

E. & J. GALLO WINERY • Modesto, California



May 23, 2011

Ms. Lynn Bartolo
Chief, Special Taxes and Fees Division
Property and Special Taxes Department
California State Board of Equalization
P.O. Box 942879
Sacramento, CA 94279-0057

Re: Classifying Wine-Based Products for Taxation Purposes

Dear Ms. Bartolo:

As stated in our correspondence of February 18, 2011, E. & J. Gallo Winery is in support of the proposed Regulation 2558.1 as submitted by the Board of Equalization Staff. We reiterate our position stated during our testimony at the February 23 hearing and continue to believe it is important that the Board of Equalization clarify the existing regulation. The Staff's proposal is straightforward and should be easy to enforce. Consequently, E. & J. Gallo Winery respectfully urges the Board to adopt proposed Regulation 2558.1.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Richard S. Grey".

Richard S. Grey
Vice President – General Counsel
(209) 341-3791
(209) 341-5030 (Fax)