

ILLINOIS INDEPENDENT
TAX TRIBUNAL

National Wound Care, LLC,

Petitioner,

v.

14 TT 235

ILLINOIS DEPARTMENT

Judge Brian F. Barov

OF REVENUE, Respondent.

PETITION

The Petitioner, National Wound Care LLC, hereby petitions the Illinois Independent Tax Tribunal to review and reverse and/or modify the Notice of Proposed Liability ("Notice") issued by the Illinois Department of Revenue ("Department"), for the reasons stated below:

INTRODUCTION

1. The "Notice" was issued by the Department on assessing a liability in the amount of \$25,129.00 in tax, \$3769.00 in penalties and \$304.00 in interest for taxable periods 10/2010 – 12/2012. A copy of the "Notice" is attached to this Petition.
2. Petitioner is LLC with its principal place of business in Champaign, IL.
3. It is located at 4112B Fieldstone Rd and its telephone number is 217-355-2680. The taxpayer account number is 37-1401747.

ERROR

1. According to Title 86 Part 130 Section 130.311 of the Illinois Department of Revenue Regulations, "with respect to medical appliances, the tax is imposed at the rate of 1%". The auditor Larry Farris, said that National Wound Care was the first medical equipment company that he had ever audited. The notice of liability had a portion of the revenue for the periods in question taxed at the 1% rate and a portion of the revenue for the periods in question taxed at a higher rate. The proposed liability in question was arrived at by the calculating the difference between the 1% that was paid and amount that the auditor claimed should be taxed at a higher rate.

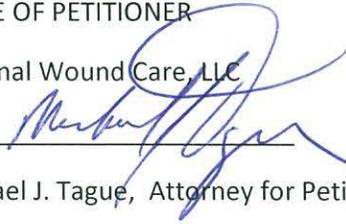
CONCLUSION AND RELIEF REQUESTED

1. Petitioner's revenue is solely derived from medical appliances and was correctly paid at the 1% rate. Petitioner requests that said proposed liability be expunged and removed for that reason.

WHEREAS, Petitioner request that the "Notice" be modified or canceled for the reasons contained herein.

NAME OF PETITIONER

National Wound Care, LLC

By: 

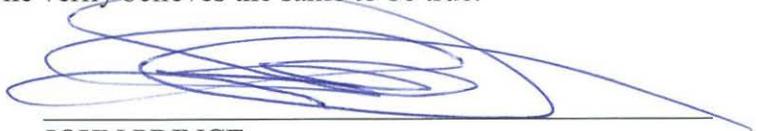
Michael J. Tague, Attorney for Petitioner

Michael J. Tague
Attorney for the Petitioner
IARDC No. 3127729
FLYNN, PALMER, TAGUE & JACOBSON
402 West Church Street
P. O. Box 1517
Champaign, IL 61824-1517
Telephone: 217-352-5181
Fax: 217-352-7964

STATE OF ILLINOIS)
) SS
COUNTY OF CHAMPAIGN)

VERIFICATION

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in the Petition are true and correct, except as to matters therein stated to be on information and belief and as to those matters the undersigned certifies as aforesaid that he verily believes the same to be true.



JOHN PRINCE

Michael J. Tague
Attorney for the Petitioner
IARDC No: 3127729
FLYNN, PALMER, TAGUE & JACOBSON
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Champaign, IL 61824-1517
Telephone: 217-352-5181
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he did on the 7th day of January, 2015, at or about the hour of 5:00 p.m., deposit in the U. S. mail at the U. S. Post Office in Champaign, Illinois, an envelope addressed to:

Illinois Department of Revenue
Office of Legal Services
100 West Randolph Street, 7-900
(7th Floor of the Thompson Center)
Chicago, IL 60601

bearing postage fully prepaying the same and also bearing the return address of Flynn, Palmer, Tague & Jacobson, 402 West Church, P. O. Box 1517, Champaign, IL 61824-1517, which such envelope contained a copy of the foregoing Petition.



Michael J. Tague
Attorney for Petitioner
IARDC No: 3127729
FLYNN, PALMER, TAGUE & JACOBSON
402 West Church Street
P. O. Box 1517
Champaign, IL 61824-1517
Telephone: 217-352-5181
Fax: 217-352-7964

Notice of Proposed Liability
for Sales, Use, and Excise Taxes and Fees



July 5, 2013



Letter ID: L1875253856

NATIONAL WOUND CARE LLC
2906 W CLARK RD STE C
CHAMPAIGN IL 61822-2810

Taxpayer ID: 37-1401747
Account ID: 2969-9479
Audit ID: A1687257088
Return type: ST-1
Audit periods: 10/2010 - 12/2012



We have audited your account and have determined that there is additional liability due.

Tax	\$25,129.00
Penalty	\$3,769.00
Interest	\$304.00
Total	<u>\$29,202.00</u>

Our calculations, periods covered, and other explanations resulting in the determination are attached for your review.

If you agree with the tax amount as shown, contact the auditor at the phone number shown below for further instructions. Please note, if you sign the Audit Report, you waive the right to seek review by the Informal Conference Board.

If you do not agree with the figures, you may request a review of this proposed liability by the Informal Conference Board (Section 2505-510). To do this, you must complete Form ICB-1, Request for Informal Conference Board Review, within 60 days from the date of this notice and mail it, along with a copy of the auditor's work papers and a copy of this notice, to:

INFORMAL CONFERENCE BOARD
100 W RANDOLPH SUITE 7-341
CHICAGO IL 60601

If you do not request an ICB review within 60 days from the date of this notice, we will issue a Notice of Tax Liability for the amount proposed to be due.

