



STATE BOARD OF EQUALIZATION

September 16, 1966

Dear _____,

It appears from your letter of September 7, 1966, that four individuals purchased an aircraft and paid use tax on the purchase. Subsequently, a fifth individual desires to "buy in" on the aircraft.

We shall assume that the four individuals are tenants in common of the aircraft and will transfer an interest therein to the fifth party.

In our opinion, this is a purchase by the fifth party of an interest in tangible personal property, i.e., an airplane, and that the use tax applies and is measured by the amount paid for the interest purchased.

Very truly yours,

E. H. Stetson
Tax Counsel