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**Experience**

Professor of Law, The University of Texas at Austin, School of Law (1981 - present) (teaching Federal Income Tax, Accounting, Tax Finance, Corporate and Partnership Tax, Analytic Methods).

Fellow, Tax Policy Center (joint program of Urban Institute and Brookings Institution), May-December 2011.

Visiting Professor, Office of Chief Counsel, IRS, Spring Semester 2007.

Academic Advisers on the Overall Health of the Tax System, Joint Committee on Taxation, U.S. Congress, 2001.

Dean's Distinguished Visitor, Vanderbilt Law School, March 13-17, 2000.

Commissioner's Advisory Group (1989) (group of 20 people to advise Commissioner of IRS).

Associate and Assistant Professor, Rutgers Law School - Newark (1975 - 1981).

Guest Scholar, The Brookings Institution, Washington, D.C. (January - August 1980) (research and writing on tax shelters).

Tax Attorney, Tax Legislative Counsel, Treasury Department (1973 - 1975).

Associate, Paul, Weiss, Rifkind, Wharton & Garrison, New York City (1971 - 1973) (tax department).

United States Army (Vietnam 1967 - 1968). Purple Heart

**Education**

Stanford Law School, J.D. 1971.  
Columbia College, B.A. 1966 (Philosophy).

## List of Publications - Calvin H. Johnson

### Books

*Righteous Anger at the Wicked States: The Meaning of the Founders Constitution* (Cambridge 2005). Chapter 6, Antifederalism:

<http://law.utexas.edu/faculty/calvinjohnson/RighteousAnger/chapter6.pdf>

For reviews, news and discussion see

<http://law.utexas.edu/faculty/calvinjohnson/RighteousAnger> .

### Articles

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*End Tax Subsidy from Abandonments and Swaps*, 152 TAX NOTES 1171 (Aug. 22, 2016),

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*Organizational Capital: The Most Important Unsettling Issue in Tax*, 148 TAX NOTES 667 (Aug. 10, 2015), <http://ssrn.com/abstract=2650456>

*When "Simplification" is a Trojan Horse for Great Harm*, 146 TAX NOTES 565 (May 4, 2015),

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*Better Twice Measured: Partnership Basis from Partnership Debt*, 147 TAX NOTES 79 (April 13, 2015),

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[http://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=2575371](http://papers.ssrn.com/sol3/papers.cfm?abstract_id=2575371)

*Repatriation Tax: Are We Chamberlain or Churchill?*, 144 TAX NOTES 1457 (Sept. 22, 2014),

<http://ssrn.com/abstract=2507269>

*Amazing Waste: Tax Subsidies To Qualified Retirement Plans*, 144 TAX NOTES 727 (August 11, 2014)

<http://ssrn.com/abstract=2485441>

*Horse Losses and Other Pleasures*, 142 TAX NOTES 1443 (March 31, 2014)

[http://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=2425262](http://papers.ssrn.com/sol3/papers.cfm?abstract_id=2425262)

*First Do No Harm: The Senate Staff Discussion Draft on Cost Recovery*, 142 TAX NOTES 549 (Feb. 3, 2014) <http://ssrn.com/abstract=2394912>

*Ending Reliance on Opinions of the Taxpayer's Own Lawyer*, 141 Tax Notes 947-62 (Dec. 2, 2013) <http://ssrn.com/abstract=2365309>. See also *Opinions by the Taxpayer's Own Lawyer: Johnson Response* (Letter to the Editor), 142 TAX NOTES 129 (Jan. 6, 2014)

<http://law.utexas.edu/faculty/calvinjohnson/Opinions-by-taxpayers-own-lawyer.pdf>  
and *The Opinions are not Reliable* (Letter to the Editor), 142 TAX NOTES 352 (Jan. 20, 2014).  
<http://law.utexas.edu/faculty/calvinjohnson/The-Opinions-are-not-reliable.pdf>

*Ordinary Medical Expenses*, 141 Tax Notes 773-80 (Nov. 18, 2013)  
<http://ssrn.com/abstract=2357803>

