OKLAHOMA TAX COMMISSION

TAX POLICY DIVISION
RICK MILLER, DIRECTOR

PHONE (405) 521-3133
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July 28, 2015

Re: LR 15-027 – Non-resident Royalty Owner Withholding

Dear

This is in response to your inquiry of July 16, 2015 wherein you requested a ruling concerning your previous Letter Ruling (LR 03-061) and the applicability of 68 O.S. § 2385.13 – Non-resident Royalty Owner Withholding.

The only changes to the facts from the 2003 Letter Ruling (LR03-061) is you have a new corporate address, a new non-Oklahoma bank, and a new Tulsa based accountant. Based on the new facts and those of your 2003 Letter Ruling (LR03-061) please be advised that is still considered an Oklahoma resident corporation and withholding under 68 O.S. §2385.13 is not required.

This response applies only to the circumstances set out in your request of July 16, 2015. 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.

Please be advised that the issuance of this ruling does not preclude the Oklahoma Tax Commission from conducting an audit or examination under 68 Okla. Stat. §206 of any report or return claiming a credit for the transactions outlined in this letter ruling. The Commission reserves the right to issue any assessment, correction, or adjustment authorized under 68 Okla. Stat. §221.

If I can be of further assistance, please feel free to call me at (405) 521-3133.

Sincerely,
OKLAHOMA TAX COMMISSION

Michael C. Kaufmann
Tax Policy Analyst