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**To:** [WaysandMeans.GeneralGovernmentSub@state.or.us](mailto:WaysandMeans.GeneralGovernmentSub@state.or.us)  
**Subject:** Department of Revenue Budget Deliberations  
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Dear Co-Chairs Smith and Steiner Hayward and Members of the Subcommittee,

For your reference, I am a practicing tax lawyer at Stoel Rives, primarily representing taxpayers. I also chair a committee of tax lawyers who meet with the Department quarterly and also work with the Department on specific issues. I make these comments in my personal and private capacity as a lawyer, not as a representative of, or on behalf of, the Oregon State Bar or any section or committee of the Oregon State Bar.

As the Legislature commences its review of the budget of the Department of Revenue, I would like to call your attention to some areas in which the Department has worked cooperatively with members of the Oregon State Bar to achieve better results for taxpayers and reduced costs for the state. Here are some examples of activities in which the Department has participated over the past year:

1. Worked with a group of tax lawyers and representatives of the Oregon Tax Court to better inform low-income taxpayers how to obtain pro bono legal assistance. This effort is expected to help taxpayers navigate through the dispute resolution system, bringing valid claims to light more quickly, eliminating claims that are unlikely to succeed, and reducing the court's workload.
2. Approached tax lawyers early in the process of developing ideas for tax legislation and rulemaking. This early vetting allows potential issues to be identified, which results in laws and rules that are clearer, easier to apply, and more in touch with taxpayer behavior. This, in turn, saves money for the state and individual taxpayers by reducing the number of needless disputes based on misunderstandings.
3. Engaged tax lawyers in discussions of nationwide proposals for uniform tax laws. The Department is very active in exploring new policy proposals through its participation in the Multistate Tax Commission. By reporting to tax lawyers about these ideas, the Department helps to inform local tax lawyers and also obtain their feedback about whether the ideas work for Oregon. This is more early vetting that will improve the quality of our laws and reduce needless litigation.

These are just selected examples of the kind of cooperation that has increased in recent years. I believe that they show good stewardship of state resources because they achieve long-term savings simply by allowing key personnel to spend time on these important issues. As a tax lawyer representing mainly businesses and individuals, I regularly oppose the Department in court and have many areas of disagreement with the Department in particular cases. Nevertheless, as a taxpayer and a citizen—as well as a tax lawyer—I am pleased with the Department's efforts to save money by promoting the integrity of the tax system. I urge you to take these efforts into account and to fund the Department appropriately so it can continue them.

Robert Manicke

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