*We Don't Need No Stinkin' VAT*, 139 TAX NOTES 527 (April 29, 2013),  
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*Measure Tax Expenditures by Internal Rate of Return*, 139 Tax Notes 273 (April 15, 2013),  
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*Partnership Allocations From Nickel-on-the-Dollar Substance*, 134 TAX NOTES 873 (Feb. 13, 2012), [http://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=2005780](http://papers.ssrn.com/sol3/papers.cfm?abstract_id=2005780)

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*Taxing GE and Other Masters of the Universe*, 132 TAX NOTES 175 (July 11, 2011),  
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*Corporate Meltdowns and the Deduction of Credit Risk Interest*, 131 TAX NOTES 513  
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*Small Business Inventory Expensing*, 129 TAX NOTES 591 (Nov. 1, 2010), <http://ssrn.com/abstract=1710153>

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<http://law.utexas.edu/faculty/calvinjohnson/states-rights-what-states-rights.pdf>.

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*Tax on Insurance Buildup*, 122 TAX NOTES 665 (February 2, 2009) (with Andrew Pike and Eric Lustig), [http://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=1520741](http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1520741)

*The Effective Tax Ratio and the Undertaxation of Intangibles*, 121 TAX NOTES 1289 (December 15, 2008) [http://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=1315477](http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1315477)

*Elephant in the Parlor: Repeal of Step-up in Basis at Death*, 121 TAX NOTES 1181 (December 8, 2008), [http://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=1520739](http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1520739). See also Letters to Editor, *Plump Target*, 121 TAX NOTES 1459 (December 22, 2008), <http://law.utexas.edu/faculty/calvinjohnson/plump-target.pdf>

*Closing Deferred Revenue*, 121 TAX NOTES 965 (November 24, 2008), [http://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=1520737](http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1520737)

*Impose Capital Gains Tax on Like-Kind Exchanges*, 121 TAX NOTES 475 (October 27, 2008), [http://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=1520734](http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1520734)

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*Business and Casualty Losses When Basis Has Not Been Lost*, 120 TAX NOTES 357 (July 28, 2008), <http://ssrn.com/abstract=1520725>; see also Letters to Editor, *Applause for Reification of Basis*, 120 TAX NOTES 903 (September 1, 2008), <http://law.utexas.edu/faculty/calvinjohnson/applause-for-reification-of-basis.pdf>

*Deferred Payment Sales: Change the Basis and Character Rules*, 120 TAX NOTES 157 (July 14, 2008), <http://ssrn.com/abstract=1520093>

*End Tax-Free Monetization of Wealth*, 119 TAX NOTES 1361 (June 30, 2008), <http://ssrn.com/abstract=1520091>

*End Identification of Stock Certificates*, 119 TAX NOTES 1171 (June 16, 2008), <http://ssrn.com/abstract=1520090>

*Really Cool Stuff: Digital Searches into the Constitutional Period*, 25 CONST. COMMENTARY 51 (Spring 2008), <http://law.utexas.edu/faculty/calvinjohnson/really-cool-stuff.pdf>

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*Tales from the KPMG's Skunk Works: The Basis-Shift or Defective-Redemption Shelter*, 108 TAX NOTES 431 (July 25, 2005), <http://law.utexas.edu/faculty/calvinjohnson/Tales-from-KPMGsskunk-works.pdf>; See also Letters to Editor, Response: *Johnson doesn't FLIP for Davis Argument*, 137 TAX NOTES 109 (October 3, 2005), <http://law.utexas.edu/faculty/calvinjohnson/DavisLtrtoEd10305.pdf>

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### **Invited Lectures and Presentations**

“Consumption of Capital Gain,” University of Texas Law School Colloquium, September 1, 2016.

“Conceptual Framework for Capital Gains,” University of Texas Law School Drawing Board, Feb. 15, 2016; Texas Tax Research, SMU Law School, May 20, 2016; Law and Society, New Orleans, June 2, 2016)

“Simplification and as Trojan Horse for Great Harm” Lone Star Progressives, Granbury Texas (July 31, 2015)

“Organizational Capital,” Texas Law School Colloquium, (October 1, 2015); Law and Society Association, Seattle Washington (May 29, 2015).

