

## M e m o r a n d u m

**To:** Ms. Yvette M. Stowers, Executive Director**Date:** January 10, 2024**From:** Henry Nanjo, Chief Counsel  
Legal Department, MIC: 121**Subject:** Board Meeting, January 24, 2024  
Legal Department's Report  
Number of Completed Work Assignments

Below is information on the number of assignments, by category, completed by the Legal Department for the Quarter 4 of 2023, as well as the current number of assignments that are new and pending for Quarter 1 of 2024.

	Completed in Q4 2023	New and Pending in Q1 2024
<b>PRA Requests</b>	52	10
<b>Litigation (cases)</b>	9	4
<b>Administration</b>	15	1
<b>Publications Review</b>	40	6
<b>State-Assessed Appeals Season</b>		
SAPD Representation	18	0
Appeals Attorney Cases	30	3
<b>Regulations</b>	1	1
<b>Tax Program/Technical Advice</b>		
Emails	34	4
Letters & Memos	9	5
Phone Calls	21	5
Special Projects	4	1
<b>Total</b>	<b>233</b>	<b>40</b>

## **Descriptions of Categories**

### **Public Record Act/Disclosure Requests**

Assignments include requests for Board of Equalization records by the public relating to property tax guidance, as well as legacy business and special taxes handled by the Board of Equalization. This involves working with the appropriate departments to gather any responsive records, reviewing several to thousands of pages of documents and redacting confidential information where required.

### **Litigation**

The litigation unit provides and represents the Department in litigation and administrative proceedings involving BOE tax programs (Property Tax, Tax on Insurers, Alcoholic Beverage Tax), bankruptcy, subpoenas, and personnel matters. The number in this table represents the amount of cases closed in Q3. Note that there are 18 total property tax, 1 tax on insurer, and 1 other tax case pending.

### **Administration (Support of Exec/BPD)**

Assignments include requests made by the Executive Office or Board Proceeding Division covering administrative legal issues.

### **Publications Review**

Assignments include requests for legal review of property tax and other publications, including surveys, legislative analyses, Assessors' Handbooks, Letters to Assessors, and annotations.

### **State-Assessment Appeals**

Assignments vary in accordance with the quarter. In Q3 2023, the number included in this table represents the number of cases completed by the State-Assessed Appeals Attorney. Note that each case encompasses multiple assignments, in which the State-Assessed Appeals Attorney researches appeal issues, drafts summary decisions and hearing summaries, and publicizes Section 40 decisions.

### **Regulations**

Assignments include any activity related to consideration and review of regulations. Such activities include researching, attending interested parties' meetings, reviewing public comments, drafting, editing, and receiving Department of Finance and Office of Administrative Law approval. The number in this table represents the number of regulatory actions that have been approved by the Office of Administrative Law.

### **Tax Program/Technical Advice**

Assignments include providing (primarily) property tax advice to the staff, assessors, taxpayers, and taxpayer representatives. Technical advice responses were in the form of phone calls, emails, letters, and memoranda.