

# OKLAHOMA TAX COMMISSION

TAX POLICY AND RESEARCH DIVISION  
TONY MASTIN, DIRECTOR

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November 18, 2002

Re: Our File No LR-02-205; Sales tax on purchases by a contractor with an Authority.

Dear

This is in response to your inquiry concerning whether sales tax is due on purchases by your company, which is a general contractor, on a project where the owner of the property is County Hospital Authority.

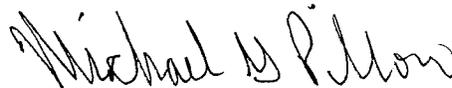
The first sentence of Oklahoma Tax Commission Rule Number 710:65-13-550 states, "Trust Authorities organized pursuant to 60 O.S. Section 176 et seq. may purchase material exempt from sales tax, but may not appoint an agent to do so". A complete copy of the rule is enclosed.

Therefore, neither \_\_\_\_\_ nor any of its subcontractors, may make purchases, exempt from sales tax, based on an agency relationship with \_\_\_\_\_ County Hospital Authority.

This response applies only to the circumstances set out in your request of November 12, 2002. Pursuant to Commission Rule 710:1-3-73(e), this Letter Ruling may be generally relied upon **only** by the entity to whom it is issued, assuming that all pertinent facts have been accurately and completely stated, and that there has been no change in applicable law.

If I can be of further assistance, please feel free to contact me.

Sincerely,  
OKLAHOMA TAX COMMISSION



Michael G. Pillow  
Tax Policy Analyst

Enclosure: (1)