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

For reviews, news and discussion see

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

Articles

*The Supreme Court's Statutory Interpretation in *Gitlitz*: A Failed Approach to Interpretation and a Bad Decision* (November 1, 2020). ABA TAX SECTION, TAX TIMES, November 1 2020, <https://ssrn.com/abstract=3779505>

Tax Gap, TAX NOTES 1479 (June 3, 2019); see also, *Deferred Valuation and the Estate Tax Gap* (July 1, 2019 Letter to the Editor)

Determine Dividends by Shareholder Gains, Not Corporate E&P, 163 TAX NOTES 871 (May 6, 2019), <http://ssrn.com/abstract=3411310>

Madison's Denial: Review of Noah Feldman, "The Three Lives of James Madison, 193 CONSTITUTIONAL COMMENTARY 193 (Feb. 2019), <http://ssrn.com/abstract=3338533>

No Orchard, No Capital Gain, 71 TAX LAWYER 501 (Jan 13, 2019), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3411269

*Don't Mess With Texas: Uniform Internet Sales Tax After *Wayfair**, 90 STATE TAX NOTES 625 (Nov. 25, 2018), <https://ssrn.com/abstract=3304810>; see also, *Texas should repeal the \$500,000 internet sales tax exemption* (Opinion, March 29, 2019), <https://www.statesman.com/opinion/20190329/commentary-texas-should-repeal-500000-internet-sales-tax-exemption>. A version of this op-ed appeared in the [Houston Chronicle](#), [Waco Tribune Herald](#), and [Corpus Christi Caller Times](#).

Altera's Bonkers Accounting: Stock Compensation is Really a Cost, 161 TAX NOTES 339 (Oct. 15, 2018), <http://ssrn.com/abstract=3299522>

Choice of Entity by Reason of Tax Rates, 158 TAX NOTES 1641 (March 19, 2018), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3167599

"Impost Begat Convention:" Albany and New York Confront the Ratification of the Constitution, 8 ALBANY L. REV. 1489 (2017), <http://ssrn.com/abstract=3088179>.

Wasting \$2.4 Trillion on No-Growth Capital, 158 TAX NOTES 909 (Feb 12, 2018), <http://ssrn.com/abstract=3159729>

Winter is Coming: Tax Policy in the Coming Bitter Hard Times: A Review of Robert J. Gordon, The Rise and Fall of American Growth (Princeton University Press 2016), 157 TAX NOTES 851 (Nov. 6, 2017), <http://ssrn.com/abstract=3083828>.

A Conceptual Framework for Capital Gain, 20 FLORIDA TAX REVIEW 664 (October 4, 2017), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3048127.

Step-Up at Death but Not for Income, 156 TAX NOTES 1023 (Aug. 21, 2017), <http://ssrn.com/abstract=3068799>

Gain Realized in Life Should Not Disappear by a Sep-Up in Basis, 156 TAX NOTES 1305 (Sept. 4, 2017), <http://ssrn.com/abstract=3068814>

Cut Negative Tax Out of Step-Up in Basis, 156 TAX NOTES 741 (Aug. 7, 2017), <http://ssrn.com/abstract=3083830>

Transition to Territoriality Without Plunder: A \$725 Billion Tax, 154 TAX NOTES 1135 (May 4, 2017), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2965256

Why our Constitution Should Not be Adopted? Review of Michael Klarman, The Framers' Coup, Balkinization Blog (April 16, 2017), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3066505.

FASB and Guarantees of Variable Interest Entities, 154 TAX NOTES 479 (January 23, 2017 at 479), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2927554

Nyet, Nein, Non, No to Capital Gain on Depreciable Property, 152 TAX NOTES 1455 (Sept. 5, 2016), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2862817

End Tax Subsidy from Abandonments and Swaps, 152 TAX NOTES 1171 (Aug. 22, 2016), <https://ssrn.com/abstract=2862839>

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), <http://ssrn.com/abstract=2611359>

Better Twice Measured: Partnership Basis from Partnership Debt, 147 TAX NOTES 79 (April 13, 2015), http://papers.ssrn.com/sol3/papers.cfm?abstract_id=2611361

What is Very Wrong in Obama's Business Tax Reform, 146 TAX NOTES 627 (Feb. 2, 2015), 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

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://www.utexas.edu/law/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://www.utexas.edu/law/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), <http://ssrn.com/abstract=2268018>

Measure Tax Expenditures by Internal Rate of Return, 139 Tax Notes 273 (April 15, 2013), http://papers.ssrn.com/sol3/papers.cfm?abstract_id=2253291

Profits From Tax Evasion Under the Midco Transaction, 138 TAX NOTES 1485 (March 15, 2013), http://papers.ssrn.com/sol3/papers.cfm?abstract_id=2255031

Settle Withholding by the Dollars, Not Control, 136 TAX NOTES 949 (Aug. 20, 2012), http://papers.ssrn.com/sol3/papers.cfm?abstract_id=2135057

The Tax Explanation for the Romney Leveraged Buyouts, 136 TAX NOTES 579-587 (July 30, 2012), http://papers.ssrn.com/sol3/papers.cfm?abstract_id=2125210

Extend the Amortization Life for Acquired Intangibles from 15 to 75 Years, 135 TAX NOTES 1054 (May 21, 2012), <http://ssrn.com/abstract=2429268>

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

Recognizing Built-In Gain on Contribution to a Partnership, 133 TAX NOTES 905 (Nov. 14, 2011), http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1961144

Payout by Charities Over 50 Years, 132 TAX NOTES 1161 (September 12, 2011), http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1930385

Passing Estate Tax Values Through the Eye of a Needle, 132 TAX NOTES 939 (Aug. 29, 2011), (with Joseph M. Dodge), http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1924339

Taxing GE and Other Masters of the Universe, 132 TAX NOTES 175 (July 11, 2011), <http://ssrn.com/abstract=2078163>

Corporate Meltdowns Caused by Compensatory Stock Options, 131 TAX NOTES 737 (May 16, 2011), <http://ssrn.com/abstract=2070108>

Corporate Meltdowns and the Deduction of Credit Risk Interest, 131 TAX NOTES 513 (May 2, 2011), <http://ssrn.com/abstract=2070104>

Fixing the Double Deduction From Carried Interest, 131 TAX NOTES 201 (April 11, 2011), <http://ssrn.com/abstract=1816725>; *Johnson Withdraws Shelf Project Recommendation*, Letter to Editor, 132 TAX NOTES 1441 (Sept. 26, 2011) http://www.utexas.edu/law/faculty/calvinjohnson/withdraw_carried_interests.pdf

