



HB 2093: A chance to improve Oregon's estate tax provisions

House Revenue Committee – Jody Wiser – 2.6.2025

As you are aware Tax Fairness Oregon doesn't believe Oregon's \$1,000,000 exemption is a "problem to be solved." There are 16 other estate tax bills up this session. Raising Oregon's exemption to match Washington's indexed \$2,193,000 and 10-20% rate would not satisfy the aims of at least nine of the sponsors of those 16 bills.

We believe \$1,000,000 in homes and financial assets without a penny of tax is plenty for those kids who won the birth lottery. Given that most kids have two parents, that's actually \$2,000,000. At most, 5½% of estates have paid the estate tax in recent years. That means 94½% of estates paid no tax. The estate tax is not taxing middle class families.

But there are problems to address, problems that this bill could be used to resolve.

In 2023 SB 498 [created](#) a second provision for natural resource estates. Doing so created multiple problems, including varying definitions of family, the number of years a member of the family must be engaged in the farm, forest or fishing businesses, the treatment of debt, annual reporting, etc. It makes little sense to have complicated our tax system with two different provisions, one a credit and the other an exemption. Instead a single natural resource provision needs to be designed which includes the best measures of each provision.

We also think you should undo the SB498 loophole that allows any decedent with natural resource property in which they or a family member has been somewhat involved, to pass on up to \$15 million of value without taxation, regardless of the size of their estate and other assets available to pay the tax. That means that when Chinese investor Tianqiao Chen, Shilo Inn owner Mark Hemstreet, or Inheritor, Businessman and Philanthropist Robert Pamplin Jr and their wives die, their heirs might inherit up to \$15 million of Oregon natural resource property from each parent tax free, despite their multimillions in assets other than natural resource property (my written testimony gives details about these families' assets).

The issues generated with the passage of SB 498 are a challenge that deserves a workgroup and we hope you will appoint one to address those issues.

The directions to that workgroup should ask them to resolve the many conflicts between our two natural resource provisions, establish the size and nature of the tax break, and place a cap on taxable estate value and the natural resource assets as a percentage of the total estate. They should return us to a single provision.

Additionally, we believe the workgroup could address:

- The absence of an Oregon gift tax – which is probably Oregon’s greatest estate tax loophole
- The possibility of providing an extended payment period to constrained family businesses
- Easing of portability of the exemption of the first decedent to the estate of the second decedent for couples, and other ideas.

Thank you for your attention to the estate tax, our most equitable tax.

Note: SB 498 isn’t a provision to help retain the classic Oregon small family farm, fishing and forest businesses. For example, each of these families could arrange their affairs to benefit from SB 498’s provisions.

Chinese billionaire and entrepreneur, [Tianqiao Chen](https://www.opb.org/article/2024/01/21/tianqiao-chen-oregon-landacquisition/#:~:text=About%2033%2C000%20acres%20of%20the,near%20the%20Deschutes%20National%20Forest.&text=A%20Chinese%20billionaire%20and%20a,major%20purchases%20of%20Oregon%20forests), became the second largest foreign owner of U.S. land following the purchase of nearly 200,000 acres of forestland in Klamath and Deschutes counties. <https://www.opb.org/article/2024/01/21/tianqiao-chen-oregon-landacquisition/#:~:text=About%2033%2C000%20acres%20of%20the,near%20the%20Deschutes%20National%20Forest.&text=A%20Chinese%20billionaire%20and%20a,major%20purchases%20of%20Oregon%20forests>.

Former political donor Mark Hemstreet is owner of 18 Shilo Inns, many in Oregon, the 9400 acre Shilo Ranch in Wallowa County (currently available for sale for \$21 million) along with properties in several other western states. <https://www.landleader.com/property/shilo-ranch-wallowa-oregon/40838>

Inheritor, businessman and philanthropist Robert Pamplin’s sprawling 81,000 acre ranch stretches 20 by 40 miles and is the largest in Central Oregon, he and his wife also own two Yamhill County wineries, and Columbia Empire Farms (once Oregon’s largest producer of hazelnuts). https://www.wweek.com/news/2025/01/15/dr-robert-pamplin-concedes-he-raided-his-employees-pension-fund/?utm_source=Master+Audience&utm_campaign=2474d7283e-EMAIL_CAMPAIGN_2025_01_14_05_43&utm_medium=email&utm_term=0_-2474d7283e-87957400&mc_cid=2474d7283e&mc_eid=01357e93f7

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