

AMENDED IN SENATE APRIL 14, 2016

SENATE BILL

No. 1267

Introduced by Senator Allen
(Coauthor: Senator Leno)
(Coauthors: Assembly Members Bloom and Chiu)

February 18, 2016

An act to amend ~~Section 50199.15 of the Health and Safety Code,~~
Sections 1962 and 1962.7 of the Civil Code, to amend Sections 1161
and 1162 of the Code of Civil Procedure, and to amend Section 7060.4
of the Government Code, relating to housing.

LEGISLATIVE COUNSEL'S DIGEST

SB 1267, as amended, Allen. ~~Low-income housing credit: annual report.~~ *Rent: unlawful detainer: withdrawal of accommodations from rent or lease.*

Existing law requires an owner of a dwelling structure containing one or more units offered to the public for rent or for lease for residential purposes, or a party signing a rental agreement or lease on behalf of the owner, to provide certain information to a tenant, including, among other things, disclosure in the rental agreement or lease the name and contact information of the person or entity to whom rent payments are required to be made and, if rent payments may be made personally, the usual days and hours that the person will be available to receive the payments, or, at the owner's option, the rental agreement or lease instead is required to disclose the number of the account in a financial institution located within 5 miles of the rental property into which rent payments may be made, and the name and street address of the institution, or the information necessary to establish an electronic funds transfer procedure for paying the rent.

This bill would require that the address for payment in person be within 5 miles of the rental property and that the rental agreement or lease disclose a name and address to which rent may be paid by mail.

Existing law provides that a party who enters into a rental agreement on behalf of an owner who fails to comply with laws requiring that certain information be provided to a tenant is deemed an agent of each person who is an owner for, among other things, receiving rental payments, which may be made in cash, by check, by money order, or in any form previously accepted by the owner or agent, unless the form of payment has been specified in the rental agreement or the tenant has been notified by the owner in writing that a particular form of payment is unacceptable.

This bill would omit the specific reference to cash, check, or money order and instead would authorize payment in any manner disclosed in the rental agreement or lease pursuant to these provisions.

Existing law, if personal delivery is not allowed, requires that it be conclusively presumed that upon mailing of any rent or notice to the owner by the tenant to the name and address provided, the notice or rent is deemed receivable by the owner on the date posted, if the tenant can show proof of mailing.

This bill would require that presumption to be applied regardless of whether personal delivery is allowed.

Existing law provides that a tenant of real property is guilty of unlawful detainer in certain circumstances, including when the tenant continues in possession without permission of the landlord after default in the payment of rent and 3 days' notice requiring its payment or possession of the property was served on the tenant, as specified.

This bill would recast and clarify that provision.

Existing law provides various methods for serving notices in unlawful detainer proceedings, including the service of notice to a tenant, whose place of residence and business cannot be ascertained or there is not a person of suitable age or discretion with whom to leave a copy, by affixing a copy in a conspicuous place on the property, delivering a copy to a person living on the property if such person can be found, and sending a copy through the mail addressed to the tenant at the place where the property is situated.

This bill would add that the copy sent through the mail to the tenant be with proof of service by mail.

Existing law, commonly known as the Ellis Act, generally prohibits public entities from adopting any statute, ordinance, or regulation, or

taking any administrative action, to compel the owner of residential real property to offer or to continue to offer accommodations, as defined, in the property for rent or lease. Existing law authorizes a public entity to enact by ordinance or statute procedures for an owner to notify the entity of his or her intention to withdraw accommodations from rent or lease and for an owner to notify the tenant of specified information. Existing law provides, if the tenant or lessee is at least 62 years of age or disabled, as defined, and has lived in the accommodations for at least one year before the notice of intent to withdraw has been filed with the entity, the date of withdrawal of the accommodations of that tenant or lessee is extended for one year after delivery of the notice to the public entity and certain other requirements apply.

This bill would additionally apply that extension if the tenant or lessee has a custodial or family relationship with a pupil enrolled in a primary or secondary school who lives in the accommodations, as specified.

Existing law authorizes a public entity to also require the owner to notify the tenant of, among other things, his or her right to extended tenancy for one year after delivery of the notice if that tenant or lessee is at least 62 years of age or disabled and has lived in those accommodations for at least one year prior to the above-referenced notice of intent to withdraw accommodations from rent or lease.