End Tax Floats by Taxing Receivables or Deferring Payables, 129 TAX NOTES 1243 (Dec. 13, 2010) (with Gregg D. Polsky), <http://ssrn.com/abstract=2070109>

Small Business Inventory Expensing, 129 TAX NOTES 591 (Nov. 1, 2010), <http://ssrn.com/abstract=1710153>

No Deduction for Tax Planning and Controversy Costs, 129 TAX NOTES 333 (Oct 18, 2010), http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1710157

Don't Let Capital Accounts Go Negative, 129 TAX NOTES 127 (Oct. 4, 2010), http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1710160

Repeal Roth Retirement Plans To Increase National Savings, 128 TAX NOTES 773 (August 16, 2010), http://papers.ssrn.com/sol3/papers.cfm?abstract_id=2070120

Ain't Charity: Disallowing Deductions for Kept Resources, 128 TAX NOTES 545, (Aug. 2, 2010), http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1661345

UBIT to the Defense! ESOPs and Government Entities, 128 TAX NOTES 317 (JULY 19, 2010) (with Ellen P. Aprill) <http://ssrn.com/abstract=1658080>

How to Raise \$1 Trillion Without a VAT or a Rate Hike, 128 TAX NOTES 101 (July 5, 2010), <http://ssrn.com/abstract=1636915>

Corporate Distributions from Earnings and Beyond, 127 TAX NOTES 813 (May 17, 2010) <http://ssrn.com/abstract=2076034>

Why Do Venture Capital Funds Burn Research and Development Deductions, 29 VIRGINIA TAX REVIEW 29 (2009), <http://www.utexas.edu/law/faculty/calvinjohnson/va-tax-review-29.pdf>.

Common Trust Funds: The Living Fossil of Passthroughs, 128 TAX NOTES 103 (May 5, 2010), http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1586565

'Contributions to Capital' from Nonowners, 126 TAX NOTES 1127 (March 1, 2010) http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1563464

Gains and Losses on Business Depreciable Property, 126 TAX NOTES 787 (Feb. 8, 2010), http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1557823

Two Years of the Shelf Project, 126 TAX NOTES 513 (Jan. 25, 2010), http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1546651

Cleaning Compensation for Services Out of Capital Gain, 126 TAX NOTES 233 (Jan. 11, 2010), http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1540041

Fixing Capital Gains at its Core, 125 TAX NOTES 1221 (Dec. 14, 2009)
<http://www.utexas.edu/law/faculty/calvinjohnson/fixing-capital-gains-at-its-core.pdf>

Timber! 125 TAX NOTES 801 (Nov. 16, 2009),
http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1512005

Accurate and Honest Tax Accounting for Oil and Gas, 125 TAX NOTES 575 (Nov. 2, 2009).
http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1503574

Taxing the Publicly Traded Stock in a Corporate Acquisition, 124 TAX NOTES 1363 (Sept. 28, 2009), http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1517455

Omnibus Capitalization Proposals, 124 TAX NOTES 1121 (Sept 14, 2009),
http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1517450

Simplification by Repeal of the One-Year Rule for Prepayments, 124 TAX NOTES 809 (August 24, 2009), http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1517456

Capitalize Costs of Software Development, 124 TAX NOTES 603 (August 10, 2009)
http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1516809

Taxing the Consumption of Capital Gains, 28 VIRGINIA TAX REV. 477 (2009)
http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1496573

States' Rights? What States' Rights?: Implying Limitations on the Federal Government from the Overall Design, 57 BUFFALO L. REV. 225 (2009)
<http://www.utexas.edu/law/faculty/calvinjohnson/states-rights-what-states-rights.pdf>.

An Employer-level Proxy Tax on Fringe Benefits, 123 TAX NOTES 483 (April 27, 2009),
http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1516835

Percentage Depletion of Imaginary Costs, 122 TAX NOTES 1619 (March 30, 2009),
http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1517453

Codification of General Disallowance of Artificial Losses, 122 TAX NOTES 1389 (March 16, 2009) (with Lawrence Zelenak) <http://ssrn.com/abstract=2070135>

Taxation of the Really Big House, 122 TAX NOTES 915 (February 16, 2009),
http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1520767; see also Letters to Editor, *Tax Only What Happened*, 122 TAX NOTES 1271 (March 4, 2009)
<http://www.utexas.edu/law/faculty/calvinjohnson/tax-only-what-happened.pdf>

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

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

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. See also Letters to Editor, *Plump Target*, 121 TAX NOTES 1459 (December 22, 2008), <http://www.utexas.edu/law/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

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

Wash Sales with Replacement by Related Parties, 120 TAX NOTES 1325 (September 29, 2008), http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1520731

Amended Returns — Imposing a Duty to Correct Material Mistakes, 120 TAX NOTES 979 (September 8, 2008), (Keith Fogg & Calvin Johnson, coauthors), http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1520729

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://www.utexas.edu/law/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://www.utexas.edu/law/faculty/calvinjohnson/really-cool-stuff.pdf>

Sale of Goodwill and Other Intangibles as Ordinary Income, 118 TAX NOTES 321 (January 14, 2008), <http://ssrn.com/abstract=1520063>

Repeal Tax Exemption for Municipal Bonds, 117 TAX NOTES 1259 (December 24, 2007), <http://ssrn.com/abstract=1520000>

Replace the Corporate Tax with a Market Capitalization Tax, 117 TAX NOTES 1082 (December 10, 2007), <http://ssrn.com/abstract=1517925>

The Shelf Project: Revenue Raising Projects that Defend the Tax Base, 117 TAX NOTES 1077 (DECEMBER 10, 2007), <http://www.utexas.edu/law/faculty/calvinjohnson/the-shelf-project.pdf>. Reprinted in August 27, 2012, Tax Notes as best or most interesting Tax Notes article of 2007 in honor of Tax Notes' 40th Anniversary.

The Four Good Dissenters in Pollock, 32 JOURNAL OF SUPREME COURT HISTORY 162 (2007), http://www.utexas.edu/law/faculty/calvinjohnson/4_Good_Dissenters_in_Pollock.pdf .

Was it Lost? Personal Deductions under Tax Reform, 59 SOUTHERN METHODIST UNIVERSITY L. REV. 689 (2006), <http://www.utexas.edu/law/faculty/calvinjohnson/WasItLost.pdf>.

The Dubious Enumerated Power Doctrine, 22 CONSTITUTIONAL COMMENTARY 25 (2005) , <http://www.utexas.edu/law/faculty/calvinjohnson/DubiousEnum.pdf> .

