

**STATE BOARD OF EQUALIZATION**1020 N STREET, SACRAMENTO, CALIFORNIA
(P.O. BOX 942879, SACRAMENTO, CALIFORNIA 94279-0001)

March 21, 1975

Mr. W--- C. K---
[K]
Attorneys at Law
XXX --- --- Street
--- ---, CA XXXXX

Dear Mr. K---:

This is in response to your letter of February 14, 1975, which was addressed to Mr. T. P. Putnam. Your letter was referred to the undersigned for reply.

We understand that the name of your law partnership was changed from "[K] to "[K-1] on May 1, 1974. In addition to the name change, Mr. H--- withdrew from the firm on May 1, 1974. Certain vehicles were registered in the name of [K]. You have sought to have these vehicles reregistered in the name of [K-1].

We understand from our telephone conversation of March 19, 1975 that the withdrawal of Mr. H--- from your partnership did not effect a dissolution of the partnership since your partnership agreement contains a provision of the type described in Corporations Code Section 15031(7) providing for continued existence of the partnership upon withdrawal of a member. We are thus of the opinion that the vehicles in question may be reregistered in the new name of the continuing partnership without payment of tax. No change in ownership of the vehicles was occasioned by the withdrawal of Mr. H---. The "person" who owns the vehicles, i.e., the co-partnership, remains the same.

Very truly yours,

Gary J. Jugum
Tax Counsel

This issue is now covered by Reg. 1595(b)(7). However, since this annotation specifically discusses vehicle registration after a withdrawal, it remains worthwhile in that it covers something not specifically addressed by the Reg. DHL 9/10/97.

Note changes to partnership law under Revised Uniform Partnership Act. Corp. Codes §§ 16100-16962. SPJ 5/22/01.