Sincerely,

Larry Farris
Revenue Auditor

ILLINOIS DEPARTMENT OF REVENUE
AUDIT - API-A, IL DEPT OF REVENUE, PO BOX 19475
SPRINGFIELD, IL 62794-9475

618 973-6861
618 973-6861 cell
217 785-3251 fax



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Sales Tax Audit System
Global Taxable Exceptions Detailed Report / All Codes Sorted by Date

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Taxpayer: NATIONAL WOUND CARE LLC

IBT #: 2969-9479

Audit Period: 10/01/2010 through 12/31/2012

Auditor: Larry E. Farris

<u>Date</u>	<u>Doc #</u>	<u>Name</u>	<u>Description</u>	<u>Reason Questioned</u>	<u>Amount Taxable</u>
Tax Code: 10		Exam Type: 100			
12/31/2010		Medicare-3rd party	20% not pd by Medicare	No tax charged	\$5,772.94
12/31/2011		Medicare-3rd party	20% not pd by Medicare	No tax charged	\$10,038.21
03/31/2012		Medicare-3rd party	20% not pd by Medicare	No tax charged	\$1,817.23
06/30/2012		Medicare-3rd party	20% not pd by Medicare	No tax charged	\$2,648.84
09/30/2012		Medicare-3rd party	20% not pd by Medicare	No tax charged	\$2,408.84
12/31/2012		Medicare-3rd party	20% not pd by Medicare	No tax charged	\$2,433.05
Total for Exam Type: 100					\$25,119.11
Tax Code: 10		Exam Type: 101			
12/31/2010		Medicare-private pay	20% not pd by Medicare	No tax charged	\$2,534.43
12/31/2011		Medicare-private pay	20% not pd by Medicare	No tax charged	\$4,406.97
03/31/2012		Medicare-private pay	20% not pd by Medicare	No tax charged	\$797.79
06/30/2012		Medicare-private pay	20% not pd by Medicare	No tax charged	\$1,162.88
09/30/2012		Medicare-private pay	20% not pd by Medicare	No tax charged	\$1,057.52
12/31/2012		Medicare-private pay	20% not pd by Medicare	No tax charged	\$1,068.14
Total for Exam Type: 101					\$11,027.73
Tax Code: 10		Exam Type: 102			
12/31/2010		3rd party/ins sales	High rate 3rd party/ins	No tax charged	\$11,965.77
12/31/2011		3rd party/ins sales	High rate 3rd party/ins	No tax charged	\$53,884.90
03/31/2012		3rd party/ins sales	High rate 3rd party/ins	No tax charged	\$13,883.27
06/30/2012		3rd party/ins sales	High rate 3rd party/ins	No tax charged	\$11,064.19
09/30/2012		3rd party/ins sales	High rate 3rd party/ins	No tax charged	\$12,104.60
12/31/2012		3rd party/ins sales	High rate 3rd party/ins	No tax charged	\$14,090.77
Total for Exam Type: 102					\$116,993.50
Tax Code: 10		Exam Type: 103			
12/31/2010		Private pay sales	High rate private pay	No tax charged	\$1,791.68
12/31/2011		Private pay sales	High rate private pay	No tax charged	\$25,120.58
03/31/2012		Private pay sales	High rate private pay	No tax charged	\$4,227.29
06/30/2012		Private pay sales	High rate private pay	No tax charged	\$10,445.80



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Taxpayer: NATIONAL WOUND CARE LLC

IBT #: 2969-9479

Audit Period: 10/01/2010 through 12/31/2012

Auditor: Larry E. Farris

<u>Date</u>	<u>Doc #</u>	<u>Name</u>	<u>Description</u>	<u>Reason Questioned</u>	<u>Amount Taxable</u>
09/30/2012		Private pay sales	High rate private pay	No tax charged	\$4,055.74
12/31/2012		Private pay sales	High rate private pay	No tax charged	\$721.94
Total for Exam Type: 103					\$46,363.03
Total for Tax Code: 10 - ROT/SOT Receipts Adjustment					\$199,503.37
Tax Code: 14 Exam Type: 100					
12/31/2010		Medicare-3rd party	20% not pd by Medicare	No tax charged	\$2,565.38
12/31/2011		Medicare-3rd party	20% not pd by Medicare	No tax charged	\$5,769.81
03/31/2012		Medicare-3rd party	20% not pd by Medicare	No tax charged	\$616.26
06/30/2012		Medicare-3rd party	20% not pd by Medicare	No tax charged	\$1,280.05
09/30/2012		Medicare-3rd party	20% not pd by Medicare	No tax charged	\$892.12
12/31/2012		Medicare-3rd party	20% not pd by Medicare	No tax charged	\$1,254.42
Total for Exam Type: 100					\$12,378.04
Tax Code: 14 Exam Type: 101					
12/31/2010		Medicare-private pay	20% not pd by Medicare	No tax charged	\$1,126.25
12/31/2011		Medicare-private pay	20% not pd by Medicare	No tax charged	\$2,533.06
03/31/2012		Medicare-private pay	20% not pd by Medicare	No tax charged	\$270.55
06/30/2012		Medicare-private pay	20% not pd by Medicare	No tax charged	\$561.96
09/30/2012		Medicare-private pay	20% not pd by Medicare	No tax charged	\$391.66
12/31/2012		Medicare-private pay	20% not pd by Medicare	No tax charged	\$550.71
Total for Exam Type: 101					\$5,434.19
Tax Code: 14 Exam Type: 102					
12/31/2010		3rd party/ins sales	Low rate 3rd party/ins	No tax charged	\$1,255.20
12/31/2011		3rd party/ins sales	Low rate 3rd party/ins	No tax charged	\$4,844.26
03/31/2012		3rd party/ins sales	Low rate 3rd party/ins	No tax charged	\$1,319.96
06/30/2012		3rd party/ins sales	Low rate 3rd party/ins	No tax charged	\$864.39
09/30/2012		3rd party/ins sales	Low rate 3rd party/ins	No tax charged	\$366.87
12/31/2012		3rd party/ins sales	Low rate 3rd party/ins	No tax charged	\$736.39
Total for Exam Type: 102					\$9,387.07



