

STATE OF NEW YORK
STATE TAX COMMISSION
ALBANY, NEW YORK 12227

September 28, 1983

Manufacturers Hanover, Trust
ATTN: Thomas J. Hanss, V.P.
183 E. Main St., Central Region
Rochester, NY 14604

Gentlemen:

Please take notice of the Decision of the State Tax Commission enclosed herewith.

You have now exhausted your right of review at the administrative level. Pursuant to section(s) 1138 of the Tax Law, any proceeding in court to review an adverse decision by the State Tax Commission can only be instituted under Article 78 of the Civil Practice Law and Rules, and must be commenced in the Supreme Court of the State of New York, Albany County, within 4 months from the date of this notice.

Inquiries concerning the computation of tax due or refund allowed in accordance with this decision may be addressed to:

NYS Dept. Taxation and Finance
Law Bureau - Litigation Unit
Building #9 State Campus
Albany, New York 12227
Phone # (518) 457-2070

Very truly yours,

STATE TAX COMMISSION

cc: Taxing Bureau's Representative

STATE OF NEW YORK

STATE TAX COMMISSION

In the Matter of the Petition :
of :
Manufacturers Hanover, Trust : AFFIDAVIT OF MAILING
for Redetermination of a Deficiency or a Revision :
of a Determination or a Refund of Sales & Use Tax :
under Article 28 & 29 of the Tax Law for the :
Period 3/1/77-2/29/80.

State of New York
County of Albany

Connie Hagelund, being duly sworn, deposes and says that she is an employee of the State Tax Commission, over 18 years of age, and that on the 28th day of September, 1983, she served the within notice of Decision by certified mail upon Manufacturers Hanover, Trust, the petitioner in the within proceeding, by enclosing a true copy thereof in a securely sealed postpaid wrapper addressed as follows:

Manufacturers Hanover, Trust
ATTN: Thomas J. Hanss, V.P.
183 E. Main St., Central Region
Rochester, NY 14604

and by depositing same enclosed in a postpaid properly addressed wrapper in a (post office or official depository) under the exclusive care and custody of the United States Postal Service within the State of New York.

That deponent further says that the said addressee is the petitioner herein and that the address set forth on said wrapper is the last known address of the petitioner.

Sworn to before me this
28th day of September, 1983.



AUTHORIZED TO ADMINISTER
OATHS PURSUANT TO TAX LAW
SECTION 174

STATE OF NEW YORK

STATE TAX COMMISSION

In the Matter of the Petition
of
MANUFACTURERS HANOVER, N.A.
for Revision of a Determination or for Refund
of Sales and Use Taxes under Articles 28 and
29 of the Tax Law for the Period March 1, 1977
through February 29, 1980.

DECISION

Petitioner, Manufacturers Hanover, N.A., 183 East Main Street, Central Region, Rochester, New York 14604, filed a petition for revision of a determination or for refund of sales and use taxes under Articles 28 and 29 of the Tax Law for the period March 1, 1977 through February 29, 1980 (File No. 31446).

A small claims hearing was held before John F. Koagel, Hearing Officer, at the offices of the State Tax Commission, 1 Marine Midland Plaza, Room 1300, Rochester, New York 14604, on March 9, 1983, at 2:45 P.M. Petitioner appeared by Thomas J. Hanss, Senior Vice President and Secretary and Michael J. Beyma, Vice President and Counsel. The Audit Division appeared by John P. Dugan, Esq. (Thomas C. Sacca, Esq., of counsel).

ISSUE

Whether certain monies paid by petitioner were taxable rental payments or non-taxable payments of principal and interest against a loan.

FINDINGS OF FACT

1. On June 13, 1980, as a result of a field audit, Manufacturers Hanover Trust Company/Central Region, a New York State Chartered Bank, was issued a Notice of Determination and Demand for Payment of Sales and Use Taxes Due for

1947-1948

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1951-1952

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tax of \$8,881.60 plus interest of \$1,360.91 for a total of \$10,242.51. Said Notice covered the period March 1, 1977 through February 29, 1980.

2. On January 1, 1982, Manufacturers Hanover N.A. (hereinafter petitioner) became the correct successor of Manufacturers Hanover Trust Company/Central New York or, as listed on the above Notice, Manufacturers Hanover Trust Company/Central Region.

