1 OPEN EXECUTIVE SESSION TO CONSIDER FAVORABLY REPORTING 2 THE NOMINATIONS OF HON. BRENT JAMES McINTOSH, OF 3 MICHIGAN, TO BE AN UNDER SECRETARY OF THE TREASURY; 4 BRIAN CALLANAN, OF NEW JERSEY, TO BE GENERAL COUNSEL FOR 5 THE DEPARTMENT OF THE TREASURY; BRIAN MCGUIRE, OF NEW 6 YORK, TO BE A DEPUTY UNDER SECRETARY OF THE TREASURY; 7 AND TRAVIS GREAVES, OF THE DISTRICT OF COLUMBIA, TO BE A 8 JUDGE OF THE UNITED STATES TAX COURT FOR A TERM OF 9 FIFTEEN YEARS WEDNESDAY, JULY 31, 2019 10 11 U.S. Senate, 12 Committee on Finance, 13 Washington, DC. 14 The hearing was convened, pursuant to notice, at 15 10:32 a.m., in room 215, Dirksen Senate Office Building, 16 Hon. Chuck Grassley (chairman of the committee) 17 presiding. 18 Present: Senators Scott, Wyden, and Whitehouse. 19 Also present: Nondesignated Staff: Joshua LeVasseur, Chief Clerk and Historian; and Susanna Segal, 20 21 Deputy Clerk. 22 23

OPENING STATEMENT OF HON. CHUCK GRASSLEY, A U.S. SENATOR
 FROM IOWA, CHAIRMAN, COMMITTEE ON FINANCE

3

The Chairman. The committee will come to order. The purpose of this executive session is to report to the Senate the four nominees that this committee heard testimony from just last week. Since the hearing, the nominees have responded to all questions in writing from members of the committee.

I intend to support these nominees, and I encourage
my colleagues to do the same. Since his confirmation in
August 2017, Brent McIntosh has served as General
Counsel at Treasury. He is now nominated to be Treasury
Under Secretary for International Affairs.

15 The pending nominee to replace Mr. McIntosh as 16 General Counsel is Brian Callanan, who, after a brief 17 stint as Acting General Counsel, currently serves as Deputy General Counsel. Since tax reform was enacted at 18 the end of 2017, at least 122 guidance provisions have 19 been issued, and the Treasury Office of General Counsel 20 has been a significant part of that process. I 21 22 appreciate all the work that Mr. McIntosh and Mr.

Callanan have put into the implementation of the tax
 reform bill.

The committee also heard from Brian McGuire, 3 4 nominated to be Treasury Assistant Secretary for 5 Legislative Affairs. As I noted in my opening statement 6 just last week, I hope Mr. McGuire's lengthy service to 7 leader McConnell has instilled in him an appreciation for the importance of congressional oversight, and that 8 9 he will work diligently to respond to letters from members of this committee. 10

11 The final witness was Travis Greaves, nominated 12 to a 15-year term on the U.S. Tax Court. We have had a 13 chance to learn about his qualifications in the private 14 sector, as an adjunct faculty member at the Georgetown 15 University Law Center, and as Deputy Assistant Attorney 16 General at the Department of Justice.

17 The committee recently received a letter from the 18 Tax Section of the Federal Bar Association discussing 19 Mr. Greaves's qualifications, and I would like to quote 20 from that letter. "We fully support Mr. Greaves's 21 nomination and urge the Committee to swiftly approve his 22 nomination."

I would say without objection, I would put the full content of that letter and have it printed in the record.

4 [The letter appears at the end of the transcript.] 5 The Chairman. The nominees have responded to all the questions that they were sent. I think they have 6 7 shown that they are qualified to the positions to which 8 they have been nominated, and I encourage their support. Before I turn to the ranking member to give his 9 statement, I want to note that, in the event that we are 10 11 not able to hold a vote here this morning, the meeting 12 will be postponed until a vote is scheduled on the 13 Senate floor, and the committee will reconvene there 14 like we have done on many occasions. 15 Now, Senator Wyden.

16

OPENING STATEMENT OF HON. RON WYDEN, A U.S. SENATOR FROM
 OREGON

3

Senator Wyden. Thank you, Mr. Chairman. I
appreciate your letting everybody on both sides know how
we are going to handle it, because colleagues were
asking about voting off the floor.

