

**Illinois Department of Revenue
Regulations**

Title 86 Part 210 Section 210.115 Offers in Compromise

TITLE 86: REVENUE

**PART 210
BOARD OF APPEALS**

Section 210.115 Offers in Compromise

- a) A petition in the nature of an offer in compromise may be filed by the taxpayer. The only grounds for relief that may be propounded is uncertainty as to collectibility. No such petition may be filed prior to an assessment of tax liability becoming final.
- b) "An offer in compromise" is defined as a proposal by taxpayer to pay a sum certain in full satisfaction to taxpayer's unpaid amount of tax (including penalty and interest).
- c) In considering taxpayer's proposal to pay a sum certain, the Board may examine taxpayer's financial situation and the likelihood of future earnings as well as the likelihood of collection of the amount due by the Department.

(Source: Amended at 17 Ill. Reg. 8860, effective June 2, 1993)