



January 23, 2020

By: Email

City of Chicago
Lori Lightfoot
Mayor

Department of Law

Mark A. Flessner
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Re: [REDACTED] - Private Letter Ruling

Dear [REDACTED]

I am writing in response to your letter dated December 7, 2016 ("Request") (copy attached), requesting a private letter ruling ("PLR") concerning the application of the Chicago Personal Property Lease Transaction Tax ("Lease Tax"), Chapter 3-32 of the Municipal Code of Chicago ("Code"), to the [REDACTED] service offered by [REDACTED] (n/k/a [REDACTED]) (hereafter "[REDACTED]").

Based on the facts set forth in your Request, along with our subsequent communications, including the demonstrations we attended at your offices on March 14, 2019 and October 30, 2019, we find that the charges for [REDACTED] are subject to the Lease Tax.

The Lease Tax ordinance defines a nonpossessory computer lease as "a nonpossessory lease in which the customer obtains access to the provider's computer and uses the computer and its software to input, modify or retrieve data or information, in each case without the intervention (other than de minimis intervention) of personnel acting on behalf of the provider." Code Section 3-32-020(I). A customer that subscribes to [REDACTED] obtains access to [REDACTED]'s computer and uses the computer and its software to input, modify or retrieve data or information (hereafter collectively "information"). As we have discussed, regardless of how often the customer inputs or modifies information, there is no question that the customer retrieves information on a daily basis, which by itself meets the definition of a nonpossessory computer lease.

This leaves the question of whether [REDACTED] qualifies for Exemption 11, which exempts "the nonpossessory lease of a computer in which the customer's use or control of the provider's computer is de minimis and the related charge is predominantly for information transferred to the customer rather than for the customer's use or control of the computer, such as the nonpossessory lease of a computer to receive either current price quotations or other information having a fleeting or transitory character." Code Section 3-32-050(A)(11).

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Exemption 11 is discussed in Lease Tax Ruling #12, which states in pertinent part:

Passive access to information is an exempt use of the provider's computer. In the case of a stock market "ticker-tape," where the customer simply receives the one-way dissemination of a scrolling list of current stock prices for a set group of businesses. In that case, the customer's use of the provider's computer is de minimis, as there is no search function (or at most a single or infrequent "channel" selection), and the charge is predominantly for information transferred to the customer (in the form of one-way "streaming"). Ruling #12 par. 10.

It is our understanding that the main reason a customer subscribes to [REDACTED] is because the product allows the customer to select the scope of data that the customer wishes to retrieve from the [REDACTED] database. The many settings that a customer can select give the customer more than de minimis control. We understand that the typical customer may leave most of its settings unchanged after they are initially selected, which could be viewed as constituting a single or infrequent "channel" selection, as referenced in Ruling #12. However, even assuming that to be the case, it is our understanding that the typical customer's portfolio changes on a somewhat regular basis, which means that the "instruments" or "assets" for which it seeks to retrieve information will change as well. The [REDACTED] diagnostic tool allows the customer to make those changes manually, but even if the customer instead uses some other method to make the changes, such as an automated system that sends signals from its computer system to a [REDACTED] computer, this would still constitute an example of the customer exercising more than de minimis use of the provider's computer. Especially in view of the rule that exemptions are to be narrowly construed, it is our judgment that [REDACTED] does not qualify for Exemption 11.

This PLR is based on the text of the Lease Tax ordinance as of the date of this letter and the facts as represented in the Request being true. The opinions contained herein are expressly intended to constitute written advice that may be relied upon pursuant to Code Section 3-4-325. Please be advised, however, that pursuant to Uniform Revenue Procedures Ordinance Ruling #3, Section 12, reliance on written advice in a PLR that is ten or more years old shall be deemed not reasonable unless ratified in writing by the Corporation Counsel's Office.