This bill would additionally authorize a public entity to require the owner to provide notice of this right to extend tenancy to a tenant or lessee that has a custodial or family relationship with a pupil enrolled in a primary or secondary school who lives in the accommodations, as specified.

This bill also would make technical changes.

~~Existing law establishes the California Tax Credit Allocation Committee in state government to allocate authorized low-income housing tax credits to stimulate the production and rehabilitation of shelter for lower income individuals and families. Existing law requires the committee to allocate the housing tax credit on a regular basis consisting of 2 or more periods during which applications may be filed and considered. Existing law also requires the committee to submit an annual report to the Legislature containing specified information regarding its activities that includes, among other things, the total amount of low-income housing credits allocated by the committee.~~

~~This bill would expand the reporting requirements of the committee to additionally include the total number of projects assisted by the credit per county during the previous calendar year.~~

Vote: majority. Appropriation: no. Fiscal committee: ~~yes~~-no.
State-mandated local program: no.

The people of the State of California do enact as follows:

1 *SECTION 1. Section 1962 of the Civil Code is amended to*
2 *read:*
3 1962. (a) Any owner of a dwelling structure specified in
4 Section 1961 or a party signing a rental agreement or lease on
5 behalf of the owner shall do all of the following:
6 (1) Disclose therein the name, telephone number, and usual
7 street address at which personal service may be effected of each
8 person who is:
9 (A) Authorized to manage the premises.
10 (B) An owner of the premises or a person who is authorized to
11 act for and on behalf of the owner for the purpose of service of
12 process and for the purpose of receiving and receipting for all
13 notices and demands.
14 (2) Disclose therein the name, telephone number, and address
15 of the person or entity to whom rent payments shall be made.
16 (A) If rent payments may be made personally, *the rental*
17 *agreement or lease shall disclose* the usual days and hours that
18 the person will be available to receive the payments ~~shall also be~~
19 ~~disclosed, and the address for payment shall be within five miles~~
20 *of the rental property.*
21 (B) *The rental agreement or lease shall disclose a name and*
22 *address to which the rent may be tendered by mail.*
23 ~~(B) At the owner's option, the rental agreement or lease shall~~
24 ~~instead disclose~~
25 (C) *The rental agreement or lease also may provide the number*
26 of either:
27 (i) The account in a financial institution into which rent
28 payments may be made, and the name and street address of the
29 institution; provided that the institution is located within five miles
30 of the rental property.
31 (ii) The information necessary to establish an electronic funds
32 transfer procedure for paying the rent.
33 (3) Disclose therein ~~the any other~~ form or forms in which rent
34 payments ~~are to be made~~. *will be accepted.*

(4) Provide a copy of the rental agreement or lease to the tenant within 15 days of its execution by the tenant. Once each calendar year thereafter, upon request by the tenant, the owner or owner's agent shall provide an additional copy to the tenant within 15 days. If the owner or owner's agent does not possess the rental agreement or lease or a copy of it, the owner or owner's agent shall instead furnish the tenant with a written statement stating that fact and containing the information required by paragraphs (1), (2), and (3).

(b) In the case of an oral rental agreement, the owner, or a person acting on behalf of the owner for the receipt of rent or otherwise, shall furnish the tenant, within 15 days of the agreement, with a written statement containing the information required by paragraphs (1), (2), and (3) of subdivision (a). Once each calendar year thereafter, upon request by the tenant, the owner or owner's agent shall provide an additional copy of the statement to the tenant within 15 days.

(c) The information required by this section shall be kept current and this section shall extend to and be enforceable against any successor owner or manager, who shall comply with this section within 15 days of succeeding the previous owner or manager. A successor owner or manager shall not serve a notice pursuant to paragraph (2) of Section 1161 of the Code of Civil Procedure or otherwise evict a tenant for nonpayment of rent that accrued during the period of noncompliance by a successor owner or manager with this subdivision. Nothing in this subdivision shall relieve the tenant of any liability for unpaid rent.

(d) A party who enters into a rental agreement on behalf of the owner who fails to comply with this section is deemed an agent of each person who is an owner:

(1) For the purpose of service of process and receiving and receipting for notices and demands.

(2) For the purpose of performing the obligations of the owner under law and under the rental agreement.

