I've read through the proposed changes to the rule. A couple comments/questions:

- Why does B become an OT in example 10 but not in example 11? Not all of the transferors are among the joint tenants.
- In example 14, would the answer be different if B granted to C instead of A and B granting to A and C?
- Is the wording correct in the last sentence of example 22? 100 percent change in ownership because the transfer terminated the joint tenancy of A and B, and none of the interests in the property were vested in A, the only original transferor, after the termination. Shouldn't it be "...and all of the interest in the property was not vested solely in A..."?

Thank you,

Claudia Cunha
Chief Deputy Assessor - Administration
Santa Cruz County Assessor