



STATE OF CALIFORNIA

**STATE BOARD OF EQUALIZATION**

1000 N STREET, SACRAMENTO, CALIFORNIA  
(P.O. BOX 1799, SACRAMENTO, CALIFORNIA 95808)

(916) 445-4982

CONWAY H COLLIS  
First District, Los Angeles  
ERNEST J DRONENBURG, JR  
Second District, San Diego  
WILLIAM M BENNETT  
Third District, Kentfield  
RICHARD NEVINS  
Fourth District, Pasadena  
KENNETH CORY  
Controller, Sacramento

DOUGLAS D BELL  
Executive Secretary

No. 83/45

April 1, 1983

TO COUNTY ASSESSORS:

CHANGE IN OWNERSHIP OF LEGAL ENTITIES

Here is an overview of the Board's Legal Entity Ownership Program (LEOP).

I. Introduction

LEOP implements that portion of Section 64 of the Revenue and Taxation Code which pertains to the State Board of Equalization. The section requires reappraisal of all taxable real property owned by a legal entity at the time any person or entity acquires control in a corporation or a majority ownership interest in any other legal entity.

LEOP is designed to assist assessors in discovering legal entities that have had a change in control or majority ownership. Discovery can be difficult because ordinarily there is no recorded notice of a transfer of the ownership interests in legal entities. Such notice may appear as a matter of interest in newspapers, magazines, trade journals and financial subscription services, but not in the official county records.

II. Franchise Tax Board

In 1981, the Legislature required a special question be added to the corporate and partnership state income tax forms (questions L and I respectively). These questions ask entities; 1) did this entity own real property in California, and 2) has there been a change in control or majority ownership since March 1, 1975? As the Franchise Tax Board processes corporate and partnership tax returns, the response to these questions is recorded and sent to the Board's data processing section and then into the LEOP computer program.

III. LEOP

An entity that answers "no" to one or both questions on its income tax form is dropped from the program. Entities that answer with any other response, including blank answers, will receive an inquiry from LEOP in order to determine if a transfer did in fact take place and, if so, the identity and location of any taxable real property involved.

Three basic forms are used by LEOP to acquire information from legal entities. These forms are described below:

- (1) The Declaration of Change of Ownership or Control (First Inquiry) form (Exhibit A) is a "follow-up" form sent to entities whose response to questions "I" or "L" is incomplete. If the entity verifies on this form that a change in control occurred and owns real property in California, that entity will be sent the more complex Statement of Change in Ownership of Legal Entities (Exhibit B) form to obtain specific details about the transfer and the property owned by the entity at the time of the transfer.
- (2) The Statement of Change in Ownership of Legal Entities form is also a follow-up form. It is sent to legal entities who verify a change in control and the ownership of real property in California on the First Inquiry as described above. It is also sent to entities who indicated on their income tax form (questions "I" or "L") that a change in control may have taken place and real property is owned. The form is designed to obtain information needed to determine if a change in ownership did occur and to inventory the real property involved. Pertinent data will then be distributed to assessors so that appraisals can be made as required by Article XIII A of the State Constitution.
- (3) The Penalty Notice and Penalty Abatement form (Exhibit C) is a notice sent to legal entities that have not fully completed the forms sent them or have not returned forms within the statutory time allowed. This form tells the entity that a penalty has been set but that the State will recommend county officials abate the penalty if the entity will provide the information requested within the additional statutory time limit and can show that it missed the filing date due to good cause.

An additional form, the Notice of Findings (NOF), will be mailed to each entity for which a valid change in ownership has been verified. The NOF informs the entity that its California real property is subject to appraisal for property tax purposes and that a representative from the county assessor's office will be in touch.

#### IV. Penalties

A penalty may be incurred by a legal entity that does not respond timely to the State Board's request for information regarding a change in ownership. The penalty, which is statutory, is provided for in Section 480.1 of the Revenue and Taxation Code and states in part:

"...The failure to file a change in ownership statement within 45 days from the date of a written request by the State Board of Equalization results in a penalty of either: (1) one hundred dollars (\$100), or (2) 10 percent of the taxes applicable to the new base year value reflecting the change in control of the real property owned by the corporation, partnership, or legal entity (or 10 percent of the current years taxes on that property if no change in control occurred), whichever is greater..."