Tales from the KPMG's Skunk Works: The Basis-Shift or Defective-Redemption Shelter, 108 TAX NOTES 431 (July 25, 2005), <http://www.utexas.edu/law/faculty/calvinjohnson/Tales-from-KPMGs-skunk-works.pdf>; See also Letters to Editor, Response: *Johnson doesn't FLIP for Davis Argument*, 137 TAX NOTES 109 (October 3, 2005), <http://www.utexas.edu/law/faculty/calvinjohnson/DavisLtrtoEd10305.pdf>. See also Letters to Editor, *KPMG FLIP: What's the Theory? Progressive? Yes. But Steeply Progressive?* 109 TAX NOTES 395 (October 17, 2005), <http://www.utexas.edu/law/faculty/calvinjohnson/KPMG-flip-whats-the-theory.pdf> .

The Disloyalty of Stock and Stock Option Compensation, 11 CONN. INSUR. L. J. 1333 (2005), <http://www.utexas.edu/law/faculty/calvinjohnson/F04DisloyaltyofStock.pdf>

Can the IRS be Well-Liked? Review of Charles Rossetti's Many Unhappy Returns, 108 TAX NOTES 145 (July 4, 2005), <http://www.utexas.edu/law/faculty/calvinjohnson/RossettiReview.pdf> .

Fixing the Constitutional Absurdity of the Apportionment of Direct Tax, 21 CONSTITUTIONAL COMMENTARY 295 (2004), <http://www.utexas.edu/law/faculty/calvinjohnson/ConstitutionalAbsurdity.pdf> .

The Panda's Thumb: The Modest and Mercantilist Original Meaning of the Commerce Clause, 13 WILLIAM AND MARY BILL OF RIGHTS JOURNAL 1 (2004), <http://www.utexas.edu/law/faculty/calvinjohnson/PandasThumb.pdf> .

Homage to Clio: the Historical Continuity from the Articles of Confederation into the Constitution, 20 CONSTITUTIONAL COMMENTARY 463 (2004), <http://www.utexas.edu/law/faculty/calvinjohnson/HomageToClio.pdf> .

The Incredible Shrinking Domain of Corporate Stock, 103 TAX NOTES 871 (2004), <http://www.utexas.edu/law/faculty/calvinjohnson/ShrinkingDomain.pdf>.

Stock and Stock-Option Compensation: A Bad Idea, 51 CANADIAN TAX J. 1259 (2003), <http://www.utexas.edu/law/faculty/calvinjohnson/Stock-option-compensation-a-bad-idea.pdf>

Depreciation Policy During Carnival: The New 50 Percent Bonus Depreciation, 100 TAX NOTES 712 (2003), <http://www.utexas.edu/law/faculty/calvinjohnson/DepreciatonduringCarnival.pdf> .

Destroying Tax Base: The Proposed INDOPCO Capitalization Regulations, 99 TAX NOTES 1381 (2003), <http://www.utexas.edu/law/faculty/calvinjohnson/DestroyingTaxBase99TN1381.pdf>.

A Thermometer for the Tax System: The Overall Health of the Tax System as Measured by Implicit Tax, 56 SOUTHERN METHODIST UNIVERSITY L. REV. 13 (2003), <http://www.utexas.edu/law/faculty/calvinjohnson/thermometer.pdf> .

The Bush 35 Percent Flat Tax on Distributions from Public Corporations, 98 TAX NOTES 1881 (2003), <http://www.utexas.edu/law/faculty/calvinjohnson/bushflattax.pdf> .

Purging out "Pollock": The Constitutionality of Federal Wealth or Sales Taxes, 97 TAX NOTES 1723 (2002), <http://www.utexas.edu/law/faculty/calvinjohnson/PurgingOutPollock.pdf> .

But, Cf. Was George Washington Constitutional?, 18 CONSTITUTIONAL COMMENTARY 295 (2002), <http://www.utexas.edu/law/faculty/calvinjohnson/was-george-washington-constitutional-05-01-2002-const-commentary.pdf> .

H.R...., The Anti-Skunk Works Corporate Tax Shelter Act of 1999, 84 TAX NOTES 443 (July 19, 1999), <http://www.utexas.edu/law/faculty/calvinjohnson/SkunkWorks4.pdf> .

Stock Compensation: The Most Expensive Way to Pay Future Cash, 52 SOUTHERN METHODIST UNIVERSITY LAW REVIEW 423 (1999) slightly revised version in 85 TAX NOTES 351 (October 18, 1999), <http://www.utexas.edu/law/faculty/calvinjohnson/stockcom.pdf> .

GAAP Tax, 83 TAX NOTES 425 (April 19, 1999), <http://www.utexas.edu/law/faculty/calvinjohnson/GAAPTax.pdf> .

Apportionment of Direct Taxes: The Foul-up in the Core of the Constitution, 7 WILLIAM & MARY BILL OF RIGHTS JOURNAL 1 (1998), <http://www.utexas.edu/law/faculty/calvinjohnson/directtax.pdf> .

Corporate Tax Shelters, 1997 and 1998, 80 TAX NOTES 1603 (1998) , <http://www.utexas.edu/law/faculty/calvinjohnson/corptax.htm> .

The Constitutional Meaning of "Apportionment of Direct Taxes," 80 TAX NOTES 591 (August 3, 1998) reprinted 15 STATE TAX NOTES 591 (August 17, 1998) <http://www.utexas.edu/law/faculty/calvinjohnson/80tn591.htm> .

Simplification: Replace the Personal Exemptions Phaseout Bubble, 77 TAX NOTES 1403 (December 22, 1997) (part I), <http://www.utexas.edu/law/faculty/calvinjohnson/77tn1403.htm> ; *Simplification: Replacement of the Section 68 Limitation on Itemized Deductions*, 78 TAX NOTES 89 (January 5, 1998) (part II), <http://www.utexas.edu/law/faculty/calvinjohnson/78tn89.htm> .

Accounting in Favor of Investors, 19 CARDOZO LAW REVIEW 637 (1997), <http://www.utexas.edu/law/faculty/calvinjohnson/Bufft4a.pdf> .

A Full and Faithful Marriage: The Substantially-All-The-Properties Requirement in a Corporate Reorganization, 50 TAX LAWYER 319 (1997), <http://www.utexas.edu/law/faculty/calvinjohnson/FLL.pdf> .

The Illegitimate 'Earned' Requirement in Tax and Nontax Accounting, 50 TAX LAW REVIEW 373 (1995) *see also Response: The Roads Not Traveled: Professor Johnson Responds*, 74 TAX NOTES 367 (1997), <http://www.utexas.edu/law/faculty/calvinjohnson/74tn367.htm> .