8 The Finance Committee meets today to vote on four nominations. Mr. Brent McIntosh has been nominated to 9 be Treasury Under Secretary for International Affairs. 10 11 Mr. Brian Callanan has been nominated to be Treasury 12 General Counsel. Mr. Brian McGuire is nominated to be a 13 Deputy Under Secretary of the Treasury for Legislative 14 Affairs. Mr. Travis Greaves is nominated to be a judge 15 of the United States Tax Court.

16 With respect to Mr. Greaves's and Mr. McGuire's 17 nominations, it is my intention to support both of those 18 two men. So what I am going to do here briefly is focus 19 my remarks on the other two nominations.

These nominees are currently the top lawyers at the Treasury Department. They have been at the center of two of the most political actions the Treasury has taken

1 under this President, actions that in my view,

2 unfortunately appear tailor-made to protect the 3 President and his associates, rather than the American 4 people.

5 First, the Treasury's handling of the Ways and 6 Means request for the President's tax returns under 7 section 6103 of the tax code -- this type of inquiry has 8 always been routine. Let me emphasize it has always 9 been routine for years and years. And it has never been 10 political.

11 Unfortunately, the Trump Treasury Department has politicized it. In May I began investigating whether 12 13 there was political interference in the decision to 14 withhold the tax returns. I put forward a series of 15 questions for the Treasury to answer. And in my view, 16 again unfortunately, the responses were just extremely 17 misleading. It took multiple attempts to get more 18 concrete answers that accurately reflect the history of 19 the 6103 request, and show the unprecedented reach of the Trump administration's political interference in 20 this process. 21

22

I am also very concerned about the new dark money

rule. This new dark money rule amounts to the Trump
 administration welcoming foreign money and dark money
 groups who want to buy elections in America.

In fact, late yesterday a Federal district court issued a ruling that threw out the Treasury Department's repeal of the dark money rule because it had been issued without providing for the necessary public notice and comment. In effect, it looked like the Trump administration had tried to sneak this pro dark money rule by without anyone noticing.

11 So now a court has directly repudiated the position 12 that the nominees advocated. The court made it clear 13 that their decision to repeal the dark money rule and to 14 do so in the dark was unlawful. In both of these cases, 15 in my view, the administration has put out ridiculous 16 legal arguments to support its actions.

Now the committee is deciding whether to approve
promotions for the Treasury Department's top lawyers.
Unfortunately, I must say "no." I cannot get behind
these nominees who have been acting like partisan
operatives rather than public servants.

22 So as I stated earlier, I intend when we vote -- as

1 Chairman Grassley noted, off the floor -- I intend to 2 vote for Mr. Greaves's and Mr. McGuire's nominations at 3 that time. But I cannot support the other two 4 individuals, Mr. Callanan and Mr. McIntosh, for the 5 reasons that I have outlined this morning. And I urge 6 colleagues to join me.

7 Thank you, Mr. Chairman.

8 The Chairman. I will not adjourn if any of the 9 staff people here -- well not really adjourn. I will 10 not recess if some of the staff people here say that 11 their members are on the way, and then I will stay here 12 for a few minutes.

13 Okay, since there does not appear to be any 14 additional members who care to make a statement, the 15 committee is going to recess until we reconvene off the 16 floor during roll call vote. And just in case there are 17 people in the audience who have come to see a committee 18 function, this is not really the way we function. You should have been here last Thursday when we had 4 hours 19 of vigorous debate on a bill to reduce drug costs when 20 you would have seen everybody here. But I have three 21 committee meetings this morning. Most other members, on 22

Wednesday mornings, have three committee meetings. So
 that is why it is difficult to get a quorum.

3 Senator Wyden. Mr. Chairman, I really want to 4 echo your point about last Thursday, because that dealt 5 with what is arguably the premier domestic issue of our 6 time, the fact that Americans, particularly seniors, 7 feel like they are getting mugged at the pharmacy 8 counter.

9 The Chairman and I have been concerned about 10 insulin prices. And the two of us came together and 11 developed a bipartisan bill. And it is often said 12 around here, nobody gets everything they want, but that 13 is bipartisanship.

So I appreciate that last comment you made, Mr.Chairman.