(3) For the purpose of receiving rental payments, which may be made in cash, by check, by money order, *any manner pursuant to subdivision (a)* or in any ~~form~~ *manner* previously accepted by the owner or owner's agent, unless the form of payment has been specified in the oral or written ~~agreement~~, *agreement* or the tenant

1 has been notified by the owner in writing that a particular form of
2 payment is unacceptable.

3 (e) Nothing in this section limits or excludes the liability of any
4 undisclosed owner.

5 ~~(f) If the address provided by the owner does not allow for~~
6 ~~personal delivery, then it shall~~ *It shall* be conclusively presumed
7 that upon the mailing of any rent or notice to the owner by the
8 tenant to the name and address provided, the notice or rent is
9 deemed receivable by the owner on the date posted, if the tenant
10 can show proof of mailing to the name and address provided by
11 the owner.

12 *SEC. 2. Section 1962.7 of the Civil Code is amended to read:*

13 1962.7. In the event an owner, successor owner, manager, or
14 agent specified in Section 1961 fails to comply with the
15 requirements of this chapter, service of process by a tenant with
16 respect to a dispute arising out of the tenancy may be made by
17 registered or certified mail sent to the address at which rent is paid,
18 *may be tendered*, in which case the provisions of Section 1013 of
19 the Code of Civil Procedure shall apply.

20 *SEC. 3. Section 1161 of the Code of Civil Procedure is*
21 *amended to read:*

22 1161. A tenant of real property, for a term less than life, or the
23 executor or administrator of his or her estate heretofore qualified
24 and now acting or hereafter to be qualified and act, is guilty of
25 unlawful detainer:

26 1. When he or she continues in possession, in person or by
27 subtenant, of the property, or any part thereof, after the expiration
28 of the term for which it is let to him or her; provided the expiration
29 is of a nondefault nature however brought about without the
30 permission of his or her landlord, or the successor in estate of his
31 or her landlord, if applicable; including the case where the person
32 to be removed became the occupant of the premises as a servant,
33 employee, agent, or licensee and the relation of master and servant,
34 or employer and employee, or principal and agent, or licensor and
35 licensee, has been lawfully terminated or the time fixed for
36 occupancy by the agreement between the parties has expired; but
37 nothing in this subdivision shall be construed as preventing the
38 removal of the occupant in any other lawful manner; but in case
39 of a tenancy at will, it must first be terminated by notice, as
40 prescribed in the Civil Code.

1 2. When he or she continues in possession, in person or by
2 subtenant, without the permission of his or her landlord, or the
3 successor in estate of his or her landlord, if applicable, after default
4 in the payment of rent, pursuant to the lease or agreement under
5 which the property is held, and three days' notice, in writing,
6 ~~requiring its payment, stating the amount which is due, the name,~~
7 ~~telephone number, and address of the person to whom the rent~~
8 ~~payment shall be made, and, if payment may be made personally,~~
9 ~~the usual days and hours that person will be available to receive~~
10 ~~the payment (provided that, if the address does not allow for~~
11 ~~personal delivery, then it shall be conclusively presumed that upon~~
12 ~~the mailing of any rent or notice to the owner by the tenant to the~~
13 ~~name and address provided, the notice or rent is deemed received~~
14 ~~by the owner on the date posted, if the tenant can show proof of~~
15 ~~mailing to the name and address provided by the owner), or the~~
16 ~~number of an account in a financial institution into which the rental~~
17 ~~payment may be made, and the name and street address of the~~
18 ~~institution (provided that the institution is located within five miles~~
19 ~~of the rental property), or if an electronic funds transfer procedure~~
20 ~~has been previously established, that payment may be made~~
21 ~~pursuant to that procedure, or possession of the property, shall~~
22 ~~have been served upon him or her and if there is a subtenant in~~
23 ~~actual occupation of the premises, also upon the subtenant.~~
24 *possession of the property or payment of rent, shall have been*
25 *served upon him or her, and if there is a subtenant in actual*
26 *occupation of the premises, also upon the subtenant. The notice*
27 *shall state the amount which is due and the name, telephone*
28 *number, and address of the person to whom the rent payment shall*
29 *be made. If payment may be made personally, the notice shall state*
30 *the usual days and hours that person will be available to receive*
31 *the payment. If payment may be made at a financial institution,*
32 *the notice shall state the number of an account in a financial*
33 *institution into which the rental payment may be made, and the*
34 *name and street address of the institution, provided that the*
35 *institution is located within five miles of the rental property. If an*
36 *electronic funds transfer procedure has been previously*
37 *established, the notice shall state that payment may be made*
38 *pursuant to that procedure. It shall be conclusively presumed that*
39 *upon the mailing of any rent or notice to the owner by the tenant*
40 *to the name and mailing address required to be provided, the notice*