Taxing the Income from Writing Options, 73 TAX NOTES 203 (1996), <http://www.utexas.edu/law/faculty/calvinjohnson/73tn203.htm>.

Inefficiency Does Not Drive Out Inequity: Market Equilibrium & Tax Shelters, 71 TAX NOTES 377 (1996), <http://www.utexas.edu/law/faculty/calvinjohnson/71tn377.htm>.

What's a Tax Shelter?, 68 TAX NOTES 879 (1995), <http://www.utexas.edu/law/faculty/calvinjohnson/68tn879.htm>.

Three Errors in the "Neutral Cost Recovery System" Proposal, 67 TAX NOTES 1229 (1995), <http://www.utexas.edu/law/faculty/calvinjohnson/67tn1229.htm>.

Stealing the Company With Free Stock Options: The Furor Over Accounting Standards, 65 TAX NOTES 351 (October 17, 1994) (part I), <http://www.utexas.edu/law/faculty/calvinjohnson/Stealing-the-company-partI.pdf>; *Stealing the Company With Free Stock Options: The Furor Over Accounting Standards*, 65 TAX NOTES 479 (October 24, 1994) (part II), <http://www.utexas.edu/law/faculty/calvinjohnson/Stealing-the-company-partII.pdf> ; *see also* Letters to Editor, *Accounting Standards for Stock Options: FASB Responds* (November 28, 1994), <http://www.utexas.edu/law/faculty/calvinjohnson/Accounting-standards-for-stock-options-FASB-responds.pdf> ; and *Johnson replies to FASB*, 65 TAX NOTES 1149 (November 28, 1994), <http://www.utexas.edu/law/faculty/calvinjohnson/65tn1149.htm> .

Capitalization After the Government's Big Win in INDOPCO, 63 TAX NOTES 1323 (1994), http://www.utexas.edu/law/faculty/calvinjohnson/capitalization_after_the_governments_big_win.pdf

Deferring Tax Losses with an Expanded §1211, 48 TAX LAW REVIEW 719 (1993), [<http://www.utexas.edu/law/faculty/calvinjohnson/deferring-tax-losses.pdf>].

The Mass Asset Rule Reflects Income and Amortization Does Not, 56 TAX NOTES 629 (1992) <http://www.utexas.edu/law/faculty/calvinjohnson/56tn629.htm> ; see also Letters to the Editor, *Component Depreciation for the Purchase of Businesses*, 58 TAX NOTES 983 (February 15, 1993) <http://www.utexas.edu/law/faculty/calvinjohnson/58tn983.htm> ; *Once More Into the Mass Assets*, 58 TAX NOTES 369 (January 18, 1993), <http://www.utexas.edu/law/faculty/calvinjohnson/58tn369.htm> ; *The Mass Asset Rule is Not the Blob that Ate Los Angeles*, 57 TAX NOTES 1602 (December 14, 1992) <http://www.utexas.edu/law/faculty/calvinjohnson/57tn1603.htm> ; *Sowing Mass Confusion*, 57 TAX NOTES 1087 (November 16, 1992), <http://www.utexas.edu/law/faculty/calvinjohnson/57tn1087.htm> ; *The Argument over NEWARK MORNING LEDGER*, 57 TAX NOTES 1090 (November 16, 1992), <http://www.utexas.edu/law/faculty/calvinjohnson/57tn1090.htm> ; *Newark Morning Ledger: Intangibles are Not Amortizable*, 57 TAX NOTES 691 (November 2, 1992), <http://www.utexas.edu/law/faculty/calvinjohnson/57tn691.htm> ; *Current and Quotable: Effective Tax Rates on High-Goodwill Takeovers Under House and Senate Bills*, 60 TAX NOTES 531 (July 26, 1993), <http://www.utexas.edu/law/faculty/calvinjohnson/60tn531.htm> ; *Current and Quotable: Amortization of Intangibles: Impact of Seller Tax*, 59 TAX NOTES 285 (April 12, 1993) <http://www.utexas.edu/law/faculty/calvinjohnson/59tn285.htm> .

The Private Advantage of Money-Losing Investments under Cut-Rate Capital Gains, 55 TAX NOTES 1125 (1992), reprinted in part in THE CAPITAL GAINS CONTROVERSY D-12, J. Andrew Hoerner, ed. (2d ed. 1992) <http://www.utexas.edu/law/faculty/calvinjohnson/55tn1125.htm> .

The Consumption of Capital Gain, 55 TAX NOTES 957 (1992), reprinted in part in THE CAPITAL GAINS CONTROVERSY D-13, J. Andrew Hoerner, ed. (2d ed. 1992), <http://www.utexas.edu/law/faculty/calvinjohnson/55tn957.htm> .

The Undertaxation of Holding Gains, 55 TAX NOTES 807 (1992), reprinted in part in THE CAPITAL GAINS CONTROVERSY D-14, J. Andrew Hoerner, ed. (2d ed. 1992), <http://www.utexas.edu/law/faculty/calvinjohnson/undertaxation-of-holding-gains.pdf> .

Play Money Basis: When is Nonrecourse Liability a Valid Cost?, 11 VIRGINIA TAX REV. 631 (1992), <http://www.utexas.edu/law/faculty/calvinjohnson/play-money-basis-when-is-nonrecourse-liability-a-valid-cost-1992.pdf> .

The Liability Was Also Not a Cost to Bayles, 11 VIRGINIA TAX REV. 651 (1992). <http://www.utexas.edu/law/faculty/calvinjohnson/liability-was-also-not-a-cost-to-bayles-1992.pdf>

The Legitimacy of Basis from a Corporation's Own Stock, 9 AMERICAN J. OF TAX POLICY 155 (1991) <http://www.utexas.edu/law/faculty/calvinjohnson/legit-basis.pdf> ; see also Letters to the Editor, *Issuer's FMV Basis is not Carried Over*, 56 TAX NOTES 115 (July 6, 1992) <http://www.utexas.edu/law/faculty/calvinjohnson/fmvbasis.htm>.

Expenses Paid With Stock Are Legitimate Deductions, 55 TAX NOTES 1281 (June 1, 1992) <http://www.utexas.edu/law/faculty/calvinjohnson/stockexp.htm>.

Error! Bookmark not defined.

The Expenditures Incurred by the Target Corporation in an Acquisitive Reorganization is Dividends to the Shareholders: (Past, Don't Tell the Supreme Court), 53 TAX NOTES

463 (1991), http://www.utexas.edu/law/faculty/calvinjohnson/expenditures_incurred_by_the_target_corp_10_28_91.pdf.

