STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DIVISION OF TAXATION

ADMINISTRATIVE HEARING

FINAL DECISION AND ORDER

#2018-07

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF REVENUE
DIVISION OF TAXATION
ONE CAPITOL HILL
PROVIDENCE, RHODE ISLAND 02908

IN THE MATTER OF:	:	**Case No.: 18-T-023**
	:	**Personal Income Tax**
Taxpayer.	:	

DECISION

I. INTRODUCTION

The above-entitled matter came before the undersigned as the result of a Notice of Hearing and Appointment of Hearing Officer dated March 27, 2018 and issued to the above-captioned taxpayers ("Taxpayers") by the Division of Taxation ("Division") in response to a request for hearing. A hearing was held on May 14, 2018. The Division and Taxpayers were represented by counsel. A briefing schedule was set with briefs being timely filed by May 31, 2018.

II. JURISDICTION

The Division has jurisdiction over this matter pursuant to R.I. Gen. Laws § 44-30-1 *et seq.*, R.I. Gen. Laws § 44-1-1 *et seq.*, the *Division of Taxation Administrative Hearing Procedures Regulation AHP 97-01*, and the *Division of Legal Services Regulation 1 Rules of Procedure for Administrative Hearings*.

III. ISSUE

The parties agreed to the following issue: whether the Division properly disallowed Taxpayers alleged net operating loss deduction in 2016 arising from certain Rhode Island sources.

IV. MATERIAL FACTS AND TESTIMONY

The parties entered into a partially agreed statement of facts as follows:[1]

1. The Taxpayers are residents of Florida dating back to at least 2005, with several businesses and sources of income, both in and outside of Rhode Island.

2. The Taxpayers claimed a decreasing modification on 2016 RI Schedule II, which it believes represents its net operating loss. Division's Exhibit One (1). The Division takes the position that, in order to claim the net operating loss deduction, it must be put on line 21 of the federal return.

3. The period covered by this audit is January 1, 2016 through December 31, 2016, and pertains mostly to an alleged net operating loss generated from two (2) businesses, both of which are RI sourced income.

4. On November 2, 2017, the Division issued a Notice of Deficiency due to the Division by December 2, 2017. On November 13, 2017, the Taxpayers appealed the Notice of Deficiency and requested more information about the deficiency determination. A Notice of Assessment was sent on December 7, 2017 informing the Taxpayers that payment was due by January 6, 2018 as this matter was not resolved within the initial time frame. In response, the Taxpayers requested that this matter go to administrative hearing. Division's Exhibits Two (2) (Notice of Deficiency; Three (3); and Four (4) (Notice of Assessment).

5. Prior to the preliminary hearing, a Division employee discussed a passthrough withholding of $ dollars. During the initial audit, a Division auditor allowed the $ credit and it was explained to counsel for the Taxpayers that this was in error, as there was no passthrough withholding account and the Taxpayers were allegedly operating at a loss. Counsel for the Taxpayer agreed. As such, the passthrough withholding credit was not proper.[2]

6. The Division was provided with three (3) years of the Taxpayers' returns – 2005, 2008, and 2016. The 2005 return properly listed a net operating loss on line 21 of the federal return, and so the Division did not question the validity of the deduction. Division's Exhibits Five (5) and Six (6). Again in 2008, the Taxpayers properly listed the net operating loss on line 21 on the federal return, and again the Division did not question it. Division's Exhibits Seven (7) and Eight (8). Finally, the Division has the 2016 returns. On the 2016 federal return, the Taxpayers listed a zero-dollar amount on line 21. This is the first return that the Division was aware of where the Taxpayers did this. Division's Exhibits One (1) and Nine (9). As a result, this is the first time the Division pursued the Taxpayers regarding the net operating loss.

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[1] See the parties' partially agreed statement of facts in which the parties also agreed to the issue in this matter.

[2] The parties also agreed to a second issue: whether the Taxpayers were properly allowed to claim a passthrough withholding for tax year 2016. However, the parties agreed in this stipulated fact that the passthrough credit was improperly allowed. Therefore, there is no reason to address this issue in the decision.

