July 22nd, 1933

Mr. Elbert R. Thurman
County Attorney
Santa Cruz County
Nogales, Arizona

Dear Sir:

Replying to your telephone conversation of Thursday with Mr. Salmon, I advise that the privilege sales tax does not apply to sales of cattle to packing houses, where the same are to be resold although in the form of meat.

In reply to your question as to whether or not bank deposits in California, belonging to an Arizona resident, are taxable under the intangible tax, it is my opinion that such deposits are taxable under the doctrine that intangible personal property follows the domicile. This is a general rule in both the Supreme Court of the United States and most state courts.

Very truly yours,

Attorney General.

Assistant Attorney General.

CLS:H

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