“A Box of Chocolates: 10 Shelf Project Proposals,” NYU Graduate Tax Program, New York, (March 30, 2015), Austin Tax Study Group (April 21, 2015)

“Ending Tax Subsidies to Qualified Pension Plans,” Law and Society Association, Minneapolis, Minnesota (May 30, 2014)

“The Inconsistency of Debt and Qualified Plans,” Austin Tax Study Group, May 20, 2014

“Can Texas Tax Online Sales?” to Austin Tax Study Group, June 11, 2013

“Ending Tax Opinions from the Taxpayer’s Own Lawyer” to Austin Tax Study Group.  
November 19, 2013

“Can Texas Tax Online Sales?” to Austin Tax Study Group, June 11, 2013

“Ordinary Medical Expenses” to Law and Society Association, Boston, MA, May 31, 2013; to  
Austin Tax Study Group, Austin, April 16, 2013

“Impost Begat Convention: Understanding the New York Ratification of the Constitution” to  
Phd Colloquium, Rothermere American Institute, Oxford, UK (April 29, 2013)

“Cary Brown Thesis and Three Corollaries” to Oxford Business Tax Centre, Oxford, UK  
(April 24, 2013)

Presented “Can Texas Tax Online Sales?” to Austin Tax Study Group, June 11, 2013

“Impost Begat Convention: Understanding the New York Ratification of the Constitution” to  
Phd Colloquium, Rothermere American Institute, Oxford, UK (April 29, 2013)  
[http://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=2767894](http://papers.ssrn.com/sol3/papers.cfm?abstract_id=2767894)

Presented “Cary Brown Thesis and Three Corollaries” to Oxford Business Tax Centre, Oxford,  
UK (April 24, 2013)

Presented “Charles Beard and the Three Barbie Dolls” at Conference on Charles Beard,  
Economic Interpretation and History, at Rothermere American Institute, Oxford, UK (April 22, 2013),  
[http://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=2575374](http://papers.ssrn.com/sol3/papers.cfm?abstract_id=2575374)

Presented "Righteous Anger at the Wicked States" to Sun City Democrats, April 6, 2010

Presented “Tax Shelf Project” at tax colloquium series at the University of San Diego Law  
School, San Diego, California (March 21, 2013).

Is Obamacare Constitutional?” debate before University of Texas Federalist Society (March 6,  
2013)

“Should the U.S. Adopt a VAT? The Case for the Negative,” presented paper at AALS  
Annual Meeting, Taxation Section: New Orleans (January 6, 2013.)  
<http://law.utexas.edu/faculty/calvinjohnson/does-us-need-vat.pdf>

“The Shelf Project: Revenue Raising Ideas that Improve the Fairness and Efficiency of the  
Income Tax” (October 26, 2012), presented at University of Washington Law School in Seattle  
Washington

Constitutionality of Obamacare, presented by invitation to Stanford Federalist Society,  
Stanford California, October 4, 2012

“Middle Level News from the Shelf Project” Austin Tax Study Group, May 22, 2012.

“Raising a Trillion” Lakeway Men’s Breakfast Club, June 6, 2012.

“Real Originalism” (Debate over Health Care Mandate), presented at Loyola-New Orleans Law School, February 25, 2011, presented to American Constitution Society, Austin branch, March 8, 2011.

“Recent Developments in Tax” (as counterpoint to Ira Shepard), Austin Tax Study Group, December 6, 2010

“Fifty Ways to Raise a Trillion,” Austin Tax Study Group, December 6, 2010, SMU Tax Colloquium Series, Dallas, Texas, January 21, 2011.

“Fixing Capital Gain at its Core,” Law and Society Meeting, Chicago, Illinois, May 30, 2010

“Origin of Capital Gains,” University of Minnesota Law School Workshop, Minneapolis, April 23, 2010.

“The Effective Tax Ratio,” SMU Law School Tax Policy Colloquium Series, Dallas, February 19, 2010.

“Righteous Anger at the Wicked States” Lone Star Progressives, Grandby, Texas, January 14, 2010

“The Impending Tax Crisis,” 57th Annual Taxation Conference, University of Texas Continuing Legal Education, December 10, 2009.