Principal Revenue Agent, testified on behalf of the Division. He testified that a net operating loss ("NOL") is a business and accounting term where business expenses and deductions are greater than the business income. He testified that business income can pass through to the individual's federal 1040 return and State return using a passthrough entity. He testified that Rhode Island accepts the federal income tax return and the NOL will pass from the business entity into the individual's federal 1040 and the NOL is a line item on the federal 1040 return. He testified that the NOL will be applied against other income on the federal 1040 and then will flow into the federal adjusted gross income (line 37 on the federal return). He testified that federal adjusted gross income is a starting point for Rhode Island income tax so Rhode Island will accept a NOL as long as it is on the federal return. He testified that the Notice of Deficiency was a result of the Taxpayers' 2016 NOL claim being disallowed on the Rhode Island return because it was listed as a decrease in modification on the Rhode Island income tax allocation form. He testified that for Rhode Island purposes, modifications can be an increase of decrease in federal adjusted gross income. He testified that a NOL goes on line 21 of federal return and for 2016, there was no NOL listed on line 21 of the Taxpayers' return so there was no NOL for the federal return. He testified that if there is a NOL on the federal return, Rhode Island would accept the NOL as part of a taxpayer's federal adjusted gross income. He testified that there is no way to claim a NOL on the Rhode Island return because a NOL is part of the federal adjusted gross income which is the starting point for Rhode Island purposes. He testified that a modification cannot be a NOL. He testified that there is no difference on how a resident or non-resident can claim a NOL on his or her federal return.

testified that the Taxpayers had previously put a NOL on their federal returns. He testified that for 2005, the Taxpayers included a NOL on line 21 of their federal return in schedule

E. He testified that line 37 shows the federal adjusted gross income and that is what was used for the Taxpayers' Rhode Island income. He testified that in 2008, the Taxpayers again included a NOL on their federal return. See Division's Exhibits Five (5) (2005 federal return); Six (6) (2006 Rhode Island return); Seven (7) (2008 federal return); and Eight (2008 Rhode Island return). He testified that since the NOL was included in the federal adjusted gross income for 2005 and 2008 then it was the starting point for Rhode Island's income tax.

testified that on the Rhode Island non-resident allocated schedule for 2016, the Taxpayers included in their calculations the NOL as a modification (lines 10, 11, 12). He testified that the NOL is not allowed as a Rhode Island modification. See Division's Exhibit One (1) (Taxpayers non-resident calculations for Rhode Island). He testified in 2016, the Taxpayers did not include a NOL on their federal return (no entry on line 21). See Division's Exhibit Nine (9) (2016 federal return). He testified that R.I. Gen. Laws § 44-30-87(i) allows the NOL pursuant to 26 U.S.C. § 172. He testified that 26 U.S.C. § 172(c) defines NOL under federal law and under § 172(c) and (d) modifications are not included.

On cross examination, testified that there is no line to put a NOL on the Rhode Island return, because it needs to be on the federal return. He testified that Rhode Island residents and non-residents all start from federal adjusted gross income and the allocated income schedule divides up income from Rhode Island sourced income and federal income so one can obtain a percentage of income derived from Rhode Island sources to allocate Rhode Island taxes owed. He testified that R.I. Gen. § 44-30-12 sets forth what increasing or decreasing modifications are allowed under Rhode Island and would be set forth in Schedule M.

V. DISCUSSION

A. Legislative Intent

The Rhode Island Supreme Court has consistently held that it effectuates legislative intent by examining a statute in its entirety and giving words their plain and ordinary meaning. *In re Falstaff Brewing Corp.*, 637 A.2d 1047 (R.I. 1994). If a statute is clear and unambiguous, "the Court must interpret the statute literally and must give the words of the statute their plain and ordinary meanings." *Oliveira v. Lombardi*, 794 A.2d 453 (R.I. 2002) (citation omitted). The Supreme Court has also established that it will not interpret legislative enactments in a manner that renders them nugatory or that would produce an unreasonable result. See *Defenders of Animals v. Dept. of Environmental Management,* 553 A.2d 541 (R.I. 1989) (citation omitted). In cases where a statute may contain ambiguous language, the Rhode Island Supreme Court has consistently held that the legislative intent must be considered. *Providence Journal Co. v. Rodgers*, 711 A.2d 1131 (R.I. 1998).