Note that failure to respond within 45 days to the Board's request results in a penalty being levied--even if there has been no change in control. Section 480.1 continues in part:

"...This penalty will be added to the assessment roll and shall be collected like any other delinquent property taxes, and be subject to the same penalties for nonpayment."

How will the assessor know which entities are to be penalized? Each month the State Board will send each assessor a list of those entities that have property in the abatable penalty status. Abatable penalty status occurs when an entity does not respond timely to the first Statement of Change In Ownership form sent to it by the State Board. Non response to first request triggers an automatic second questionnaire. The second questionnaire is accompanied by a Penalty and Penalty Abatement Request Form which (1) advises the entity that it is in the abatable penalty status and (2) that unless the questionnaire and the penalty abatement form are completed and returned timely (within 60 days of the date of mailing) the penalty will permanently attach. If the entity responds properly and timely to both forms the State Board will RECOMMEND that the County Board of Supervisors abate the penalty. Entities for which penalty abatement is recommended will be identified by the word "abate" opposite the entity's name on the list sent monthly. Any entity that does not respond timely to the questionnaire and penalty abatement forms will be placed on the "Non-response List". This list is described later in this letter.

V. What Information Will the County Assessor Receive from LEOP?

- (1) A printout (Exhibit D) listing alphabetically all entities and the number of parcels (not APN) that were included in a change in control in the county. The printout is "paged" county by county and only those counties that have had a change will receive this printout.

- (2) Xerox copies of the property schedules (Exhibit E) submitted by entities. This schedule is page 3 of the Statement of Change in Ownership of Legal Entities form described above. Note that the information will be a copy. The Board will not edit information reported on these forms. Entities are asked to identify leased property that qualifies as real property, but terms and conditions of such leases are not requested.
- (3) A listing of entities (Exhibit F) sorted alphabetically by corporation name that have been sent a Q2 (second Statement of Change in Ownership of Legal Entities Form) and the accompanying Penalty and Penalty Abatement Request Form (PARF). Entities that have returned a Q2, the PARF, and for which abatement has been recommended will be identified on this printout.

Semiannually LEOP will send two cumulative lists to all assessors. One list, the Change in Control list, will show in alphabetical order all entities that have experienced a change in control and are subject to reappraisal. The other list, the Non-Response list, is an alphabetical listing of all entities that have not responded to the Board's efforts to contact them. These latter entities are subject to penalties and assessors are requested to apply penalties accordingly.

The Non-Response list should be researched to determine if any of the entities listed owns real property in the county. If the entity does own real property in the county, the assessor should investigate to determine if a reappraisal is proper.

Any questions you have regarding LEOP may be directed to Don Davis (916) 445-4982.

Sincerely,



Verne Walton, Chief  
Assessment Standards Division

VW:ab  
AL-04B-0631A

STATE BOARD OF EQUALIZATION  
 PROPERTY TAXES DEPARTMENT  
 LEGAL ENTITY OWNERSHIP PROGRAM  
 P.O. BOX 1799 SACRAMENTO, CA 95808 (916) 445-4982

DECLARATION OF CHANGE OF OWNERSHIP OR CONTROL  
 (FIRST INQUIRY)

DUE ON OR BEFORE: APRIL 4, 1983

ID: C 00-093-4260  
 82/10

81/12

YOUR RESPONSE TO QUESTION "L" ON YOUR CALIFORNIA "CORPORATION FRANCHISE OR INCOME TAX RETURN" (FTB FORM 100) REQUIRES FURTHER CLARIFICATION. PLEASE ANSWER THE FOLLOWING QUESTIONS.