Very truly yours,



Weston W. Hanscom

cc: Elaine Herman, Department of Finance
Brian Carlson, Department of Finance



[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Telephone [REDACTED]
Fax [REDACTED]
[REDACTED]

December 7, 2016

Ms. Elaine Herman
Supervisor of Tax Policy
Chicago Department of Finance
333 South State Street, Suite 300
Chicago, IL 60604-3977

Dear Ms. Herman:

On behalf of our client, [REDACTED], ("Company"), [REDACTED] ([REDACTED]) respectfully requests the Chicago Department of Finance (the "Department") to issue a letter ruling ("ruling") with respect to the following factual situation.

The Company is in the business of providing its customers with market related information. We are requesting a ruling on behalf of Company as to whether its non-real time data service, e.g., [REDACTED] is subject to the Personal Property Lease Transaction Tax ("PPLTT"). The Company and [REDACTED] would like to reserve the opportunity to discuss preliminary responses prior to the issuance of conclusions by the Department.

General Information

1. Enclosed please find a copy of the Power of Attorney and Declaration of Representative, authorizing [REDACTED] to represent the Company before the Department (attached as Exhibit A). The original Power of Attorney and Declaration of Representative is on file with the Department in conjunction with the ongoing audit.
2. This ruling is not requested with regard to hypothetical or alternative proposed transactions. This ruling is requested to determine the PPLTT consequences of the actual business practices of the Company.
3. The Company is not currently engaged in litigation with the Department with regard to this or any other tax matter.
4. To the best knowledge of the Company's personnel, the Department has not previously ruled regarding this matter for the Company. In addition, the Company previously has not submitted the same or similar issue to the Department.
5. The Company requests that certain information be deleted from the ruling prior to dissemination to others. The Company requests deletion of its name, business product names, addresses, locations of facilities, description of facilities, and the name of its representative.
6. The Company knows of no authority contrary to the authorities referred to and cited below.

[REDACTED]

[REDACTED]

Statement of Material Facts

Company, through [REDACTED], primarily derives revenue by providing its customers with market related information. The information can take many forms (stock prices, commodity prices, relating to domestic or foreign entities, for current or historic periods, be market focused or industry focused, etc.) and is continually being updated. Company's clients often buy these information services in bundles. Company operates globally and is headquartered outside of Illinois, but maintains an office in the city of Chicago and has many subscribers in the city of Chicago. Company licenses very little delivered software and virtually all of its revenue is currently derived from provision of information which is accessed remotely by its customers who use their own devices (computers, phones, tablets, etc.) to access content to which they have subscribed.

At issue in the present ruling request is Company's non-real time data service offering [REDACTED].

[REDACTED], a strategic data delivery platform for non-streaming content, is a cross-asset offering with intelligently linked data for content such as reference data, corporate actions, entity data, end-of-day/intraday pricing and evaluated pricing services. Customers have their choice of three flexible data delivery interfaces including web browser, FTP (file transfer protocol), or SOAP API (application programming interface). This flexible solution seamlessly fits into client workflows and provides the required data and data delivery status.

Web Browser

Users can access the data by logging on to [REDACTED] via a web browser. The web browser interface is used for the "view only data delivery option. Extraction definition and delivery can then be controlled manually from the browser.

FTP

FTP, or file transfer protocol, is a process used to transfer data files between computers. The files are placed on an FTP website that only the customer can access. The customer accesses the FTP site, downloads the file with raw data (i.e., no software content) and exits the site.

Using FTP, users can upload (send data) to [REDACTED] to declare instrument lists, reports, or schedules. Users can also download (receive data) from [REDACTED]. The data prepared would be based on the files uploaded or setup in the Graphical User Interface (GUI). [REDACTED] uses the uploaded/setup information to extract data into formatted files, mark usage, and place the file in a directory where the user can download them. Extraction definition and delivery can be controlled manually from the browser, with Extensible Markup Language ("XML") based actions submitted to the FTP servers or using the web services API. Scheduling of extractions can be automated and based on event triggers or exact client time requirements. Field-level formatting of the data output can be set up as fixed width, delimited, or in XML.