B. Relevant Statutes and Regulation[3]

R.I. Gen. Laws § 44-30-87.1 provides as follows:

> Net operating loss – Limitation. A net operating loss deduction shall be allowed which shall be the same as the net operating loss deduction allowed under § 172 of the Internal Revenue Code, 26 U.S.C. § 172, except that: (1) any net operating loss included in determining the deduction shall be adjusted to reflect the modifications increasing and decreasing adjusted gross income required by §§ 44-30-12 and 44-30-32; (2) the deduction shall not include any net operating loss sustained during any taxable year beginning in which the taxpayer was not subject to the tax imposed by this chapter; and (3) the deduction shall not exceed the deduction for the taxable year allowable under § 172 of the Internal Revenue Code, 26 U.S.C. § 172; provided, notwithstanding any other provision of law, the deduction for a taxable year may not be carried back to any other taxable year for Rhode Island purposes but shall only be allowable on a carry forward basis for the number of succeeding taxable years allowed under § 172 of the Internal Revenue Code, 26 U.S.C. § 172.

[3] The parties agreed that the statutes directly at issue include R. I. Gen. Laws § 44-30-8, R. I. Gen. Laws § 44-30-12, R. I. Gen. Laws § 44-30-32, R. I. Gen. Laws § 44-30-87.1, and 26 U.S.C. § 172. The relevant regulation is PIT 03-22 *Net Operating Loss Limitation* and its predecessors.

R.I. Gen. Laws § 44-30-12 provides in part as follows:

> Rhode Island income of a resident individual. *(a) General.* The Rhode Island income of a resident individual means his or her adjusted gross income for federal income tax purposes, with the modifications specified in this section.
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> *(c) Modifications reducing federal adjusted gross income.* There shall be subtracted from federal adjusted gross income:
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> (1) Any interest income on obligations of the United States and its possessions to the extent includible in gross income for federal income tax purposes, and any interest or dividend income on obligations, or securities of any authority, commission, or instrumentality of the United States to the extent includible in gross income for federal income tax purposes but exempt from state income taxes under the laws of the United States; ***
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> (2) A modification described in § 44-30-25(f) or § 44-30-1.1(c)(1);
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> (3) The amount of any withdrawal or distribution from the "tuition savings program" referred to in § 16-57-6.1 which is included in federal adjusted gross income, other than a withdrawal or distribution or portion of a withdrawal or distribution that is a nonqualified withdrawal;
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> (4) Contributions made to an account under the tuition savings program, including the "contributions carryover" pursuant to paragraph (iv) of this subdivision, if any, subject to the following limitations, restrictions and qualifications:
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> ***
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> (5) The modification described in § 44-30-25.1(d)(1).
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> (6) Amounts deemed taxable income to the taxpayer due to payment or provision of insurance benefits to a dependent, including a domestic partner pursuant to chapter 12 of title 36 or other coverage plan.
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> (7) Modification for organ transplantation.
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> (8) Modification for taxable Social Security income.
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> ***
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> (9) Modification for up to fifteen thousand dollars ($15,000) of taxable retirement income from certain pension plans or annuities.

The Personal Income Taxation regulation, PIT 03-22 *Net Operating Loss Limitation* ("PIT 03-22"), repeats the statutory provisions and then provides three (3) examples of how the statute will be applied as follows:

> (1) Any net operating loss included in determining such deduction shall be adjusted to reflect the modifications increasing and decreasing adjusted gross income as required by sections 44-30-12 and 44-30-32. Examples of the modifications would be interest on US government obligations taxable on the federal level but exempt from

state taxation or interest on non Rhode Island municipal bonds exempt from federal taxation but taxable on the state level.

(2) A loss sustained in a year prior to becoming a Rhode Island resident and being carried forward for federal purposes will not be allowed for Rhode Island purposes. An example of this limitation would be an instance where a Massachusetts resident sustains a net operating loss, which is carried forward for federal purposes and in a subsequent year, changes his residence to Rhode Island. Such a loss would not be allowed for Rhode Island purposes.

(3) A net operating loss deduction, for Rhode Island purposes, cannot exceed the deduction for the taxable year allowable under section 172 of the Internal Revenue Code [26 U.S.C.], provided, however, notwithstanding any other provision of law such deduction for a taxable year may not be carried back to any other taxable year for Rhode Island purposes. An example of this limitation would be an instance where a Rhode Island resident sustains a net operating loss and for federal purposes the allowable deduction is utilized in full by being carried back to a prior year. For Rhode Island purposes, no deduction is allowed for net loss carry back. Further, since the Rhode Island net operating loss deduction cannot exceed the federal net operating loss carry forward in this instance, there is no Rhode Island net operating loss carry forward allowed in subsequent years.