Zarin and the Tax Benefit Rule: Tax Models for Gambling Losses and the Forgiveness of Gambling Debts, 45 TAX LAW REVIEW 697 (1990)
<http://www.utexas.edu/law/faculty/calvinjohnson/zarin-and-tax-benefit.pdf>.

Soft Money Investing under the Income Tax, 1989, ILLINOIS L. REV. 1019 (1990).
<http://www.utexas.edu/law/faculty/calvinjohnson/soft-money-investing.pdf>.

Seventeen Culls from Capital Gains, 48 TAX NOTES 1285 (1990), *reprinted in* TAX POLICY: READINGS & MATERIALS (Philip Oliver and Fred W. Peel, Jr., eds., 1996); THE CAPITAL GAINS CONTROVERSY: A TAX ANALYSTS READER (J. Hoerner, ed., 1992)
http://www.utexas.edu/law/faculty/calvinjohnson/17_Culls_from_Capital_Gains.pdf.

The Front End of the Crane Rule, 47 TAX NOTES 593 (1990)
<http://www.utexas.edu/law/faculty/calvinjohnson/endcrane.htm> ;
see also Letters to the Editor: *Seeking Shelter: Opportunity Lost in Pleasant Summit*, 47 TAX NOTES 1009 (1990) <http://www.utexas.edu/law/faculty/calvinjohnson/opplost.htm>.

Current and Quotable: Incentive to Distribute Earnings is Key to Corporate Integration, 46 TAX NOTES 1067 (1990)
<http://www.utexas.edu/law/faculty/calvinjohnson/Incentives-to-Distribute-Earnings.pdf>.

"True and Correct:" Standards for Tax Return Reporting, 43 TAX NOTES 1521 (1989)
<http://www.utexas.edu/law/faculty/calvinjohnson/truestds.htm>.

Why Have Anti-Tax Shelter Legislation?, 67 TEXAS LAW REV. 591 (1989).
<http://www.utexas.edu/law/faculty/calvinjohnson/why-have-anti-tax-shelter-leg-a-response-to-prof-zelenak.pdf>

Financial Impact of the 1986 Tax Reform Act on Real Estate: A View from the Spreadsheets, 36 TAX NOTES 309 (1987)
<http://www.utexas.edu/law/faculty/calvinjohnson/fin-impact-of-1986-act-on-real-estate-07-20-87.pdf>.

Is an Interest Deduction Inevitable? 6 VIRGINIA TAX REV. 121 (1986).
<http://www.utexas.edu/law/faculty/calvinjohnson/is-an-interest-deduction-inevitable-1986.pdf>.

Tax Return Positions in Contempt of Civil Penalties, 33 TAX NOTES 501 (1986)
<http://www.utexas.edu/law/faculty/calvinjohnson/contempt.htm>.

Deduction of Nonprorata Shareholder Contributions is a Violation of Principles of Taxation, 32 TAX NOTES 267 (1986) <http://www.utexas.edu/law/faculty/calvinjohnson/nonpro.htm>.

Error in the Name of Interest, 30 TAX NOTES 451 (1986)
<http://www.utexas.edu/law/faculty/calvinjohnson/errorint.htm>.

Silk Purses from a Sow's Ear: Cost Free Liabilities Under the Income Tax, 3 AMERICAN J. OF TAX POLICY 231 (1984). <http://www.utexas.edu/law/faculty/calvinjohnson/silk-purses-from-a-sows-ear-cost-free-liabilities-1984.pdf> .

Tax Models for Nonprorata Shareholder Contributions, 3 VIRGINIA TAX REV. 81 (1983) http://www.utexas.edu/law/faculty/calvinjohnson/Tax_Models_for_Nonprorata.pdf .

Tax Shelter Gain: The Mismatch of Debt and Supply Side Depreciation, 61 TEXAS LAW REV. 1013 (1983). <http://www.utexas.edu/law/faculty/calvinjohnson/tax-shelter-gain.pdf> .

The Thor Power Tool Decision and Unrealized Inventory Losses, 26 TAX NOTES 1259 (1980) http://www.utexas.edu/law/faculty/calvinjohnson/Thor_Power_Tool_vs_IRS.pdf .

Stock Compensation Under Section 83: A Reassessment, 1980 UNIVERSITY OF SOUTHERN CALIFORNIA TAX INSTITUTE §800 reprinted in 2 CORP. COUNSEL ANN. 1457 J. Spires and E. Burchell, eds., (1981) [<http://www.utexas.edu/law/faculty/calvinjohnson/major-tax-planning-1980.pdf>] .

The Case for Taxing Fringe Benefits, 9 TAX NOTES, 43 (1979); see also Letters to Editor, 9 TAX NOTES 296 (1979).

The Economic Waste in Cutting Capital Gains Tax, 7 TAX NOTES 203 (1978).

The Election for Compensatory Options: Dubious Use of a Conference Report for Dubious Non-legislation, 55 TAXES 618 (1977).

Tax Models for Nonrecourse Employee Liability, 32 TAX LAW REV. 359 (1977) http://www.utexas.edu/law/faculty/calvinjohnson/Tax_Models_for_Nonrecourse.pdf .

Treasury on Fringe Benefits: To Tax or Not to Tax, 4 TAX NOTES 3 (1976).

Congressional Statements

“Extender Tax Provisions,” Statement by invitation of the Committee, Hearings of the Senate Finance Committee (Jan. 31, 2012).

"Fifty Ways to Raise a Trillion," Statement on the Shelf Project for the US Senate Finance Committee Hearings on Lessons From the Tax Reform Act of 1986 (Sept. 23, 2010).

“Honest and Accurate Tax Accounting for Oil & Gas” statement by invitation of the U.S. Senate Finance Subcommittee on Energy, Natural Resources, and Infrastructure hearings on Administration tax proposal for FY 2010 (Sept. 10, 2009) <http://www.utexas.edu/law/faculty/calvinjohnson/sen-fin-on-energy-honest-and-accurate-tax-accounting-for-oil-and-gas-09-10-09.pdf> .

“Public Accountants and the Tax Shelter Industry,” statement by invitation of the U.S. Senate Committee on Governmental Affairs, Permanent Subcommittee on Investigations, Hearings on U.S. Tax Shelter Industry (November 18, 2003)

<http://www.utexas.edu/law/faculty/calvinjohnson/KPMGTestim.pdf> .

“The Pooling Method is Per se Misleading” statement by invitation for the Roundtable Meeting and Discussion on Accounting for Intangible Assets Acquired in a Business Combination before the Senate Committee on Banking, Housing, and Urban Affairs (June 14, 2000)

http://banking.senate.gov/00_06hrg/061400/johnson.htm ,

<http://www.utexas.edu/law/faculty/calvinjohnson/Pooling.pdf> .