	YES	NO
DID THIS ENTITY OWN REAL PROPERTY IN CALIFORNIA ON MARCH 1, 1981? *	<input type="checkbox"/>	<input type="checkbox"/>
HAS CUMULATIVELY MORE THAN 50% OF THE VOTING STOCK, OR OTHER OWNERSHIP INTERESTS, BEEN TRANSFERRED SINCE MARCH 1, 1975?	<input type="checkbox"/>	<input type="checkbox"/>
HAS ANY PERSON OR ENTITY ACQUIRED CONTROL OF THIS ENTITY SINCE MARCH 1, 1975? **	<input type="checkbox"/>	<input type="checkbox"/>

\* REAL PROPERTY INCLUDES, BUT IS NOT LIMITED TO, LAND, STRUCTURES, FIXED EQUIPMENT, TREES, AND VINES. IT MAY BE OWNED IN FEE, OR LEASED FOR A TERM OF 35 YEARS OR MORE INCLUDING WRITTEN RENEWAL OPTIONS, OR LEASED FROM A GOVERNMENT AGENCY FOR ANY PERIOD OF TIME, OR CONSIST OF A RIGHT TO PRODUCE OR EXTRACT OIL, GAS OR MINERALS SO LONG AS PRODUCED IN PAYING QUANTITIES.

\*\* ACQUIRING CONTROL MEANS ACQUISITION BY ONE OR MULTIPLE TRANSACTIONS OF MORE THAN 50% OF VOTING STOCK, PARTNERSHIP CAPITAL AND PROFITS, OR OTHER INTERESTS IN AN ENTITY. SUCH OWNERSHIP INTERESTS MAY BE ACQUIRED BY PURCHASE, GRANT, DEVISE, INHERITANCE, TRUST, OR DELETION OF ONE OR MORE OWNERS. CONTROL OF A LEGAL ENTITY MAY BE ACQUIRED AT ONE TIME OR OVER A PERIOD OF TIME, VOLUNTARILY, INVOLUNTARILY, OR BY OPERATION OF LAW.

I CERTIFY (OR DECLARE) UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOREGOING AND ALL INFORMATION HEREON, IS TRUE, CORRECT AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

TITLE: \_\_\_\_\_ PHONE (8AM-5PM): \_\_\_\_\_

INDICATE CHANGE OF ADDRESS HERE.

ADDRESS \_\_\_\_\_  
 CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP \_\_\_\_\_

**STATE BOARD OF EQUALIZATION**  
**PROPERTY TAXES DEPARTMENT**  
 1020 N STREET, SACRAMENTO, CALIFORNIA  
 (P.O. BOX 1799, SACRAMENTO, CALIFORNIA 95808)  
 TELEPHONE: (916) 445-4982

EXHIBIT B  
 [1 of 5]

**STATEMENT OF CHANGE IN OWNERSHIP OF LEGAL ENTITIES**

California Property Tax Laws require the reporting of changes in ownership of corporations and other legal entities to this Board. The purpose of reporting is to determine if real property owned or leased by the above named entity is subject to reappraisal by county assessors.

Please answer, or forward to the current owner(s) of this entity for answering, the following questions pursuant to the applicable "Important Notice" shown on Page 4. These notices are contained in Sections 480.1 and 480.2 of the California Revenue and Taxation Code.

