



U.S. Department
of Transportation
**Federal Aviation
Administration**

Mike Monroney
Aeronautical Center

P.O. Box 25082
Oklahoma City, Oklahoma 73125

October 16, 1989

Mr. Alvin R. Stitch, President
Ventura Development Co.
Valley View, a Partnership
321 N. Aviator Street - Suite 200
Camarillo, CA 93010

Dear Mr. Stitch:

Registration of N9YT, N414YT and N6329Y

Your letter of August 9, 1989, to the FAA Aircraft Registry has been referred to this office for review. I am the Assistant Chief Counsel for the Aeronautical Center, and provide legal services to the Registry.

Your letter states that these aircraft are registered to Southern California Builders, a partnership composed of Ventura Development Co., and Dowel Enterprises, of which yourself and Mr. D.E. Hill are the respective presidents. You and Mr. Hill signed the respective Aircraft Registration Applications as partners. You state that Southern California Builders has now dissolved into Valley View, a partnership composed of the same two companies.

In our opinion, these aircraft are not properly registered, and have not been properly registered since initially registered to Southern California Builders. By clear language in the Federal Aviation Act at Section 1301(16)(b), we are only authorized to accept aircraft registration applications for partnerships composed of individuals, not corporations. We cannot register the aircraft to Valley View since it is a partnership composed of two corporations.

We will require, as one alternative, a bill of sale from Southern California Builders to yourself and to Mr. Hill as partners, individually, or from Southern California Builders to one or the other corporation, and an Application for Registration in its name. Meanwhile, we do not consider the aircraft properly registered, and operation of the aircraft in this status may subject you to civil penalties.

If you have any questions, please contact the undersigned at 405-680-3296.

Sincerely,

Joseph R. Standell
Assistant Chief Counsel
for the Aeronautical Center

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By: R. Bruce Carter
Attorney Adviser

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