## SLOAN G. SPECK

University of Colorado Law School Wolf Law Building, Room 453 | Boulder, CO 80309 (303) 492-9856 | sloan.speck@colorado.edu

#### ACADEMIC EMPLOYMENT

University of Colorado Law School

Associate Professor of Law

New York University School of Law

Acting Assistant Professor of Tax Law

DePaul University College of Law

Adjunct Professor

Spring 2012, Spring 2013

### **SCHOLARLY INTERESTS**

Income Taxation, Business Taxation, Tax Policy, Legal Education

### **EDUCATIONAL BACKGROUND**

New York University School of Law	New York, NY
LL.M. in Taxation	May 2010
■ GPA: 3.91	

## **University of Chicago Law School**

Chicago, IL June 2007

J.D., cum laude

- Articles Editor, *The University of Chicago Law Review*
- Board Member, Japan Law Society
- Bell, Boyd & Lloyd Prize for Bigelow Moot Court Competition

# University of Chicago, Division of Social Sciences M.A. in History Chicago, IL December 2004

Century Fellowship

Rice UniversityHouston, TXB.A. in Biochemistry, Biology, German, and HistoryMay 2001

### **PUBLICATIONS**

Collateral Tax Benefits in Crisis Relief (in progress)

*The Taxation of Crowdfunding for Health Care* (in progress)

Debt and Taxes over the Life Cycle (in progress)

Expertise and International Tax Norms (in progress)

Structural Tax Reform and the Next REIT Revolution, 27 U. PA. J. BUS. L. \_\_ (forthcoming 2025), https://papers.ssrn.com/sol3/papers.cfm?abstract\_id=2901123

Transforming Tax Expenditures, 2024 COLUM. BUS. L. REV. \_\_ (forthcoming 2025), https://papers.ssrn.com/sol3/papers.cfm?abstract\_id=4933867

The Realization Rule as a Legal Standard, 16 COLUM. J. TAX L. 1 (2024) [DOI 10.52214/cjtl.v16i1.12712], <a href="https://papers.ssrn.com/sol3/papers.cfm?abstract\_id=4947856">https://papers.ssrn.com/sol3/papers.cfm?abstract\_id=4947856</a>, reviewed by David Elkins, TaxProf Blog (October 11, 2024), <a href="https://bit.ly/4aK1WWi">https://bit.ly/4aK1WWi</a>

Zoom as an In-Person Learning Platform, 99 N.D. L. Rev. 627 (2024), <a href="https://papers.ssrn.com/abstract=4993813">https://papers.ssrn.com/abstract=4993813</a>

The Social Boundaries of Corporate Taxation, 84 FORDHAM L. REV. 2583 (2016) (symposium), <a href="https://papers.ssrn.com/sol3/papers.cfm?abstract\_id=2901118">https://papers.ssrn.com/sol3/papers.cfm?abstract\_id=2901118</a>

Tax Planning and Policy Drift, 69 TAX L. REV. 549 (2016) (awarded Jules Milstein Scholarship Award, 2018), <a href="https://papers.ssrn.com/sol3/papers.cfm?abstract\_id=2901068">https://papers.ssrn.com/sol3/papers.cfm?abstract\_id=2901068</a>

Comment, "Failure to Pay Any Poll Tax or Other Tax": The Constitutionality of Tax Felon Disenfranchisement, 74 U. Chi. L. Rev. 1549 (2007) [DOI 10.2307/20141870], https://papers.ssrn.com/sol3/papers.cfm?abstract\_id=2902242

#### **ACADEMIC PRESENTATIONS**

The Realization Rule as a Legal Standard, National Tax Association, 117th Annual Conference on Taxation, Detroit, Michigan (November 16, 2024)

Collateral Tax Benefits in Crisis Relief, International Meeting on Law & Society, Denver, Colorado (June 7, 2024)

*The Realization Rule as a Standard*, 6th Annual UCI Law–Taylor Nelson Amitrano LLP Tax Symposium, University of California, Irvine School of Law, held remotely (April 18, 2024)

Collateral Tax Benefits in COVID-19 Relief, International Meeting on Law & Society, Lisbon, Portugal (July 13–16, 2022) (accepted but not presented due to COVID-19)

Transforming Tax Expenditures, James Hausman Tax Law and Policy Workshop, University of Toronto School of Law, held remotely (March 2, 2022) (invited)

Domesticating the Pass-Through Deduction, Junior Tax Scholars Workshop, University of San Diego School of Law, held remotely (June 11, 2021)

*The Pass-Through Deduction as Rate Structure*, International Meeting on Law & Society, held remotely (May 29, 2021)

The Next REIT Revolution, National Tax Association, 113th Annual Conference on Taxation, held remotely (November 19, 2020)

Double Tax Benefits and Targeted Tax Benefits Under the CARES Act, Junior Tax Scholars Workshop, University of Utah S.J. Quinney College of Law, held remotely (October 30, 2020)

The Next REIT Revolution, International Meeting on Law & Society, held remotely (May 30, 2020)

