

DEPARTMENT OF TAXATION AND FINANCE

MEMORANDUM

Corp. Tax Determin. A-2
RAC Corporation

TO: Mr. Doran

FROM: Mr. Scully

SUBJECT: RAC CORPORATION

OFFICE

DATE September 10, 1969

Form CT-122 attached to the franchise tax report of the above corporation for the calendar year 1961 shows a reduction in tax of \$32,664.00. Accordingly, your approval and the approval of the Tax Commission are required.

The corporation submitted a report of federal change on Form CT-3360 showing a small reduction in its net income as the result of a conference with the Internal Revenue Service. At the same time, it submitted a request for allocation of its business income which it had failed to claim when filing its original report. The request for allocation is timely based on the decision in the case of American Can Company when submitted with a federal change. Detailed riders supporting the claim of a business allocation are attached to Form CT-3360.

Your approval is recommended.

/s/

E. J. SCULLY

EJS/de

Approved
E. A. DORAN

Approved
MILTON KOERNER 9/15/69

Approved
A. B. MANLEY 9/15/69

Mr. Rook

ER says there is no action required by this office
on this matter -- hold pending until case comes
through for Commission action. 5/26/69 CEP

From Commissioner Murphy
5/26/69

CABLE ADDRESS
PLATFIELD

BLEAKLEY, PLATT, SCHMIDT, HART & FRITZ
120 BROADWAY
NEW YORK, N. Y. 10005

Sales Tax Bureau
Case A-2

TEL. RECTOR 2-2000

RAC Corporation

Mr. Park
JAM



May 20, 1968

Pending

Mr. Edward M. Best, Counsel
Law Bureau
Department of Taxation and Finance
State Campus
Albany, New York 12226

Re: RAC Corporation
Sales Tax Determination \$90,250,904
9/1/65 to 9/30/65

Dear Sir:

It has been over one year since hearings in connection with the above taxpayer's application for revision were completed and the Taxpayers Hearing Memorandum submitted and received by the Department.

Hearings were had at 80 Centre Street, New York City before Hearing Officer Alfred Rubinstein, and completed on April 12, 1968; and Taxpayers Hearing Memorandum was received by the Department on May 10, 1968.

Our letter of inquiry dated October 24, 1968 as to the status of the matter has not been answered.

Since the above taxpayer is a dissolved corporation in the process of liquidation, its liquidators would appreciate information as to the status of the application and when a determination might reasonably be expected on the Application for Revision.

Very truly yours,

BLEAKLEY, PLATT, SCHMIDT, HART & FRITZ

SES:mrf

cc: Mr. Frederick W. Tierney,
Director Sales Tax Bureau
Mr. Joseph H. Murphy
President of State Tax Commission

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