<b>PART I</b>	YES	NO
1. Did this legal entity own real property in California on March 1, 1981 ? (See definition A - "Real Property" on reverse side). <i>If you answered "yes" go to question 2. If you answered "no", sign on line 8 and return this statement.</i>	<input type="checkbox"/>	<input type="checkbox"/>
2. Has any person or legal entity, through one or multiple transactions, obtained control of this legal entity since March 1, 1975? (See definition B - "Control" on reverse side). <i>If you answered "yes" go to question 3. If "no" skip to question 6, Part II.</i>	<input type="checkbox"/>	<input type="checkbox"/>
3. When the controlling interest was obtained, was the acquisition a merger of an affiliated group of corporations reorganized under Section 368 of the U.S. Internal Revenue Code? <i>If you answered "yes" go to question 4.                      If "no" skip to page 3, complete Part IV, sign below on line 8 and return this statement.</i>	<input type="checkbox"/>	<input type="checkbox"/>
4. Is 100 percent of the voting stock, exclusive of any shares owned by directors of each of the corporations, except the parent, owned by one or more of the other affiliated corporations? <i>If "yes" go to question 5. If "no" skip to page 3, complete Part IV, sign and return.</i>	<input type="checkbox"/>	<input type="checkbox"/>
5. Does the common parent entity own directly 100 percent of the voting stock, exclusive of any shares owned by directors of at least one of the other affiliated corporations? <i>If "yes", sign at line 8 and return this statement.                      If "no" skip to page 3, complete Part IV, sign below on line 8 and return this statement.</i>	<input type="checkbox"/>	<input type="checkbox"/>
<b>PART II</b>		
6. Has any transfer of real property to this legal entity been excluded from a property tax appraisal pursuant to Section 62(a) of the California Revenue and Taxation Code since March 1, 1975? (See definition C - "62(a) Exclusion" on the reverse side). <i>If you answered "yes" go to question 7. If "no" sign on line 8 and return this statement.</i>	<input type="checkbox"/>	<input type="checkbox"/>
7. Cumulatively has more than 50 percent of the original co-owners interest in this entity transferred since the exclusion(s) referred to in question 6. <i>If you answered "yes" skip to page 5, complete Part V.                      If you answered "no" sign and return.</i>	<input type="checkbox"/>	<input type="checkbox"/>
<b>PART III</b>		
<i>I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing and all information hereon, including any accompanying statements or documents, is true, correct, and complete to the best of my knowledge and belief.</i>		
8. _____ Signature of Owner or Corporate Officer	_____ Title, if Corporate Officer/Partner	(    ) Telephone (8 a.m. - 5 p.m.)

**DEFINITIONS**

- A. REAL PROPERTY INCLUDES, BUT IS NOT LIMITED TO, LAND, STRUCTURES, FIXED EQUIPMENT, TREES, AND VINES. IT MAY BE OWNED IN FEE, OR LEASED FOR A TERM OF 35 YEARS OR MORE INCLUDING WRITTEN RENEWAL OPTIONS, OR LEASED FROM A GOVERNMENT AGENCY FOR ANY PERIOD OF TIME, OR CONSIST OF A RIGHT TO PRODUCE OR EXTRACT OIL, GAS OR MINERALS SO LONG AS PRODUCED IN PAYING QUANTITIES.
- B. "ACQUIRING CONTROL" MEANS ACQUISITION BY ONE OR MULTIPLE TRANSACTIONS OF MORE THAN 50% OF VOTING STOCK, PARTNERSHIP CAPITAL AND PROFITS, OR OTHER INTERESTS IN AN ENTITY. SUCH OWNERSHIP INTERESTS MAY BE ACQUIRED BY PURCHASE, GRANT, DEVISE, INHERITANCE, TRUST, OR DELETION OF ONE OR MORE OWNERS. CONTROL OF A LEGAL ENTITY MAY BE ACQUIRED AT ONE TIME OR OVER A PERIOD OF TIME, VOLUNTARILY, INVOLUNTARILY, OR BY OPERATION OF LAW.
- C. Section 62 Change in Ownership Exclusions. (a) Any transfer between coowners which results in a change in the method of holding title to the real property without changing the proportional interests of the coowners, such as a partition of a tenancy in common, or any transfer of title between an individual and a legal entity or between legal entities, such as a cotenancy to a partnership, a partnership to a corporation, a trust to a cotenancy, or an individual to a legal entity, which results solely in a change in the method of holding title and in which the proportional interests by the transferors and transferees, whether represented by stock, partnership interest, or otherwise, remain the same after transfer.

**D. COUNTY IDENTIFICATION NUMBERS**

01 Alameda	15 Kern	29 Nevada	43 Santa Clara
02 Alpine	16 Kings	30 Orange	44 Santa Cruz
03 Amador	17 Lake	31 Placer	45 Shasta
04 Butte	18 Lassen	32 Plumas	46 Sierra
05 Calaveras	19 Los Angeles	33 Riverside	47 Siskiyou
06 Colusa	20 Madera	34 Sacramento	48 Solano
07 Contra Costa	21 Marin	35 San Benito	49 Sonoma
08 Del Norte	22 Mariposa	36 San Bernardino	50 Stanislaus
09 El Dorado	23 Mendocino	37 San Diego	51 Sutter
10 Fresno	24 Merced	38 San Francisco	52 Tehama
11 Glenn	25 Modoc	39 San Joaquin	53 Trinity
12 Humboldt	26 Mono	40 San Luis Obispo	54 Tulare
13 Imperial	27 Monterey	41 San Mateo	55 Tuolumne
14 Inyo	28 Napa	42 Santa Barbara	56 Ventura
			57 Yolo
			58 Yuba

