

## Income/Franchise:

### Indiana DOR Says Company May Carry Forward Adjustments and Attributes from Previous RARs

*Letter of Findings 02-20221113*, Ind. Dept. of Rev. (6/21/23). In an administrative ruling involving a tax audit resulting in a pending assessment, the Indiana Department of Revenue (Department) held that a taxpayer may carry forward attributes (e.g., net operating losses, offsets) and adjustments called for in three previous federal revenue agent reports (RARs) to apply against the Department's pending assessment, but that to implement these adjustments, the company must file all appropriately detailed Indiana returns and supporting documentation within 90 days of the ruling. That is, the company must prepare amended Indiana returns tracking the adjustments year-by-year, return-by-return, dollar-by-dollar, and entity-by-entity for all years in which the RAR adjustments had an effect, including a schedule of the attributes and the impact of those attributes year-by-year. Please contact us with any questions.

**URL:** <http://iac.iga.in.gov/iac/20230621-IR-045230436NRA.xml.pdf>

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