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December 1, 2010

Cheryl Schmit, Director Stand Up For California P.O. Box 355 Penryn, CA 95663

Re:

Tax Opinion Request 10-475

No Account Number

Dear Ms. Schmit:

This is to acknowledge receipt of your correspondence dated November 22, 2010. Your request for an opinion has been assigned to me for a response. Your letter has been given the assignment number 10-475. Please refer to this number when you contact this office for any questions you may have concerning this matter as that helps us locate your file.

I expect to have my research completed and a response to you by March 1, 2011. If you have not heard from me by then, please feel free to contact me at (916) 323-3142 for a status report.

Sincerely,

Carolee D. Johnstone

Tax Counsel III (Specialist)

CDJ/yg

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cc: Sacramento District Administrator (KH)