

To
Glenna Schultz
California State Board of Equalization
Property Taxes Department P.O. Box 942879 Sacramento, CA 94279-006
Re: Proposed Property Tax Rule 462.520

The interpretation by the lawyers at the Board of Equalization of Proposition 19 is far too broad. The rule adopted, and the rule proposed, is not contained anywhere in the ballot measure for which the people of California voted. The net result of this action by the Board of Equalization is to write and create rules which depart from the obvious intent of Proposition 19

Since I am not law expert, for the understanding for general public, can you list the portions of "Proposed Adoption of Property Tax Rule 462.520" which are not in Proposition 19 and explain why it is included.

Few things I noticed is time limit on filing "1 years". People should be able to file anytime retrospectively even after 10-15 years and get back the property TAX just like any other TAX (State or Federal)

Transfer between siblings is not part of proposition 19

There shouldn't be any other requirement other than filing form. If there is any additional requirement then BOE should bear cost of filing (attorney or provide staff to do additional paper work on behalf of property owner) " Federal paper work reduction law"

Others are . Non-Pro Rata Share Distribution

Please response by letter or email skumar0004@yahoo.com

- (1) , can you list the portions of "Proposed Adoption of Property Tax Rule 462.520" which are not in Proposition 19 and explain why it is included.
- (2) BOE has got several suggestions. Which suggests BOE has implemented and which suggestion BOE has not implemented and explanation as to why they are not implemented.
- (3) For hearing, what is BOE procedure for documenting all concerns and dealing with those concerns.

Thanks
S Kumar