

680.0090 **Separate Statements.** Affiliated corporate assesses must file separate statements for each business location within a county to the extent that the personal of each in the county has an aggregate cost of \$30,000 or more, or if requested to file by the assessor. A parent corporation cannot file a single, combined statement on behalf of itself and its subsidiaries. C 10/16/78.

Note: Stats. 1995, Ch. 498 changed \$30,000 threshold to \$100,000.

(916) 445-3237

October 16, 1978

Redacted

Dear Redacted

This is in response to your recent letter to Redacted wherein asked whether your client, a large corporation, may file a single combined property statement on behalf of itself and its newly-formed subsidiaries.

Section 405(a) of the Revenue and Taxation Code requires the assessor to annually assess all taxable property in his county to the persons owning, claiming, possessing, or controlling it on the lien date. Similarly, Section 404 of the Code requires that all taxable property be assessed where situated. Under Section 452, the State Board of Equalization is required to prescribe in detail the content of property statements. As you can see from the attached Board prescribed business property statement form and instructions, the statement is to be completed by owner of the property and separate statements must be filed for each business location. Based on the foregoing, the answer to your question is that each assessee must file separate property statements for each business location within a county if the personal property in the county has an aggregate cost of \$30,000 or more or if requested to file by the assessor. (See Rev. & Tax. Code, § 441.)

In the event that the parent corporation desires to file the separate property statements on behalf of its subsidiaries, I invite your attention to Section 441(e) of the Code, which provides as follows:

In the case of a corporate owner of property, the property statement shall be signed either by an officer of the corporation or an employee or agent who has been designated in writing by the board of directors to sign such statements on behalf of the corporation.

I hope this is responsive to your question. If we may be of further assistance, please do not hesitate to contact this office.

Very Truly Yours,  
Margaret S. Shedd  
Tax Counsel

MSS:fr  
Enclosure