

BEFORE THE STATE BOARD OF EQUALIZATION
OF THE STATE OF CALIFORNIA

In the Matter of the Appeal of)
LLOYD F. AND BARBARA M.)
NOONAN)

Appearances:

For Appellants: Dan L. Shehi
 Certified Public Accountant

For Respondent: Kendall Kinyon
 Counsel

OPINION

This appeal is made pursuant to section 18594 of the Revenue and Taxation Code from the action of the Franchise Tax Board on the protest of Lloyd F. and Barbara M. Noonan against a proposed assessment of additional personal income tax in the amount of \$3,088.47 for **1963**.

Appeal of Lloyd F. and Barbara M. Noonan

By agreement of the parties, this appeal was consolidated, for purpose of hearing and decision with the Appeals of Wilfred and Gertrude Winkknbach. et al. , this day decided. Therefore, in accordance with our decision in Winkknbach we find that respondent properly attributed the corporate income of L. F. Noonan, Inc. and Linda Lloyd, Inc. to the appellant in his individual capacity in accordance with the federal determination, and that the tax paid by the corporations L. F. Noonan, Inc. and Linda Lloyd, Inc. should be offset against the amount owed by the individual appellant.

ORDER

Pursuant to the views expressed in the opinion of the board on file in this proceeding, and good cause appearing therefor,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED, pursuant to section 18595 of the Revenue and Taxation Code, that the action of the Franchise Tax Board on the protest of Lloyd F. and Barbara M. Noonan against a proposed assessment of additional personal income tax in the amount of \$3,088.47 for 1963, be and the same is hereby modified in accordance with the opinion of the board. In all other respects the action of the Franchise Tax Board is sustained.

Done at Sacramento, California, this 16th day of December, 1975, by the State Board of Equalization.

William E. Burnett, Chairman
George R. Feller, Member
Robert Klein, Member
_____, Member
_____, Member

ATTEST: W. W. Dunlop, Executive Secretary