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U.S. TAX COURT
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UNITED STATES TAX COURT

MILO L. & SHARLYN K. SHELLITO,)
)
 Petitioners,)
)
 v.)
)
 COMMISSIONER OF INTERNAL REVENUE,)
)
 Respondent.)

Docket No. 10223-06

STIPULATION OF SETTLED ISSUES

THE PARTIES have resolved the following issues in the above-captioned case as follows:

1. In adjustment 1(c) on the Notice of Deficiency respondent disallowed expenses for employee benefit programs in the amount of \$14,904.00 for the tax year ended December 31, 2001. Respondent agrees that petitioners are allowed to deduct \$6,044.00 of the amount previously disallowed for employee benefit program expenses for the tax year ended December 31, 2001. The amount of employee benefit program expenses remaining in dispute for tax year ended December 31, 2001, is zero.

2. In adjustment 1(c) on the Notice of Deficiency respondent disallowed expenses for employee benefit programs in the amount of \$20,208.00 for the tax year ended December 31, 2002. Respondent agrees that petitioners are allowed to deduct all of the previously disallowed employee benefit program expenses for the tax year ended December 31, 2002. The amount of employee benefit program expenses remaining in dispute for 2002 is zero.

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2/21/12

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