The Chairman. Not only a bipartisan bill, but a bill that reforms an entitlement program, which does not happen very often around here, a bill that has White House support, a bill that saves \$100 billion, a bill that will put a cap on what out-of-pocket costs are for seniors and will not increase co-pays or co-premiums, and even do some good to keep premiums reasonable in the

1 commercial market, and a bill that even has a

Libertarian organization by the name of Cato Institute
supporting it, which seems to me ought to have some
influence over a lot of people who are complaining
because you and I are interfering in the marketplace,
which we are not because the marketplace is not affected
when these companies can set their price where they want
to.

9 All we are going to do is make sure that they do 10 not continue to get a subsidy when they want to raise 11 the prices just as high as they want to raise them, and 12 force the taxpayers to pay more. All we are doing is 13 ending the subsidy.

14 Senator Wyden. Correct.

15 The Chairman. Thank you.

16 [Whereupon, at 10:43 a.m., the hearing was recessed 17 subject to reconvening off the floor.]

1 The executive session was reconvened, pursuant to 2 notice, at 3 p.m., in room S-216, The President's Room, 3 United States Capitol, Hon. Chuck Grassley (chairman of 4 the committee) presiding.

5 Present: Senators Crapo, Roberts, Enzi, Cornyn,
6 Thune, Portman, Toomey, Scott, Cassidy, Lankford,
7 Daines, Young, Wyden, Stabenow, Cantwell, Menendez,
8 Carper, Cardin, Brown, Casey, Warner, Whitehouse,
9 Hassan, and Cortez Masto.

Also present: Republican staff: Nicholas Wyatt,
Tax, Infrastructure and Nominations Policy Advisor.
Democratic staff: Ian Nicholson, Investigator. Nondesignated staff: Joshua LeVasseur, Chief Clerk and
Historian; Jewel Harper, Senior Deputy Clerk; and Athena
Schritz, Hearing Clerk.

1 The Chairman. The committee will come to order. I 2 appreciate everyone being here for this afternoon's 3 executive session.

We have four nominations before us. The first is the nomination of the honorable Brent James McIntosh to be an Under Secretary of the Treasury. I would entertain a motion to favorably report the nomination of the honorable Mr. McIntosh.

9 Senator Wyden. So moved.

10 The Chairman. The clerk will call the roll.

11 The Clerk. Mr. Crapo?

12 Senator Crapo. Aye.

13 The Clerk. Mr. Roberts?

14 Senator Roberts. Aye.

15 The Clerk. Mr. Enzi?

16 Senator Enzi. Aye.

17 The Clerk. Mr. Cornyn?

18 Senator Cornyn. Aye.

19 The Clerk. Mr. Thune?

20 Senator Thune. Aye.

21 The Clerk. Mr. Burr?

22 Senator Grassley. Aye by proxy.

23 The Clerk. Mr. Isakson?

24 Senator Grassley. Aye by proxy.

25 The Clerk. Mr. Portman?

1	Senator	Portman.	Aye.
2	The Cler	rk. Mr.	Toomey?
3	Senator	Toomey.	Aye.
4	The Cler	rk. Mr.	Scott?
5	Senator	Scott.	Aye.
б	The Cler	rk. Mr.	Cassidy?
7	Senator	Cassidy.	Aye.
8	The Cler	rk. Mr.	Lankford?
9	Senator	Lankford	. Aye.
10	The Cler	rk. Mr.	Daines?
11	Senator	Daines.	Aye.
12	The Cler	rk. Mr.	Young?
13	Senator	Young.	Aye.
14	The Cler	rk. Mr.	Wyden?
15	Senator	Wyden.	Nay.
16	The Cler	rk. Ms.	Stabenow?
17	Senator	Stabenow	. Nay.
18	The Cler	ck. Ms.	Cantwell?
19	Senator	Cantwell	. Nay.
20	The Cler	rk. Mr.	Menendez?
21	Senator	Menendez	. Nay.
22	The Cler	rk. Mr.	Carper?
23	Senator	Carper.	Nay.
24	The Cler	rk. Mr. (Cardin?
25	Senator	Cardin.	Nay.