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Taxpayer: NATIONAL WOUND CARE LLC

IBT #: 2969-9479

Audit Period: 10/01/2010 through 12/31/2012

Auditor: Larry E. Farris

<u>Date</u>	<u>Doc #</u>	<u>Name</u>	<u>Description</u>	<u>Reason Questioned</u>	<u>Amount Taxable</u>
Tax Code: 14	Exam Type: 103				
12/31/2010		Private pay sales	Low rate private pay	No tax charged	\$454.93
12/31/2011		Private pay sales	Low rate private pay	No tax charged	\$4,132.90
03/31/2012		Private pay sales	Low rate private pay	No tax charged	\$966.84
06/30/2012		Private pay sales	Low rate private pay	No tax charged	\$1,383.10
09/30/2012		Private pay sales	Low rate private pay	No tax charged	\$1,267.22
12/31/2012		Private pay sales	Low rate private pay	No tax charged	\$915.31
Total for Exam Type: 103					\$9,120.30
Tax Code: 14	Exam Type: 104				
12/31/2010		Taxable sales on ST-1	Taxable sales on ST-1	Tax paid on ST-1	-\$2,263.00
12/31/2011		Taxable sales on ST-1	Taxable sales on ST-1	Tax paid on ST-1	-\$40,071.00
03/31/2012		Taxable sales on ST-1	Taxable sales on ST-1	Tax paid on ST-1	-\$5,534.00
06/30/2012		Taxable sales on ST-1	Taxable sales on ST-1	Tax paid on ST-1	-\$12,961.00
09/30/2012		Taxable sales on ST-1	Taxable sales on ST-1	Tax paid on ST-1	-\$3,446.00
12/31/2012		Taxable sales on ST-1	Taxable sales on ST-1	Tax paid on ST-1	-\$1,711.00
Total for Exam Type: 104					-\$65,986.00
Total for Tax Code: 14 - FDA Receipts Adjustment					-\$29,666.40
Tax Code: 30	Exam Type: 100				
12/31/2010		Rental assets-10/10-12/10	Beds, mattresses	No tax paid or SA	\$7,396.31
12/31/2011		Rental assets-1/11-12/11	Beds, mattresses	No tax paid or SA	\$66,393.75
01/31/2012		Rental assets	Beds, mattresses	No tax paid or SA	\$2,014.40
02/28/2012		Rental assets	Beds, mattresses	No tax paid or SA	\$2,374.04
03/31/2012		Rental assets	Beds, mattresses	No tax paid or SA	\$2,543.17
04/30/2012		Rental assets	Beds, mattresses	No tax paid or SA	\$5,985.10
05/31/2012		Rental assets	Beds, mattresses	No tax paid or SA	\$2,169.51
06/30/2012		Rental assets	Beds, mattresses	No tax paid or SA	\$7,637.37
07/31/2012		Rental assets	Beds, mattresses	No tax paid or SA	\$923.32
08/31/2012		Rental assets	Beds, mattresses	No tax paid or SA	\$929.96
09/30/2012		Rental assets	Beds, mattresses	No tax paid or SA	\$4,040.40



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Taxpayer: NATIONAL WOUND CARE LLC

IBT #: 2969-9479

Audit Period: 10/01/2010 through 12/31/2012

Auditor: Larry E. Farris

<u>Date</u>	<u>Doc #</u>	<u>Name</u>	<u>Description</u>	<u>Reason Questioned</u>	<u>Amount Taxable</u>
10/31/2012		Rental assets	Beds, mattresses	No tax paid or SA	\$13,726.17
11/30/2012		Rental assets	Beds, mattresses	No tax paid or SA	\$124.32
12/31/2012		Rental assets	Beds, mattresses	No tax paid or SA	\$972.99
Total for Exam Type: 100					\$117,230.81
Tax Code: 30	Exam Type: 101				
02/15/2011	41942	Fastrack Healthcare Sys	Software	No tax paid or SA	\$1,195.45
05/15/2011	43514	Fastrack Healthcare Sys	Software	No tax paid or SA	\$1,195.45
08/15/2011	45059	Fastrack Healthcare Sys	Software	No tax paid or SA	\$1,195.46
11/15/2011	46536	Fastrack Healthcare Sys	Software	No tax paid or SA	\$1,231.31
02/15/2012	48309	Fastrack Healthcare Sys	Software	No tax paid or SA	\$1,231.31
05/15/2012	50032	Fastrack Healthcare Sys	Software	No tax paid or SA	\$1,231.31
08/15/2012	51797	Fastrack Healthcare Sys	Software	No tax paid or SA	\$1,231.31
Total for Exam Type: 101					\$8,511.80
Total for Tax Code: 30 - Assets Use Tax Adjustment					\$125,742.41
Tax Code: 31	Exam Type: 200				
06/08/2012	Check request	RockAuto.com (John)	Ford van parts	No tax paid or SA	\$418.88
09/10/2012	105-3026452-280902	Amazon.com	12V power cords	No tax paid or SA	\$49.52
09/18/2012	102-6392449-720342	Amazon (Katie)	12V power cords	No tax paid or SA	\$123.80
Total for Exam Type: 200					\$592.20
Total for Tax Code: 31 - Consumable Supplies Use Tax Adjustment					\$592.20
Tax Code: 33	Exam Type: 100				
12/31/2010		Rental assets-10/10-12/10	Wheelchairs	No tax paid or SA	\$430.36
12/31/2011		Rental assets-1/11-12/11	Wheelchairs	No tax paid or SA	\$586.77
04/30/2012		Rental assets	Wheelchairs	No tax paid or SA	\$273.92
05/31/2012		Rental assets	Wheelchairs	No tax paid or SA	\$186.48
06/30/2012		Rental assets	Wheelchairs	No tax paid or SA	\$192.70
07/31/2012		Rental assets	Wheelchairs	No tax paid or SA	\$231.24