3. In 1973, Manufacturers Hanover Corporation (hereinafter "parent"), a bank holding corporation, purchased the assets of the State Bank of Ontario in order to expand its banking operations in the banking district serving the Rochester area. As a result of this acquisition, petitioner originated and became a wholly owned subsidiary of parent and began its business operations at 183 E. Main Street, Rochester, New York and at several branch locations with a first year capital contribution from parent in the approximate amount of \$900,000.00.

4. In order to operate at its various locations, petitioner had to obtain a wide variety of fixed assets which, for the most part, were furniture and fixtures. Petitioner testified that it was restricted in purchasing the required assets in the following two ways:

- a) The New York State Banking Law limited petitioner, by percentage of capital, on what it could spend for furniture, fixtures, equipment, land improvements, etc. The percentage would have been exceeded if the required assets were purchased.
- b) At the time in question, Federal law prohibited financial transactions of any nature between sister banks (banks with the same parent corporation); petitioner had one sister bank, that being Manufacturers Hanover Trust Company.

However, as parent did not engage in banking activities, there was no restriction concerning financial transactions (loans, etc.) between parent and petitioner.

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5. In order to obtain the required fixed assets, parent purchased the fixed assets required by petitioner. Petitioner immediately took possession of the fixed assets, most of which at petitioner's main office at 183 E. Main Street, Rochester, New York. The assets were purchased between the fall of 1973 and March of 1974. Parent never had possession of the assets in question.

6. Payments were made by petitioner to parent on a quarterly basis which commenced approximately one year from when the first of the assets were purchased by parent. Payments were computed based upon the amount the assets depreciated during the payment quarter plus interest on the assets' undepriciated amount. The Audit Division considered these payments as rental payments and assessed tax on them in the amount reflected in Finding of Fact 1, that being \$8,881.60.

7. Petitioner alleged that the payments were simply intercompany payments against a non-recourse loan, plus interest, and that the loan was made probably because parent did not want to make an additional capital contribution to petitioner.

8. There is no written agreement concerning or controlling the payments in question; there was no evidence introduced to show the existence of a security agreement.

9. Petitioner testified that the payments were to continue until the value of the assets, with a useful life of seven years, and the interest were fully paid at which time ownership of the assets would be transferred to petitioner.

10. Petitioner testified that parent paid sales tax on the purchase of the assets; however there was no documentary evidence shown reflecting sales tax payment nor was there any evidence presented to indicate what effect such sales tax payment would have on the transactions in the instant case.

CONCLUSIONS OF LAW

A. That section 1105(a) of the Tax law imposes a sales tax on the receipts from every retail sale of tangible personal property with certain exceptions, none of which appear in the instant case.

That section 1101(b)(4) of the Tax law defines a retail sale as a sale of tangible personal property to any person for any purpose with certain exceptions, none of which appear in the instant case.

That section 1101(b)(5) defines sale, selling or purchase as:

"Any transfer of title or possession or both, exchange or barter, rental, lease or license to use or consume, conditional or otherwise, in any manner or by any means whatsoever for a consideration, or any agreement therefore, including the rendering of any service, taxable under this article, for a consideration or any agreement therefor." (emphasis added).

That regulation 20 NYCRR 526.7(b) states that consideration "...includes monetary consideration, exchange, barter, the rendering of any service, or any agreement therefor. Monetary consideration includes assumption of liabilities, fees, rentals, royalties or any other charge that a purchaser, lessee or licensee is required to pay". (emphasis added).

B. That the monies paid by petitioner to parent for the depreciable value of the fixed assets in the possession of and used by petitioner plus interest on the undepreciated amount of those fixed assets are taxable rentals within the meaning and intent of sections 1105 and 1101 of the Tax Law; that petitioner has not shown or attempted to show that the transaction(s) involved a non-taxable security agreement as provided for in regulation 20 NYCRR 526.7(c)(3).

[illegible]

⁷ "Quanto a [sic] natureza jurídica da responsabilidade civil do Estado, há de se considerar que esta é decorrente de uma atividade estatal, ou seja, de um ato administrativo, e não de fato ilícito praticado por agente público." (Tribunal de Justiça do Rio Grande do Sul, 1998).

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1. The first step is to identify the problem or question that needs to be answered. This involves understanding the context and the specific requirements of the task.

[illegible]

1. The first group of people who are not in the labor force are those who are not in the labor force for any reason. This group includes people who are not in the labor force because they are not in the labor force for any reason. This group includes people who are not in the labor force because they are not in the labor force for any reason.

