



STATE BOARD OF EQUALIZATION

August 24, 1964

[T]
P.O. Box XXXX
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Attention: Mr. [T]
Division Secretary

B-XXXXXXX

Gentlemen:

In answer to your letter of August 13, 1964, we advise that "Liquid Smoke" is considered to be sold for resale to a restaurant or other customer who applies the Liquid Smoke as an ingredient for barbequing meats, which are to be sold. The theory is that the smoke or certain ingredients contained in it become physically incorporated into the food providing flavor to it.

The Attorney General issued an opinion a number of years ago which is still applicable, and we are enclosing a copy. Our opinion on your question is based upon the assumption that the Liquid Smoke is used in a manner comparable to that upon which the Attorney General based his opinion.

Very truly yours,

E. H. Stetson
Tax Counsel

EHS:fb
Enclosure

cc: --- --- – District Administrator