



CALIFORNIA ASSOCIATION OF CLERKS AND ELECTION OFFICIALS

OFFICERS 2018-2020

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* non-voting member

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December 10, 2018

Via Email

The Honorable George Runner, Chairman
State Board of Equalization
450 N Street
P.O. Box 942879
Sacramento, CA 94279-0007

STATE BOARD OF EQUALIZATION



Appeal Name: PT Rules 302, 305, 305.1, 305.2, and 323

Case ID: John McKibben ITEM # C1

Date: December 12, 2018 Exhibit No: 12.2

TP FTB DEPT MEMBER **PUBLIC COMMENT**

Subject: Item C1. of the Agenda for the Meeting of December 12, 2018

The Clerk of the Board of Supervisors members of the California Association of Clerks and Election Officials (CACEO) urge your Honorable Board to adopt proposed Property Tax Rules 302, 305, 305.1, 305.2, and 323 with regard to practices and procedures of county boards of equalization, as proposed.

CACEO members have worked diligently with members of your staff, including your Chief Counsel, and with tax agents and county assessors over the last year-and-a-half to craft rules that address many of the concerns raised by the California Alliance of Taxpayer Advocates (CATA) that are consistent with state law and that appropriately preserve the county board's judicial discretion under those laws.

We intend to continue to work with stakeholders to draft *Assessment Appeal Manual* amendments that are consistent with these Rule changes that will provide county boards and the parties that come before them with useful guidance with respect to county equalization procedures.

A member of our association will attend the December 12 meeting to answer any questions the Members may have regarding our position on these Rule changes.

Very truly yours,

John McKibben, Chairman
BOE Rules Work Group
California Association of Clerks and
Election Officials

c: The Honorable Fiona Ma, Member c/o Kasey O'Connor
The Honorable Diane Harkey, Member c/o Gabrielle Magana
The Honorable Jerome Horton, Member c/o Kari Hammond
The Honorable Betty T. Yee, Member c/o Yvette Stowers, Deputy Controller, Taxation
Dean Kinnee, Executive Director
Henry D. Nanjo, Chief Counsel
Joann Richmond-Smith, Chief, Board Proceedings Division
Joe E. Holland, President, California Association of Clerks and Election Officials