



BEFORE THE STATE BOARD OF EQUALIZATION
OF THE STATE OF CALIFORNIA

In the Matter of the Appeals)
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)
KAY ALDRIDGE CAMERON and)
A. A. CAMERON)

Appearances:

For Appellants: C. E. Lind, Public Accountant
For Respondent: Burl D. Lack, Chief Counsel;
John S. Warren, Associate Tax
Counsel

O P I N I O N

These appeals are made pursuant to Section 18593 of the Revenue and Taxation Code from the action of the Franchise Tax Board on the protests of Kay Aldridge Cameron and A. A. Cameron to proposed assessments of additional personal income tax in the amounts of \$147.95 against Kay Aldridge Cameron and \$155.58 against A. A. Cameron for the year 1949.

Appellants, husband and wife, are residents of California. During the year 1949 their income was derived from oil properties located in Colorado. They reported this income, on separate returns, to the Department of Revenue of the State of Colorado and also to the Franchise Tax Board, since as residents of California they were liable, under Section 17052 (now Section 17041(a)) of the Revenue and Taxation Code, for taxes on their entire income, including that derived from sources outside the State.

On their California returns each Appellant took a credit in the full amount of the California tax for income taxes paid to Colorado. The Franchise Tax Board recomputed the allowable credits to be less than the California tax and issued the proposed assessments involved herein.

As in the Appeals of E. B. Bishop and Helen Bishop, decided this day, the issue for our determination is the proper method of computing the credit allowable under Section 17976 (now Section 18001) of the Revenue and Taxation Code for income taxes paid to another state. For the reasons set forth in our opinion in that matter, we