1 *or rent is deemed received by the owner on the date posted if the*
2 *tenant can show proof of mailing to the name and address provided*
3 *by the owner.*

4 The notice may be served at any time within one year after the
5 rent becomes due. In all cases of tenancy upon agricultural lands,
6 where the tenant has held over and retained possession for more
7 than 60 days after the expiration of the term without any demand
8 of possession or notice to quit by the landlord or the successor in
9 estate of his or her landlord, if applicable, he or she shall be deemed
10 to be holding by permission of the landlord or successor in estate
11 of his or her landlord, if applicable, and shall be entitled to hold
12 under the terms of the lease for another full year, and shall not be
13 guilty of an unlawful detainer during that year, and the holding
14 over for that period shall be taken and construed as a consent on
15 the part of a tenant to hold for another year.

16 3. When he or she continues in possession, in person or by
17 subtenant, after a neglect or failure to perform other conditions or
18 covenants of the lease or agreement under which the property is
19 held, including any covenant not to assign or sublet, than the one
20 for the payment of rent, and three days' notice, in writing, requiring
21 the performance of such conditions or covenants, or the possession
22 of the property, shall have been served upon him or her, and if
23 there is a subtenant in actual occupation of the premises, also, upon
24 the subtenant. Within three days after the service of the notice, the
25 tenant, or any subtenant in actual occupation of the premises, or
26 any mortgagee of the term, or other person interested in its
27 continuance, may perform the conditions or covenants of the lease
28 or pay the stipulated rent, as the case may be, and thereby save the
29 lease from forfeiture; provided, if the conditions and covenants of
30 the lease, violated by the lessee, cannot afterward be performed,
31 then no notice, as last prescribed herein, need be given to the lessee
32 or his or her subtenant, demanding the performance of the violated
33 conditions or covenants of the lease.

34 A tenant may take proceedings, similar to those prescribed in
35 this chapter, to obtain possession of the premises let to a subtenant
36 or held by a servant, employee, agent, or licensee, in case of his
37 or her unlawful detention of the premises underlet to him or her
38 or held by him or her.

39 4. Any tenant, subtenant, or executor or administrator of his or
40 her estate heretofore qualified and now acting, or hereafter to be

qualified and act, assigning or subletting or committing waste upon the demised premises, contrary to the conditions or covenants of his or her lease, or maintaining, committing, or permitting the maintenance or commission of a nuisance upon the demised premises or using the premises for an unlawful purpose, thereby terminates the lease, and the landlord, or his or her successor in estate, shall upon service of three days' notice to quit upon the person or persons in possession, be entitled to restitution of possession of the demised premises under this chapter. For purposes of this subdivision, a person who commits or maintains a public nuisance as described in Section 3482.8 of the Civil Code, or who commits an offense described in subdivision (c) of Section 3485 of the Civil Code, or subdivision (c) of Section 3486 of the Civil Code, or uses the premises to further the purpose of that offense shall be deemed to have committed a nuisance upon the premises.

5. When he or she gives written notice as provided in Section 1946 of the Civil Code of his or her intention to terminate the hiring of the real property, or makes a written offer to surrender which is accepted in writing by the landlord, but fails to deliver possession at the time specified in that written notice, without the permission of his or her landlord, or the successor in estate of the landlord, if applicable.

As used in this section, tenant includes any person who hires real property except those persons whose occupancy is described in subdivision (b) of Section 1940 of the Civil Code.

This section shall become operative on January 1, 2012.