REST/SOAP API

[REDACTED]'s REST (representational state transfer) and SOAP APIs provide flexible and comprehensive access to the full data model and are suitable as an application data source or as embedded methodology in client side data retrieval workflows. The REST API, [REDACTED]'s next generation API designed around REST architecture, expands upon the SOAP API capabilities to provide added content, flexible extractions scheduling and increased validation and extraction processing limits.

The API provides independent integration with [REDACTED] content and services based on web service technology, XML-based messaging, and content. It consists of multiple web methods for searching and validating

[REDACTED]

instruments and counterparties, accessing data dictionaries, and executing extractions, ensuring a reliable and managed replication of [REDACTED] pricing and reference content into a customer's database applications.

The API will facilitate a high level of control and automation. With the API, a user's interaction with [REDACTED] could be fully automated. For example, if a fund manager buys a new security, he can use an API-based program to look-up the security and obtain the required pricing and reference data, and then store that information in a database spreadsheet or in-house application within seconds of making the decision. For clients with overnight processing requirements, the API can facilitate automated data retrieval, error processing, and alerting.

The API provides platform-independent integration with [REDACTED] content and services based on web services technology and XML-based messaging and content. It consists of multiple web methods for searching and validating instruments and legal entities, accessing data dictionaries, and executing extractions, ensuring a reliable and managed replication of [REDACTED] pricing and reference content into your own database applications.

To access the API, new clients are required to login to the [REDACTED] user interface and set their user preferences. Your [REDACTED] user name and password are used to access the API. This is the same information that you use to login to the [REDACTED] user interface. The API is available over the public internet and via [REDACTED] providing access to a Web Service Description Language (WSDL) document and associated web methods.

[REDACTED] uses several IP addresses to maintain connectivity and resilience over Internet, [REDACTED], or [REDACTED] networks. This connectivity allows for outbound and inbound traffic to Company servers via public or private networks

The WSDL is an XML document that defines the [REDACTED] API service ('ExtractionService'). It specifies the location of the ExtractionService and exposes the operations that can be performed ('methods'). Data requests and responses are formatted as XML and are exchanged using Simple Object Access Protocol (SOAP)

Delivered through [REDACTED], [REDACTED] covers many asset classes and is available on an intraday, end-of-day, and time series basis. Securities are linked to issuers and markets and additionally linked to corporate actions data and reference data. [REDACTED] provides pricing, reference data, and derived analytics across all asset classes so that only one source and a single retrieval method is required. That is why [REDACTED] covers all major asset classes including reference data, corporate actions, entity data, end-of-day/intraday pricing, evaluated pricing services and non-real time commodities data from providers such as [REDACTED] and [REDACTED].

The cost for the [REDACTED] service is based on usage. All data extractions are recorded at the security and asset class levels and are made available in the "Usage" screens. Current and past usage can be seen on a user and company level for full transparency on the amount and types of data being extracted.

Ruling Requested

On behalf of the Company, we respectfully request the Department to rule that charges for Company's [REDACTED] service are not subject to the PPLTT.



RELEVANT AUTHORITIES

The Chicago Personal Property Lease Transaction Tax is imposed upon (1) the lease or rental in the City of Chicago of personal property, or (2) the privilege of using in Chicago personal property that is leased or rented outside the city.¹ "Lease' or 'rental' means any transfer of the possession or use of personal property, but not title or ownership, to a user for consideration, whether or not designated as a lease, rental, license or by some other term, and includes a 'nonpossessory lease'.² "Use' means the exercise of any right to or power over personal property by a lessee incident to the lease or rental of that property. . . ."³

The term lease is broadly defined to include "nonpossessory leases", including "nonpossessory computer leases."⁴ The definition of "nonpossessory computer lease" specifies that for purposes of taxation of such leases, "use" of a computer is deemed to occur at the location of the access device used to access the remote computer.⁵ Therefore, "if the user's access device is located in the City of Chicago, the Lease Tax applies to all charges for the use of the computer and its software including, but not limited to, the running or execution of computer programs, or the access, input, retrieval, or modification of data or information which are accessed by the user from such device."⁶ It is through this Ordinance definition that Chicago asserts its jurisdiction to tax such transactions involving "personal property" which physically resides outside its jurisdictional borders.

