

Mr. COHEN. Generally, that type of case involves complex issues and a serious attempt is made by the parties to stipulate as many of the relevant facts as possible. The Tax Court likes to get the case as clean as it can before trial, and requires stipulation and agreement of facts. That, usually, is a long, arduous process when dealing with a group of attorneys. But we will find the exact reason for you, sir.

Mr. PATMAN. The number of employees necessary to properly service and police these million to a million and a half tax-exempt organizations and foundations must be a tremendous number. How many would you say actually are required to properly police them?

Mr. COHEN. Any figure that I give you is purely speculative.

It is a question of what kind of organization we are talking about, what degree of supervision one needs.

Mr. PATMAN. Depends upon the category?

Mr. COHEN. I can tell you right now, every year for the last 3 years, I have gone to the Appropriations Committee, and I have asked for an increase in the number of revenue agents for this and other areas. Every year the committee has granted me some increase, but the number has been vastly smaller than the number that I think is required to do the job.

Mr. PATMAN. How many full-time employees do you have in the tax-exempt organization branch now?

Mr. COHEN. In Washington?

Mr. PATMAN. Yes, sir.

Mr. COHEN. One hundred. That is, 100 of the 700 that exist in that whole organization. There are 700 employees in the national office in the technical organization, and 100 of them are involved in this one area, the largest single commitment of manpower.

Mr. PATMAN. 700 in all?

Mr. COHEN. Yes, sir.

Mr. PATMAN. In the tax-exempt branch?

Mr. COHEN. One hundred out of the 700. There are 700 people in that technical organization.

Mr. PATMAN. I understood that the 700 relate to tax-exempt organizations.

Mr. COHEN. The 700 relate to all of the rulings of any kind, and over 100 are devoted to this one area.

Mr. PATMAN. Do you not think that that is a rather small number?

Mr. COHEN. When you think that 700 persons are devoted to all of the technical areas, covering the thousand pages of statutory material in the code, and one-seventh of those are devoted to the area covered by 10 pages of code, why, I think it is a fairly large commitment of manpower.

Mr. PATMAN. It is not meaningful to me about pages of code, because one law can be rather long and not have too much in it, and another law can be short and be pretty meaningful.

Mr. COHEN. In your million figure, you are probably talking about thousands of organizations of one kind of denomination of church and thousands of another kind of denomination of church, and thousands of Boy Scout troops, hundreds of secondary schools, hundreds of DAR chapters, Veterans of Foreign Wars posts, American Legion posts. This kind of organization requires little or no supervision and presents no problem. The category that you and I are generally talking about is