

10/26/15 San Diego  
Marvel  
ORIGINAL

24

UNITED STATES TAX COURT

██████████ &	)	
██████████,	)	
	)	
Petitioners,	)	
	)	
v.	)	Docket No. ██████████
	)	
COMMISSIONER OF INTERNAL REVENUE,	)	
	)	
Respondent.	)	

DECISION

Pursuant to the stipulation of the parties in this case, and incorporating herein the facts stipulated by the parties as the findings of the Court, it is

ORDERED AND DECIDED: That there is **no deficiency in income tax due** from petitioners for the taxable year 2010 and that there is an overpayment in income tax for the taxable year 2010 in the amount of **\$147.00**, which amount was paid on April 15, 2011, and for which amount a claim for refund could have been filed, under the provisions of I.R.C. § 6511(b)(2), on February 7, 2014, the date of the mailing of the notice of deficiency.

(Signed) Michael B. Thornton  
Chief Judge

Entered: JUL 31 2015

\* \* \* \* \*

It is hereby stipulated that the Court may enter the foregoing decision in this case in accordance with the stipulation of the parties submitted herewith.

SERVED JUL 31 2015

Name and Address of Taxpayer [Redacted], Suite [Redacted] Poway CA 92064-6895	Taxpayer Identification Number [Redacted]	Return Form No.: 1040
Person with whom examination changes were discussed.		Name and Title:

	Period End 12/31/2010	Period End	Period End
<b>1. Adjustments to Income</b>			
a. Other Income	2,058,969.00		
b.			
c.			
d.			
e.			
f.			
g.			
h.			
i.			
j.			
k.			
l.			
m.			
n.			
o.			
p.			
<b>2. Total Adjustments</b>	2,058,969.00		
<b>3. Taxable Income Per Return or as Previously Adjusted</b>	(193,256.00)		
<b>4. Corrected Taxable Income</b>	1,865,713.00		
Tax Method	SCHEDULE D		
Filing Status	Joint		
<b>5. Tax</b>	623,053.00		
<b>6. Additional Taxes / Alternative Minimum</b>			
<b>7. Corrected Tax Liability</b>	623,053.00		
<b>8. Less</b>			
a. Credits			
b.			
c.			
d.			
<b>9. Balance (Line 7 less total of Lines 8a thru 8d)</b>	623,053.00		
<b>10. Plus</b>			
a. Other Taxes			
b.			
c.			
d.			
<b>11. Total Corrected Tax Liability (Line 9 plus Lines 10a thru 10d)</b>	623,053.00		
<b>12. Total Tax Shown on Return or as Previously Adjusted</b>	0.00		
<b>13. Adjustments to:</b>			
a.			
b.			
c.			
<b>14. Deficiency-Increase in Tax or (Overassessment - Decrease in Tax) (Line 11 less Line 12 adjusted by Lines 13a through 13c)</b>	623,053.00		
<b>15. Adjustments to Prepayment Credits-Increase (Decrease)</b>			
<b>16. Balance Due or (Overpayment) - (Line 14 adjusted by Line 15) (Excluding interest and penalties)</b>	623,053.00		