1	The Clerk. Mr. Brown?
2	Senator Brown. Nay.
3	The Clerk. Mr. Bennet?
4	Senator Wyden. Nay by proxy.
5	The Clerk. Mr. Casey?
6	Senator Casey. Nay.
7	The Clerk. Mr. Warner?
8	Senator Warner. Nay.
9	The Clerk. Mr. Whitehouse?
10	Senator Whitehouse. Nay.
11	The Clerk. Ms. Hassan?
12	Senator Hassan. Nay.
13	The Clerk. Ms. Cortez Masto?
14	Senator Cortez Masto. Nay.
15	The Clerk. Mr. Chairman?
16	The Chairman. Aye.
17	The clerk will announce the vote.
18	The Clerk. Mr. Chairman, the final tally is 15
19	ayes and 13 nays.
20	The Chairman. The "ayes" have it. The nomination
21	is ordered favorably reported.
22	The next nomination is Brian Callanan to be General
23	Counsel for the Department of the Treasury. I would
24	entertain a motion to favorably report the nomination of
25	Mr. Callanan.

1	Senator Wyden. So moved.
2	The Chairman. The clerk will call the roll.
3	The Clerk. Mr. Crapo?
4	Senator Crapo. Aye.
5	The Clerk. Mr. Roberts?
6	Senator Roberts. Aye.
7	The Clerk. Mr. Enzi?
8	Senator Enzi. Aye.
9	The Clerk. Mr. Cornyn?
10	Senator Cornyn. Aye.
11	The Clerk. Mr. Thune?
12	Senator Thune. Aye.
13	The Clerk. Mr. Burr?
14	Senator Grassley. Aye by proxy.
15	The Clerk. Mr. Isakson?
16	Senator Grassley. Aye by proxy.
17	The Clerk. Mr. Portman?
18	Senator Portman. Aye.
19	The Clerk. Mr. Toomey?
20	Senator Toomey. Aye.
21	The Clerk. Mr. Scott?
22	Senator Scott. Aye.
23	The Clerk. Mr. Cassidy?
24	Senator Cassidy. Aye.
25	The Clerk. Mr. Lankford?

1	Senator Lankford. Aye.
2	The Clerk. Mr. Daines?
3	Senator Daines. Aye.
4	The Clerk. Mr. Young?
5	Senator Young. Aye.
6	The Clerk. Mr. Wyden?
7	Senator Wyden. Nay.
8	The Clerk. Ms. Stabenow?
9	Senator Stabenow. Nay.
10	The Clerk. Ms. Cantwell?
11	Senator Cantwell. Nay.
12	The Clerk. Mr. Menendez?
13	Senator Menendez. Nay.
14	The Clerk. Mr. Carper?
15	Senator Carper. Aye.
16	The Clerk. Mr. Cardin?
17	Senator Cardin. Aye.
18	The Clerk. Mr. Brown?
19	Senator Brown. Nay.
20	The Clerk. Mr. Bennet?
21	Senator Wyden. Nay by proxy.
22	The Clerk. Mr. Casey?
23	Senator Casey. Nay.
24	The Clerk. Mr. Warner?
25	Senator Warner. Nay.

1	The Clerk. Mr. Whitehouse?
2	Senator Whitehouse. Nay.
3	The Clerk. Ms. Hassan?
4	Senator Hassan. Nay.
5	The Clerk. Ms. Cortez Masto?
б	Senator Cortez Masto. Nay.
7	The Clerk. Mr. Chairman?
8	The Chairman. Aye.
9	The clerk will announce the vote.
10	The Clerk. Mr. Chairman, the final tally is 17
11	ayes and 11 nays.
12	The Chairman. The "ayes" have it. The nomination
13	is ordered favorably reported.
14	The next nomination is for Brian McGuire to be a
15	Deputy Under Secretary of the Treasury. I would
16	entertain a motion to favorably report the nomination of
17	Mr. McGuire.
18	Senator Wyden. So moved.
19	The Chairman. The clerk will call the roll.
20	The Clerk. Mr. Crapo?
21	Senator Crapo. Aye.
22	The Clerk. Mr. Roberts?
23	Senator Roberts. Aye.
24	The Clerk. Mr. Enzi?
25	Senator Enzi. Aye.

