**OFFICE OF TAX APPEALS**

**STATE OF CALIFORNIA**

**ERRATA NOTICE – August 2022**

*Appeal of MJK Real Estate Fund II, LLC*, 2022-OTA-247P

1. P. 12, 1st line of last paragraph “FTB contends that using the profit interest is inconsistent with the purpose of R&TC section 23101(b)(3), which addresses the value and location of property, and that the capital interest is more applicable as it entitles the holder to proceeds from the sale of partnership assets if the partnership was in complete liquidation.”

Replace the underlined “profit” with “capital,” and the underlined “capital” with “profit.”

The published Opinion will reflect these changes.