The Taxation of Crowdfunding for Health Care, National Tax Association, 112th Annual Conference on Taxation, Tampa, Florida (November 23, 2019)

The Next REIT Revolution, National Business Law Scholars Conference, University of California, Berkeley School of Law, Berkeley, California (June 20, 2019)

*The Next REIT Revolution,* Junior Tax Scholars Workshop, University of Richmond School of Law, Richmond, Virginia (June 7, 2019)

The Taxation of Crowdfunding for Health Care, International Meeting on Law & Society, Washington, D.C. (June 1, 2019)

Debt and Taxes over the Life Cycle, Rocky Mountain Junior Scholars Forum, University of Utah S.J. Quinney College of Law, Salt Lake City, Utah (October 5, 2018)

The Taxation of Crowdfunding for Health Care, Junior Tax Scholars Workshop, University of Colorado School of Law, Boulder, Colorado (June 15, 2018)

Debt and Taxes over the Life Cycle, International Meeting on Law & Society, Toronto, Canada (June 7, 2018)

Debt and Taxes over the Life Cycle, UCLA Colloquium on Tax Policy and Public Finance, UCLA School of Law, Los Angeles, California (February 8, 2018) (invited)

Smoothing and the Home Mortgage Interest Deduction, Virginia Autumn Invitational Tax Conference, University of Virginia School of Law, Charlottesville, Virginia (November 17, 2017) (invited)

Smoothing and the Home Mortgage Interest Deduction, National Tax Association, 110th Annual Conference on Taxation, Philadelphia, Pennsylvania (November 9, 2017)

Competitiveness as a Rationale for International Tax Reform, International Meeting on Law & Society, Mexico City, Mexico (June 22, 2017)

Consumption Smoothing and the Home Mortgage Interest Deduction, Junior Tax Scholars Workshop, University of Toronto Faculty of Law, Toronto, Canada (June 16, 2017)

The Unchanging Terminology of International Tax Policy, National Business Law Scholars Conference, University of Utah Law School, Salt Lake City, Utah (June 8, 2017)

Expertise and International Tax Norms, Tax Policy Seminar, Duke University Law School, Durham, North Carolina (March 2, 2017) (invited)

Expertise and International Tax Norms, Georgetown Tax Law and Public Finance Workshop, Georgetown University Law Center, Washington, D.C. (January 24, 2017) (invited)

Expertise and International Tax Norms, National Tax Association, 109th Annual Conference on Taxation, Baltimore, Maryland (November 10, 2016)

Expertise and International Tax Norms, Advanced Topics in Taxation Colloquium, Northwestern University School of Law, Chicago, Illinois (October 19, 2016) (invited)

Expertise and International Tax Norms, Oklahoma Junior Scholars Conference, University of Oklahoma School of Law, Norman, Oklahoma (July 28, 2016) (invited)

Competitiveness as a Rationale for International Tax Reform, National Business Law Scholars Conference, University of Chicago Law School, Chicago, Illinois (June 24, 2016)

Expertise and International Tax Norms, Junior Tax Scholars Workshop, University of California, Irvine School of Law, Irvine, California (June 10, 2016)

The Social Boundaries of Corporate Taxation, Business Law Colloquium, University of Colorado Law School, Boulder, Colorado (March 17, 2016)

The Social Boundaries of Corporate Taxation, Symposium: We Are What We Tax, Fordham University School of Law, New York, New York (November 12, 2015)

Tax Equity and the Rule of Law, Junior Tax Scholars Workshop, University of Texas School of Law, Austin, Texas (June 4, 2015)

"Trafficking" in Loss Corporations: The Dynamics of Public-Private Tax Administration, 1954–1962, National Tax Association, 106th Annual Conference on Taxation, Tampa, Florida (November 21, 2013)

"Dogs for Defense": War Dogs and State Obligations in World War II, 1941–1946, University of Chicago, Social History Workshop (March 2007) and Seminar Paper Symposium, Chicago, Illinois (March 2006)

Seeds of Resistance: Working-Class Migration, Middle-Class Culture, and Community Resistance in Joliet, 1910–1950, University of Chicago, Seminar Paper Symposium, Chicago, Illinois (May 2004)

## ACADEMIC COMMENTARY

Discussant, *The Historical Origins and Current Prospects of the Multilateral Tax Convention* by Reuven Avi-Yonah & Eran Lempert, National Tax Association, 116th Annual Conference on Taxation, Denver, Colorado (November 2, 2023)

Discussant, Explaining and Predicting Tax Treaty Policy with Machine Learning Algorithms by Dmitry Erokhin & Martin Zagler, National Tax Association, 116th Annual Conference on Taxation, Denver, Colorado (November 2, 2023)

Discussant, *Beyond Purposivism in Tax Law* by Jonathan Choi, Junior Tax Scholars Workshop, University of San Diego School of Law, held remotely (June 4, 2021)

Chair (with commentary provided to all four panelists), *Panel: Tax Practice and Interpretation*, International Meeting on Law & Society, held remotely (May 28, 2021)