26 U.S.C. § 172 provides in part as follows:

(a) Deduction allowed. There shall be allowed as a deduction for the taxable year an amount equal to the lesser of--

(1) the aggregate of the net operating loss carryovers to such year, plus the net operating loss carrybacks to such year, or

(2) 80 percent of taxable income computed without regard to the deduction allowable under this section.

For purposes of this subtitle, the term "net operating loss deduction" means the deduction allowed by this subsection.

(b) Net operating loss carrybacks and carryovers.

(1) Years to which loss may be carried.

(A) General rule. Except as otherwise provided in this paragraph, a net operating loss for any taxable year--

(i) except as otherwise provided in this paragraph, shall not be a net operating loss carryback to any taxable year preceding the taxable year of such loss, and

(ii) shall be a net operating loss carryover to each taxable year following the taxable year of the loss.

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(c) Net operating loss defined. For purposes of this section, the term "net operating loss" means the excess of the deductions allowed by this chapter [26 USCS §§ 1 et seq.] over the gross income. Such excess shall be computed with the modifications specified in subsection (d).

(d) Modifications. The modifications referred to in this section are as follows:

(1) Net operating loss deduction. No net operating loss deduction shall be allowed.

C. Arguments

The Division argued that pursuant to R.I. Gen. Laws § 44-30-87(i), a net operating loss is only allowed when it is allowed under 26 U.S.C. § 172. The Division argued that a NOL was not allowed by federal law for the Taxpayers (since the Taxpayers had used already used it on prior federal returns and now wanted to use the Rhode Island portion again in Rhode Island) so cannot be used in Rhode Island under the statute. The Division argued that the Taxpayers tried to claim a modification which is not a NOL under federal law and is not allowed under Rhode Island law. The Division also argued that residents and non-residents are treated the same.

The Taxpayers argued that it is unfair for the Taxpayers not to be able to claim a NOL in Rhode Island for Rhode Island sources losses. The Taxpayers argued that Rhode Island is treating non-residents differently which is unconstitutional. The Taxpayers relied on a hypothetical about a taxpayer selling a business for one (1) dollar more than the NOL for that business and being taxed on the entire sale price because of not being able to previously claim a NOL in Rhode Island.

D. Whether the Taxpayers Properly Claimed the NOL on their Rhode Island Return

The Taxpayers claimed a decreasing modification on their 2016 Rhode Island non-resident return. This represented a NOL. R.I. Gen. Laws § 44-30-87.1 allows that a NOL may be used for Rhode Island income tax purposes based on federal law, specifically Internal Revenue Code 26 U.S.C. § 172. Thus, Rhode Island law allows a NOL that is part of the federal return. If a taxpayer has a NOL on his or her federal return then it is part of the federal adjusted gross income so is allowed. Rhode Island has certain modifications it allows under R.I. Gen. Laws § 44-30-12, but net operating losses are not allowed. Indeed, 26 U.S.C. § 172(d) itself does not allow modifications as NOL. As the Taxpayers did not include the NOL on their 2016 federal return, it is not allowed under State law. This statutory provision is the same for residents and non-residents

The Taxpayers implied that the Division was elevating form above substance by relying on "line 21" of the federal return. However, the reliance on line 21 is because line 21 is the evidence needed to implement the legal requirements of Rhode Island law: NOL can be claimed when allowed for by federal law. As there was no NOL on line 21 of the Taxpayers 2016 federal return, there was no NOL allowed by federal law so it cannot then be inserted into the Rhode Island return as a decreasing modification. Indeed, the Taxpayers admitted that they could not use what they claimed as NOL in Rhode Island on their 2016 federal return as that NOL had been used up already on prior federal returns.[4]

The Taxpayers argued that a Michigan case, *Preston v. Department of Treasury*, 476 N.W.2d 455 (Mich.App. 1991) allowed a Michigan taxpayer to claim a Michigan NOL in Michigan despite not having it on the federal return. However, that case is a Michigan case applicable to Michigan law. This matter concerns Rhode Island and its own statutory provisions.