Section 64 of the Revenue and Taxation Code states that a change in control of a legal entity constitutes a change in ownership of the real property owned by the entity. A change in control occurs when one person or entity, through one or multiple transactions, directly or indirectly owns or controls more than 50 percent of the voting stock of a corporation or the ownership interests of a legal entity (e.g. partnership interests).

Further the transfer of real property, or an interest therein, between entities (e.g. corporation, partnership, etc.), or between an individual and an entity is a change in ownership requiring reappraisal of the property transferred. However, no change in ownership occurs if the proportional interests of the transferors and transferees remain the same before and after transfer (e.g. transfer from two individuals as equal tenants in common to a corporation or partnership in which they own equal interests). The transferees, in such a transfer, are termed "original co-owners" and the transfer of more than 50 percent, cumulatively, of the "original co-owners'" interest will be regarded as a change in ownership requiring reappraisal. Those holding interests after reappraisal are new "original co-owners."

Any addition or deletion of partners in a partnership is a change in ownership if the partnership is not a continuing partnership.

PROPERTY TAXES DEPARTMENT  
TELEPHONE (916) 445-4982

**PROPERTY SCHEDULE**

**PART IV**

Acquiring Legal Entity: Name (DBA) \_\_\_\_\_  
\_\_\_\_\_ Corp. No. \_\_\_\_\_

Address: \_\_\_\_\_

Effective Date of Acquisition: \_\_\_\_\_

California Income Tax Reporting Period For Entity Addressed: Beg. \_\_\_\_\_ End \_\_\_\_\_

Please list separately each property owned by or under lease to the acquired legal entity and to all of its subsidiaries. For each property please enter each Business Name (DBA), Address (situs), APN (County Assessors Parcel Number), and County Number (see listing on Page 2 facing this form). Please indicate "Entity", "Subsidiary", "Owned", or "Leased" in the spaces provided.

NAME and ADDRESS	APN	CO. NO.	Entity	Subsidiary	Owned	Leased
NAME (DBA) ADDRESS (SITUS)						
NAME (DBA) ADDRESS (SITUS)						
NAME (DBA) ADDRESS (SITUS)						
NAME (DBA) ADDRESS (SITUS)						
NAME (DBA) ADDRESS (SITUS)						
NAME (DBA) ADDRESS (SITUS)						
NAME (DBA) ADDRESS (SITUS)						



PROPERTY TAXES DEPARTMENT  
TELEPHONE (916) 445-4982

Revenue and Taxation Code Section 480.1 states

**"IMPORTANT NOTICE"**

"THE LAW REQUIRES ANY PERSON OR LEGAL ENTITY ACQUIRING OWNERSHIP CONTROL IN ANY CORPORATION, PARTNERSHIP, OR OTHER LEGAL ENTITY OWNING REAL PROPERTY IN CALIFORNIA SUBJECT TO LOCAL PROPERTY TAXATION TO FILE A CHANGE IN OWNERSHIP STATEMENT WITH THE STATE BOARD OF EQUALIZATION AT ITS OFFICE IN SACRAMENTO. THE CHANGE IN OWNERSHIP STATEMENT MUST BE FILED WITHIN 45 DAYS FROM THE DATE OF THE CHANGE IN CONTROL OF A CORPORATION, PARTNERSHIP, OR OTHER LEGAL ENTITY. THE FAILURE TO FILE A CHANGE IN OWNERSHIP STATEMENT WITHIN 45 DAYS FROM THE DATE OF A WRITTEN REQUEST BY THE STATE BOARD OF EQUALIZATION RESULTS IN A PENALTY OF EITHER (1) ONE HUNDRED DOLLARS (\$100), OR (2) 10 PERCENT OF THE TAXES APPLICABLE TO THE NEW BASE YEAR VALUE REFLECTING THE CHANGE IN CONTROL OF THE REAL PROPERTY OWNED BY THE CORPORATION, PARTNERSHIP, OR LEGAL ENTITY (OR 10 PERCENT OF THE CURRENT YEAR'S TAXES ON THAT PROPERTY IF NO CHANGE IN CONTROL OCCURRED), WHICHEVER IS GREATER. THIS PENALTY WILL BE ADDED TO THE ASSESSMENT ROLL AND SHALL BE COLLECTED LIKE ANY OTHER DELINQUENT PROPERTY TAXES, AND BE SUBJECT TO THE SAME PENALTIES FOR NONPAYMENT."

