



STATE BOARD OF EQUALIZATION

1020 N STREET, SACRAMENTO, CALIFORNIA
(P.O. BOX 942879, SACRAMENTO, CALIFORNIA 94279-0001)
(916) 445-8485

March 17, 1989

K--- Z---
G--- Graphics & Printing
P.O. Box XXX
---, CA XXXXX

Re: SR -- XX-XXXXXX

Dear K--- Z---:

On October 5, 1988, we wrote you expressing our opinion that G--- Graphics & Printing's sales of letters and envelopes to R--- Community Services were exempt pursuant to Revenue and Taxation Code Section 6379.5.

Since writing to you, it has come to our attention that the advice given you was erroneous. Upon further review of the materials attached to you original request for opinion of August 9, 1988, we have concluded that the principal purpose of the letters and envelopes in question was to solicit donations, not to advertise or promote goods or services. Our position in this area has consistently been that sales of such materials do not qualify for the section 6379.5 exemption. Accordingly, kindly disregard our prior advice in all future dealings with this customer and others similarly situated.

Very truly yours,

E. L. Sorensen, Jr.
Senior Tax Counsel

ELS:jb

cc: Audit Evaluation and Planning Unit (GEL)