



January 12, 1950

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Attention: REDACTED TEXT

Gentlemen:

This is in reply to your letter of November 29 in which you inquire as to the application of Sales and Use Tax Ruling 51 to federal savings and loan associations.

You are advised that we do not regard a federal savings and loan association as a bank within the meaning of the "in lieu" provision of Article XIII, Section 16 of the California State Constitution. Accordingly, Ruling 51 does not apply to a federal savings and loan association.

Very truly yours,

E. H. Stetson  
Tax Counsel

EHS/WAP/hb