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Taxpayer: NATIONAL WOUND CARE LLC

IBT #: 2969-9479

Audit Period: 10/01/2010 through 12/31/2012

Auditor: Larry E. Farris

<u>Date</u>	<u>Doc #</u>	<u>Name</u>	<u>Description</u>	<u>Reason Questioned</u>	<u>Amount Taxable</u>
08/31/2012		Rental assets	Wheelchairs	No tax paid or SA	\$231.24
09/30/2012		Rental assets	Wheelchairs	No tax paid or SA	\$104.43
11/30/2012		Rental assets	Wheelchairs	No tax paid or SA	\$231.24
12/31/2012		Rental assets	Wheelchairs	No tax paid or SA	\$269.77
Total for Exam Type: 100					\$2,738.15
Total for Tax Code: 33 - FDA Use Tax Adjustment					\$2,738.15
Totals for Examination:					\$298,909.73

National Wound Care LLC
 2969-9479
 Track #1687257088
 10/1/10 - 12/31/12

Period	Medicare Purchase	Medicare Rental	Total	Total Low-rate purchases	Total High-rate purchases	Low-rate purchases 20% not paid by Medicare	High-rate purchases 20% not paid by Medicare	Low-rate 20% portion paid by 3rd party/ins	Low-rate 20% portion paid by Medicaid	Low-rate 20% portion paid by Private pay	High-rate 20% portion paid by 3rd party/ins	High-rate 20% portion paid by Medicaid	High-rate 20% portion paid by Private pay
10/31/10	18,201.08	26,425.76	44,626.84	7,459.53	10,741.55	1,491.91	2,148.31	972.93	91.85	427.13	1,400.99	132.26	615.05
11/30/10	23,967.30	34,858.30	58,825.60	7,302.93	16,664.37	1,460.59	3,332.87	952.50	89.92	418.17	2,173.48	205.19	954.20
12/31/10	21,762.48	31,561.07	53,323.55	4,906.55	16,855.93	981.31	3,371.19	639.95	60.41	280.95	2,198.47	207.55	965.17
1/31/11	22,284.60	38,473.72	60,758.32	6,458.03	15,826.57	1,291.61	3,165.31	842.31	79.52	369.79	2,064.21	194.87	906.23
2/28/11	14,165.59	45,437.22	59,602.81	4,316.31	9,849.28	863.26	1,969.86	562.96	53.15	247.15	1,284.62	121.27	563.97
3/31/11	13,159.57	42,210.32	55,369.89	4,009.77	9,149.80	801.95	1,629.96	522.98	49.37	229.60	1,193.38	112.66	523.92
4/30/11	7,792.99	23,562.07	31,375.06	4,893.44	2,899.55	978.69	579.91	638.24	60.25	280.20	378.18	35.70	166.03
5/31/11	8,863.16	28,429.25	37,292.41	2,700.64	6,162.52	540.13	1,232.50	352.24	33.25	154.64	803.76	75.88	352.86
6/30/11	6,276.43	21,213.51	27,489.94	4,106.14	4,340.06	434.06	821.23	283.07	26.72	124.27	535.55	50.56	235.12
7/31/11	10,919.30	24,556.20	35,475.50	6,164.72	4,754.58	1,232.94	950.92	804.04	75.91	352.99	620.13	58.54	272.25
8/31/11	3,838.50	18,468.68	22,307.18	1,878.66	1,959.84	375.73	391.97	245.03	23.13	107.57	255.62	24.13	112.22
9/30/11	7,475.47	28,849.05	36,324.52	2,853.40	4,622.07	570.68	924.41	372.16	25.13	163.39	602.84	56.91	264.66
10/31/11	6,872.15	26,745.29	33,617.44	1,554.59	4,917.56	390.92	983.51	254.93	24.07	111.92	641.38	60.55	281.59
11/30/11	9,058.11	30,633.24	39,591.35	3,463.84	5,594.27	692.77	1,118.85	451.78	42.65	198.34	729.64	68.88	320.33
12/31/11	10,496.08	35,829.06	46,325.14	3,374.08	7,122.00	674.82	1,424.40	440.07	41.55	193.20	928.90	87.69	407.80
1/31/12	6,056.82	27,002.27	33,059.09	2,282.71	3,774.11	456.54	754.82	297.73	28.11	130.71	492.25	46.47	216.10
2/28/12	5,488.37	34,939.73	40,428.10	1,070.87	4,417.50	214.17	883.50	139.67	13.19	61.32	576.16	54.39	252.95
3/31/12	7,112.63	33,517.32	40,629.95	1,371.37	5,741.25	274.27	1,148.25	178.86	16.89	78.52	748.82	70.69	328.74
4/30/12	14,209.51	38,639.89	52,849.40	4,818.92	9,380.59	963.78	1,878.12	628.52	59.33	275.93	1,224.79	115.63	537.70
5/31/12	9,718.91	37,152.85	46,871.76	3,746.66	5,972.25	749.33	1,194.45	488.67	46.13	214.53	778.94	73.54	341.97
6/30/12	6,194.82	37,991.89	44,186.71	1,248.72	4,946.10	249.74	989.22	162.85	15.38	71.50	645.11	60.90	283.31
7/31/12	5,441.57	42,213.87	47,655.44	1,559.03	3,882.54	311.81	776.51	203.34	89.27	19.20	506.39	47.81	222.21
8/31/12	10,240.79	55,848.96	66,089.75	2,660.84	7,079.95	532.17	1,515.99	347.05	32.76	152.36	988.63	93.33	434.03
9/30/12	9,626.42	9,626.42	19,252.84	2,620.09	7,006.33	524.02	1,401.27	341.73	32.26	150.03	913.82	86.27	401.18
10/31/12	10,578.13	46,448.96	57,027.09	3,829.88	6,748.25	765.98	1,349.65	499.52	47.16	219.20	880.16	83.09	386.40
11/30/12	9,146.26	34,922.97	44,069.23	2,190.57	6,955.69	438.11	1,391.14	285.71	26.97	125.43	907.21	85.65	398.28
12/31/12	8,547.84	29,960.17	38,508.01	3,597.32	4,950.52	719.46	990.10	469.19	44.29	205.98	645.68	60.96	283.46
	297,494.88	922,161.59	1,209,656.47	94,903.76	192,591.12	18,980.75	38,518.22	12,378.04	1,168.55	5,434.19	25,119.11	2,371.37	11,027.73