E. Equity and Constitutional Arguments

The Taxpayers represented that they used the Rhode Island NOL on earlier federal returns to offset other losses on earlier years so by 2016 the NOL was gone for federal purposes. However, the Taxpayers argued that because the NOL is from Rhode Island sources, they want to be able to use the NOL in Rhode Island. In addition, the Taxpayers argued that a non-resident would end up with higher losses when (and if) he or she sold a business that had a NOL but that NOL was not allowed within Rhode Island even if not used federally. See Taxpayers' Exhibit Four (4) (hypotheticals by the Taxpayers purporting to demonstrate how higher taxes could be incurred). The Taxpayers' argument is essentially one of equity (fairness). However, equitable principles are

[4] Indeed, the statute provides that the NOL cannot exceed what is allowed under federal law. See Example Three (3) from PIT 03-022. The Taxpayers' argument to claim the deduction again just for Rhode Island would exceed what is allowed by federal law because the NOL can no longer used on the federal return.

not applicable to administrative proceedings. See *Nickerson v. Reitsma*, 853 A.2d 1202 (R.I. 2004) (Supreme Court vacated a Superior Court order that vacated an agency sanction on equitable grounds).[5] It should be noted that the statutory provision for when a taxpayer can use a NOL is applicable to all taxpayers, residents and non-residents.

In addition, the Taxpayers implied that there are constitutional issues with the statute. However, a determination of unconstitutionality of a statute is a not an issue that is properly before an administrative agency. See *Easton's Point Association et al v. Coastal Resources Management Council et al.*, 522 A.2d 199 (R.I. 1987). See *also Owners-Operators Independent Drivers Association of America v. Rhode Island*, 541 A.2d 69 (R.I. 1988).

F. Penalty and Interest

Pursuant to R.I. Gen. Laws § 44-30-84,[6] the Division imposed interest for the late payment of the tax owed. Pursuant to R.I. Gen. Laws § 44-30-85,[7] the Division imposed a late payment penalty for the late payment of the tax owed.

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[5] In terms of the hypotheticals that the Taxpayers raise, the issue is not what may or may not happen in other cases, but what the law requires in this case. As the United States Supreme Court held in *Comm'r v. Nat'l Alfalfa Dehydrating & Milling Co.*, 417 U.S. 134, 149 (U.S. 1975).

> This Court has observed repeatedly that, while a taxpayer is free to organize his affairs as he chooses, nevertheless, once having done so, he must accept the tax consequences of his choice, whether contemplated or not [citations omitted], and may not enjoy the benefit of some other route he might have chosen to follow but did not. 'To make the taxability of the transaction depend upon the determination whether there existed an alternative form which the statute did not tax would create burden and uncertainty.' (citation omitted).

[6] R.I. Gen. Laws § 44-30-84 provides in part as follows:

> Interest on underpayment. – (a) General.
> (1) If any amount of Rhode Island personal income tax, including any amount of the tax withheld by an employer, is not paid on or before the due date, interest on the amount at the annual rate provided by § 44-1-7 shall be paid for the period from the due date to the date paid, whether or not any extension of time for payment was granted. The interest shall not be paid if its amount is less than two dollars ($2.00).

[7] R.I. Gen. Law § 44-30-85 provides in part as follows:

G. Conclusion

Based on the foregoing, since the Taxpayers did not have a 2016 NOL as provided for by federal law then pursuant to Rhode Island law, it could not be claimed on their Rhode Island return. By federal law, a NOL is not a modification. Nor can the NOL be considered a decreasing modification under Rhode Island law.

VI. FINDINGS OF FACT

1. On or about March 27, 2018, the Division issued a Notice of Hearing and an Appointment of Hearing Officer to the Taxpayer.

2. A hearing was held on May 14, 2018. The parties timely filed briefs by May 31, 2018.

3. The Taxpayers did not claim a NOL on their 2016 federal tax return. This was evidenced by the entry of zero dollars on line 21 on their 2016 federal 1040 return.

