



**ANTONIO VAZQUEZ**  
MEMBER, THIRD DISTRICT  
CALIFORNIA STATE BOARD OF EQUALIZATION

**MEMORANDUM**

**Date:** September 24, 2026

**To:** Sally J. Lieber, Chair  
Ted Gaines, Vice Chair  
Mike Schaefer, Board Member, Fourth District  
Malia M. Cohen, State Controller

**From:** Antonio Vazquez, Board Member, Third District

**Re:** **September 24, 2026, Board Work Group Meeting to Further Uniformity in Methods of Valuing Intangible Assets and Rights Meeting.**

Honorable Members,

This memorandum is submitted in support of the Board Work Group to Further Uniformity in Methods of Valuing Intangible Assets and Rights (the Work Group) meeting to be led by Controller Cohen and Deputy Controller Emran on September 24, 2026.

Prior to the Work Group meeting, I wish to offer some brief, preliminary comments to contribute to the Work Group's discussion on several topics as described in the agenda. I am hopeful that these comments can further the discussion or pose additional questions for consideration by all participants during the Work Group meeting.

Regarding *Front End Reporting* (Agenda Item 2) and a *Preliminary Framework for Identifying Non-Taxable Intangible Assets and Rights* (Agenda Item 3), the agenda indicates several topics for discussion, including but not limited to, options for adding a dedicated intangibles section to certain forms, developing a standard statewide information-request template and reporting structure, and developing a standardized definition and screening checklist for intangible review.

While I am cognizant of the usefulness of standardized and consistent terminology across California's 58 counties, I believe that the Work Group participants must remain mindful of two important considerations: 1) the sophistication of the parties involved in cases where intangible assets and rights are at issue, and 2) the complexity of front-end reporting and forms as they currently exist.

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As evidenced by the decades of practice and expertise by the individuals directly participating in this Work Group alone, it is my understanding that the taxpayers and their representatives dealing with these issues tend to be highly sophisticated actors. Many of these stakeholders and Work Group participants are deeply familiar with current best practices and are generally up to date on changes in terminology or legal definitions. Moreover, to the extent that less sophisticated actors or the general public who are not dealing with questions of intangible assets or rights engage with front-end reporting or forms, adding sections about intangible assets and rights could increase the potential for confusion.

Therefore, rather than making changes to existing front-end forms, my initial position is that it may be more effective to focus on the suggestion of the “initial, non-exhaustive list of recurring intangible categories,” as described in the third bullet point under Item 3 on the agenda. Such a list could be updated by the BOE without significant impediments should the need arise. I remain open to any and all testimony on this topic, but based on the sophistication of parties dealing with intangible assets and rights, as well as my experience with exploring options to simplify front-end reporting and forms, I wish to express my hesitancy to support front-end additions to existing forms without an exhaustive review.

Regarding the *Compilation of Relevant Case Law and Historical Legal Overview* (Item 4), I am strongly supportive of this in concept and would suggest that it be published as a Letter to Assessors (LTA). As with other LTAs, this document would undergo review by the relevant BOE divisions and could be widely distributed and even referenced in Assessors’ Handbook (AH) 502. While a compilation of legal cases and history may be difficult to describe in a neutral manner to the satisfaction of all parties, the proposed case compilation provided by Mr. O’Neill at the Work Group’s previous meeting in June can serve as a brilliant starting point, though ultimately the BOE would need to draft and review the final version of any document to be published.

As to the final bullet point for discussion under Item 4, which suggests the development of a neutral, descriptive summary of burden-of-proof considerations, I anticipate that this could be difficult to achieve in a Work Group setting involving all stakeholders, and would welcome commentary and input on the extent to which legislative or regulatory changes could serve as the best avenue to resolve relevant questions on the burden of proof.

Finally, I commend the Work Group for consideration of Item 5, *Statewide Training and Educational Resources*, as I continue to believe that there is tremendous potential for the BOE to act in this area. In addition to the suggestions provided in the agenda, I would encourage the Work Group to consider or discuss the development of a self-study training session focused exclusively on the issue of intangibles. The BOE provides self-study training programs on a variety of topics, which generally operate in tandem with assessors’ handbooks.<sup>1</sup> As currently constituted, AH 502, which contains a detailed discussion on the issue of intangibles, accompanies the self-study training program titled Advanced Appraisal. While this training session does cover intangibles, it is just one of several topics included in the training. Given the unique nature and salience of the questions relating to

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<sup>1</sup>A full list of self-study training programs available from the BOE can be found at:

<https://www.boe.ca.gov/proptaxes/selfstudy.htm>.

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intangibles, the Work Group could consider recommending a self-study training program focused solely on intangibles.

Thank you for the opportunity to provide these comments, and I look forward to receiving and reviewing the testimony provided by the Work Group Participants. I truly appreciate the efforts of Controller Cohen, Deputy Controller Emran, my fellow Board Members, and all of the highly experienced and dedicated stakeholders to engage on this issue.

Sincerely,

A handwritten signature in dark ink, appearing to read "Antonio Vazquez". The signature is fluid and cursive, with the first name "Antonio" written in a larger, more prominent script than the last name "Vazquez".

ANTONIO VAZQUEZ, Member  
Board of Equalization, 3<sup>rd</sup> District

Mr. Juan Carlos Flores, Chief Deputy, Office of Member Antonio Vazquez  
Mr. Douglas Winslow, Chief Deputy, Office of Chair Sally J. Lieber  
Mr. Matt Cox, Chief Deputy, Office of Vice Chair Ted Gaines  
Mr. Cody Petterson, Chief Deputy, Office of Member Mike Schaefer  
Mr. Hasib Emran, Deputy State Controller  
Ms. Yvette Stowers, Executive Director