There are several exemptions to the lease transaction tax, including nonpossessory leases of a computer "in which the customer's use or control of the provider's computer is de minimis and the related charge is predominantly for information transferred to the customer rather than for the customer's use or control of the computer, such as the nonpossessory lease of a computer to receive either current price quotations or other information having a fleeting or transitory character."⁷

¹ Chicago Municipal Code §3-32-030(A).

² Chicago Municipal Code §3-32-020(I).


³ Chicago Municipal Code §3-32-020(R).

⁴ Chicago Municipal Code §3-32-020(I).

⁵ City of Chicago Department of Revenue Personal Property Lease Transaction Tax Ruling #9 (effective June 1, 2004).

⁶ *Id.*

⁷ Chicago Municipal Code §3-32-050(11).



Guidance from prior cases and rulings

Ruling Number 3

In a 2004 tax ruling, the city of Chicago noted that the “lease or rental of personal property includes lease time on personal property not itself rented, such as usage time on a computer, data processing equipment, copying machines, etc.”⁸ As such, the Department opined that the rental or usage of time on computer software is subject to tax.⁹

Ruling Number 5

“For time-sharing purposes (where the possession of the computer is not transferred), the user of the computer shall be deemed using the computer at the location of the user’s access terminal to the computer. Therefore, if the user’s terminal is within the City, the lease tax will apply to all charges for the use of the computer and its software, which is accessed by the user at such terminal.”¹⁰

The lease of computer software in the City is subject to the lease tax, but the sale of computer software is not.¹¹ “Pursuant to Code Section 3-32-020(l), any transfer of personal property that is not a sale is a lease. Therefore a transfer of software that meets the five-part test set forth in 86 Illinois Administrative Code Section 130.1935 is a lease, subject to the lease tax.”¹²

Ruling Number 9

Personal Property Lease Transaction Tax Ruling 9 provides that the lease or rental of personal property includes “time-sharing and time or other use of a computer with other users, whether or not denominated as such.”¹³ In these cases, the Ruling notes, “possession of the computer is neither transferred nor intended to be transferred.”¹⁴ Instead, “the owner of the computer permits use of the computer through a terminal or other device (“access device”) at the user’s location for a fee.”¹⁵ “Where possession of the computer is not transferred, use of a computer is deemed to occur at the location of the access device used to access the computer. Therefore, if the user’s access device is located in the City of Chicago, the lease tax applies to all charges for the use of the computer and its software”¹⁶

Unless charges for the use of the computer include charges for services performed by the owner’s personnel at the time of the transaction, the transaction is considered to involve charges “solely for the use of personal property and not for the sale of a service.”¹⁷

Ruling Number 12

Personal Property Lease Transaction Tax Ruling Number 12, effective July 1, 2015, states that “passive access to information is an exempt use of the provider’s computer.”¹⁸ In the case of a stock market “ticker-tape,” where the customer simply receives the one-way dissemination of a scrolling list of current stock prices for a set group of businesses, the customer’s use of the provider’s computer is de minimis, as there is no search function and the charge is predominantly for information transferred to the customer (in the form of one-way “streaming”).¹⁹

⁸ City of Chicago Department of Revenue Personal Property Lease Transaction Tax Ruling #3, Section 2 (effective June 1, 2004).

⁹ *Id.*

¹⁰ City of Chicago Department of Revenue Personal Property Lease Transaction Tax Ruling #5, Section 2 (effective Sept. 1, 2013).

¹¹ City of Chicago Department of Revenue Personal Property Lease Transaction Tax Ruling #5, Section 5 (effective Sept. 1, 2013).

¹² *Id.*

¹³ City of Chicago Department of Revenue Personal Property Lease Transaction Tax Ruling #9 (effective June 1, 2004).