Discussant, From Scotland to the World: Transnational Implications of the Anti-Poll Tax Movement by Jeremy Bearer-Friend, Junior Tax Scholars Workshop, University of Utah S.J. Quinney College of Law, held remotely (October 30, 2020)

Discussant, *The Psychology of Taxing Capital Income: Evidence from a Survey Experiment on the Realization Rule* by Zach Liscow & Ed Fox, Junior Tax Scholars Workshop, University of Utah S.J. Quinney College of Law, held remotely (October 2, 2020)

Discussant, Gift and Estate Taxes and the Case for Deunification by Jay A. Soled, National Tax Association, 112th Annual Conference on Taxation, Tampa, Florida (November 23, 2019)

Discussant, Loss Offset and Income Averaging by Jacob Nussim, National Tax Association, 112th Annual Conference on Taxation, Tampa, Florida (November 23, 2019)

Discussant, *Impoverishment by Taxation* by Ariel Jurow Kleiman, Junior Tax Scholars Workshop, University of Richmond Law School, Richmond, Virginia (June 7, 2019)

Discussant, *Benefit Corporations and the Shareholder Primacy Norm* by Gladriel Shobe, Junior Tax Scholars Workshop, University of Richmond Law School, Richmond, Virginia (June 8, 2019)

Discussant, *Ironing out the Tax Code* by Edward Fox & Jacob Goldin, Junior Tax Scholars Workshop, University of Colorado Law School, Boulder, Colorado (June 15, 2018)

Discussant, Cannabis Complexities in State-Tribal Tax Revenue Sharing Compacts by Pippa Browde, Junior Tax Scholars Workshop, University of Colorado Law School, Boulder, Colorado (June 15, 2018)

Discussant, Disrupting the Tax Treaty Network: An Argument for Tax Treaty Customization by Genevieve Tokic, Junior Tax Scholars Workshop, University of Toronto Faculty of Law, Toronto, Canada (June 16, 2017)

Discussant, Negating the Cost of "I Do": Ending the U.S. Tax Code's Family Penalty Through Permissive Joint Filing by Christine Allie, Junior Tax Scholars Workshop, University of Toronto Faculty of Law, Toronto, Canada (June 16, 2017)

Discussant, A Hierarchy of Expertise: Science, Technology, and Policy in the United States by Patrick O'Connor, Rocky Mountain Interdisciplinary History Conference, University of Colorado, Boulder, Colorado (September 25, 2016)

Discussant, *Reconsidering Alimony and Tax* by Tessa Davis, Junior Tax Scholars Workshop, University of California, Irvine School of Law, Irvine, California (June 11, 2016)

Discussant, The Long Reach of European Union Law: Patent Boxes and the Limits of International Cooperation by Lilian Faulhaber, Junior Tax Scholars Workshop, University of California, Irvine School of Law, Irvine, California (June 10, 2016)

Discussant, *Through the Lens of Innovation* by Mirit Eyal-Cohen, Junior Tax Scholars Workshop, University of Texas School of Law, Austin, Texas (June 4, 2015)

Discussant, New Paradigm in International Tax Law and Diplomacy by Itai Grinberg, Junior Tax Scholars Workshop, University of Texas School of Law, Austin, Texas (June 4, 2015)

### **PUBLIC PRESENTATIONS**

Presenter, *The Case That Could Unravel the Tax System*, Mini Law School, University of Colorado Law School, Boulder, Colorado (January 31, 2024)

Presenter, *Real Estate and Income Taxes*, Real Estate Law for Non-Lawyers (short course), Leeds School of Business, University of Colorado (December 6, 2023)

Presenter, *Real Estate and Income Taxes*, Real Estate Law for Non-Lawyers (short course), Leeds School of Business, University of Colorado (February 21, 2023)

Podcast, *Are You Election Ready? Talking Taxes and Midterms*, Leeds Business Insights, Season 2, Episode 5, Leeds School of Business, University of Colorado (November 1, 2022), <a href="https://pod.link/1609017004/episode/2920a5fdd263520b56dc0b0d8b470b23">https://pod.link/1609017004/episode/2920a5fdd263520b56dc0b0d8b470b23</a>

Presenter, *Tax Relief and the Pandemic: Year One*, Leeds School of Business, University of Colorado (April 9, 2021), <a href="https://youtu.be/tjTHfNosR80">https://youtu.be/tjTHfNosR80</a>

Presenter, *Taxes and Spending in the Pandemic*, Mini Law School, University of Colorado Law School, Boulder, Colorado (March 2, 2021)

Presenter, *Taxes and the CARES Act: Opportunities and Pitfalls*, Leeds School of Business, University of Colorado (April 16, 2020), <a href="https://youtu.be/sV2EU-nh0lw">https://youtu.be/sV2EU-nh0lw</a>

Presenter, CARES Act: Tax Provisions, University of Colorado Law School (April 2, 2020)

Presenter, Your Taxes After Tax Reform, Mini Law School, University of Colorado Law School, Boulder, Colorado (September 17, 2019)

Panelist, *Tax Cuts in 2018: The Winners, The Losers*, Conference on World Affairs, University of Colorado, Boulder, Colorado (April 10, 2019)