SEC. 4. Section 1162 of the Code of Civil Procedure is amended to read:

1162. (a) Except as provided in subdivision (b), the notices required by Sections 1161 and 1161a may be served by any of the following methods:

- (1) By delivering a copy to the tenant personally.
- (2) If he or she is absent from his or her place of residence, and from his or her usual place of business, by leaving a copy with some person of suitable age and discretion at either place, and sending a copy through the mail addressed to the tenant at his or her place of residence.
- (3) If such place of residence and business cannot be ascertained, or a person of suitable age or discretion there ~~can not~~ cannot be

1 found, then by affixing a copy in a conspicuous place on the
2 property, and also delivering a copy to a person there residing, if
3 such person can be found; and also sending a copy through the
4 mail addressed to the tenant at the place where the property is
5 ~~situated~~. *situated with proof of service by mail*. Service upon a
6 subtenant may be made in the same manner.

7 (b) The notices required by Section 1161 may be served upon
8 a commercial tenant by any of the following methods:

9 (1) By delivering a copy to the tenant personally.

10 (2) If he or she is absent from the commercial rental property,
11 by leaving a copy with some person of suitable age and discretion
12 at the property, and sending a copy through the mail addressed to
13 the tenant at the address where the property is situated.

14 (3) If, at the time of attempted service, a person of suitable age
15 or discretion is not found at the rental property through the exercise
16 of reasonable diligence, then by affixing a copy in a conspicuous
17 place on the property, and also sending a copy through the mail
18 addressed to the tenant at the address where the property is situated.
19 Service upon a subtenant may be made in the same manner.

20 (c) For purposes of subdivision (b), “commercial tenant” means
21 a person or entity that hires any real property in this state that is
22 not a dwelling unit, as defined in subdivision (c) of Section 1940
23 of the Civil Code, or a mobilehome, as defined in Section 798.3
24 of the Civil Code.

25 *SEC. 5. Section 7060.4 of the Government Code is amended*
26 *to read:*

27 7060.4. (a) Any public entity which, by a valid exercise of its
28 police power, has in effect any control or system of control on the
29 price at which accommodations are offered for rent or lease, may
30 require by statute or ordinance, or by regulation as specified in
31 Section 7060.5, that the owner notify the entity of an intention to
32 withdraw those accommodations from rent or lease and may require
33 that the notice contain statements, under penalty of perjury,
34 providing information on the number of accommodations, the
35 address or location of those accommodations, the name or names
36 of the tenants or lessees of the accommodations, and the rent
37 applicable to each residential rental unit.

38 Information respecting the name or names of the tenants, the
39 rent applicable to any residential rental unit, or the total number
40 of accommodations, is confidential information and for purposes

1 of this chapter shall be treated as confidential information by any
2 public entity for purposes of the Information Practices Act of 1977
3 (Chapter 1 (commencing with Section 1798) of Title 1.8 of Part
4 4 of Division 3 of the Civil Code). A public entity shall, to the
5 extent required by the preceding sentence, be considered an
6 “agency,” as defined by subdivision (d) of Section 1798.3 of the
7 Civil Code.

8 (b) The statute, ordinance, or regulation of the public entity may
9 require that the owner record with the county recorder a
10 memorandum summarizing the provisions, other than the
11 confidential provisions, of the notice in a form which shall be
12 prescribed by the statute, ordinance, or regulation, and require a
13 certification with that notice that actions have been initiated as
14 required by law to terminate any existing tenancies. In that
15 situation, the date on which the accommodations are withdrawn
16 from rent or lease for purposes of this chapter is 120 days from
17 the delivery in person or by first-class mail of that notice to the
18 public entity. However, if the tenant or lessee is at least 62 years
19 of age or disabled, ~~and age, disabled, or has a custodial or family~~
20 *relationship with a pupil enrolled in a primary or secondary school*
21 *who lives in the accommodations, and the tenant or lessee* has
22 lived in his or her accommodations for at least one year prior to
23 the date of delivery to the public entity of the notice of intent to
24 withdraw pursuant to subdivision (a), then the date of withdrawal
25 of the accommodations of that tenant or lessee shall be extended
26 to one year after the date of delivery of that notice to the public
27 entity, provided that the tenant or lessee gives written notice of
28 his or her entitlement to an extension to the owner within 60 days
29 of the date of delivery to the public entity of the notice of intent
30 to withdraw. In that situation, the following provisions shall apply:

31 (1) The tenancy shall be continued on the same terms and
32 conditions as existed on the date of delivery to the public entity
33 of the notice of intent to withdraw, subject to any adjustments
34 otherwise available under the system of control.

35 (2) No party shall be relieved of the duty to perform any
36 obligation under the lease or rental agreement.