Period	3rd Party/Ins Purchase	3rd Party/Ins Rental	3rd Party/Ins Total	3rd Party/Ins Low-rate purchases	3rd Party/Ins High-rate purchases	Medicaid Purchase	Medicaid Rental	Medicaid Total	Private Purchase	Private Rental	Private Total	Private Low-rate purchases	Private High-rate purchases	
10/31/10	3,278.58	13,581.07	16,859.65	419.87	2,858.71	147.16	6,277.42	6,424.58	1,020.82	1,148.09	2,168.91	210.00	810.82	
11/30/10	5,989.84	17,386.83	23,376.67	415.46	5,574.38	282.47	5,956.80	6,239.27	995.00	936.64	1,931.64	64.93	330.07	
12/31/10	3,952.55	14,673.44	18,625.99	419.87	3,532.68	320.12	6,023.16	6,343.28	830.79	1,620.17	2,450.96	180.00	650.79	
1/31/11	6,204.16	14,073.42	20,277.58	857.06	5,347.10	325.03	7,294.46	7,619.49	2,852.59	1,529.01	4,381.60	550.00	2,302.59	
2/28/11	10,057.93	20,894.55	30,952.48	697.62	9,360.31	678.60	10,431.47	11,110.07	2,045.60	1,274.64	3,320.24	336.25	1,709.35	
3/31/11	7,920.69	16,454.61	24,375.30	549.38	7,371.31	365.23	5,614.25	5,979.48	2,735.14	1,214.17	3,949.31	449.60	2,285.54	
4/30/11	2,967.88	11,997.30	14,965.18	205.85	2,762.03	2,858.35	6,180.20	9,046.55	2,341.41	16.61	2,358.02	367.15	1,974.26	
5/31/11	6,016.80	12,499.41	18,516.21	417.33	5,599.47	1,223.51	18,807.91	20,031.42	1,179.10	1,031.84	2,210.94	163.82	985.28	
6/30/11	6,419.36	13,280.37	19,699.73	329.39	6,089.97	0.00	5,331.66	290.34	290.34	480.86	771.20	120.60	169.74	
7/31/11	2,801.06	12,332.20	15,133.26	299.68	2,501.38	229.99	6,138.80	6,368.79	3,171.42	17.07	3,188.49	125.00	3,046.42	
8/31/11	4,941.23	10,056.84	14,998.07	33.44	4,907.79	318.73	3,054.54	3,373.27	2,017.96	563.60	2,581.56	510.60	1,507.36	
9/30/11	1,638.77	11,397.19	13,035.96	299.68	1,339.09	2,860.44	4,287.93	7,148.37	9,533.60	907.24	10,440.84	559.21	8,974.39	
10/31/11	2,689.73	9,625.74	12,315.47	192.34	2,497.39	209.00	5,063.77	5,272.77	829.55	253.17	1,082.72	779.87	49.68	
11/30/11	4,248.41	15,239.01	19,487.42	825.44	3,422.97	115.00	624.69	739.69	2,115.96	681.87	2,997.83	80.80	2,035.16	
12/31/11	2,823.14	12,505.58	15,328.72	137.05	2,686.09	194.94	6,205.06	6,400.00	140.81	395.86	536.67	60.00	80.81	
1/31/12	5,051.14	16,733.98	21,785.12	337.69	4,713.45	110.14	7,136.34	7,246.48	71.08	470.20	541.28	60.60	10.48	
2/28/12	5,644.56	15,807.74	21,452.30	951.83	4,692.73	56.51	8,772.11	8,828.62	468.40	0.00	468.40	402.04	66.36	
3/31/12	4,507.53	19,259.96	23,767.49	30.44	4,477.09	306.71	5,829.16	6,135.87	4,654.65	0.00	4,654.65	504.20	4,150.45	
4/30/12	4,292.50	15,214.34	19,506.84	268.34	4,024.16	107.02	6,619.03	6,726.05	1,310.52	329.98	1,640.50	964.55	345.97	
5/31/12	3,912.21	12,925.88	16,838.09	596.05	3,316.16	0.00	9,963.27	9,963.27	10,374.77	1,307.03	11,681.80	358.55	10,016.22	
6/30/12	3,723.87	17,014.75	20,738.62	0.00	3,723.87	107.44	5,675.63	5,783.07	143.61	1,657.05	1,800.66	60.00	83.61	
7/31/12	2,992.76	13,418.93	16,411.69	306.87	2,685.89	245.82	10,273.06	10,518.88	1,053.39	615.20	1,668.59	376.87	676.52	
8/31/12	5,234.33	7,682.21	12,916.54	60.00	5,174.33	534.01	11,819.26	12,353.27	2,058.17	1,048.59	3,106.76	17.30	2,040.87	
9/30/12	4,244.38	12,216.73	16,461.11	0.00	4,244.38	227.25	6,130.17	6,357.42	2,211.40	343.42	2,554.82	873.05	1,338.35	
10/31/12	5,075.87	7,044.86	12,120.73	0.00	5,075.87	107.46	9,060.73	9,168.19	928.43	1,382.16	2,310.61	551.29	377.14	
11/30/12	5,430.49	8,433.67	13,864.16	736.39	4,694.10	0.00	8,799.56	8,799.56	529.57	341.00	870.57	195.49	334.08	
12/31/12	4,320.80	13,180.03	17,500.83	0.00	4,320.80	0.00	5,687.91	5,687.91	179.25	0.00	179.25	169.53	10.72	
	126,330.57	364,930.64	491,311.21	9,387.07	116,993.50		11,930.93	193,066.35	204,997.28	55,483.33	19,765.49	75,248.82	9,120.30	45,363.03

National Wound Care LLC
 2969-9479
 Track #1687257088
 10/1/10 - 12/31/12

Period	IL Rental Income	All rental Income	
10/31/10	47,432.34	132,414.66	25.82%
11/30/10	59,138.57	131,648.56	44.92%
12/31/10	53,877.84	129,582.94	41.58%
1/31/11	61,370.51	152,762.01	40.17%
2/28/11			
3/31/11			
4/30/11			
5/31/11			
6/30/11			
7/31/11			
8/31/11			
9/30/11			
10/31/11	41,687.97	92,199.65	45.21%
11/30/11	47,278.81	120,992.61	39.09%
12/31/11	54,935.56	135,256.46	40.62%
1/31/12	51,342.79	125,004.86	41.07%
2/28/12	59,519.58	125,881.29	47.28%
3/31/12	58,606.44	120,292.62	48.72%
4/30/12	60,803.24	123,483.76	49.24%
5/31/12	61,349.03	129,066.81	47.53%
6/30/12	62,339.32	133,428.73	46.72%
7/31/12	66,521.06	135,507.30	49.09%
8/31/12	76,399.02	160,073.38	47.73%
9/30/12	65,040.29	159,821.55	40.70%
10/31/12	63,936.73	171,045.29	37.38%
11/30/12	52,497.20	178,023.59	29.49%
12/31/12	48,828.11	180,575.77	27.04%
	1,092,904.51	2,637,061.84	41.44%

Grand Total

70,079.98
89,773.18
80,743.78
93,036.39
104,985.60
89,673.98
67,744.81
78,050.98
53,292.53
60,166.04
43,260.08
66,949.69
52,288.40
62,816.29
68,590.53
62,631.97
71,177.42
75,167.96
80,722.79
85,354.92
72,509.06
76,254.60
94,466.32
81,349.74
80,626.62
67,603.52
61,876.00
1,981,213.78



Illinois Department of Revenue
Sales Tax Audit System
Schedule 2-A Interest Computation

Date: 07/05/2013
Time: 12:20:10
Page: 1

Taxpayer: NATIONAL WOUND CARE LLC IBT: 2969-9479 Audit Period: 10/01/2010 through 12/31/2012
Tax Type: ROT Interest Thru Date: 07/05/2013 Detail Liability: \$25,046.16 Average Liability: \$83.28

Auditor: Larry E. Farris

<u>Month</u>	<u>Detail Liability</u>	<u>Average Liability</u>	<u>Prepayment</u>	<u>Total Liability</u>	<u>Rate</u>	<u>Interest</u>
12/2010	\$2,428.61	\$9.24	\$0.00	\$2,437.85	4.8767	\$118.88
02/2011	\$74.72	---	---	---	---	---
05/2011	\$74.72	---	---	---	---	---
08/2011	\$74.72	---	---	---	---	---
11/2011	\$76.96	---	---	---	---	---
12/2011	\$12,104.50	\$36.96	\$0.00	\$12,442.58	1.3726	\$170.78
01/2012	\$125.90	---	---	---	---	---
02/2012	\$225.34	---	---	---	---	---
03/2012	\$1,948.85	\$9.24	\$0.00	\$2,309.33	0.6246	\$14.43
04/2012	\$376.81	---	---	---	---	---
05/2012	\$214.41	---	---	---	---	---
06/2012	\$2,606.20	\$9.24	\$0.00	\$3,206.66	0.0000	\$0.00
07/2012	\$60.02	---	---	---	---	---
08/2012	\$137.39	---	---	---	---	---
09/2012	\$1,965.62	\$9.24	\$0.00	\$2,172.27	0.0000	\$0.00
10/2012	\$857.89	---	---	---	---	---
11/2012	\$10.08	---	---	---	---	---
12/2012	\$1,683.42	\$9.36	\$0.00	\$2,560.75	0.0000	\$0.00
Total:	\$25,046.16	\$83.28	\$0.00	\$25,129.44		\$304.09



Illinois Department of Revenue
 Sales Tax Audit System
 Schedule 2-B Penalty Computation

Date: 07/05/2013
 Time: 12:21:42
 Page: 1

Taxpayer: NATIONAL WOUND CARE LLC IBT: 2969-9479 Audit Period: 10/01/2010 through 12/31/2012
 Tax Type: ROT Interest Thru Date: 07/05/2013

Auditor: Larry E. Farris

Late Filing

This penalty was not assessed for any periods.

Late Payment

<u>Filing Period</u>	<u>Tax Amount</u>	<u>Penalty</u>		<u>Interest</u>		<u>Total</u>
		<u>Rate</u>	<u>Amount</u>	<u>Rate</u>	<u>Amount</u>	
10/2010 - 12/2010	\$2,437.85	15.00%	\$365.68	0.00%	\$0.00	\$365.68
01/2011 - 12/2011	\$12,442.58	15.00%	\$1,866.39	0.00%	\$0.00	\$1,866.39
01/2012 - 03/2012	\$2,309.33	15.00%	\$346.40	0.00%	\$0.00	\$346.40
04/2012 - 06/2012	\$3,206.66	15.00%	\$481.00	0.00%	\$0.00	\$481.00
07/2012 - 09/2012	\$2,172.27	15.00%	\$325.84	0.00%	\$0.00	\$325.84
10/2012 - 12/2012	\$2,560.75	15.00%	\$384.11	0.00%	\$0.00	\$384.11
Total Late Payment	\$25,129.44		\$3,769.42		\$0.00	\$3,769.42

Negligence

This penalty was not assessed for any periods.

Fraud

This penalty was not assessed for any periods.

Grand Total	\$3,769.42	\$0.00	\$3,769.42
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Illinois Department of Revenue

Sales Tax Audit System

Projected Data Results

Date: 07/05/2013

Time: 12:17:18

Page: 1

Taxpayer: 2969-9479/NATIONAL WOUND CARE LLC Audit Period: 10/01/2010 through 12/31/2012

Auditor: Larry E. Farris

Selection Criteria

Tax Code: 10 ROT/SOT Receipts Adjustment

Exam Type: 100 ROT/SOT Receipts Adjustment

Additional Tax Base: \$25,119.11

<u>Location</u>	<u>Name</u>	<u>Rate</u>	<u>Rate Period</u>	<u>Taxable Amount</u>	<u>Tax Due</u>
010 0005 5	CHAMPAIGN	08.75	2010 01 - Current	\$25,119.11	\$2,197.91
				<u>\$25,119.11</u>	<u>\$2,197.91</u>



Illinois Department of Revenue

Sales Tax Audit System

Projected Data Results

Date: 07/05/2013

Time: 12:17:18

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Taxpayer: 2969-9479/NATIONAL WOUND CARE LLC Audit Period: 10/01/2010 through 12/31/2012

Auditor: Larry E. Farris

Selection Criteria

Tax Code: 10 ROT/SOT Receipts Adjustment

Exam Type: 101 ROT/SOT Receipts Adjustment

Additional Tax Base: \$11,027.73

<u>Location</u>	<u>Name</u>	<u>Rate</u>	<u>Rate Period</u>	<u>Taxable Amount</u>	<u>Tax Due</u>
010 0005 5	CHAMPAIGN	08.75	2010 01 - Current	\$11,027.73	\$964.92
				<u>\$11,027.73</u>	<u>\$964.92</u>



Illinois Department of Revenue

Sales Tax Audit System

Projected Data Results

Date: 07/05/2013

Time: 12:17:18

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Auditor: Larry E. Farris

Taxpayer: 2969-9479/NATIONAL WOUND CARE LLC Audit Period: 10/01/2010 through 12/31/2012

Selection Criteria

Tax Code: 10 ROT/SOT Receipts Adjustment

Exam Type: 102 ROT/SOT Receipts Adjustment

Additional Tax Base: \$116,993.50

<u>Location</u>	<u>Name</u>	<u>Rate</u>	<u>Rate Period</u>	<u>Taxable Amount</u>	<u>Tax Due</u>
010 0005 5	CHAMPAIGN	08.75	2010 01 - Current	\$116,993.50	\$10,236.93
				<hr/> \$116,993.50	<hr/> \$10,236.93



Illinois Department of Revenue

Sales Tax Audit System

Projected Data Results

Date: 07/05/2013

Time: 12:17:18

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Taxpayer: 2969-9479/NATIONAL WOUND CARE LLC Audit Period: 10/01/2010 through 12/31/2012

Auditor: Larry E. Farris

Selection Criteria

Tax Code: 10 ROT/SOT Receipts Adjustment

Exam Type: 103 ROT/SOT Receipts Adjustment

Additional Tax Base: \$46,363.03

<u>Location</u>	<u>Name</u>	<u>Rate</u>	<u>Rate Period</u>	<u>Taxable Amount</u>	<u>Tax Due</u>
010 0005 5	CHAMPAIGN	08.75	2010 01 - Current	\$46,363.03	\$4,056.77
				<hr/> \$46,363.03	<hr/> \$4,056.77



Illinois Department of Revenue

Sales Tax Audit System

Projected Data Results

Date: 07/05/2013

Time: 12:17:18

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Taxpayer: 2969-9479/NATIONAL WOUND CARE LLC Audit Period: 10/01/2010 through 12/31/2012

Auditor: Larry E. Farris

Selection Criteria

Tax Code: 14 FDA Receipts Adjustment

Exam Type: 100 FDA Receipts Adjustment

Additional Tax Base: \$12,378.04

<u>Location</u>	<u>Name</u>	<u>Rate</u>	<u>Rate Period</u>	<u>Taxable Amount</u>	<u>Tax Due</u>
010 0005 5	CHAMPAIGN	01.00	2010 01 - Current	\$12,378.04	\$123.77
				<hr/> \$12,378.04	<hr/> \$123.77



Illinois Department of Revenue

Sales Tax Audit System

Projected Data Results

Date: 07/05/2013

Time: 12:17:18

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Taxpayer: 2969-9479/NATIONAL WOUND CARE LLC Audit Period: 10/01/2010 through 12/31/2012

Auditor: Larry E. Farris

Selection Criteria

Tax Code: 14 FDA Receipts Adjustment

Exam Type: 101 FDA Receipts Adjustment

Additional Tax Base: \$5,434.19

<u>Location</u>	<u>Name</u>	<u>Rate</u>	<u>Rate Period</u>	<u>Taxable Amount</u>	<u>Tax Due</u>
010 0005 5	CHAMPAIGN	01.00	2010 01 - Current	\$5,434.19	\$54.35
				<hr/> \$5,434.19	<hr/> \$54.35



Illinois Department of Revenue

Sales Tax Audit System

Projected Data Results

Date: 07/05/2013

Time: 12:17:18

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Taxpayer: 2969-9479/NATIONAL WOUND CARE LLC Audit Period: 10/01/2010 through 12/31/2012