Moderator, *Taxes: I Don't Want to Pay for Your Government*, Conference on World Affairs, University of Colorado, Boulder, Colorado (April 12, 2017)

Panelist, *The Basics and Effects of the Trump Tax Plan*, University of Colorado Law School, Boulder, Colorado (February 16, 2017)

Presenter and Panelist, *Tax Panel for TCJA*, CU-Boulder Graduate Student Committee on Rights and Compensation, University of Colorado, Boulder, Colorado (December 13, 2017)

Panelist, *International Forum Shopping and the Panama Papers*, New York University School of Law, New York, New York (October 6, 2016)

Commentator, Wealth Redistribution and the Presidential Election by Steven Teles, Federalist Society, University of Colorado Law School, Boulder, CO (September 21, 2016)

Moderator, *Budget Battles: Let's Make a Deal*, Conference on World Affairs, University of Colorado, Boulder, Colorado (April 7, 2016)

### **INTERNET AND MEDIA**

Op-Ed, *How to Design a Tax Exemption for Tips that Is Workable and Fair*, THE HILL (August 22, 2024), <a href="https://bit.ly/4cUCxc3">https://bit.ly/4cUCxc3</a>

**Guest Blogger**, SSRN Tax Article Review and Roundup, TaxProf Blog, August 2017–present, <a href="https://bit.ly/4bWTdir">https://bit.ly/4bWTdir</a>

- Review of Jason Oh & Andrew Verstein, A Theory of the REIT, 133 YALE L.J. 755 (2024), TaxProf Blog (October 18, 2024), <a href="https://bit.ly/3ND6ovk">https://bit.ly/3ND6ovk</a>
- Review of Leigh Osofsky, Wellness and The Tax Law, 59 GA. L. REV. \_\_ (2025), TaxProf Blog (October 4, 2024), <a href="https://bit.ly/3AdLxf0">https://bit.ly/3AdLxf0</a>
- Review of Danielle A. Chaim, *The Common Ownership Tax Strategy*, 101 WASH. U. L. REV. 501 (2023), TaxProf Blog (August 2, 2024), https://bit.ly/4dY2CZe
- Review of Jeffrey L. Hoopes & Kyle Pomerleau, Sweeping Changes and an Uncertain Legacy: The Tax Cuts and Jobs Act of 2017, 39 J. Econ. Persp. \_\_ (2024), TaxProf Blog (June 7, 2024), <a href="https://bit.ly/3XHOmhK">https://bit.ly/3XHOmhK</a>
- Review of David Elkins, *Rules, Standards, and the Value of Certainty in Tax Law* (February 1, 2024), TaxProf Blog (March 1, 2024), <a href="https://bit.ly/4cJsiYy">https://bit.ly/4cJsiYy</a>
- Review of Edward G. Fox (Michigan) & Zachary D. Liscow (Yale), *No More Tax-Free Lunch for Billionaires: Closing the Borrowing Loophole*, 182 TAX NOTES FED. 647 (January 22, 2024), and Jay A. Soled (Rutgers), *The Gift Tax and the Tax Gap*, 182 TAX NOTES FED. 1047 (February 5, 2024), TaxProf Blog (March 1, 2024), <a href="https://bit.ly/4a2YAga">https://bit.ly/4a2YAga</a>
- Review of Chris William Sanchirico & Reed Shuldiner, *Circular Partnerships* (December 17, 2023), TaxProf Blog (January 12, 2024), <a href="https://bit.ly/3u7UfZr">https://bit.ly/3u7UfZr</a>
- Review of Reuven Avi-Yonah & Eran Lempert, The Historical Origins and Current Prospects of the Multilateral Tax Convention, 15 World Tax J. 379 (2023) and Reuven S. Avi-Yonah, Much Ado: Why the U.S. Should Calm Down About DSTs, 181 Tax Notes Fed. \_\_ (forthcoming 2023), TaxProf Blog (November 3, 2023), <a href="https://bit.ly/3SHp3ck">https://bit.ly/3SHp3ck</a>
- Review of Daniel J. Hemel, *Phaseouts*, 74 TAX L. REV. \_\_ (2024), TaxProf Blog (September 15, 2023), <a href="https://bit.ly/30qZUkb">https://bit.ly/30qZUkb</a>