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ *Id.*

¹⁷ *Id.* at (3)(B)

¹⁸ City of Chicago Department of Revenue Personal Property Lease Transaction Tax Ruling #12 (effective July 1, 2015).

¹⁹ *Id.*

Access to materials that are primarily proprietary is also an exempt use of the provider's computer.²⁰ The customer may pay a subscription fee for the ability to download or otherwise access the desired information or data, and the subscription fee may allow the customer to use a search function to locate the information or data that the customer wishes to download or otherwise access, but the value of the search function is subordinate to the value of the information or data that the customer wishes to download or otherwise access (i.e., the charge is predominantly for the information or data).²¹ This exemption typically applies in the case of a web site or "app" that allows a subscriber to download or otherwise access materials that are primarily proprietary, such as copyrighted newspapers, newsletters, or magazines, that the subscriber would have to purchase at a "bricks and mortar" store.

As a general rule "a subscription to an interactive web site will be subject to the lease tax, and will not be exempt, even if most or all of the information available on the web site is fleeting or transitory."²² This would include, for example, a web site that provides financial research, information and analytical tools."²³

The effects of Ruling Number 12 are limited to periods on and after January 1, 2016.²⁴ Prior to Ruling Number 12, the Department had generally interpreted the reference to "fleeting and transitory" information as exempting certain products that provide financial market data.²⁵ Ruling Number 12 clarified that such uses are exempt only if the receipt (and any usage) is simply the passive receipt of information.²⁶

Chicago Department of Revenue Information Bulletin: Nonpossessory Computer Leases

There is an exemption for usage that is de minimis where the charge is predominantly for information rather than usage (Exemption 11).²⁷ "De minimis" usage means that the information is delivered passively, with a minimum of search or other functionality, except in certain circumstances where the information is predominantly (i.e., primarily) proprietary.²⁸

Determining whether a charge is predominately for information, or whether the information is predominantly proprietary, is necessarily a fact and circumstances test, and it requires an assessment of the relative value of the information versus the search or other functionality.²⁹ In most cases, information that is in the public domain will not have sufficient independent value to meet this test.³⁰

Examples of proprietary information include copyrighted newspapers, newsletters, or magazines that the subscriber would have to purchase if the materials were acquired or accessed through other means, such as a purchase at a "bricks and mortar" store.³¹ The fact that the sign and features of a web site may be proprietary does not mean that the information on the web site is proprietary.³² Likewise, the fact that the procedures and systems used to create and maintain the database may be proprietary does not mean that the information on the web site is proprietary.³³ Also, the fact that some information on the web site may be proprietary (such as notes or commentary), does not mean that the charge paid by the customer is primarily for proprietary information.³⁴

State Guidance

Statutes

²⁰ *Id.*

²¹ *Id.*

²² *Id.*

²³ *Id.*

²⁴ *Id.*

²⁵ November 2015 *Information Bulletin: Nonpossessory Computer Leases.*

²⁶ *Id.*

²⁷ *Id.*

²⁸ *Id.*

²⁹ *Id.*

³⁰ *Id.*

³¹ *Id.*

³² *Id.*

³³ *Id.*

³⁴ *Id.*

[REDACTED]

The Service Occupation Tax ("SOT") is imposed upon "all persons engaged in the business of making sales of service (referred to as "servicemen") on all tangible personal property transferred as an incident of a sale of service, including computer software..."³⁵

"Transfer" means "any transfer of the title to property or the ownership of property whether or not the transferor retains title as security for the payment of amounts due him from the transferee."³⁶

Additional Guidance

In a recent General Information Letter, the Illinois Department of Revenue stated that a provider of software as a service is acting as a serviceman.³⁷ If the provider does not transfer any tangible personal property to the customer, then the transaction generally would not be subject to the Retailers' Occupation Tax, Use Tax, Service Occupation Tax, or Service Use Tax.³⁸ If the provider transfers to the customer an API, applet, desktop agent, or a remote access agent to enable the customer to access the provider's network and services, it appears the customer is receiving computer software that is subject to tax.³⁹ Although there may not be a separate charge to the customer for the computer software, it is nonetheless subject to tax, unless the transfer qualifies as a non-taxable license of computer software.⁴⁰ If the provider, as a serviceman, is not otherwise required to be registered under Section 2a of the Retailers' Occupation Tax Act and qualifies as a de minimis serviceman, the provider could elect to pay Use Tax on its costs of the computer software.⁴¹