“Impost Begat Convention: The New York Debates on Ratification of the Constitution.” Presentation to the Society of Historians of the Early American Republic, Springfield, Illinois, July 17, 2009.

Taxing Apples under the Consumption Tax, Law and Society Meeting, Denver, Colorado May 30, 2009.

The Effective Tax Ratio and the Undertaxation of Intangibles, Law and Society Meeting, Denver, Colorado May 29, 2009.

Current Developments in Tax, Austin Tax Study Group, Nov. 19, 2008.

“Effective Tax Rate Ratio,” presented to Northwestern Law School Graduate Tax Colloquium, Nov. 27, 2008; to University of Texas Law School Law, Law, Business and Economics Workshop, Sept. 8, 2008.

“Superiority of Back End Consumption Tax,” University of Texas Drawing Board, March 1,

“Replace the Corporate Tax with a Market Capitalization Tax,” University of Texas Law,

Business and Economics Workshop, May 2, 2008.

“The Shelf Project” presented to Northwestern Law School Graduate Tax Colloquium, November 21, 2007 and to University of Texas Drawing Board, November 20, 2007.

“Blackstone Carried Interests: A Glitch too Deep to Fix?”, presented to symposium on hedge funds, Yale Club, New York City, July 31, 2007.

“Righteous Anger at the Wicked States: The Meaning of the Founders’ Constitution” to Michigan Law School Faculty, March 8, 2007, to IRS National Office, March 15, 2007, to joint meeting of the Columbia Law School American Constitution Society and of Federalist Society (March 20, 2006), Harvard Law School American Constitution Society (March 15, 2006), University of Pennsylvania Law School American Constitution Society (March 16, 2006), “UT Explore” (March 4, 2006), to Northwestern Faculty Workshop (March 2, 2006).

Harvard Presentation of Righteous Anger at the Wicked States broadcast on C-Span2 Book TV, April 8, 2006 and rebroadcast.

“The Burning of R&D Deductions,” presented to University of Michigan Law School Tax Series, Ann Arbor, March 7, 2007.

“General Anti-Abuse Doctrines,” (February 21, 2007) presented to IRS National Office Counsel, Brown Bag Series, Washington, D.C.

Shelter War II: Update on Tax Shelter Developments to IRS (July 26, 2006), New Orleans.

“The Four Good Dissenters in *Pollock*” presented to the Supreme Court Historical Society (May 18, 2006) in U.S. Supreme Court Chambers and introduced by Mr. Justice Samuel Alito.

“Tales from the KPMG Skunk Works” presented to Northwestern Advanced Topics in Taxation Colloquium (March 2, 2006).

Organized Symposium on Righteous Anger at the Wicked States, University of Texas Law School, October 27-28, 2005. Speakers included political scientists, Walter Dean Burnham (Texas), Sotiris Barber, (Notre Dame), and Keith Whittington (Princeton), historians Jack Rakove, (Stanford), Jack Greene (Johns Hopkins), John Kaminski, (Wisconsin), Robin Einhorn, (Berkeley), and law professors, Lynn Baker, Ernest Young and Mitch Berman (all University of Texas School of Law).

Organized panel on “Was the Constitution Good or Necessary?” for Society of Historians of the Early American Republic, Independence Mall, Philadelphia, July 23, 2005 with nationalists, Calvin Johnson, “Righteous Anger at the Wicked States,” and Richard Leffler, “A Supreme Legislature” and skeptics, John Kaminski, “Empowering the Confederation: A Counter-factual Model” and Pauline Maier, “The View from Mt. Vernon.”

“Righteous Anger at the Wicked States” to joint meeting of the Yale Law School chapters of American Constitution Society and of Federalist Society, New Haven, Connecticut, April 21, 2005. Debate reported at ([Yale ACS and Federalist Society Debate](#)).

“Righteous Anger at the Wicked States” to joint meeting of the NYU Law School chapters of

American Constitution Society and of Federalist Society, New York, April 22, 2005.

“Righteous Anger at the Wicked States: The Meaning of the Founders’ Constitution,” Lakeway Breakfast Club, January 12, 2005.