1	The Clerk.	Mr.	Cornyn?
2	Senator Corr	nyn.	Aye.
3	The Clerk.	Mr.	Thune?
4	Senator Thu	ne.	Aye.
5	The Clerk.	Mr.	Burr?
6	Senator Gra	ssley	. Aye by proxy.
7	The Clerk.	Mr.	Isakson?
8	Senator Gra	ssley	. Aye by proxy.
9	The Clerk.	Mr.	Portman?
10	Senator Port	tman.	Aye.
11	The Clerk.	Mr.	Toomey?
12	Senator Too	ney.	Aye.
13	The Clerk.	Mr.	Scott?
14	Senator Sco	tt.	Aye.
15	The Clerk.	Mr.	Cassidy?
16	Senator Cas	sidy.	Aye.
17	The Clerk.	Mr.	Lankford?
18	Senator Lan	kford	. Aye.
19	The Clerk.	Mr.	Daines?
20	Senator Dain	nes.	Aye.
21	The Clerk.	Mr.	Young?
22	Senator You	ng.	Aye.
23	The Clerk.	Mr.	Wyden?
24	Senator Wyde	en.	Aye.
25	The Clerk.	Ms.	Stabenow?

1	Senator Stabenow. Aye.
2	The Clerk. Ms. Cantwell?
3	Senator Cantwell. Aye.
4	The Clerk. Mr. Menendez?
5	Senator Menendez. Aye.
6	The Clerk. Mr. Carper?
7	Senator Carper. Aye.
8	The Clerk. Mr. Cardin?
9	Senator Cardin. Aye.
10	The Clerk. Mr. Brown?
11	Senator Brown. Aye.
12	The Clerk. Mr. Bennet?
13	Senator Wyden. Aye by proxy.
14	The Clerk. Mr. Casey?
15	Senator Casey. Nay.
16	The Clerk. Mr. Warner?
17	Senator Warner. Aye.
18	The Clerk. Mr. Whitehouse?
19	Senator Whitehouse. Aye.
20	The Clerk. Ms. Hassan?
21	Senator Hassan. Aye.
22	The Clerk. Ms. Cortez Masto?
23	Senator Cortez Masto. Aye.
24	The Clerk. Mr. Chairman?
25	The Chairman. Aye.

1	The clerk will announce the vote.
2	The Clerk. Mr. Chairman, the final tally is 27
3	ayes and 1 nay.
4	The Chairman. The "ayes" have it. The nomination
5	is ordered favorably reported.
6	The last nomination is for Travis Greaves to be a
7	judge of the United States Tax Court. I would favorably
8	report the nomination of Mr. Greaves.
9	Senator Wyden. So moved.
10	The Chairman. The clerk will call the roll.
11	The Clerk. Mr. Crapo?
12	Senator Crapo. Aye.
13	The Clerk. Mr. Roberts?
14	Senator Roberts. Aye.
15	The Clerk. Mr. Enzi?
16	Senator Enzi. Aye.
17	The Clerk. Mr. Cornyn?
18	Senator Cornyn. Aye.
19	The Clerk. Mr. Thune?
20	Senator Thune. Aye.
21	The Clerk. Mr. Burr?
22	Senator Grassley. Aye by proxy.
23	The Clerk. Mr. Isakson?
24	Senator Grassley. Aye by proxy.
25	The Clerk. Mr. Portman?

1	Senator	Portman.	Aye.
2	The Cler	rk. Mr.	Toomey?
3	Senator	Toomey.	Aye.
4	The Cler	rk. Mr.	Scott?
5	Senator	Scott.	Aye.
б	The Cler	rk. Mr.	Cassidy?
7	Senator	Cassidy.	Aye.
8	The Cler	rk. Mr.	Lankford?
9	Senator	Lankford	. Aye.
10	The Cler	rk. Mr.	Daines?
11	Senator	Daines.	Aye.
12	The Cler	rk. Mr.	Young?
13	Senator	Young.	Aye.
14	The Cler	ck. Mr.	Wyden?
15	Senator	Wyden.	Aye.
16	The Cler	ck. Ms.	Stabenow?
17	Senator	Stabenow	. Aye.
18	The Cler	rk. Ms.	Cantwell?
19	Senator	Cantwell	. Aye.
20	The Cler	rk. Mr.	Menendez?
21	Senator	Menendez	. Aye.
22	The Cler	rk. Mr.	Carper?
23	Senator	Carper.	Aye.
24	The Cler	rk. Mr.	Cardin?
25	Senator	Cardin.	Aye.