4. The Taxpayers tried to claim the NOL in Rhode Island for tax year 2016 by claiming it as a decreasing modification.

VII. CONCLUSIONS OF LAW

Based on the testimony and facts presented:

Additions to tax and civil penalties. – *(a) Failure to file tax returns or to pay tax.* In the case of failure:

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(2) To pay the amount shown as tax on the personal income tax return or the employer's withheld tax return on or before the prescribed date for payment of the tax (determined with regard to any extension of time for payment) unless it is shown that the failure is due to reasonable cause and not due to willful neglect, there shall be added to the amount shown as tax on the return five-tenths percent (0.5%) of the amount of the tax if the failure is for not more than one month, with an additional five-tenths percent (0.5%) for each additional month or fraction thereof during which the failure continues, not exceeding twenty-five percent (25%) in the aggregate; or

(3) To pay any amount in respect of any tax required to be shown on a return which is not so shown, including an assessment made as a result of mathematical error, within ten (10) days of the date of the notice and demand therefor, unless it is shown that the failure is due to reasonable cause and not due to willful neglect, there shall be added to the amount of tax stated in the notice and demand five-tenths percent (0.5%) of the amount of the tax if the failure is for not more than one month, with an additional five-tenths percent (0.5%) for each additional month or fraction thereof during which the failure continues, not exceeding twenty-five percent (25%) in the aggregate.

1. The Division has jurisdiction over this matter pursuant to R.I. Gen. Laws § 44-30-1 *et seq*. and R.I. Gen. Laws § 44-1-1 *et seq*.

2. Pursuant to R.I. Gen. Laws § 44-30-87.1, the Taxpayers are not entitled to the NOL claimed for the tax year 2016.

3. Pursuant to R.I. Gen. Laws § 44-30-12, the Taxpayers' claimed 2016 NOL is a not a decreasing modification

VIII. RECOMMENDATION

Based on the above analysis, the Hearing Officer recommends as follows:

Pursuant to R.I. Gen. Laws § 44-30-1 *et seq*., R.I. Gen. Laws § 44-30-12, and R.I. Gen. Laws § 44-30-87.1, the Division properly disallowed the Taxpayers' 2016 NOL claim and they owe the tax, penalty, and interest set forth in the Notice of Deficiency and Notice of Assessment subject to any revised calculations.

Date: July 9, 2018

Catherine R. Warren
Hearing Officer

ORDER

I have read the Hearing Officer's Decision and Recommendation in this matter, and I hereby take the following action with regard to the Decision and Recommendation:

✓ ADOPT
_____ REJECT
_____ MODIFY

Dated: July 12, 2018

Neena S. Savage
Tax Administrator

NOTICE OF APPELLATE RIGHTS

THIS DECISION CONSTITUTES A FINAL ORDER OF THE DIVISION. THIS ORDER MAY BE APPEALED TO THE SIXTH DIVISION DISTRICT COURT PURSUANT TO R.I. Gen. Laws § 44-30-90 WHICH STATES AS FOLLOWS:

Review of tax administrator's decision.
(a) General. Any taxpayer aggrieved by the decision of the tax administrator or his or her designated hearing officer as to his or her Rhode Island personal income tax may within thirty (30) days after notice of the decision is sent to the taxpayer by certified or registered mail, directed to his or her last known address, petition the sixth division of the district court pursuant to chapter 8 of title 8 setting forth the reasons why the decision is alleged to be erroneous and praying relief therefrom. Upon the filing of any complaint, the clerk of the court shall issue a citation, substantially in the form provided in § 44-5-26 to summon the tax administrator to answer the complaint, and the court shall proceed to hear the complaint and to determine the correct amount of the liability as in any other action for money, but the burden of proof shall be as specified in § 8-8-28.
(b) Judicial review sole remedy of taxpayer. The review of a decision of the tax administrator provided by this section shall be the exclusive remedy available to any taxpayer for the judicial determination of the liability of the taxpayer for Rhode Island personal income tax.
(c) Date of finality of tax administrator's decision. A decision of the tax administrator shall become final upon the expiration of the time allowed for petitioning the district court if no timely petition is filed, or upon the final expiration of the time for further judicial review of the case.

CERTIFICATION

I hereby certify that on the 13th day of July, 2018 a copy of the above Decision and Notice of Appellate Rights were sent by first class mail, postage prepaid and return receipt requested to the Taxpayers' attorney's address on file with the Division of Taxation and by hand delivery to Michael Tayler, Esquire, Department of Revenue, One Capitol Hill, Providence, Rhode Island, 02908.

Gail Bilavco