“Three Errors in the Neutral Cost Recovery System” in CONTRACT WITH AMERICA – SAVINGS AND INVESTMENT, Hearings before the Committee on Ways and Means, 104th Cong., 1st Sess. 561 (January 26, 1995).

“Why Not Collect Correct Tax?: Statement on Tax Return Standards,” in Review of the Civil Penalty Provisions Contained in the Internal Revenue Code: hearings on Civil Tax Penalties before Subcommittee on Oversight of House Ways and Means Committee, 101st Cong., 1st Sess. 149 (February 21, 1989).

“Statement on Relief from Imputed Interest Rules of Section 1274,” in Tax Treatment of Imputed Interest on Deferred Payment Sales of Property: hearings before the House Ways and Means Committee, 99th Cong., 1st Sess. at 168 (April 24, 1985).

<http://www.utexas.edu/law/faculty/calvinjohnson/deferred-payment-sales.pdf> .

“Statement on Accelerated Depreciation and Liabilities,” in 3 Tax Aspects of the Presidents’ Economic Program: hearings before the House Ways and Means Committee, 97th Cong., 1st Sess. at 2638 (1981).

“Statement on Installment Sales,” in Tax Simplification: hearings on S.1063 before the Subcommittee on Taxation and Debt Management Generally of the Senate Finance Committee, 96th Cong., 1st Sess. at 187 (1979).

“Statement on the Economic Damage from the Exemption of Fringe Benefits,” in Tax Treatment of Employee Fringe Benefits: hearings before a Task Force of the House Ways and Means Committee, 95th Cong., 2d Sess. at 75 (September 21, 1978).

Selected Briefs

Brief of the Taxation With Representation Fund and the Tax Reform Research Group as Amici Curiae in Support of Respondent, (1977) in Thor Power Tool Co. v. Commissioner, 439 U.S. 522 (1979) http://www.utexas.edu/law/faculty/calvinjohnson/Thor_Power_Tool_vvs_IRS.pdf . (provided the framework for the *Thor Power* opinion)

Brief, Amicus Curiae, Pro Se in Support of Respondents (2006) in Carabell v. Army Corps of Engineers, <http://www.utexas.edu/law/faculty/calvinjohnson/Carabell.pdf> .

Op-eds and Other Short Pieces

Cut Off the Equity Funds, 176 TAX NOTES FEDERAL 1601 (September 5, 2022)

The Wonderful Mark-to-Market Tax, 173 TAX NOTES FED. 1227 (Nov. 29, 2021),
<https://taxprof.typepad.com/files/johnson.pdf>

Finance Committee's Corporate 18.5 Percent Bracket Focuses on the Superrich, 173 TAX NOTES FEDERAL 824 (Nov. 8, 2021)

A Fair Income Tax on the Trillion-dollar Behemoths 171 TAX NOTES FEDERAL 1199 (May 24, 2021)., <https://ssrn.com/abstract=3873277>

Return to Civic Virtue: Tax Meals, 170 TAX NOTES FEDERAL 1105 (February 15, 2021). <https://ssrn.com/abstract=3810867>

Deficits by Tier: Payback of the 2017 Tax Act by Wealth (September 16, 2019). 164 TAX NOTES FEDERAL 1893, September 2019, <https://ssrn.com/abstract=3470719>

A Wealth Tax is Constitutional (August 12, 2019). 38-4 ABA TAX TIMES, August 2019), <https://ssrn.com/abstract=3436365>; *A Sur-Rebuttal to Professor Jensen on the Constitutionality of an Unapportioned Wealth Tax* (November 6, 2019). 39(1) ABA TAX TIMES (Nov. 2019), <https://ssrn.com/abstract=3482081>

Wealth Tax, Balkinization Blog <http://balkin.blogspot.com/2019/03/a-wealth-tax-is-constitutional.html> (March 13, 2019)

Wherein Our Duty Lies, 159 TAX NOTES 1969 (June 25, 2018), <http://ssrn.com/abstract=3227305>

The Tax Cut Bill Would Push U.S. Debt Over the Critical Breaking Point, (Nov. 20, 2017), <http://ssrn.com/abstract=3074682>

Death and the Tax Benefit Rule, 154 TAX NOTES 1335 (May 29, 2017), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3070245 (Viewpoint)

Sale of Long-Term Electricity Supply Contract is Ordinary Gain, 152 TAX NOTES 887 (Aug. 18, 2016) (Current and Quotable Section: Letter to IRS Chief Counsel)

Where's the Rest of Me?: Ryan's Republican Wish List, 152 TAX NOTES 105 (July 4, 2016), <http://ssrn.com/abstract=2813033>

Trump's Bought Law <https://ssrn.com/abstract=2866142> (Nov. 9, 2016) restatement of 153 Tax Notes 873 (Nov. 7, 2016) (Letter to the Editor)

Were Trump's Fake Losses Legal Tax Deductions?, 153 TAX NOTES 581 (Oct. 24, 2016)
<https://ssrn.com/abstract=2857992>

Sale of Long-Term Electricity Supply Contract is Ordinary Gain, 152 TAX NOTES 887 (Aug. 18, 2016) (Current and Quotable), <https://ssrn.com/abstract=2830941>

Where's the Rest of Me?: Ryan's Republican Wish List, 152 TAX NOTES 105 (July 4, 2016),
<http://ssrn.com/abstract=2813033>

Don't Increase Holding Incentives, 148 TAX NOTES 695 (Aug. 10, 2015) (Letter to the Editor)

Professor Comments on Administrations' Fiscal 2015 Revenue Proposals (March 27, 2014),
2014 Tax Notes Today 63-25.

Book review of JÜRGEN HEIDEKING, *THE CONSTITUTION BEFORE THE JUDGMENT SEAT: THE PREHISTORY AND RATIFICATION OF THE AMERICAN CONSTITUTION, 1787-1791*, in 118 (1) AMERICAN HISTORICAL REVIEW 176 (2013), <https://academic.oup.com/ahr/article/118/1/176/42800/Jurgen-Heideking-The-Constitution-before-the?searchresult=1>

Tax Reform and the Presidential Election. American-Statesman (Op-ed) (Oct. 28, 2012) reprinted with footnote support in 137 TAX NOTES 676-78 (Nov. 5, 2012),
http://www.utexas.edu/law/faculty/calvinjohnson/tax_reform_and_the_presidential_election.pdf.