Revenue and Taxation Code 480.2

**"IMPORTANT NOTICE"**

"THE LAW REQUIRES ANY CORPORATION, PARTNERSHIP, OR OTHER LEGAL ENTITY OWNING REAL PROPERTY IN CALIFORNIA SUBJECT TO LOCAL PROPERTY TAXATION AND TRANSFERRING SHARES OR OTHER OWNERSHIP INTEREST IN SUCH LEGAL ENTITY WHICH CONSTITUTE A CHANGE IN OWNERSHIP PURSUANT TO SUBDIVISION (d) OF SECTION 64 OF THE REVENUE AND TAXATION CODE, TO FILE A CHANGE IN OWNERSHIP STATEMENT WITH THE STATE BOARD OF EQUALIZATION AT ITS OFFICE IN SACRAMENTO. THE CHANGE IN OWNERSHIP STATEMENT MUST BE FILED WITHIN 45 DAYS FROM THE DATE THAT SHARES OR OTHER OWNERSHIP INTERESTS REPRESENTING CUMULATIVELY MORE THAN 50 PERCENT OF THE TOTAL CONTROL OR OWNERSHIP INTERESTS IN THE ENTITY ARE TRANSFERRED BY ANY OF THE ORIGINAL COOWNERS IN ONE OR MORE TRANSACTIONS. THE FAILURE TO FILE A CHANGE IN OWNERSHIP STATEMENT WITHIN 45 DAYS FROM THE DATE OF A WRITTEN REQUEST BY THE BOARD OF EQUALIZATION RESULTS IN A PENALTY OF EITHER (1) ONE HUNDRED DOLLARS (\$100), OR (2) 10 PERCENT OF THE TAXES APPLICABLE TO THE NEW BASE YEAR VALUE REFLECTING THE CHANGE IN OWNERSHIP OF THE REAL PROPERTY OWNED BY THE CORPORATION, PARTNERSHIP, OR LEGAL ENTITY (OR 10 PERCENT OF THE CURRENT YEAR'S TAXES ON THAT REAL PROPERTY IF NO CHANGE IN OWNERSHIP OCCURRED), WHICHEVER IS GREATER. THIS PENALTY WILL BE ADDED TO THE ASSESSMENT ROLL AND SHALL BE COLLECTED LIKE ANY OTHER DELINQUENT PROPERTY TAXES, AND BE SUBJECT TO THE SAME PENALTIES FOR NONPAYMENT."