1. The first part of the document is a list of names and addresses, which appears to be a directory or a list of contacts. The names are written in a cursive script, and the addresses are listed below them. The list includes names such as "Mr. J. H. Smith", "Mr. W. H. Jones", and "Mr. R. H. Brown".

Figure 1. The effect of the concentration of the *Ag* on the *Ag* adsorption capacity of the *Ag*-*Ag*2S-*Ag*2S2O3-*Ag*2S2O4-*Ag*2S2O6-*Ag*2S2O8-*Ag*2S2O10-*Ag*2S2O12-*Ag*2S2O14-*Ag*2S2O16-*Ag*2S2O18-*Ag*2S2O20-*Ag*2S2O22-*Ag*2S2O24-*Ag*2S2O26-*Ag*2S2O28-*Ag*2S2O30-*Ag*2S2O32-*Ag*2S2O34-*Ag*2S2O36-*Ag*2S2O38-*Ag*2S2O40-*Ag*2S2O42-*Ag*2S2O44-*Ag*2S2O46-*Ag*2S2O48-*Ag*2S2O50-*Ag*2S2O52-*Ag*2S2O54-*Ag*2S2O56-*Ag*2S2O58-*Ag*2S2O60-*Ag*2S2O62-*Ag*2S2O64-*Ag*2S2O66-*Ag*2S2O68-*Ag*2S2O70-*Ag*2S2O72-*Ag*2S2O74-*Ag*2S2O76-*Ag*2S2O78-*Ag*2S2O80-*Ag*2S2O82-*Ag*2S2O84-*Ag*2S2O86-*Ag*2S2O88-*Ag*2S2O90-*Ag*2S2O92-*Ag*2S2O94-*Ag*2S2O96-*Ag*2S2O98-*Ag*2S2O100-*Ag*2S2O102-*Ag*2S2O104-*Ag*2S2O106-*Ag*2S2O108-*Ag*2S2O110-*Ag*2S2O112-*Ag*2S2O114-*Ag*2S2O116-*Ag*2S2O118-*Ag*2S2O120-*Ag*2S2O122-*Ag*2S2O124-*Ag*2S2O126-*Ag*2S2O128-*Ag*2S2O130-*Ag*2S2O132-*Ag*2S2O134-*Ag*2S2O136-*Ag*2S2O138-*Ag*2S2O140-*Ag*2S2O142-*Ag*2S2O144-*Ag*2S2O146-*Ag*2S2O148-*Ag*2S2O150-*Ag*2S2O152-*Ag*2S2O154-*Ag*2S2O156-*Ag*2S2O158-*Ag*2S2O160-*Ag*2S2O162-*Ag*2S2O164-*Ag*2S2O166-*Ag*2S2O168-*Ag*2S2O170-*Ag*2S2O172-*Ag*2S2O174-*Ag*2S2O176-*Ag*2S2O178-*Ag*2S2O180-*Ag*2S2O182-*Ag*2S2O184-*Ag*2S2O186-*Ag*2S2O188-*Ag*2S2O190-*Ag*2S2O192-*Ag*2S2O194-*Ag*2S2O196-*Ag*2S2O198-*Ag*2S2O200-*Ag*2S2O202-*Ag*2S2O204-*Ag*2S2O206-*Ag*2S2O208-*Ag*2S2O210-*Ag*2S2O212-*Ag*2S2O214-*Ag*2S2O216-*Ag*2S2O218-*Ag*2S2O220-*Ag*2S2O222-*Ag*2S2O224-*Ag*2S2O226-*Ag*2S2O228-*Ag*2S2O230-*Ag*2S2O232-*Ag*2S2O234-*Ag*2S2O236-*Ag*2S2O238-*Ag*2S2O240-*Ag*2S2O242-*Ag*2S2O244-*Ag*2S2O246-*Ag*2S2O248-*Ag*2S2O250-*Ag*2S2O252-*Ag*2S2O254-*Ag*2S2O256-*Ag*2S2O258-*Ag*2S2O260-*Ag*2S2O262-*Ag*2S2O264-*Ag*2S2O266-*Ag*2S2O268-*Ag*2S2O270-*Ag*2S2O272-*Ag*2S2O274-*Ag*2S2O276-*Ag*2S2O278-*Ag*2S2O280-*Ag*2S2O282-*Ag*2S2O284-*Ag*2S2O286-*Ag*2S2O288-*Ag*2S2O290-*Ag*2S2O292-*Ag*2S2O294-*Ag*2S2O296-*Ag*2S2O298-*Ag*2S2O300-*Ag*2S2O302-*Ag*2S2O304