DISCUSSION AND ANALYSIS

All [REDACTED] Methods

The Department's Personal Property Lease Transaction Tax Ruling #12 introduced a new policy relating to information that is proprietary. Access to a database that contains primarily proprietary data, according to the Ruling, is nontaxable access. The Department does note that a "legal research database" is not covered by the exemption, based on the assumption that "although the customer ultimately wants to find pertinent documents, the charge is predominantly for the ability to perform the searches necessary to locate those documents."⁴² *The American Heritage Dictionary* defines the word "predominant" as "having the greatest ascendancy, importance, influence, authority, or force" or "[m]ost common or conspicuous; main or prevalent." "Predominant" does not mean that it has to be the majority – that is, 50% plus 1. Instead, "predominant" merely must be the largest of all considerations.

[REDACTED] delivers relevant financial and market data to clients, including reference data, corporate actions, entity data, end-of-day/intraday pricing, and evaluated pricing services. This data is collected in a single source for the clients to download. Company's customers are predominantly paying for access to this data or information rather than the retrieval method, as evidenced by the fact that Company offers multiple ways to access the information.

The ultimate charge for the service is the delivery of the data and information, not the use of Company's computers, search functions, etc. As demonstrated by the variety of methods that can be used to access the data (e.g., FTP, API, etc.), the delivery mechanism and access to Company's computers is unimportant as users are purchasing the data. Rather than charging a flat fee as would be expected for a service, costs for [REDACTED] are based upon usage (i.e., the amount of data extracted).

Further, the methods for extracting the data involve de minimis use of Company's computer. With FTP, Company places the requested documents on a secure website. Users' interactions with this site are largely

³⁵35 ILCS 115/3.

³⁶ 35 ILCS 115/2.

³⁷ Illinois General Information Letter 16-033 (8/17/2016).

³⁸ *Id.*

³⁹ *Id.*

⁴⁰ *Id.*

⁴¹ *Id.*

⁴² City of Chicago Department of Revenue Personal Property Lease Transaction Tax Ruling #12 (effective July 1, 2015).

[REDACTED]

limited to logging on, downloading the data, and logging off. Should company choose to use APIs to extract the information, the user's computer automatically extracts the data from Company's system. The applications are executed on the user's computer, and the information is obtained with no further access to or use of Company's computers.

API Delivery Method

Finally, customers who select the API delivery method should not be subject to the lease tax as the transfer of software will be subject to the SOT. As noted above, in a recent General Information Letter the Illinois Department of Revenue found that if the provider of software as a service (i.e., the serviceman) transfers to the customer an API, applet, desktop agent, or a remote access agent to enable the customer to access the provider's network and services, the customer is receiving computer software subject to tax. Although there may not be a separate charge for the software, it is subject to SOT unless it qualifies as a non-taxable license of computer software.

Pursuant to Personal Property Lease Transaction Tax Ruling #5, the lease of computer software in the City is subject to the lease tax, but the sale of computer software is not. As such, a transfer of software that meets the five-part test set forth in 86 Illinois Administrative Code Section 130.1935 is a lease, subject to the lease tax. In reaching this conclusion, the Ruling cites both the City Code's definition of a lease ("any transfer of the possession or use of personal property, but not title or ownership) and the State's definition of a "sale at retail" ("any transfer of the ownership of or title to tangible personal property to a purchaser, for the purpose of use or consumption").