AF-02-1571A  
AUGUST, 1982

PROPERTY TAXES DEPARTMENT  
TELEPHONE (916) 445-4982

<b>PART V</b>			
1. LIST ALL PROPERTIES EXCLUDED FROM REAPPRAISAL PURSUANT TO SECTION 62 (d) OF THE CALIFORNIA REVENUE AND TAXATION CODE.			
STREET ADDRESS	CITY	COUNTY NO	ASSESSORS PARCEL NO
a.			
b.			
c.			
d.			
e.			
f.			
g.			
h.			
<i>ATTACH ADDITIONAL SCHEDULE IF NECESSARY</i>			
2. LIST "ORIGINAL CO-OWNERS" AND THE PERCENTAGE OF OWNERSHIP INTEREST HELD BY EACH AT THE TIME OF THE 62 (d) EXCLUSION.			
ORIGINAL CO-OWNERS			PERCENTAGE OF OWNERSHIP INTEREST
a.			
b.			
c.			
d.			
e.			
f.			
g.			
h.			
<i>ATTACH ADDITIONAL SCHEDULE IF NECESSARY</i>			
3. LIST "NEW ORIGINAL CO-OWNERS" AND THE PERCENTAGE OF OWNERSHIP INTEREST HELD BY EACH AFTER MORE THAN 50 PERCENT OF THE OWNERSHIP HAS TRANSFERRED. (CHRONOLOGY OF INTEREST CHANGE AND DATE MORE THAN 50 PERCENT CHANGED).			
NEW ORIGINAL CO-OWNERS			PERCENTAGE OF OWNERSHIP INTEREST
a.			
b.			
c.			
d.			
e.			
f.			
g.			
h.			
<i>ATTACH ADDITIONAL SCHEDULE IF NECESSARY</i>			
4. SIGN AT LINE 8, PART III ON PAGE 1 AND RETURN ALL PAGES.			



STATE OF CALIFORNIA

STATE BOARD OF EQUALIZATION

1000 N STREET, SACRAMENTO, CALIFORNIA  
P.O. BOX 1799, SACRAMENTO, CALIFORNIA 95808

CONWAY H. COLLIS  
First District, Los Angeles  
ERNEST J. DRONENBURG, JR.  
Second District, San Diego

WILLIAM M. BENNETT  
Third District, Kentfield

RICHARD NEVINS  
Fourth District, Pasadena

KENNETH CORY  
Controller, Sacramento

DOUGLAS D. BELL  
Executive Secretary

PENALTY NOTICE

Section 480.1 of the Revenue and Taxation Code requires that any person or legal entity receiving a request to file a "CHANGE IN OWNERSHIP STATEMENT" from the State Board of Equalization, must do so within a 45 day period. Failure results in a 10% penalty or \$100 fine whichever is greater. (See Page 4, Important Notice, on the accompanying questionnaire.) Our records (see dates above) indicate that the time period has elapsed and the Penalty is Now in Effect.

PENALTY ABATEMENT PROCEDURE

The penalty may be abated by:

1. Completing the Penalty Abatement Request at the bottom of this page,
2. Completing the accompanying Change in Ownership statement, and
3. Returning both documents, properly filled out and signed, to the Board by the above noted "Date This Notice Due."

Your penalty Abatement Request below MUST include a statement that will establish to the Board's satisfaction that failure to file the first Change in Ownership Statement was due to reasonable cause and not willful neglect.

**PENALTY ABATEMENT REQUEST**

On behalf of the above addressed entity, I hereby request abatement of the penalty noted above.

STATEMENT: Failure to timely file the first Change in Ownership Statement was due to

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Signed \_\_\_\_\_ Date \_\_\_\_\_

Office \_\_\_\_\_

01/04/83

EXHIBIT D

BOARD OF EQUALIZATION  
DIVISION OF ASSESSMENT STANDARDS  
ENTITIES INDICATING A CHANGE IN CONTROL

AS090

P/C ID NUMBER	CORPORATION NAME	PARCELS
---------------	------------------	---------

01 ALAMEDA

P 02-100-1199

A & D Market

5

666 F STREET

SACRAMENTO, CA 95809

5

THIS IS A MONTHLY LISTING, COUNTY BY COUNTY, THAT WILL SUMMARIZE THE ENTITIES AND THE NUMBER OF PARCELS (NOT APN) OWNED BY SUCH ENTITIES THAT HAVE HAD A CHANGE IN CONTROL AND OWNERSHIP. THE ASSESSOR WILL ALSO RECEIVE THE PROPERTY SCHEDULES FROM THE STATEMENT OF CHANGE IN OWNERSHIP OF LEGAL ENTITIES FORM WHERE THE PARCEL NUMBER OF PROPERTIES INVOLVED WILL BE LISTED. SEE EXHIBIT D.

