

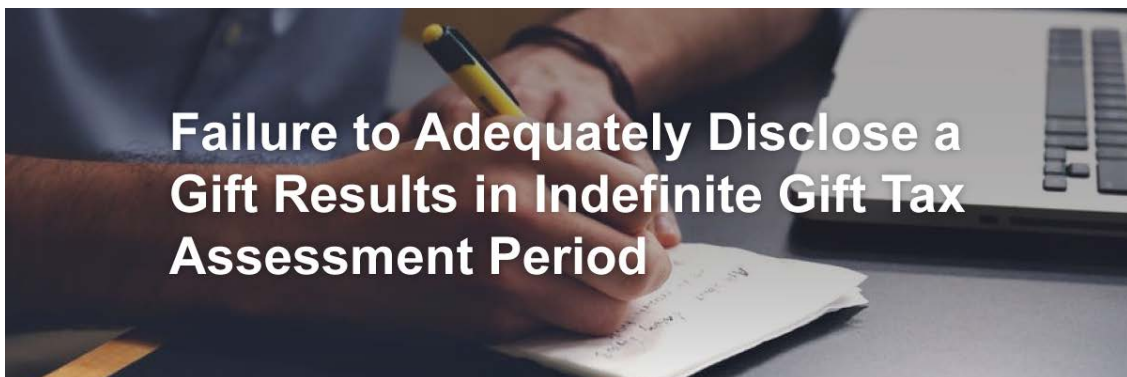


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In Office of Chief Counsel Memorandum FAA 20172807F, the IRS Chief Counsel stated that the three-year limitations period for gift tax assessment remained open indefinitely for a donor’s gifts where the donor (i) failed to file federal gift tax returns disclosing gifts made in each of six different tax years and (ii) filed a gift tax return that failed to adequately disclose gifts made in a seventh year because the return did not describe the transferred property nor provide a description of the method used to determine the value of the transferred property. See FAA 20172801F.

[View FAA 20172801F](#)

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