- Review of Kathleen Claussen, *Tax Intelligence*, 72 DUKE L.J. ONLINE 155 (2023), TaxProf Blog (July 21, 2023), <a href="https://bit.ly/3u7UfZr">https://bit.ly/3u7UfZr</a>
- Review of Gregg D. Polsky & Ethan Yale, A Critical Evaluation of the Qualified Small Business Stock Exclusion, 42 VA. TAX REV. 353 (2023), TaxProf Blog (May 26, 2023), https://bit.ly/42kDh6B
- Review of Christopher H. Hanna & Cody A. Wilson, U.S. International Tax Policy and Corporate America, 48 J. CORP. L. 261 (2023), TaxProf Blog (April 7, 2023), https://bit.ly/45as7Cq
- Review of Erin Henry, Jennifer Luchs-Nuñez & Steven Utke, Do Corporate Taxes Impede Merger and Acquisition Activity? Evidence from Private Corporations (2023), TaxProf Blog (February 9, 2023), <a href="https://bit.ly/3Op5eFy">https://bit.ly/3Op5eFy</a>
- Review of George K. Yin, Textualism, the Role and Authoritativeness of Tax Legislative History, and Stanley Surrey, 86 LAW & CONTEMP. PROBS. \_\_\_ (2023), TaxProf Blog (December 16, 2022), <a href="https://bit.ly/3wPpYv8">https://bit.ly/3wPpYv8</a>
- Review of Rory Gillis, The Limits of Legal Substance: Tax Avoidance and Equitable Remedies After Collins Family Trust, 66 CAN. Bus. L.J. \_\_ (2022), and Amandeep S. Grewal, When Is the Economic Substance Doctrine "Relevant" to a Transaction? (2022), TaxProf Blog (October 7, 2022), <a href="https://bit.ly/3XWORBY">https://bit.ly/3XWORBY</a>
- Review of Michael Doran, *Executive Compensation and Corporate Governance* (2022), TaxProf Blog (September 16, 2022), https://bit.ly/3wOGw7o
- Review of Israel Klein, *The Corporate Tax Paradox*, 42 VA. TAX REV. \_\_ (2022), TaxProf Blog (July 29, 2022), <a href="https://bit.ly/3WXExZ8">https://bit.ly/3WXExZ8</a>
- Review of Linda Galler, *Tax Opinion Policies and Procedures*, 75 TAX LAW. 443 (2022), TaxProf Blog (June 17, 2022), <a href="https://bit.ly/3WUTJ99">https://bit.ly/3WUTJ99</a>
- Review of Benjamin Alarie & Stefanie Di Giandomenico, *Timing Is Everything: The Step Transaction Doctrine in GSS Holdings*, 174 TAX NOTES FED. 1849 (March 28, 2022); Benjamin Alarie & Christopher Yan, *Using Machine Learning to Evaluate the Existence of a Trade or Business:* Olsen, 174 TAX NOTES FED. 1231 (February 28, 2022), and Benjamin Alarie & Bettina Xue Griffin, *Using Machine Learning to Crack the Tax Code*, 174 TAX NOTES FED. 661 (January 31, 2022), TaxProf Blog (April 29, 2022), <a href="https://bit.ly/3JwRq9m">https://bit.ly/3JwRq9m</a>
- Review of Amanda Parsons, Tax's Digital Labor Dilemma, 71 DUKE L.J. (2022), TaxProf Blog (March 4, 2022), <a href="https://bit.ly/3RqwuCL">https://bit.ly/3RqwuCL</a>
- Review of Sofia Ranchordás & Luisa Scarcella, Automated Government for Vulnerable Citizens: Intermediating Rights, 30 WM. & MARY BILL RTS. J. \_\_\_\_ (2021), TaxProf Blog (November 19, 2021), <a href="https://bit.ly/3gh2SGw">https://bit.ly/3gh2SGw</a>
- Review of Ariel Jurow Kleiman, *Revolutionizing Redistribution: Tax Credits and the American Rescue Plan*, 131 YALE L.J. F. \_\_ (2021) and Deborah A. Widiss, *Chosen Family, Care, and the Workplace*, 131 YALE L.J. F. \_\_ (2021), TaxProf Blog (October 22, 2021), <a href="https://bit.ly/3AQUpTK">https://bit.ly/3AQUpTK</a>
- Review of Joshua Blank & Leigh Osofsky, The Inequity of Informal Guidance, 75
   VAND. L. REV. (2022), TaxProf Blog (September 3, 2021), <a href="https://bit.ly/3EsYmhX">https://bit.ly/3EsYmhX</a>
- Review of Sarah Lawsky, *Teaching Algorithms and Algorithms for Teaching*, 24 FLA.
   TAX REV. \_\_\_\_ (2021), TaxProf Blog (July 9, 2021), <a href="https://bit.ly/3k9ixKn">https://bit.ly/3k9ixKn</a>
- Review of Orly Mazur, Can Blockchain Revolutionize Tax Administration?, TaxProf Blog (May 14, 2021), <a href="https://bit.ly/3ugnpmE">https://bit.ly/3ugnpmE</a>
- Review of Emily Cauble, *Questions the IRS Will Not Answer*, 97 IND. L.J. \_\_ (2021), TaxProf Blog (March 26, 2021), <a href="https://bit.ly/35xiYcG">https://bit.ly/35xiYcG</a>