LEOP-03-1098A  
01-18-83

EXHIBIT D

0144217

Oil Company  
713 Elm Street  
Hanford, CA 93230

PROPERTY TAXES DEPARTMENT  
TELEPHONE (916) 445-4982

PROPERTY SCHEDULE							
<b>PART IV</b>							
Acquiring Legal Entity. Name (DBA) <u>Oil America, Ltd.</u>							
Corp. No. <u>N/A</u>							
Address: <u>90 South Oak, New York, New York 10549</u>							
Effective Date of Acquisition: <u>November 25, 1981</u>							
California Income Tax Reporting Period For Entity Addressed: Beg. <u>January 1</u> End <u>December 31</u>							
Please list separately each property owned by or under lease to the acquired legal entity and to all of its subsidiaries. For each property please enter each Business Name (DBA), Address (situs), APN (County Assessor's Parcel Number), and County Number (see listing on Page 2 facing this form). Please indicate "Entity", "Subsidiary", "Owned", or "Leased" in the spaces provided.							
NAME and ADDRESS	APN	CO. NO.	Entity	Subsidiary	Owned	Leased	
NAME (DBA) Oil Company ADDRESS (SITUS) 14798 Lincoln Avenue San Leandro, CA S.S. #379	77C-1299-1000	01			X		
NAME (DBA) Oil Company ADDRESS (SITUS) 29705 Chapel Boulevard Hayward, CA S.S. #546	78G-2660-3-15	01			X		
NAME (DBA) Oil Company ADDRESS (SITUS) 4225 13th Street Fremont, CA S.S. #558	525-1282-22-5	01			X		
NAME (DBA) Oil Company ADDRESS (SITUS) 2519 Plane Street Chico, CA S.S. #534	044-20-0-067	04			X		
NAME (DBA) Oil Company ADDRESS (SITUS) 1522 17th Avenue San Pablo, CA S.S. #498	410-230-36-7	07			X		
NAME (DBA) Oil Company ADDRESS (SITUS) West Boulevard Pittsburg, CA S.S. #501	087-110-015-2	07			X		

01/04/83

BOARD OF EQUALIZATION  
 DIVISION OF ASSESSMENT STANDARDS  
 ENTITIES IN PENALTY STATUS

AS090

P/C ID NUMBER	CORPORATION NAME	PENALTY RECOMMENDATION	
P 01-100-0199	DDDDDDDDDDDDPPPPPPPPPPPPZZZZZZZZZZ A & G LIQUOR STORE 999 I ST. SACRAMENTO, CA 95809	A	ABATE
P 01-200-0299	DDDDDDDDDDDDPPPPPPPPPPPPZZZZZZZZZZ A & G LIQUOR STORE 999 I ST. SACRAMENTO, CA 95809	P	APPLY PENALTY*
P 01-300-0399	DDDDDDDDDDDDPPPPPPPPPPPPZZZZZZZZZZ A & G LIQUOR STORE 999 I ST. SACRAMENTO, CA 95809	A	ABATE
P 01-400-0499	DDDDDDDDDDDDPPPPPPPPPPPPZZZZZZZZZZ A & G LIQUOR STORE 999 I ST. SACRAMENTO, CA 95809	P	APPLY PENALTY*
P 01-500-0599	DDDDDDDDDDDDPPPPPPPPPPPPZZZZZZZZZZ A & G LIQUOR STORE 999 I ST. SACRAMENTO, CA 95809	P	APPLY PENALTY*
P 01-600-0699	DDDDDDDDDDDDPPPPPPPPPPPPZZZZZZZZZZ A & G LIQUOR STORE 999 I ST. SACRAMENTO, CA 95809	P	APPLY PENALTY*

THIS IS A MONTHLY LIST THAT WILL SHOW LEGAL ENTITIES WHOSE PROPERTIES ARE IN THE PENALTY STATUS. THE ENTITIES WILL BE ARRAYED IN ALPHABETICAL SEQUENCE STATEWIDE BECAUSE LEOP WILL NOT HAVE COUNTY NUMBERS OR PARCEL NUMBERS. ASSESSORS WILL HAVE TO SEARCH THE LIST FOR PROPERTIES IN THEIR COUNTY.

LEOP-03-1098A  
 01-18-83