

property is, it's real estate with all improvements and fixtures thereon, very easy to describe. It's very easy to understand what real property is. And then personal property is described as everything else. So if it's not real property, something is considered personal property. That leaves you with a wide variety of items. As a practical matter, you need to be able to have the flexibility to treat those items differently because there is huge differences between real and personal property. One of those reasons certainly are that personal property is moveable, it's certainly subject to wear and tear, which is a form of depreciation, where real property is not. Real property could be wasted, obviously, but real property, by it's very existence, is not subject at least to the real estate end to depreciation. It's not subject to waste. It's the source of a lot of wealth and that's the reason you treat it differently because real property doesn't move. The other big difference with personal property is it's so moveable, it's easy to hide, oftentimes can be very small and so you need the flexibility to treat those various items of personal property differently. What we then talk about is once you decide what type of personal property you're dealing with, am I fair to them within their classes. And then that really strikes to what Senator Warner just was talking about, the fairness within dealing with those items of personal property. You need the flexibility to treat, for example, intangibles may be a whole lot different to treat for tax purposes, just by their very nature, than would household goods or jewelry, or tractors or printing presses or whatever else you may have. Just by their very nature, you need that flexibility to do it. That's a very good reason legally and practically to treat real and personal property differently because of the wide variety of definitions of personal property. So it isn't just to go out and give some preferential treatment. It's because you have to have a basic reason for making a distinction between real and personal property. If you don't change the Constitution and unhook and uncouple real and personal property from tangible property, every time you wanted to have a special session, like Senator Cudaback wanted to have before the beginning of this year, even if that was good policy, you had the problem of real and personal property being tied together, and it didn't work. There are major differences between real and personal that have substantial reasonable reasons because of the nature of just the way they are to treat them differently. And so I think that it's important and a lot of this gets put in for the record but I think that's an important reason, at least from my point of view, for separating