Did Romney Cheat on his Taxes?, 137 Tax Notes 570 (Oct. 29, 2012) (Letter to Editor), continuing dialog in Letters to the Editor, 137 Tax 809 (Nov. 12, 2012) and 137 Tax Notes 1245 (Dec. 10, 2012),
http://www.utexas.edu/law/faculty/calvinjohnson/did_romney_cheat_on_his_taxes_letters.pdf
Position reported front page of Huffington Post, as *Tax Expert Calvin Johnson 'Skeptical' of Romney Return*, http://www.huffingtonpost.com/2012/10/29/mitt-romney-taxes-calvin-johnson_n_2039899.html

Evolution of the Shelf Project, 137 TAX NOTES 216 (October 8, 2012) (Letter to the Editor),
http://www.utexas.edu/law/faculty/calvinjohnson/evolution_of_the_shelf_project.pdf

Charging for Access to Public Markets, 137 TAX NOTES 106 (October 1, 2012) (Letter to the Editor) http://www.utexas.edu/law/faculty/calvinjohnson/137_tax_notes_106.pdf

Perpetual Trusts: The Walking Dead, 136 TAX NOTES 1215 (Sept. 3, 2012),
<http://ssrn.com/abstract=2147989> (Letter to the Editor)

Contribution, FIFTY YEARS OF CHANGE, ONE CONSTANT: TAX NOTES 14-14 (Tax Analysts 2010), <http://www.utexas.edu/law/faculty/calvinjohnson/TaxNotesat40.pdf>

The Fiscal Commission Has Forgotten Its Role, 129 TAX NOTES 921-921 (Nov. 22, 2010),
<http://www.utexas.edu/law/faculty/calvinjohnson/fiscal-commission.pdf>

Mis-Estimating Tax Revenue, Letter to Editor, WALL ST. J., July 19, 2010,
<http://www.utexas.edu/law/faculty/calvinjohnson/wsj-ltr-on-rev-misestimating.pdf>.

Healthcare Penalty Need Not Be Apportioned Among the States, 128 TAX NOTES 335-335 (JULY 19, 2010), <http://www.utexas.edu/law/faculty/calvinjohnson/healthcare-penalty.pdf> (Letter to Editor)

Guns, Virtuous History and the Internet, NATIONAL LAW JOURNAL (March 1, 2010)
http://www.utexas.edu/law/faculty/calvinjohnson/guns_virtuous_history_and_internet_searches.pdf.

The Terrible State of the Tax Base, TOWARD TAX REFORM: RECOMMENDATIONS FOR PRESIDENT OBAMA'S TASK FORCE 54 (TAX NOTES supplement, September 7, 2009)
<http://www.utexas.edu/law/faculty/calvinjohnson/TerribleStateOfTheTaxBase.pdf>.

Inequities of Cost Living Adjustments, Point/Counterpoint, 28 ABA SECTION OF TAXATION NEWSQUARTERLY 24 (Summer 2009) [<http://www.utexas.edu/law/faculty/calvinjohnson/inequities-in-cost-of-living-adjustments-counterpoint-summer-09-sect-of-tax-news-quarterly.pdf>].

Income Tax Case, ENCYCLOPEDIA OF THE SUPREME COURT OF THE UNITED STATES 453 (2008),
<http://www.utexas.edu/law/faculty/calvinjohnson/Income-Tax-in-Gale-Encyclopedia.pdf>.

Pretty Cruddy Investments Brought To You by Stimulus Depreciation, 118 TAX NOTES 731 (February 11, 2008), <http://www.utexas.edu/law/faculty/calvinjohnson/pretty-cruddy-investments.pdf>.

A Better, Smarter Tax System is Not a Partisan Project, Letters to the Editor, 118 TAX NOTES 223 (Jan. 7, 2008), <http://www.utexas.edu/law/faculty/calvinjohnson/better-smarter-tax-system.pdf>.

Viewpoint, Expensing for Extraordinary Returns, 117 TAX NOTES 360 (October 22, 2007)
<http://www.utexas.edu/law/faculty/calvinjohnson/expensing-extraordinary.pdf>.

TaxProfBlog Spotlight: Profile of Calvin H. Johnson (Texas) (May 6, 2006)
<http://www.utexas.edu/law/faculty/calvinjohnson/BlogSpotlight.pdf>.

Tax Incentives are Always the Wrong Way to Go, 111 TAX NOTES 90 (April 3, 2006)
<http://www.utexas.edu/law/faculty/calvinjohnson/NotoTaxIncentives.pdf>.

IRS Settlement Initiative: A Perfect Environment for Shelters, 109 TAX NOTES 929 (November 14, 2005)
<http://www.utexas.edu/law/faculty/calvinjohnson/SettlementInitiative.pdf>

Letters to the Editor on KPMG's FLIP Shelter: Davis does not extend to FLIPs, 109 TAX NOTES 137 (October 3, 2005).

Comment on Richard Leffler's A Supream Legislature, Society of Historians of the Early American Republic, Philadelphia, (July 23, 2005) [Comments on Richard Leffler, "A Supream Legislature"](#).

Current and Quotable: Will Bush's Tax Plans be Good for Bastrop County?, 105 TAX NOTES 1285 (November 29, 2004) <http://www.utexas.edu/law/faculty/calvinjohnson/will-bush-tax-plans-be-good-for-bastrop-county-11-29-2004-tax-notes.pdf>.

Letters to the Editor: *The Reagan Legacy*, 103 TAX NOTES 1560 (June 21, 2004)
<http://www.utexas.edu/law/faculty/calvinjohnson/the-reagan-legacy-LTE-06-21-2004-tax-notes.pdf>.

Barbie Dolls in the Archeological Dig: Professor Johnson Responds [to Erik Jensen, The Constitution Matter in Tax], 100 TAX NOTES 832 (2003)
<http://www.utexas.edu/law/faculty/calvinjohnson/BarbieintheDig100TN0832.pdf>.

Current and Quotable: 28 Tax Professors Urge SEC to Take a Tough Stance on Auditor Independence, (with co-authors), 98 TAX NOTES 765 (2003)
<http://www.utexas.edu/law/faculty/calvinjohnson/tax-profs-urged-SEC.pdf>.

Current and Quotable: Requiring Inventory Accounting for Rotable Spare Parts, Letters to IRS Office of Associate Chief Counsel, June 13, 2003, 99 TAX NOTES 1711 (2003) <http://www.utexas.edu/law/faculty/calvinjohnson/current.pdf>.

But Cf. Was George Washington Constitutional?, 18 CONST. COMMENTARY 295 (2002)
<http://www.utexas.edu/law/faculty/calvinjohnson/was-george-washington-constitutional-05-01-2002-const-commentary.pdf>.

The Visual Display of the Bush Tax Cut, 90 TAX NOTES 1095 (2001)
<http://www.utexas.edu/law/faculty/calvinjohnson/visual-display-of-the-bush-tax-cut-03-19-2001-tax-notes.pdf>.

