Roberta F. Mann

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Teaching 2008 – Present	University of Oregon School of Law Mr. & Mrs. L.L. Stewart Professor of Business Law Tax I, Tax II, Tax Policy, International Tax, Real Estate Planning, Property
February 2018	Allard School of Law at University of British Columbia Visiting Professor of Law Environmental Taxation (intensive seminar)
1998 – 2008	Delaware School of Law at Widener University Professor Federal Income Tax, Introduction to Business Tax, Taxation of Mergers & Acquisitions, Tax Policy, Advanced Income Tax, Tax Aspects of International Transactions, Property I
1996 - 1997	Georgetown University Law Center Adjunct Professor, LLM Program
1995 - 1996	King Hall School of Law, University of California - Davis Visiting Professor of Law
<u>Practice</u> 1997 - 1998	Legislation Counsel, Joint Committee on Taxation, U.S. Congress.
1987 - 1997	Office of Chief Counsel, Internal Revenue Service, National Office Areas: Corporate, Partnerships, Estate & Gift, Natural Resources

Education

LL.M. (Taxation) with distinction 1995 Georgetown University Law Center

J.D. cum laude 1987

Arizona State University College of Law

Law Journal, Assistant Editor; Moot Court Board

M.B.A. 1982, B.S. (Psychology) 1980

Arizona State University

Bar Memberships: District of Columbia, Arizona (inactive)

Scholarship:

Articles:

Controlling the Environmental Costs of Obesity, 47 Env. L. 697 (2017), see related Radio New Zealand interview, https://www.radionz.co.nz/audio/player?audio_id=2018635209 (Mar. 9, 2018)

Sustainably Funding Transportation Infrastructure: Tax Fuel or Miles?, 31 Australian Tax Forum 609 (2016) See related blog post, Why American Infrastructure Gets a "D+" and What Can be Done (April 28, 2017), http://www.austaxpolicy.com/american-infrastructure-gets-d-candone/#comment-462

Making the IRS Work (with Jonathan B. Forman), 17 Fla. Tax Rev. 725 (2015). See related blog post, Mind the Gap: Effect of IRS Budget Cuts on the Tax Gap and Potential Solutions, (January 2017), https://surlysubgroup.com/2017/01/23/mind-the-gap-effect-of-irs-budget-cuts-on-the-tax-gap-and-potential-solutions/#more-11964

Subchapter S: Vive La Différence, 18 Chapman L. Rev. 65 (2014)

Economists are from Mercury, Policymakers are from Saturn: The Tax Policy Implications of Communication Failure, 5 Wm & Mary Pol. Rev. 50 (2013)

Lightning in a Bottle: Using Tax Policy to Solve Renewable Energy's Storage Challenges, 20 J. Env. & Sust. L. 71 (2013)

Smart Incentives for the Smart Grid, 43 N. Mex. L. Rev. 127 (2013)

Chief Counsel's Subtle Impact on Revenue: Regulations, Litigation, and Administrative Guidance, 65 Nat'l Tax J. 889 (2012)

Like Water for Energy: The Water-Energy Nexus Through the Lens of Tax Policy, 82 Colo. L. Rev. 505 (2011)

Federal, State, and Local Tax Policies for Climate Change: Coordination or Cross-Purpose?, 15 Lewis & Clark L. Rev 369 (2011)

How to Love the One You're With: Changing Tax Policy to Fit Cap-And Trade, 2 San Diego J. Clim. & Ener. L. 145 (2010)

Back to the Future, Recommendations and Predictions for Greener Tax Policy, 88 Or. L. Rev. 355 (2010)

Is Sharif's Castle Deductible: Islam and the Tax Treatment of Mortgage Debt, 17 Wm. & Mary Bill Rts. J. 1139 (2009)

The Case for the Carbon Tax: How to Overcome Politics and Find Our Green Destiny, 39 Env. L. Rep. 10118 (2009)

Moonshine to Motorfuel: Tax Incentives for Fuel Ethanol (with Mona L. Hymel), 18 Duke Env. L. & Pol. Forum 43 (2008)

Another Day Older and Deeper in Debt: How Tax Incentives Encourage Burning Coal and the Consequences for Global Warming, 20 Pac. McG. Glob. Bus. & Dev. J 111 (2007)

Getting Into the Act: Enticing the Consumer to Become "Green" Through Tax Incentives (with Mona Hymel), 36 Env. L. Rep. 10419 (2006)

On the Road Again: How Tax Policy Drives Transportation Choice, 24 Va. Tax Rev. 587 (2005)

The American Jobs Creation Act's Impact on Individual Investors: A Monster of Complexity? (with Mona Hymel and Gail Richmond), 22 J. Tax'n of Invest. 187 (2005)

Waiting to Exhale?: Global Warming and Tax Policy, 51 Am. U. L. Rev. 1135 (2002)

Tax Incentives for Historic Preservation: An Antidote to Sprawl?, 8 Widener L. Symp. J. 207 (2002)

The (Not So) Little House on the Prairie: The Hidden Costs of the Home Mortgage Interest Deduction, 32 Ariz. St. L. J. 1348 (2000)

Book Chapters:

The Tax Treatment of Coal, in TAX LAW AND THE ENVIRONMENT 59, Roberta F. Mann and Tracey M. Roberts, eds., (Lexington Books 2018)

Oregon: Constitutional Barriers to a Carbon Tax, in Rodolfo Salassa-Boix, ed., EL MARCO CONSTITUCIONAL DE LA TRIBUTACIÓN AMBIENTAL [translation: The constitutional framework of the Environmental Taxation] (Ciencia, Derecho y Sociedad 2018)

Delivering Energy Policy in the U.S.: The Role of Taxes, in Delivering Energy Law and Policy in the EU and the US: A Reader, Raphael J. Heffron & Gavin F. M. Little, eds., (Edinburgh Univ. Press 2016)

Why (or Whether) the Tax System Should Encourage Homeownership and How a Tax Benefit for Housing Should Be Structured, in BEYOND EFFICIENCY IN U.S. TAX LAW 163, David Brennan, Karen Brown & Darryl Jones, eds. (Wolter Kluwer 2013)

Contributing author, ACTING AS IF TOMORROW MATTERED: ACCELERATING THE TRANSITION TO SUSTAINABILITY (ed. John Dernbach 2012)

Taxation in The Law of Clean Energy: Efficiency and Renewables 145 – 167, Michael B. Gerrard, ed. (A.B.A. 2011) (with E. Margaret Rowe)

Subsidies, Tax Policy, and Technological Innovation, in Michael B. Gerrard, ed., GLOBAL CLIMATE CHANGE AND U.S. LAW 565 – 587 (A.B.A. 2007)

Other Publications:

Shaping Taxpayers: An Anthropologist's Perspective on Tax Compliance (Book Review), 159 Tax Notes 579 (2019)

TAX LAW AND THE ENVIRONMENT, Roberta F. Mann and Tracey M. Roberts, eds., (Lexington Books 2018)

Response to Professor Rosenbloom: 50 Shades of Gray Infrastructure, 93 Wash. L. Rev. Online 103 (2018)

Simpler Tax Reform: An Easy Road to a Win, 157 Tax Notes 1329 (2017)

To Repeal or Retain Section 1031: A Tempest in a \$6 Billion Teapot (with Bradley T. Borden, Joseph B. Darby III, and Charlene D. Luke), 34 A.B.A. Tax Sec. News Qtly. 1 (2015)

To Tax Carbon or Not to Tax Carbon: Is That the Question?, 24 Nat. Res. & Env. 44 (2009), also reprinted in Richard G. Hildreth, David R. Hodas, Nicholas A. Robinson, James Gustave Speth, Climate Change Law: Mitigation and Adaptation 270 (West 2009).

Too Many Carrots and Not Enough Sticks? The Role of the Carbon Tax in Energy Tax Policy, 29 A.B.A. Tax Sec. News Qtly. 10 (2009)

Trading Greenbacks for Green Behavior: Oregon and the City of Portland's Environmental Incentives (with Mona L. Hymel and Beth S. Wolfsong), 5 Crit. Iss. Env. Tax'n 675 (2008)

Top Ten Strategies for Encouraging Tax Compliance, 111 Tax Notes 919 (2006)

Federal Tax - CCH Explanations and Analysis - CCH Tax Research Consultant - Corporate Reorganizations and Net Operating Losses (various chapters)

Point & Counterpoint: The No-Net-Value Proposed Regulations: Invalid Exercise of Authority or Well-Reasoned Interpretation (with Jasper Cummings), 25 A.B.A. Tax Sec. News Qtly. 14 (2005)

Home Mortgage Interest Deduction Ultimately Helps Few Reach American Dream: Recent Proposals Would Be More Equitable, 19 J. Tax'n of Invest. 189 (2002)

Important Developments: Affiliated and Related Corporations, 54 Tax Lawyer 891 (1999)

Works in Progress:

I Robot, U Tax?, forthcoming 64 McGill L. J. (2019).

Saving the Planet by Cutting Corporation Taxes: A Comparative Case Study Analysis, forthcoming 23 Fla. Tax. Rev. ___ (2019). (with coauthors Fiona Martin and Bill Butcher)

Encouraging Clean Manufacturing through Tax Policy (invited paper Pitt. Tax Rev.)

Taxes and Intergenerational Justice (with Jonathan Barry Forman)

Can Environmental Taxation Solve the Plastics Problem?

Honors:

ATAX Fellow, University of New South Wales (2018); National Academy of Sciences, Study Panel on Carbon Audit of the Internal Revenue Code (2011-13); Shell Oil Scholar, Georgetown University Law Center (1995); American Journal of Tax Policy 14th Annual Student Writing Contest (1996 2d place)

Associations:

American Bar Association, Tax Section: Council Director (2015 – 2018); Tax Policy and Simplification, Past Chair, Individual and Family Taxation Committee, Past Chair; American Tax Policy Institute, Board of Trustees; American College of Tax Counsel, Fellow; National Tax Association Board (2006 – 2009); Delaware Tax Institute, Planning Committee;

Executive Committee, Portland Tax Forum; Wilmington Tax Group; Preservation Delaware, Inc., Past President, Board of Trustees

Presentations:

Saving the Planet by Cutting Corporate Taxes: A Comparative Case Analysis, Law & Society (Washington DC, June 2019)

Saving the Planet by Cutting Corporate Taxes: A Comparative Case Analysis, Workshop on Sustainable Taxation (Gavle, Sweden, April 2019)

Taxing Millenials to Pay Boomers (with Jonathan Barry Forman), Workshop on Sustainable Taxation (Gavle, Sweden, April 2019)

Saving the Planet by Cutting Corporate Taxes, UO Law Faculty presentation, also UO Climate Change Research Group Symposium (Eugene, Mar. 2019)

Do Corporate Tax Rates Affect Environmental Social Responsibility (with Fiona Martin), Australasian Tax Teachers' Association Conference (Perth, Australia Jan. 2019)

Can Environmental Taxation Solve the Plastics Problem?, Recycling Entanglements CLE (Eugene, Dec. 2018)

Ethics: Challenges for the Tax Professional Advising Clients Looking to Push the Envelope, New York University Law School 77th Institute on Federal Taxation (New York Oct. 2018 and San Diego Nov. 2018)

I Robot, U Tax?, 2018 Law & Society Conference, Toronto, Canada (June 2018); also McGill Law Journal Symposium, Regulatory Challenges on the Edge of Technology, Montreal, Canada (Nov. 2018)

How Do Corporate Tax Rates Affect Environmental Social Responsibility?, University of New South Wales; also Macquarie University, Sydney, Australia (Mar. 2018); also Global Conference on Environmental Taxation, Madrid, Spain (Sept. 2018)

I Robot, U Tax?, Australia National University, Canberra, Australia; also Monash University, Melbourne, Australia (Mar. 2018)

Primer on Environmental Taxation, University of Auckland, Auckland, New Zealand (Mar. 2018)

Controlling the Environmental Costs of Obesity, Victoria University, Wellington, New Zealand; also University of South Australia, Adelaide, Australia (Mar. 2018)

U.S. Tax Reform, Canterbury University, Christchurch, New Zealand (Mar. 2018)

Environmental Taxation Seminar, University of British Columbia Allard School of Law, Vancouver BC (Feb. 2018)

Working with Islamic Finance, ABA Tax Section, Sales Exchanges & Basis Committee (Feb. 2018)

Taxing R2-D2, ABA Tax Section, Tax Policy & Simplification Committee (Feb. 2018)

Partnership Allocations & Substantial Economic Effect, ABA Business Law Section LLC Institute (Arlington, Virg., Nov. 2017)

I Robot, U Tax, Global Conference on Environmental Taxation (Tucson, Ariz., Sept. 2017)

What If?: Contingent Payment Issues in Real Estate Transactions, ABA Tax Section, Sales Exchanges & Basis Committee (Sept. 2017)

Tax Fuel or Miles, 9th Annual Meeting of the Society for Environmental Law and Economics, Oxford (May 2017)

Tax Fuel or Miles, 5th International Symposium on Environmental Energy Finance Issues, Paris (May 2017)

When Can a Federal Appointee's Gain on Divestiture Be Trumped by Section 1043, ABA Tax Section, Sales Exchanges & Basis Committee (May 2017)

Denying Deductions: Does It Change Behavior?, Critical Tax Conference, St. Louis (Apr. 2017)

Mind the Gap: Effect of IRS Budget Cuts on the Tax Gap and Potential Solutions, AALS Discussion Group on the Future of Tax Administration and Enforcement (Jan. 2017), blog post available here https://surlysubgroup.com/category/2017-mini-symposium-on-tax-enforcement-and-administration/

Controlling the Environmental Costs of Obesity, Florida State University School of Law Environmental Law Colloquium (Nov. 2016)

Oil, Gas & Coal Taxation, Montana Tax Institute (Oct. 2016)

I Was Ripped Off—Do I Get a Deduction?, ABA Tax Section, Sales Exchanges & Basis Committee (Sept. 2016)

Controlling the Environmental Costs of Obesity, Global Conference on Environmental Taxation (Groningen, the Netherlands Sept. 2016)

Tax Fuel or Miles, Second Annual Sustainability Conference for Legal Educators, Tempe (May 2016)

Tax as Superhero: Saving Lives Through Tax Policy, Critical Tax Conference, New Orleans (Apr. 2016)

Tax Fuel or Miles, Third Annual Tax University of Washington Taxation Symposium, Seattle WA (Oct. 2015)

Tax Fuel or Miles, Global Conference on Environmental Taxation Sydney, Australia (Sept. 2015)

Making the IRS Work, Law & Society, Seattle, WA (May 2015) A Critical Look at "Deferred Sales Trusts," ABA Tax Section, Sales Exchanges & Basis Committee (May 2015)

Keeping our Cool: International Tax Reform and the Global Environment, University of Arizona School of Law Speaker Series (Mar. 2015)

Lincoln-Douglas Debate on Whether to Repeal § 1031, ABA Tax Section, Teaching Taxation Committee (Jan. 2015)

Making the IRS Work, National Tax Association Annual Meeting, Santa Fe, NM (Nov. 2014)

Earth, Wind, & Fire: Comparing the Taxation of Energy Sources, Montana Tax Institute (Oct. 2014)

International Tax Reform and the Global Environment, Global Conference on Environmental Taxation (Copenhagen, Denmark Sept. 2014)

International Tax Reform and the Global Environment, Law and Society, Minneapolis, MN (May 2014)

Rescissions – Where are We Now, ABA Tax Section, Sales Exchanges & Basis Committee (May 2014)

International Tax Reform and the Global Environment, University of San Diego Tax Law Speaker Series (Mar. 2014)

Financial Mechanisms & Tax Policy, Oregon Energy Storage Workshop, Roundtable Leader (Mar. 2014)

Subchapter S: Vive la Difference!, Business Tax Reform Symposium, Dale E. Fowler School of Law at Chapman University (Mar. 2014)

The Deception of Oil, Public Interest Environmental Law Conference (Feb. 2014)

To Wed or Not to Wed: The Tax Consequences of *Windsor* for Intervivos Property Transactions, ABA Tax Section, Sales Exchanges & Basis Committee (Jan. 2014)

Economists are from Mars, Lawyers are from Venus: Communication Failure and the Implications for Tax Policy, National Tax Association Annual Meeting (Nov. 2013)

Under the Sea, Under the Sea: Tax Policy Harvests Energy from the Ocean, Global Conference on Environmental Taxation (Kyoto, Oct. 2013)

Economists are from Mars, Lawyers are from Venus: Communication Failure and the Implications for Tax Policy, ABA Tax Section, Tax Policy and Simplification Committee (Sept. 2013)

Climate Change Adaptation, Water, and Tax Policy, Rocky Mountain Mineral Law Foundation 16th Annual Institute for Natural Resources Law Teachers (May 2013)

What are the Constitutional Parameters of Tax Reform and Simplification?, ABA Tax Section, Tax Policy and Simplification Committee (moderator - May 2013)

Economists are from Mars, Lawyers are from Venus: Communication Failure and the Implications for Tax Policy, 2013 Critical Tax Conference (April 2013)

Lighting in a Bottle: Using Tax Policy to Solve Renewable Energy's Storage Challenges, University of Missouri Law School's Promoting Sustainability Through Tax Policy Symposium (April 2013)

Economists are from Mars, Lawyers are from Venus: Communication Failure and the Implications for Tax Policy, UCLA Colloquium on Tax Policy & Public Finance (February 2013)

The Economic War on Women: Taxes, Austerity & Debt (Panel Discussion), Wayne Morse Center (January 2013)

Batteries in our Future, Global Conference on Environmental Taxation (Vancouver, BC, September 2012)

Voter Salience and the Presidential Candidates' Tax Platforms, ABA Tax Section, Tax Policy and Simplification Committee (September 2012)

Smart Incentives for the Smart Grid, Law & Society (June 2012)

Climate Change and Future Resource Use, University of Oregon Climate Change Symposium (May 2012)

How Treasury and the IRS Make Tax Law, National Tax Association Spring Symposium (May 2012)

Perspectives on Tax Reform: Restoring the Middle Class, ABA Tax Section, Tax Policy and Simplification Committee (May 2012 – moderator)

The Environment of the Future, Oregon State Bar Government Law Section Annual Mid-Year CLE: "Government Law: Into the Future" (February 2012)

Perspectives on Tax Reform: Taxation of Capital Gains and Dividend Income, ABA Tax Section, Tax Policy and Simplification Committee (February 2012 – moderator)

Senate Finance Committee, Academic Roundtable on Tax Reform (January 2012 – invitation only conference)

Smart Incentives for the Smart Grid, Global Conference on Environmental Taxation (Madrid, October 2011)

Tax Policy, Federalism, and Climate Change: How to Negotiate Shifting Jurisdictional Boundaries to Solve a Boundless Problem, Law & Society (June 2011) (also served as discussant for Should the Government Make Us Healthy, Wealthy and Wise?)

Sticks and Carrots in Emerging Green Technologies: Regulations and Incentives Compared, invited panelist, Navigating the New Green Economy: Challenges of Climate Change and the Opportunities for Clean Energy, the London School of Economics & Political Science (May 2011)

Women and Children First: the Impact of Deficit-Balancing Tax Reform, Incubator Session Presentation, Critical Tax Conference (Apr. 2011)

Pivotal Leaders: Growing Oregon's Leaders in the Green Economy, Greening the Pathway to Recovery (Green Business Symposium Apr. 2011)

So You Think You Can Dance: Coordinating Federal and State Tax Policy, A.B.A. Tax Section (Jan. 2011) (moderator)

Tax Incentives for Renewable Energy, Lane County Bar Association Environmental Law Committee CLE (Nov. 2010)

Financing Renewable Energy Project Through Tax Incentives, Webinar: Keeping Up With Climate Change Legislation (what every business needs to know) (Oct. 2010)

Energy Credits, 2010 IRS/Practitioners Forum, Portland (Oct. 2010)

Federal, State and Local Tax Policies for Climate Change: Coordination or Cross-Purpose?, Yale-UNITAR Conference on Environmental Governance and Democracy, New Haven (Sept. 2010); also presented at Lewis & Clark Law School's Business Law Forum: Taxes and the Environment, Portland (Oct. 2010)

Rebuilding and Renewing America II Summit, Response Panel (invited by Congressman Earl Blumenauer) Portland (Sept. 2010)

Tax Incentives for Renewable Energy: Concepts & Considerations, Oregon State Bar Tax Section (July 2010)

Will Healthcare Reform Hurt Tax Policy, A.B.A. Tax Section, Washington (May 2010) (moderator)

Climate Change and Tax Law, University of San Diego Law School 2d Annual Climate & Energy Law Symposium, San Diego (Apr. 2010)

The Water-Energy Nexus and Tax Policy, University of Florida Environmental Speaker Series, Gainesville (Mar. 2010)

Death (Taxes) Be Not Proud: Issues Relating to the Expiration of the Estate Tax, A.B.A. Tax Section, San Antonio (Jan. 2010)

Private presentation for Cong. Earl Blumenauer on Water Issues Relating to Alternative Energy, Portland (Jan. 2010)

The Accidental Deduction: A History and Critique of the Tax Subsidy for Mortgage Interest, by Dennis Ventry, Loyola Tax Policy Colloquium, Los Angeles (Nov. 2009) (discussant)

Selected Tax Issues Involving Alternative Energy Investments, University of Texas 10th Biennial Oil and Gas Tax Conference, Houston (Oct. 2009) (moderator)

Like Water for Energy: The Water-Energy Nexus Through the Lens of Tax Policy, 10th Global Conference on Environmental Taxation, Lisbon, (Sept. 2009)

Simplifying Phase-Outs or Phasing Out Simplification, A.B.A. Tax Section (May 2009) (moderator)

Tax Aspects of Alternative Energy Investments, A.B.A. