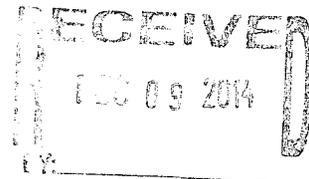


ILLINOIS INDEPENDENT  
TAX TRIBUNAL



1477235

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National Wound Care, LLC,

Petitioner,

v.

ILLINOIS DEPARTMENT

OF REVENUE, Respondent.

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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: 

John Prince, Managing Partner



COPY

**Illinois Department of Revenue**  
**OFFICE OF ADMINISTRATIVE HEARINGS**  
Willard Ice Building  
101 West Jefferson Street – Level 5SW  
Springfield, IL 62702  
(217)782-6995

October 7, 2014

National Wound Care LLC  
4112B Fieldstone Road  
Champaign, IL 61822

Re: **PROTEST DISMISSAL DUE TO LACK OF JURISDICTION**

National Wound Care LLC  
Account ID: 2969-9479  
Letter ID: CNXXXX54655792X0  
Notice of Tax Liability dated July 31, 2014

To National Wound Care LLC:

The Office of Administrative Hearings of the Illinois Department of Revenue received your protest and request for an administrative hearing for the above Notice of Tax Liability. The mailing date of your protest and request for hearing indicate that the protest was sent within the 60-day protest period for requesting an administrative hearing stated on the above Notice. However, the tax assessment at issue for the protest exceeds the statutory amount (\$15,000, exclusive of penalties and interest) or (\$15,000 for notices that involve only penalties and interest) for which the Department has jurisdiction for protests filed on or after January 1, 2014. For protests that exceed the statutory amount and are filed on or after January 1, 2014, jurisdiction is vested solely in the Illinois Independent Tax Tribunal (Tax Tribunal). See 35 ILCS 1010/1-1 *et seq.* **Because the Department does not have jurisdiction over this protest, the Department is respectfully dismissing your protest and request for administrative hearing.**

Because of these recent changes in Illinois law, the Department and the Tax Tribunal recognize that there may be instances, such as this, when a protest and request for an administrative hearing may be filed in the wrong jurisdiction. The Tax Tribunal's website ([www.illinois.gov/taxtribunal](http://www.illinois.gov/taxtribunal)) contains rules that include guidance on filing in the wrong jurisdiction and contact information for the Tax Tribunal. **The Tax Tribunal's rules provide that a timely protest that is dismissed by the Department for lack of jurisdiction may be filed with the Tax Tribunal within 60 days of the notice of such dismissal.** See Subsection (a)(3) of Section 5000.310 of the Tax Tribunal's rules. Please note that the Tax Tribunal has different requirements

than the Department for filing protests, including the payment of filing fees and the filing of a petition in the form required by the Tax Tribunal.

I recommend that you review the information provided on the Tax Tribunal's website and contact them if you have any questions.

Sincerely,



Terry D. Charlton  
Chief Administrative Law Judge  
Illinois Department of Revenue

TDC:vs

312-814-4285

ILLINOIS INDEPENDENT  
TAX TRIBUNAL

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\_\_\_\_\_,  
Petitioner,

v.

ILLINOIS DEPARTMENT  
OF REVENUE,  
Respondent.

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**PETITION**

The Petitioner, \_\_\_\_\_, hereby petitions the Illinois Independent Tax Tribunal to review and reverse and/or modify the [Notice of Tax Liability, Notice of Deficiency, Notice of Claim Denial, Notice of Penalty Liability, etc.] (“Notice”) issued by the Illinois Department of Revenue (“Department”), for the reasons stated below:

[Separately numbered paragraphs must be used below. Each factual allegation should be set out in its own paragraph or subparagraph.]

**INTRODUCTION**

1. The “Notice” was issued by the Department on \_\_\_\_\_ (assessing or denying a refund – select one) in the amount of \$ \_\_\_\_\_ in tax, \$ \_\_\_\_\_ in penalties and \$ \_\_\_\_\_ in interest for taxable periods \_\_\_\_\_ . A copy of the “Notice” is attached to this Petition. [If multiple Notices, add additional paragraphs.]



**ERROR II**

16. ADD

17. ADD

**ERROR III**

18. ADD.

**ERROR IV**

19. ADD

**CONCLUSION AND RELIEF REQUESTED**

20. ADD

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

NAME OF PETITIONER

By: \_\_\_\_\_  
\_\_\_\_\_, one of the Attorneys  
Representing Petitioner.

Representatives:

(Names and addresses, phone numbers, emails, and ARDC numbers)

Only for use by out of state attorneys:

As an attorney authorized to practice law in \_\_\_\_\_ (name state), I certify that I have complied with the Illinois Supreme Court procedures for admission to practice *pro hac vice* in Illinois for this matter and a copy of my court order on this is attached.

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Signature

# 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



**Illinois Department of Revenue**  
**Sales Tax Audit System**  
*Global Taxable Exceptions Detailed Report / All Codes Sorted by Date*

Date: 07/05/2013  
Time: 12:13:40  
Page: 1

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>
<b>Tax Code: 10      Exam Type: 100</b>					
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
<b>Tax Code: 10      Exam Type: 101</b>					
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
<b>Tax Code: 10      Exam Type: 102</b>					
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
<b>Tax Code: 10      Exam Type: 103</b>					
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



# Illinois Department of Revenue

## Sales Tax Audit System

Global Taxable Exceptions Detailed Report / All Codes Sorted by Date

Date: 07/05/2013  
Time: 12:13:40  
Page: 2

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



# Illinois Department of Revenue

## Sales Tax Audit System

Global Taxable Exceptions Detailed Report / All Codes Sorted by Date

Date: 07/05/2013

Time: 12:13:40

Page: 3

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>
<b>Tax Code: 14 Exam Type: 103</b>					
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
<b>Tax Code: 14 Exam Type: 104</b>					
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

<u>Date</u>	<u>Doc #</u>	<u>Name</u>	<u>Description</u>	<u>Reason Questioned</u>	<u>Amount Taxable</u>
<b>Tax Code: 30 Exam Type: 100</b>					
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



# Illinois Department of Revenue

## Sales Tax Audit System

Global Taxable Exceptions Detailed Report / All Codes Sorted by Date

Date: 07/05/2013

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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					\$8,511.60

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



# Illinois Department of Revenue

## Sales Tax Audit System

Global Taxable Exceptions Detailed Report / All Codes Sorted by Date

Date: 07/05/2013  
Time: 12:13:40  
Page: 5

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
<b>Totals for Examination:</b>					<b>\$298,909.73</b>

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	615.06
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	1,829.96	522.98	49.37	229.60	1,193.38	112.66	523.92
4/30/11	7,792.99	23,582.07	31,375.06	3,375.06	4,893.44	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	3,292.41	2,700.64	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	2,748.94	2,170.29	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	35.13	163.39	602.84	56.91	264.66
10/31/11	6,872.15	26,745.29	33,617.44	1,954.59	4,917.56	390.92	983.51	254.93	24.07	111.92	641.38	60.55	281.58
11/30/11	9,058.11	30,533.24	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	5,741.26	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	9,390.59	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	162.86	15.38	71.50	645.11	60.90	283.21
7/31/12	5,441.57	42,213.87	47,655.44	1,559.03	3,882.54	311.81	776.51	203.34	19.20	89.27	506.39	47.81	222.31
8/31/12	10,240.79	55,848.96	66,089.75	2,660.84	7,579.95	532.17	1,515.99	347.05	32.76	152.36	988.63	93.33	434.03
9/30/12	9,626.42	46,349.97	55,976.39	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	219.30	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
	287,494.88	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	11,023.73

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	395.00	936.64	1,331.64	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	14,965.18	17,932.06	205.85	2,762.03	2,858.35	6,188.20	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	193.82	985.28	
6/30/11	6,419.36	13,280.37	19,699.73	329.39	6,089.97	0.00	5,331.66	5,331.66	1,179.10	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	881.87	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	1,382.18	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	168.53	10.72	
	126,380.57	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	46,363.03

Period	IL Rental Income	All rental Income	
10/31/10	47,432.34	132,414.66	35.82%
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	61,370.61	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	39.08%
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  
93,036.99  
104,985.60  
89,673.98  
57,744.81  
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  
75,187.96  
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
<b>Total:</b>	<b>\$25,046.16</b>	<b>\$83.28</b>	<b>\$0.00</b>	<b>\$25,129.44</b>		<b>\$304.09</b>



# 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
<b>Total Late Payment</b>	<b>\$25,129.44</b>		<b>\$3,769.42</b>		<b>\$0.00</b>	<b>\$3,769.42</b>

### Negligence

This penalty was not assessed for any periods.

### Fraud

This penalty was not assessed for any periods.

<b>Grand Total</b>		<b><u>Penalty</u></b>	<b><u>Interest</u></b>	<b><u>Total</u></b>
		<b>\$3,769.42</b>	<b>\$0.00</b>	<b>\$3,769.42</b>



# 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
				<hr/> \$25,119.11	<hr/> \$2,197.91



# 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
				\$11,027.73	\$964.92



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

Auditor: Larry E. Farris

## 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

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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

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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
				<u>\$1,332.45</u>	<u>\$83.28</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: 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