice should be requested to file a petition to enforce the administrative summons served on the taxpayer?

Conclusion

[REDACTED]

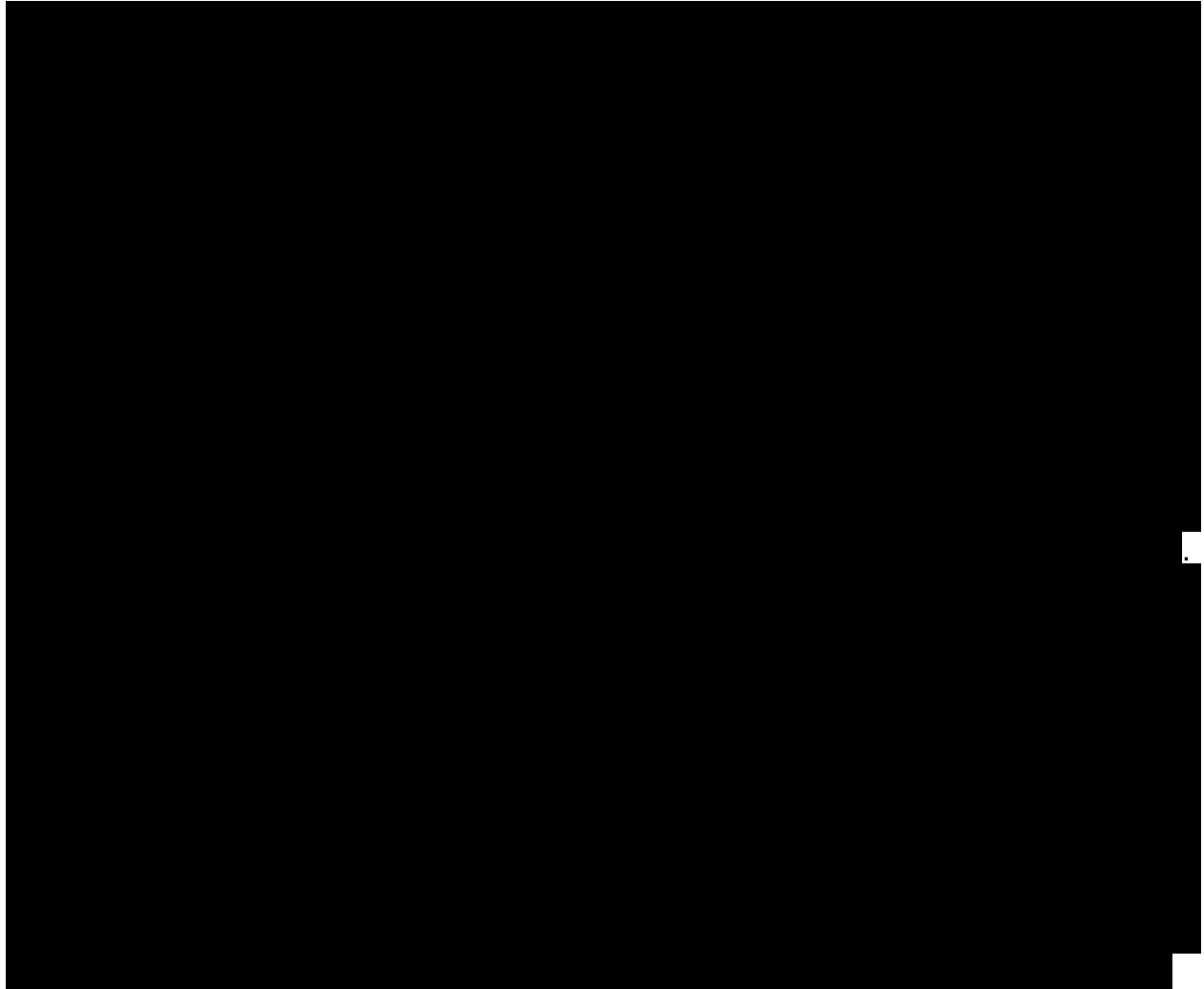
Facts

[REDACTED]

[REDACTED]

Case Development

[REDACTED]



If you have any questions, please call (202) 622-3630.

Attachments:

As stated

cc: Assistant Regional Counsel (GL), Midstates Region