1	The	Clerk.	Mr.	Brown?	

2 Senator Brown. Aye.

3 The Clerk. Mr. Bennet?

4 Senator Wyden. Aye by proxy.

5 The Clerk. Mr. Casey?

6 Senator Casey. Aye.

7 The Clerk. Mr. Warner?

8 Senator Warner. Aye.

9 The Clerk. Mr. Whitehouse?

10 Senator Whitehouse. Aye.

11 The Clerk. Ms. Hassan?

12 Senator Hassan. Aye.

13 The Clerk. Ms. Cortez Masto?

14 Senator Cortez Masto. Aye.

15 The Clerk. Mr. Chairman, the final tally is 28

16 ayes and 0 nays.

17 The Chairman. The "ayes" have it. The nomination 18 is ordered favorably reported. I thank my colleagues 19 for their time. The committee is adjourned.

20 [Whereupon, at 3:40 p.m., the meeting was

21 adjourned.]

ΙΝΟΕΧ

PAGE

STATEMENT OF:

THE HONORABLE CHUCK GRASSLEY	
A United States Senator	
from the State of Iowa	2
THE HONORABLE RON WYDEN	
A United States Senator	
from the State of Oregon	5



July 29, 2019

The Honorable Charles E. Grassley Chairman Committee on Finance United States Senate 219 Dirksen Senate Office Building Washington, D.C. 20510 The Honorable Ron Wyden Ranking Member Committee on Finance United States Senate 219 Dirksen Senate Office Building Washington, D.C. 20510

Re: Letter in Support of Travis A. Greaves, nominee for Judge of the U.S. Tax Court

Dear Chairman Grassley and Ranking Member Wyden:

The Federal Bar Association's Section on Taxation (the "Tax Section") writes to express its support¹ for Travis A. Greaves as a Judge of the United States Tax Court and urges the Senate Finance Committee to quickly approve his nomination. Mr. Greaves is a respected member of the tax community and his experience as a tax practitioner, representing both the government and taxpayers, gives him the necessary credentials and perspective to be a fair and impartial judge.

The Tax Section is a nonpartisan organization, the primary goals of which are to promote the welfare, interests, education, and professional growth and developments of its members; promote high standards of professional competence and ethical conduct in the practice of Federal tax law; and to provide opportunities of interaction between tax practitioners in public service and the private sector.

Mr. Greaves has been an active member of the Tax Section for several years, and until he joined the Department of Justice in 2017, he served as a member of the Tax Section's Steering Committee. Mr. Greaves's contributions to the tax community through the Tax Section have been many. As one example, Mr. Greaves created a community outreach program to introduce Washington, D.C. public-school students to the practice of law. Through his leadership, high school students were given the opportunity to meet with lawyers in private practice, at the Department of Justice and the Internal Revenue Service, and also Judges of the Tax Court. His passion for tax, positive attitude, and genuine willingness to serve the community represent the goals of the Tax Section.

While the majority of tax controversies are resolved prior to the filing of a petition with the Tax Court, the Tax Court is the only pre-payment forum taxpayers to resolve disputes with the Internal Revenue Service. The majority of those taxpayers appear pro se, and often do not have expertise as

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¹ This letter in support of Mr. Greaves's nomination is in the name of the Tax Section itself, and is not on behalf of the Federal Bar Association. This letter also may not reflect the views of all members of the Tax Section, its members' employers, or the Federal Bar Association.

Page 2 of 2

it relates to the complexities of the U.S. tax law. In a sense, Tax Court judges must not only fairly and impartially adjudicate cases, but they must provide a forum for taxpayers to be heard and understood.

In that sense, Mr. Greaves's litigation experience from his time in private practice to serving in a leadership role at the Tax Division of the Department of Justice gives him a unique perspective as a finder of fact. In his current role, Mr. Greaves oversees all civil appellate tax litigation, including appeals from the Tax Court. Those appeals cover the spectrum of tax issues, complexity, and types of taxpayers. As an attorney in private practice, Mr. Greaves worked for large, medium, and small firms—the smallest of which included him and a law partner. As a practitioner, Mr. Greaves represented pro bono individuals, large businesses, and everything in between. That experience mirrors the range of issues before the Tax Court.

The Tax Section believes that Mr. Greaves's experiences give him a helpful perspective to be an effective judge of the Tax Court. We fully support Mr. Greaves's nomination and urge the Committee to swiftly approve his nomination.

Respectfully submitted,

anen Bud

Anne R. Gordon Chair, Section on Taxation Federal Bar Association