- Review of James R. Repetti, The Appropriate Roles for Equity and Efficiency in a Progressive Individual Income Tax, 23 FLA. TAX REV. 522 (2020), TaxProf Blog (February 5, 2021), https://bit.ly/3s6QVZf
- Review of Hillel Nadler, The Only Sure Alpha: Tax-Motivated Trading and Price Efficiency (2020), TaxProf Blog (November 20, 2020), <a href="https://bit.ly/3oGOwAW">https://bit.ly/3oGOwAW</a>
- Review of Samuel D. Brunson, *Addressing Hate: Georgia, the IRS, and the Ku Klux Klan* (2020), TaxProf Blog (September 18, 2020), <a href="https://bit.ly/2MJIdiO">https://bit.ly/2MJIdiO</a>
- Review of Steven Z. Hodaszy, Why the Antipathy Toward Business Loss Deductions Is Misguided, 167 TAX NOTES FED. 1863 (June 15, 2020), and Clint Wallace, The Troubling Case of the Unlimited Pass-Through Deduction, U. CHI. L. REV. ONLINE (forthcoming 2020), TaxProf Blog (July 31, 2020), <a href="https://bit.ly/3j5Ad70">https://bit.ly/3j5Ad70</a>
- Review of Rory Gillis, *Carbon Tax Shifts and the Revenue-Neutrality Dilemma*, 23 FLA. TAX REV. 293 (2019), TaxProf Blog (June 5, 2020), <a href="https://bit.ly/2NWTNro">https://bit.ly/2NWTNro</a>
- Review of Andrew T. Hayashi, *Countercyclical Property Taxes*, Va. L. & Econ. Res. Paper No. 2020-04, TaxProf Blog (April 10, 2020), <a href="https://bit.ly/3akYUJo">https://bit.ly/3akYUJo</a>
- Review of Adi Libson & Gideon Parchomovsky, *Reversing the Fortunes of Active Funds* (2020), TaxProf Blog (February 14, 2020), <a href="https://bit.ly/2MJeMNF">https://bit.ly/2MJeMNF</a>
- Review of Ajay K. Mehrotra & Dominic Bayer, The Promise and Limits of Fundamental Tax Reform: Contrasting the 1986 Tax Reform Act with the 2017 Tax Cuts and Jobs Act, 53 U.C. DAVIS L. REV. ONLINE 93 (2019), TaxProf Blog (December 20, 2019), <a href="https://bit.ly/2S62oXc">https://bit.ly/2S62oXc</a>
- Review of Ari D. Glogower & David Kamin, *The Progressivity Ratchet*, 104 MINN. L.
   REV. \_\_ (forthcoming), TaxProf Blog (November 1, 2019), <a href="https://bit.ly/2PDhNyx">https://bit.ly/2PDhNyx</a>
- Review of Takayuki Nagato, Tax Losses and Excessive Risk Taking Under Limited Liability: A Case Study of the TEPCO Bailout After the Fukushima Nuclear Disaster, 32 COLUM. J. ASIAN L. 137 (2019), TaxProf Blog (July 19, 2019), <a href="http://bit.ly/2M2NwHJ">http://bit.ly/2M2NwHJ</a>
- Review of Michael Abramowicz & Andrew Blair-Stanek, Contractual Tax Reform, WM. & MARY L. REV. (forthcoming 2019), TaxProf Blog (April 19, 2019), <a href="http://bit.ly/2KMB5Av">http://bit.ly/2KMB5Av</a>
- Review of Katherine Pratt, The Curious State of Tax Deductions for Fertility Treatment Costs, 28 S. CAL. REV. L. & SOC. JUST. (forthcoming 2019), TaxProf Blog (March 1, 2019), <a href="https://bit.ly/2PEkb83">https://bit.ly/2PEkb83</a>
- Review of Stephen Shay, The US International Tax Reforms: Competition and Convergence, Pay-Offs and Policy Failures, 46 INTERTAX 905 (2018), TaxProf Blog (January 4, 2019), <a href="https://bit.ly/2N7blxY">https://bit.ly/2N7blxY</a>
- Review of Fadi Shaheen, Income Tax Treaty Aspects of Nonincome Taxes: The Importance of Residence, 71 TAX L. REV. 583 (2018), TaxProf Blog (November 16, 2018), <a href="http://bit.ly/2Tk6H0Q">http://bit.ly/2Tk6H0Q</a>
- Review of Emily Cauble, *Taxing Selling Partners*, 94 WASH. L. REV. (forthcoming 2019), TaxProf Blog (October 5, 2018), http://bit.ly/2yiHslQ
- Review of Victoria J. Haneman, Retrenchment, Temporary-Effect Legislation, and the Home Mortgage Interest Deduction (2018), TaxProf Blog (August 17, 2018), <a href="http://bit.ly/2Myg5NG">http://bit.ly/2Myg5NG</a>

