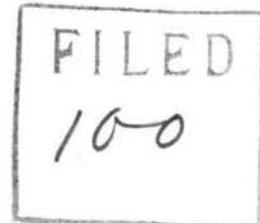


February 13, 1973,

OPINION LETTER NO. 100



Mr. James E. Riney, Chairman
State Tax Commission
Jefferson State Office Building
Jefferson City, Missouri 65101

Dear Mr. Riney:

This is in response to your request for an opinion as to the authority of the state of Missouri to levy a corporation franchise tax under the provisions of Chapter 147, RSMo 1969, against national banks operating in this state.

Title 12, Section 548, U.S.C.A., effective January 1, 1972, provides:

"For the purpose of any tax law enacted under authority of the United States or any State, a national bank shall be treated as a bank organized and existing under the laws of the State or other jurisdiction within which its principal office is located."

Inasmuch as the intent of Congress in enacting such section was to put the national banks on equal footing with state banks, the national banks are subject to the corporation franchise tax as set forth in Chapter 147 in the same manner and with like effect as state banks.

Yours very truly,

JOHN C. DANFORTH
Attorney General