-*Ag*2S2O306-*Ag*2S2O308-*Ag*2S2O310-*Ag*2S2O312-*Ag*2S2O314-*Ag*2S2O316-*Ag*2S2O318-*Ag*2S2O320-*Ag*2S2O322-*Ag*2S2O324-*Ag*2S2O326-*Ag*2S2O328-*Ag*2S2O330-*Ag*2S2O332-*Ag*2S2O334-*Ag*2S2O336-*Ag*2S2O338-*Ag*2S2O340-*Ag*2S2O342-*Ag*2S2O344-*Ag*2S2O346-*Ag*2S2O348-*Ag*2S2O350-*Ag*2S2O352-*Ag*2S2O354-*Ag*2S2O356-*Ag*2S2O358-*Ag*2S2O360-*Ag*2S2O362-*Ag*2S2O364-*Ag*2S2O366-*Ag*2S2O368-*Ag*2S2O370-*Ag*2S2O372-*Ag*2S2O374-*Ag*2S2O376-*Ag*2S2O378-*Ag*2S2O380-*Ag*2S2O382-*Ag*2S2O384-*Ag*2S2O386-*Ag*2S2O388-*Ag*2S2O390-*Ag*2S2O392-*Ag*2S2O394-*Ag*2S2O396-*Ag*2S2O398-*Ag*2S2O400-*Ag*2S2O402-*Ag*2S2O404-*Ag*2S2O406-*Ag*2S2O408-*Ag*2S2O410-*Ag*2S2O412-*Ag*2S2O414-*Ag*2S2O416-*Ag*2S2O418-*Ag*2S2O420-*Ag*2S2O422-*Ag*2S2O424-*Ag*2S2O426-*Ag*2S2O428-*Ag*2S2O430-*Ag*2S2O432-*Ag*2S2O434-*Ag*2S2O436-*Ag*2S2O438-*Ag*2S2O440-*Ag*2S2O442-*Ag*2S2O444-*Ag*2S2O446-*Ag*2S2O448-*Ag*2S2O450-*Ag*2S2O452-*Ag*2S2O454-*Ag*2S2O456-*Ag*2S2O458-*Ag*2S2O460-*Ag*2S2O462-*Ag*2S2O464-*Ag*2S2O466-*Ag*2S2O468-*Ag*2S2O470-*Ag*2S2O472-*Ag*2S2O474-*Ag*2S2O476-*Ag*2S2O478-*Ag*2S2O480-*Ag*2S2O482-*Ag*2S2O484-*Ag*2S2O486-*Ag*2S2O488-*Ag*2S2O490-*Ag*2S2O492-*Ag*2S2O494-*Ag*2S2O496-*Ag*2S2O498-*Ag*2S2O500-*Ag*2S2O502-*Ag*2S2O504-*Ag*2S2O506-*Ag*2S2O508-*Ag*2S2O510-*Ag*2S2O512-*Ag*2S2O514-*Ag*2S2O516-*Ag*2S2O518-*Ag*2S2O520-*Ag*2S2O522-*Ag*2S2O524-*Ag*2S2O526-*Ag*2S2O528-*Ag*2S2O530-*Ag*2S2O532-*Ag*2S2O534-*Ag*2S2O536-*Ag*2S2O538-*Ag*2S2O540-*Ag*2S2O542-*Ag*2S2O544-*Ag*2S2O546-

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7. The following information is provided for the year ended 31 December 2014:


C. That the petition of Manufacturers Hanover N.A. is denied and the Notice of Determination and Demand for Payment of Sales and Use Taxes Due issued on June 13, 1980 is sustained.

DATED: Albany, New York

SEP 28 1983

STATE TAX COMMISSION


PRESIDENT


COMMISSIONER


COMMISSIONER

P 481 208 239

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Manufacturer's Hanover, Trust	
ATTN: Thomas J. Hanss, V.P.	
Street and No.	
183 E. Main St., Central Region	
P.O., State and ZIP Code	
Rochester, NY 14604	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	

PS Form 3800, Feb. 1982