- Review of Allison Christians, Introduction to Tax Policy Theory (2018), TaxProf Blog (July 13, 2018), <a href="http://bit.ly/2NOLitH">http://bit.ly/2NOLitH</a>
- Review of Kai A. Konrad, Dynamics of the Market for Corporate Tax-Avoidance Advice (2018), TaxProf Blog (June 8, 2018), <a href="http://bit.ly/2kWKVQD">http://bit.ly/2kWKVQD</a>
- Review of Charlene D. Luke, *Captivating Deductions*, 46 HOFSTRA L. REV. \_\_\_ (forthcoming 2018), TaxProf Blog (May 4, 2018), <a href="https://bit.ly/2HRxr21">http://bit.ly/2HRxr21</a>
- Review of David Hasen, Rules, Standards and Detection (2018), TaxProf Blog (March 23, 2018), <a href="https://goo.gl/iX3UPK">https://goo.gl/iX3UPK</a>
- Review of David Herzig, *The Income Equality Case for Eliminating the Estate Tax*, 90 S. CAL. L. REV. 1143 (2017), TaxProf Blog (February 9, 2018), <a href="https://goo.gl/jnqQum">https://goo.gl/jnqQum</a>
- Review of Ajay Mehrotra, *Fiscal Forearms: Taxation as the Lifeblood of the Modern Liberal State*, in The Many Hands of the State: Theorizing the Complexities of Political Authority and Social Control (Kimberly Morgan & Ann Orloff eds., 2017), TaxProf Blog (January 12, 2018), <a href="https://goo.gl/bhZogA">https://goo.gl/bhZogA</a>
- Review of Kitty Richards, *An Expressive Theory of Tax*, 27 CORNELL J.L. & PUB. POL'Y \_\_ (2018), TaxProf Blog (November 17, 2017), <a href="https://goo.gl/uhF7oh">https://goo.gl/uhF7oh</a>
- Review of Tsilly Dagan, The Future of Corporate Residency, TaxProf Blog (October 13, 2017), <a href="https://goo.gl/MxGT8t">https://goo.gl/MxGT8t</a>
- Review of Lee Anne Fennell & Richard McAdams, *Inverted Theories*, TaxProf Blog (September 8, 2017), <a href="https://goo.gl/kzRp4">https://goo.gl/kzRp4</a>
- Review of Manoj Viswanathan, *Tax Compliance in a Decentralizing Economy*, TaxProf Blog (August 5, 2017), https://goo.gl/Jzt3Z9

## **Media Citations and Appearances**

- Interview, Katy Marquardt Hill, CU Strategic Relations and Communications, Moore
  v. United States: A Supreme Court Case that Could Upend the Tax Code (February 13,
  2024), <a href="http://bit.ly/3PXviqT">http://bit.ly/3PXviqT</a>
- Interview, Janet Nguyen, Marketplace (April 12, 2023), https://bit.ly/3Wt9wxl
- Interview, Luis de Leon, 9News (NBC) (February 10, 2023), <a href="https://bit.ly/3WpPC6u">https://bit.ly/3WpPC6u</a> [print] and <a href="https://bit.ly/49fGIxC">https://bit.ly/49fGIxC</a> [video]
- Interview, Allison Levine, 9News (NBC) (April 16, 2020), https://bit.ly/3jklmgl
- Interview, Shawn Chitnis, CBS4 Denver (April 15, 2020), https://cbsloc.al/2YHptCZ
- Interview, Amanda Pampuro, Courthouse News (April 8, 2020), https://bit.ly/3pKbCb6
- Interview, Sloan Dickey, Denver7 (ABC) (April 7, 2020) <a href="https://bit.ly/2YAqZHd">https://bit.ly/2YAqZHd</a>
- Interview, Brian Eason, Colorado Sun (August 15, 2019), <a href="https://bit.ly/327pdfR">https://bit.ly/327pdfR</a>
- Interview, Anna Staver, 9News (NBC) (March 15, 2019), https://bit.ly/335yqXs
- Interview, Carolyn Sackariason, Aspen Times (October 26, 2018), https://bit.ly/2N5Nddx
- Interview, Colorado's Morning News, KOA Radio (December 14, 2017)
- Interview, Colorado's Morning News, KOA Radio (November 29, 2017)

## **GRANTS AND FELLOWSHIPS**

National Science Foundation, Build and Broaden: Enhancing Social, Behavioral and Economic Science Research and Capacity at Minority-Serving Institutions (B2), SBP: Building Awareness, Engagement, and Belonging with Respect to Legal Education Among Undergraduates at an Access-Oriented Institution: An Experimental Approach, \$790,042 (PI;

Co-PIs Jeremiah Castle and Shaun LaBarre, Metropolitan State University of Denver; applied for January 2025)

Bureau of Educational and Cultural Affairs, U.S. Department of State, Fulbright U.S. Scholar Program, Study of the United States (Teaching in Social Sciences and Humanities), *Teaching U.S. Tax Law and Policy in Japan*, approximately \$68,200 (applied for September 2024; advanced from peer review December 2024)

AccessLex Institute, Diversity Pathway Intervention Grant Program, Title: *Colorado Pre-Law Pathway Partnership*, Award No. DP2024001, \$298,227, January 2025–December 2026 (PI; Second PI: Shaun LaBarre, Metropolitan State University of Denver; awarded October 2024)

Faculty Success Program Grant, Office of Faculty Affairs, University of Colorado, \$4,250, January 2023–April 2023 (awarded September 2022)

Thrive Grant, Office of Faculty Affairs, University of Colorado, \$9,894, August 2022–May 2023 (awarded June 2022)

### **TEACHING**

## **Certifications and Trainings**

- Teaching Toolkit Program, National Center for Faculty Development and Diversity (August 2023)
- Inclusive Pedagogy Certification, Center for Teaching and Learning, University of Colorado Boulder (May 2021)
- Nine additional teaching-focused training sessions through the University of Colorado Boulder's Center for Teaching and Learning