“Incredible Shrinking Domain of Corporate Stock” presented at Tulane Tax Institute, New Orleans, Louisiana, October 20, 2004 and at SMU Corporate Counsel Symposium, Dallas, Texas, October 30, 2004.

Interviewed on CNN-Financial channel on October 7, 2004, talking about Corporate Tax Shelter.

Organized and moderated panel on Digital Searches and Constitutional History (John Kaminski, Wisconsin; Eric Slater, U. Chicago; Saul Cornell, Ohio State) and presented paper, “Really Cool Stuff: Digital Searches into the Constitutional Period” Society for Historians of the Early American Republic, Brown University, Providence, Rhode Island, July 25, 2004. [ <http://law.utexas.edu/faculty/calvinjohnson/Digitalsearch.pdf> ].

“Accrue the Intrinsic Bargain on Compensatory Options Annually as it Arises and Fluctuates,” presented to Financial Accounting Standard Board, Roundtable on Share-Based Payments, Norwalk, Connecticut, June 29, 2004, <http://law.utexas.edu/faculty/calvinjohnson/FASBJune292004.pdf> .

“Managing the Discount Rate by Avoiding Stock and Stock-Option Compensation” presented at the University of Connecticut Law School, Hartford, Symposium on Corporate Governance at the Crossroads, April 23, 2004.

“Meaning of the 2003 Tax Act,” presented at The University of Texas McCombs School of Business Tax Doctoral Colloquium, January 23, 2004 and Austin Tax Study Group, February 17, 2004.

“Why Does the Public Always Lose?” presentation to summing-up panel, LBJ School Symposium on Corporate Governance and Control Fraud, The University of Texas at Austin, April 29, 2003.

“Righteous Anger at the Wicked States: The Meaning of the Founders’ Constitution” presented at The University of Texas at Austin LAMP, April 15, 2003.

“Homage to Clio: Continuity from Articles of Confederation to Constitution,” Constitutional Colloquium, presented at The University of Texas School of Law, April 1, 2003.

“The Federal Power to Provide for the General Welfare,” presented at Richard Markovits’ Legal Scholarship Seminar, at The University of Texas School of Law, March 18, 2003.

“The Bush Corporate Integration Proposals,” presented at the Austin Tax Study Group, January 21, 2003.

“The Modest and Mercantile Commerce Clause,” Constitutional Colloquium, presented at The University of Texas School of Law, October 18, 2001.

“What is Very Wrong with Stock Compensation?,” presented at the Wall Street Tax Association, New York, New York, March 15, 2001.

“Reining in the Rogue States: The Angry Anti-State Nationalism of the 1787 Constitution,” presented at Vanderbilt Law School, Nashville, Tennessee, March 14, 2000.

“Stock Compensation: The Most Expensive Way to Pay Future Cash.” Vanderbilt Law School Faculty Colloquium, Nashville, Tennessee, March 15, 2000 and Houston Tax Roundtable, Houston, Texas, November 11, 1999.

“The Turning of Madison,” at The University of Texas School of Law Constitutional Colloquium Luncheon, Austin, Texas, September 14, 1999.

“Apportionment of Direct Tax: The Foul-up in the Core of the Constitution,” at the American Political Science Association, Atlanta, Georgia, September 4, 1999.

Commentator on Kenneth Wertz’s “A Book Income Tax” reviewed on a panel at National Tax Association, 91<sup>st</sup> Annual Conference, Austin, Texas, November 10, 1998.

Resolved: “Expenses of Resisting a Cash Tender Offer for Stock are Nondeductible Dividends,” debate with Michael Shler of Cravath, Swaine & Moore, New York; before IRS Mergers and Acquisitions specialists, San Antonio, Texas, June 10, 1998.

Resolved: “Stock Compensation is Usually Silly,” debate with Valerie Wenger before the Austin Tax Study Group, May 19, 1998.

“IRS Restructuring Act,” presentation with Michael Cook before the Austin Tax Study Group, March 17, 1998.

Resolved: “Expenses of Resisting a Cash Tender Offer for Stock are Nondeductible Dividends,” debate with Henry Miller, Tennessee, before the Sales, Exchange and Basis Committee, of the American Bar Association (“ABA”) Tax Section, San Antonio, Texas, January 25, 1998.