Shifting Burden Of Proof Won't Help IRS, DALLAS MORNING NEWS [Viewpoint], (Friday, November 14, 1997) <http://www.utexas.edu/law/faculty/calvinjohnson/shifting-burden-of-proof-wont-help-irs-11-14-1997-dallas-morning-news.pdf>.

Point/Counterpoint: Singing Reason: The Case for Excluding Entity-level Debt from the Basis of Limited Liability Owners, 17 ABA SECTION OF TAXATION NEWSLETTER 13 (Fall 1997).
<http://www.utexas.edu/law/faculty/calvinjohnson/pt-counter-singing-reason-case-for-excluding-entry-level-debt-from-ltd-lib-owners-fall-1997.pdf>.

Current and Quotable: IRS Restructuring: Burden of Persuasion vs. Burden of Production, 77 TAX NOTES 624 (November 3, 1997)
<http://www.utexas.edu/law/faculty/calvinjohnson/IRS-restructuring-burden-of-persuasion-vs-production-11-03-1997-tax-notes.pdf>.

Time to Get Out of the Pool: Pooling Method for Acquisitions, 76 TAX NOTES 810 (August 11, 1997) <http://www.utexas.edu/law/faculty/calvinjohnson/pooling.htm>.

Snarling for the Cameras: Hostility and Takeover Expense Deductions, 76 TAX NOTES 689 (August 4, 1997) <http://www.utexas.edu/law/faculty/calvinjohnson/snarling.htm>.

Why is Stock so Bloody Profitable?, 75 TAX NOTES 1893 (June 30, 1997)
<http://www.utexas.edu/law/faculty/calvinjohnson/bloody.htm>.

Federal Circuit Plays Dirty Pool with Inventory Accounting, 70 TAX NOTES 111 (1996) <http://www.utexas.edu/law/faculty/calvinjohnson/drtypool.htm>.

Current and Quotable: Consumption vs. Wage Tax, 67 TAX NOTES 1382 (1995)
<http://www.utexas.edu/law/faculty/calvinjohnson/wagetax.htm> .

Stock Options Aren't "Free" Compensation, LOS ANGELES TIMES, (Op-Ed), at B7 (April 8, 1994) <http://www.utexas.edu/law/faculty/calvinjohnson/stock-options-arent-free-compensation-04-08-1994-LA-times.pdf> .

Profs Discuss Bleak and Explosive World of New Financial Products, 62 TAX NOTES 819 (February 14, 1994) <http://www.utexas.edu/law/faculty/calvinjohnson/finprods.htm> .

Current and Quotable: An Interview with Calvin Johnson, 61 TAX NOTES 623 (Nov. 1, 1993)
<http://www.utexas.edu/law/faculty/calvinjohnson/InterviewwCalvinJohnson.pdf> .

Current and Quotable: Effective Tax Rates on High-Goodwill Takeovers Under House and Senate Bills, 60 TAX NOTES 531 (July 26, 1993).

Current and Quotable: Amortization of Intangibles: Impact of Seller Tax, 59 TAX NOTES 285 (April 12, 1993).

Integration Discussion Highlights AALS Meeting in San Antonio, 54 TAX NOTES 114 (January 13, 1992) <http://www.utexas.edu/law/faculty/calvinjohnson/satmtg.htm> .

Current and Quotable: Capital Gains and Deadwood: Section 301(c)(3), 47 TAX NOTES 1635 (1990) <http://www.utexas.edu/law/faculty/calvinjohnson/deadwood.htm> .

Current and Quotable: Incentive to Distribute Earnings is Key to Corporate Integration, 46 Tax Notes 1067 (1990) <http://www.utexas.edu/law/faculty/calvinjohnson/Incentives-to-Distribute-Earnings.pdf> .

Professor Defends the Passive Activity Concept, 3 NATURAL RESOURCES TAX REVIEW 5 (March-April 1990).

Current and Quotable: When is an Oil Well an Asset, 87 TAX NOTES TODAY (ELECTRONIC ED.) 216 - 18 (November 16, 1987).

Current and Quotable: Johnson Says IRS Should Develop Different Approach to Settle Tax Shelter Cases, 35 TAX NOTES 1019 (1987)
<http://www.utexas.edu/law/faculty/calvinjohnson/taxshltr.htm> .

Lawyer, Make it Skimmable!, 48 TEXAS BAR J. 954 (1985) reprinted 58 NEW YORK STATE BAR J. 50 (1986).

Current & Quotable: Johnson Urges Tightening Regulations under Section 404(a)(5), 28 TAX NOTES 920 (1985) <http://www.utexas.edu/law/faculty/calvinjohnson/404a5.htm> .

Current & Quotable: A New Way to Look at the Tax Shelter Problem, 23 TAX NOTES 765 (1984) <http://www.utexas.edu/law/faculty/calvinjohnson/newway.htm> .

Invited Lectures and Presentations

Stop Negative Tax: Limit Interest to Interest Rate Times Adjusted Basis, presented Texas Tax Faculty Scholarship Workshop, Texas A&M Law School (May 18, 2022).

Deficit by Tiers: Pay Back of the 2017 Tax Cut by Wealth, presented Law and Society Conference Washington, D.C. (May 30, 2019), presented Texas Tax Faculty Scholarship Workshop, U. Houston Law School (May 17, 2019).

Madison's Denial: Review of Noah Feldman, "The Three Lives of James Madison," Texas Law School Faculty Drawing Board (October 8, 2018)

"Wherein Our Duty Lies," luncheon keynote address to Association of Mid-Career Tax professors, (May 21, 2018), Washington DC; also presented to Texas Tax Faculty Scholarship Workshop, Texas Tech Law School, (June 1, 2018), Lubbock, Texas

"No Orchard, No Capital Gains: panel discussion on *Greenteam Materials*," ABA Tax Section, Sales, Exchange and Basis Committee, (May 12, 2018), Washington, DC; also presented to Texas Tax Faculty Scholarship Workshop, Texas Tech Law School, (June 1, 2018), Lubbock, Texas

"What Caused the Constitution?," University of Texas Faculty colloquium (March 6, 2018).

"Death and the Tax Benefit Rule," Texas Tax Faculty Scholarship Workshop, University of Houston, May 19, 2017

"Winter is Coming: Tax Policy in the Coming Bitter Hard Times, University of Texas Drawing Board Series, Sept. 18, 2017" "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 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

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

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://www.utexas.edu/law/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://www.utexas.edu/law/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://www.utexas.edu/law/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, 91st 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, 1972.

“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.