While the lease tax's relation to the SOT is not directly addressed either in statute or ruling, it is analogous to the ROT. The SOT is imposed "upon all persons engaged in the business of making sales of service (referred to as "servicemen") on all tangible personal property transferred as an incident of a sale of service, including computer software..." "Transfer" means any "transfer of the title to property or the ownership of property..." For SOT to apply, there must be a transfer of title or ownership. As Code Section 332-020(I) defines a lease as "any transfer of the possession or use of personal property, but not title or ownership," if the SOT applies on a transfer of software, the lease tax cannot.

Under the API delivery method, in order to access the data, customers download the API which then provides them with platform-independent integration with [REDACTED]. Illinois has stated that such software when transferred during the provision of a service is subject to SOT, provided that the transfer is not an exempt license of software. As the [REDACTED] API does not meet the five-part test set forth in 86 Illinois Administrative Code Section 130.1935, the transfer is subject to SOT. As a de minimis serviceman, Company can elect to pay Use Tax on its costs.

Conclusion

We respectfully request that the Department issue a ruling stating that Company's [REDACTED] service offering is not subject to the Personal Property Lease Transaction Tax under Chicago Municipal Code §3-32-030(A).

If the Department cannot make this ruling, we request that the Department contact us at [REDACTED] to determine what additional information is required or allow the taxpayer to withdraw this ruling request.

Very truly yours,

[REDACTED]

[REDACTED]

[REDACTED]

Senior Manager



City of Chicago
Department of Revenue



Power of Attorney and
Declaration of Representative

PART I - Power of Attorney

Taxpayer(s) name, identifying number, and address including ZIP code (Please type or print)

[Redacted]

hereby appoints [name(s), address(es), including ZIP code(s), telephone number(s) and email address(es) of individual(s)]*

Please see attached.

as attorney(s)-in-fact to represent the taxpayer(s) before any office of the Chicago Department of Revenue for the following tax matter(s). Specify the type(s) of tax and year(s) or period(s).

Type of Tax	Year(s) or Period(s)
Telecommunications Tax	all open periods
Employer's Expense Tax	all open periods
Personal Property Lease Transaction Tax	all open periods
Use Tax for Non-Titled Personal Property	all open periods

The attorney(s)-in-fact (or either of them) are authorized, subject to revocation, to receive confidential information and to perform any and all acts that the principal(s) can perform with respect to the above specified tax matters (excluding the power to receive refund checks, and the power to sign the return, unless specifically granted below).

Send copies of notices and other written communications addressed to the taxpayer(s) in proceedings involving the above tax matters to:

- 1 [] the appointee first named above, or
- 2 [✓] (names of not more than two of the above named [Redacted])

Initial here ^{no}.....if you are granting the power to receive, but not to endorse or cash, refund checks for the above tax matters to:

- 3 [] the appointee first named above, or
- 4 [] (name of one of the above designated appointees)

This power of attorney revokes all earlier powers of attorney and tax information authorizations on file with the Department of Revenue for the same tax matters and years or periods covered by this power of attorney, except for the following:

(Specify to whom granted, date, and address including ZIP code, or refer to attached copies of earlier powers and authorizations.)

Signature of or for taxpayers(s)

(If signed by a corporate officer, partner, or fiduciary on behalf of the taxpayer, I certify that I have the authority to execute this power of attorney on behalf of the taxpayer.)

[Redacted Signature]

(Signature)

ASST. SECRETARY

(Title, if applicable)

7/25/12

(Date)

(Also type or print your name below if signing for a taxpayer who is not an individual.)

[Redacted Name]

(Signature)

(Title, if applicable)

(Date)

* You must authorize an organization, firm, or partnership to receive confidential information, but your representative must be an individual who must complete part II.

Thomson Reuters (Markets) LLC
 Audit Case No. 2918
 Supplement to Power of Attorney

	Name	Address	City/State/ZIP	Telephone	Facsimile	Email
1	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
2	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
3	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
4	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

	Designation	Jurisdiction	Signature	Date
1	6	IL, MN	[REDACTED]	8/16/2012
2	1	IL	[REDACTED]	8/16/12
3			[REDACTED]	8/16/2012
4	1	MO, DC	[REDACTED]	8/16/2012

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