“The Original Meaning of Direct Tax,” debate before the Teaching Tax Committee, ABA Tax Section, San Antonio, Texas, January 24, 1998.

“Whither 469?” presentation to the ABA Tax Section, Tax Structure and Simplification Committee in Scottsdale, Arizona, January 11, 1997.

“Transferring ‘Substantially All’ into a Corporate Marriage” presentation to the Austin Tax Study Group, January 21, 1997.

“Warren Buffett and Accounting in Favor of Investors,” presentation before the Cardozo Law School Conference on the Essays of Warren Buffett: Lessons for Corporate Lawyers, New York, New York, October 28, 1996.

“Taxing the Income from Writing Options Now That Deferral is No Longer Justified,” presentation to the ABA Tax Section, Tax Structure and Simplification Committee in Orlando, Florida, August 2, 1996.

“What was the Matter with Tax Shelters?,” a debate presented to the ABA Tax Section Sales, Exchanges and Basis Committee in New Orleans, Louisiana, on January 20, 1996.

“What’s a Tax Shelter?,” speech to the annual banquet of the Graduate Tax Society at Capital University, Columbus, Ohio, May 16, 1995.

“Recent Developments in Federal Income Taxation,” presented to the Austin Tax Study Group, October 18, 1994.

“Glorious, Glorious Spreadsheets,” presented to the Austin Tax Study Group, September 20, 1994

“Is *Newark Morning Ledger* Consistent with *INDOPCO?*: A Debate,” presented to the ABA Tax Section, Sales, Exchanges and Basis Committee, at Washington, D.C., May 14, 1994.

“Tax Accounting for Not-Yet-Earned Income,” delivered to the American Bar Association (“ABA”) Tax Section, Teaching Tax Committee, Houston, Texas, on January 21, 1994, summarized in McMahon, *Professors Discuss Tax Accounting Matters at ABA Meeting*, 62 TAX NOTES 677, February 7, 1994.

“Does Law Reflect Income after *INDOCPO* and *Newark Morning Ledger?*” presented at the 41st Annual Taxation Conference at The University of Texas at Austin, October 28, 1993.

“The Omnibus Budget Reconciliation Act of 1993,” a presentation with other members of the tax faculty to the Austin Tax Study Group, October 21, 1993.

“Should Savings be Taxed?,” a presentation before the American Bar Association (ABA) Tax Section, Committee on Tax Structure and Simplification, New York, New York, August 8, 1993.

“When is Nonrecourse Liability a Sham? A Debate,” presented before the ABA, Tax Section, Committee on Sales, Exchanges and Basis, San Francisco, California, August 9, 1992 and San Antonio, Texas, February 15, 1992.

“Limitations on Tax Deduction of Capital Losses are Necessary,” a presentation before the ABA Committee on Sales, Exchanges and Basis, San Francisco, California, August 9, 1992.

“Menu of Capital Gains Issues,” presented before the ABA Tax Section, Tax Structure and Simplification Committee, San Francisco, California, August 8, 1992.

“Legitimacy of Anti-Shelter Over-rides,” a panel discussing Passive Loss Limitations, at the Association of American Law Schools, San Francisco, California, January 6, 1990.

“Regulation Simplification,” presented at the Austin Tax Study Group, Austin, Texas, October 21, 1989.

“The Interest Deduction,” presented at the ABA Tax Section, Committee on Teaching Tax, Washington, D.C., May 13, 1988.

“That’s a Lot of GAAP: The Influence of ‘Generally Accepted Accounting Principles’ on Tax,” presented at the Austin Tax Study Group, September 15, 1987.

“General Overview of the 1986 Tax Reform Act,” presented at the conference on The Tax Reform Act for Non-Specialists, at The University of Texas at Austin, April 3, 1987.

“Financial Impact of the 1986 Act of Real Estate Investments – A View from the Spreadsheets,” presented at the Federal Taxation of Real Estate Transactions Conference, The University of Texas at Austin, April 23, 1987.

“Workshop on Evaluating Tax Shelters” with Cook, Barton, Morris & Jones, presented at the 31st Annual Taxation Conference, at The University of Texas at Austin, November 16, 1983.