



565.0500

STATE OF CALIFORNIA

STATE BOARD OF EQUALIZATION

May 24, 1965

Gentlemen:

We have considered your client's petition for redetermination in the light of information obtained by our auditors, information submitted by you, and information obtained at the preliminary hearing held in Hollywood on May 5, 1965.

A review of our precedent indicates that deep water well pumps have consistently been regarded as improvements to realty under Section 6384 of the law. As pointed out at the preliminary hearing, we believe the case of Bell v. Bank of Perris, 52 Cal. App. 2d 66, supports our position. Accordingly, we propose to recommend to the Board that your client be considered the consumer of the five deep well pumps furnished and installed at the REDACTED TEXT refuge pursuant to a contract with the REDACTED TEXT bureau.

Since you have not requested a Board hearing in this matter, it will be scheduled for action by the Board on the nonappearance calendar. However, if a Board hearing is desired, one should be requested in writing within 15 days of the date of this letter.

Very truly yours

Jack D. Paulson
Associate Tax Counsel

JDP:ls [lb]