37 (3) The owner may elect to extend the date of withdrawal on
38 any other accommodations up to one year after date of delivery to
39 the public entity of the notice of intent to withdraw, subject to
40 paragraphs (1) and (2).

(4) Within 30 days of the notification by the tenant or lessee to the owner of his or her entitlement to an extension, the owner shall give written notice to the public entity of the claim that the tenant or lessee is entitled to stay in their accommodations for one year after date of delivery to the public entity of the notice of intent to withdraw.

(5) Within 90 days of date of delivery to the public entity of the notice of intent to withdraw, the owner shall give written notice to the public entity and the affected tenant or lessee of the owner's election to extend the date of withdrawal and the new date of withdrawal under paragraph (3).

(c) The statute, ordinance, or regulation of the public entity adopted pursuant to subdivision (a) may also require the owner to notify any tenant or lessee displaced pursuant to this chapter of the following:

(1) That the public entity has been notified pursuant to subdivision (a).

(2) That the notice to the public entity specified the name and the amount of rent paid by the tenant or lessee as an occupant of the accommodations.

(3) The amount of rent the owner specified in the notice to the public entity.

(4) Notice to the tenant or lessee of his or her rights under paragraph (3) of subdivision (b) of Section 7060.2.

(5) Notice to the tenant or lessee of the following:

(A) ~~If the tenant or lessee is at least 62 years of age or disabled,~~
and age, disabled, or has a custodial or family relationship with a pupil enrolled in a primary or secondary school who lives in the accommodations, and the tenant or lessee has lived in his or her accommodations for at least one year prior to the date of delivery to the public entity of the notice of intent to withdraw, then tenancy shall be extended to one year after date of delivery to the public entity of the notice of intent to withdraw, provided that the tenant or lessee gives written notice of his or her entitlement to the owner within 60 days of date of delivery to the public entity of the notice of intent to withdraw.

(B) The extended tenancy shall be continued on the same terms and conditions as existed on date of delivery to the public entity of the notice of intent to withdraw, subject to any adjustments otherwise available under the system of control.

1 (C) No party shall be relieved of the duty to perform any
2 obligation under the lease or rental agreement during the extended
3 tenancy.

4 (d) The statute, ordinance, or regulation of the public entity
5 adopted pursuant to subdivision (a) may also require the owner to
6 notify the public entity in writing of an intention to again offer the
7 accommodations for rent or lease.

8 ~~SECTION 1. Section 50199.15 of the Health and Safety Code~~
9 ~~is amended to read:~~

10 ~~50199.15. (a) The committee shall annually submit to the~~
11 ~~Legislature by April 1 of each year a report specifying, with respect~~
12 ~~to its activities under this chapter during the previous calendar~~
13 ~~year, (1) the total amount of low-income housing credits allocated~~
14 ~~by the committee, (2) the total number of units assisted by the~~
15 ~~credit that are, or are to be, occupied by households whose income~~
16 ~~is 60 percent or less of area median gross income, (3) the amount~~
17 ~~of the credit allocated to each project, the other financing available~~
18 ~~to the project, and the number of units that are, or are to be, therein~~
19 ~~occupied by households whose income is 60 percent or less of area~~
20 ~~median gross income, (4) sufficient information to identify the~~
21 ~~project, and (5) the total number of units assisted by the credit per~~
22 ~~county during the previous calendar year.~~

23 ~~(b) The committee shall also include in its annual report to the~~
24 ~~Legislature, an aggregation of the information which shall be~~
25 ~~submitted annually by housing sponsors for all projects which~~
26 ~~have received an allocation in previous years, specifying all of the~~
27 ~~following:~~

28 ~~(1) Information sufficient to identify the project.~~

29 ~~(2) The total number of units in the project.~~

30 ~~(3) The total number of units assisted by the credit that are~~
31 ~~required to be occupied by households whose income is 60 percent~~
32 ~~or less of the area median gross income as a condition of receiving~~
33 ~~a tax credit.~~

34 ~~(4) The total number of units assisted by the credit that are~~
35 ~~occupied by households whose income is 60 percent or less of the~~
36 ~~area median gross income.~~

- 1 ~~(e) The committee shall also include in its annual report to the~~
- 2 ~~Legislature, any recommendations for improvement in the~~
- 3 ~~low-income housing tax credit.~~

O