Auditor: Larry E. Farris

Selection Criteria

Tax Code: 14 FDA Receipts Adjustment

Exam Type: 102 FDA Receipts Adjustment

Additional Tax Base: \$9,387.07

<u>Location</u>	<u>Name</u>	<u>Rate</u>	<u>Rate Period</u>	<u>Taxable Amount</u>	<u>Tax Due</u>
010 0005 5	CHAMPAIGN	01.00	2010 01 - Current	\$9,387.07	\$93.86
				<hr/> \$9,387.07	<hr/> \$93.86



Illinois Department of Revenue

Sales Tax Audit System

Projected Data Results

Date: 07/05/2013

Time: 12:17:18

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Taxpayer: 2969-9479/NATIONAL WOUND CARE LLC Audit Period: 10/01/2010 through 12/31/2012

Auditor: Larry E. Farris

Selection Criteria

Tax Code: 14 FDA Receipts Adjustment

Exam Type: 103 FDA Receipts Adjustment

Additional Tax Base: \$9,120.30

<u>Location</u>	<u>Name</u>	<u>Rate</u>	<u>Rate Period</u>	<u>Taxable Amount</u>	<u>Tax Due</u>
010 0005 5	CHAMPAIGN	01.00	2010 01 - Current	\$9,120.30	\$91.20
				<hr/> \$9,120.30	<hr/> \$91.20



Illinois Department of Revenue

Sales Tax Audit System

Projected Data Results

Date: 07/05/2013

Time: 12:17:18

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Taxpayer: 2969-9479/NATIONAL WOUND CARE LLC Audit Period: 10/01/2010 through 12/31/2012

Auditor: Larry E. Farris

Selection Criteria

Tax Code: 14 FDA Receipts Adjustment

Exam Type: 104 FDA Receipts Adjustment

Additional Tax Base: -\$65,986.00

<u>Location</u>	<u>Name</u>	<u>Rate</u>	<u>Rate Period</u>	<u>Taxable Amount</u>	<u>Tax Due</u>
010 0005 5	CHAMPAIGN	01.00	2010 01 - Current	-\$65,986.00	-\$659.86
				-\$65,986.00	-\$659.86



Illinois Department of Revenue

Sales Tax Audit System

Projected Data Results

Date: 07/05/2013

Time: 12:17:18

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Auditor: Larry E. Farris
Taxpayer: 2969-9479/NATIONAL WOUND CARE LLC Audit Period: 10/01/2010 through 12/31/2012

Selection Criteria

Tax Code: 30 Assets Use Tax Adjustment

Exam Type: 100 Assets Use Tax Adjustment

Additional Tax Base: \$117,230.81

<u>Location</u>	<u>Name</u>	<u>Rate</u>	<u>Rate Period</u>	<u>Taxable Amount</u>	<u>Tax Due</u>
010 0005 5	CHAMPAIGN	06.25	2010 01 - Current	\$117,230.81	\$7,326.94
				<hr/> \$117,230.81	<hr/> \$7,326.94



Illinois Department of Revenue

Sales Tax Audit System

Projected Data Results

Date: 07/05/2013

Time: 12:17:18

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Auditor: Larry E. Farris
Taxpayer: 2969-9479/NATIONAL WOUND CARE LLC Audit Period: 10/01/2010 through 12/31/2012

Selection Criteria

Tax Code: 30 Assets Use Tax Adjustment

Exam Type: 101 Assets Use Tax Adjustment

Additional Tax Base: \$8,511.60

<u>Location</u>	<u>Name</u>	<u>Rate</u>	<u>Rate Period</u>	<u>Taxable Amount</u>	<u>Tax Due</u>
010 0005 5	CHAMPAIGN	06.25	2010 01 - Current	\$8,511.60	\$532.00
				<hr/> \$8,511.60	<hr/> \$532.00



Illinois Department of Revenue

Sales Tax Audit System

Projected Data Results

Date: 07/05/2013

Time: 12:17:18

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Taxpayer: 2969-9479/NATIONAL WOUND CARE LLC Audit Period: 10/01/2010 through 12/31/2012

Auditor: Larry E. Farris

Selection Criteria

Tax Code: 31 Consumable Supplies Use Tax Adjustment

Exam Type: 200 Consumable Supplies Use Tax Adjustment

Projection Period: 10/1/2010 - 12/31/2012

Exceptions Dollar Amount: \$592.20

Number of Sample Units: / 12.00

Average Dollar Per Unit Error: \$49.35

Number of Population Units: x 27.00

Projected Taxable Base: \$1,332.45

<u>Location</u>	<u>Name</u>	<u>Rate</u>	<u>Rate Period</u>	<u>Taxable Amount</u>	<u>Tax Due</u>
010 0005 5	CHAMPAIGN	06.25	2010 01 - Current	\$1,332.45	\$83.28
				\$1,332.45	\$83.28



Illinois Department of Revenue

Sales Tax Audit System

Projected Data Results

Date: 07/05/2013

Time: 12:17:18

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Taxpayer: 2969-9479/NATIONAL WOUND CARE LLC Audit Period: 10/01/2010 through 12/31/2012

Auditor: Larry E. Farris

Selection Criteria

Tax Code: 33 FDA Use Tax Adjustment

Exam Type: 100 FDA Use Tax Adjustment

Additional Tax Base: \$2,738.15

<u>Location</u>	<u>Name</u>	<u>Rate</u>	<u>Rate Period</u>	<u>Taxable Amount</u>	<u>Tax Due</u>
010 0005 5	CHAMPAIGN	01.00	2010 01 - Current	\$2,738.15	\$27.37
				<hr/> \$2,738.15	<hr/> \$27.37