## **University of Colorado Law School**

- Income Taxation: Fall 2024, Fall 2023, Fall 2022, Fall 2021, Fall 2020 (hybrid online), Fall 2019, Spring 2019, Spring 2018, Fall 2016, Fall 2015 (including self-created problem sets)
- Partnership Tax: Fall 2024, Fall 2023, Fall 2022, Fall 2021, Fall 2020 (hybrid online), Fall 2019 (including self-created problem sets)
- *Corporate Tax*: Spring 2024, Spring 2022, Spring 2021 (online), Spring 2020 (hybrid online), Spring 2019, Spring 2017 (including self-created problem sets)
- Real Estate Planning: Spring 2018 (including self-created problem sets and experiential exercises)
- Seminar: Tax Law, Economics, and Policy: Fall 2016 (including self-created course materials)
- Business Law Colloquium: Tax Emphasis: Spring 2016
- *Independent Study*: Fall 2021 (supervised), Fall 2017 (co-supervised with Randi Grassgreen)

### **New York University School of Law**

- *Corporate Tax I*: Spring 2015
- *Tax Policy*: Spring 2015, Fall 2014, Spring 2014, Fall 2013 (including self-created course materials)
- Survey of Tax Procedure: Fall 2014, Spring 2014, Fall 2013

## **DePaul University College of Law**

• Taxation of S Corporations and Conduit Entities: Spring 2013, Spring 2012 (including the creation of all curriculum and course materials, such as problem sets)

### **SERVICE**

## **University of Colorado System**

- Faculty Council, Member (through committee work), Fall 2021–present
- Faculty Council, Personnel and Benefits Committee (elected), Fall 2021–present

## **University of Colorado Boulder (Campus)**

- Boulder Faculty Assembly, Law School Representative (elected), Fall 2024
   –present
- Boulder Faculty Assembly, Budget and Planning Reimagined Ad Hoc Committee (appointed), Fall 2024—present
- Academic Technology Advisory Group (campus-level), Spring 2025–present

## University of Colorado Law School: Institutional Service

- Faculty Advisor, Tax Emphasis Program, Summer 2017–present
- LILAC [Leaders in Law and Community] Committee, Fall 2023–present
- Rules Committee, Fall 2022–present
- Appointments Committee, Fall 2020–Spring 2021, Fall 2018–Spring 2019, Fall 2017–Spring 2018 (in total, three hiring cycles)
- International Programs Committee, Fall 2019–Spring 2020
- Faculty Salary Peer Review Committee, Fall 2018–Spring 2020
- Search Committee, Director of Academic Support, Fall 2016–Spring 2017
- Academic Support and Bar Exam Committee, Fall 2015–Spring 2017
- Faculty Secretary, Fall 2015–Spring 2017

## University of Colorado Law School: Student Service

- Administrator, CBA Tax Section Scholarship Competition, Fall 2018–present
- Faculty Sponsor, Business and Tax Law Association, Fall 2016–Spring 2022
- Judge, LawMeets Transactional Law Competition, Fall 2019
- Coach, J.D. Team, American Bar Association (ABA) Section of Taxation, 16th Annual Law Student Tax Challenge (semi-finalists), Fall 2016—Spring 2017

## New York University School of Law

Assistant Editor, Tax Law Review, Fall 2013–Spring 2015

### **Professional Service**

- Co-Organizer, Junior Faculty Scholarship Group, University of Colorado Law School, January 2023—May 2024
- Reviewer, J.D. and LL.M Problems, ABA Section of Taxation, 22nd Annual Law Student Tax Challenge, Fall 2022
- Organizing Committee, Junior Tax Scholars Workshop, University of Utah S.J. Quinney College of Law, Salt Lake City, Utah, Fall 2019–Fall 2020 (postponed and held virtually due to COVID-19)
- Organizing Committee, Junior Tax Scholars Workshop, University of Richmond Law School, Richmond, Virginia, Fall 2018–Spring 2019
- Organizing Committee, Junior Tax Scholars Workshop, University of Colorado Law School, Boulder, Colorado, Fall 2017–Spring 2018

 Organizing Committee, Junior Tax Scholars Workshop, University of Toronto Faculty of Law, Toronto, Canada, Fall 2016—Spring 2017

### PROFESSIONAL EXPERIENCE

Skadden, Arps, Slate, Meagher & Flom LLP

Chicago, IL

Tax Associate March 2008–August 2009; August 2010–August 2013

Summer Associate June 2006—September 2006

Housing Initiative, Mandel Legal Aid Clinic,

University of Chicago Law School Chicago, IL Law Clerk September 2005–June 2007

Summer Law Clerk June 2005–August 2005

Prof. Elizabeth F. Emens,

University of Chicago Law School Chicago, IL

Research Assistant June 2005–November 2005

Salesian High School Richmond, CA

Math Teacher and Assistant Football Coach

August 2001–June 2003

### **BAR ADMISSION**

Illinois, 2007–present