The following pages are a continuation of an interrupted fax transmission to 8504887112 from Yen Vo.

114 page(s) were previously delivered. This transmission is starting from page 115.



To:	8504887112
Recipient Fax Number:	18504887112
From:	Yen Vo
Sender Fax Number:	
Date:	04-24-2024 2:01 PM
Subject:	Space Exploration Technologies Corp - Petition for Chapter 120 Administrative Hearing
No of Pages with Cover:	116

Yen Vo (she, her, hers)
Administrative Assistant
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Space Exploration Technologies

April 22, 2024

Florida Department of Revenue Office of General Counsel

P.O. Box 6668 Tallahassee, FL 32314-6668 VIA Email to: <u>AgencyClerk@floridarevenue.com;</u> <u>Chris.Whittier@floridarevenue.com</u>

Re: Space Exploration Technologies Corp Refund

Claim Control Number:

5000239462/5000250831 FEIN: 01-0627671

Sales & Use Tax

Petition for Chapter 120 Administrative Hearing

Dear Sir or Madam:

The undersigned represents the above referenced Taxpayer, Space Exploration Technologies Corp ("Taxpayer"). This letter is in response to the Notice of Proposed Refund Denial issued by the Florida Department of Revenue dated March 1, 2024. Taxpayer is timely filing this Petition for Chapter 120 Administrative Hearing.

This Petition for Chapter 120 Administrative Hearing is based on the following information, including new issues of material fact and new legal arguments:

- 1. The Taxpayer's name is Space Exploration Technologies Corp. The Taxpayer's address is 1 Rocket Rd., Hawthorne, CA 90250-6844. Taxpayer's Federal EIN is 01-0627671, and its BPN is 2512879.
- 2. The type of tax being protested is Sales and Use Tax. The total amount of the Notice of Proposed Refund Denial is \$1,695,618.02.
- 3. A copy of the Notice of Proposed Refund Denial, dated March 1, 2024, is attached hereto.
- 4. The Notice of Proposed Refund Denial notes that the Taxpayer has not provided sufficient information for the Florida Department of Revenue to refund the referenced denied portion of the refund claim. The Notice of Proposed Refund Denial does not note what is insufficient regarding the information previously provided for review, nor why this deemed insufficient information has caused the entire refund claim to be denied. We are prepared to supply any further documentation necessary to support our case. If the Department could please specify the exact documents or additional information required, we will ensure their prompt submission.
- 5. Taxpayer believes it provided all of the requested information and documentation, as it previously provided a file of refund support that included the assignment of right by vendor.

Thank you for your consideration in this matter. Should further information be needed, please contact the undersigned at 310-682-4588 or jane.Hasselberg@spacex.com.

Sincerely,

Jane Hasselberg, Senior Manager, US Indirect Tax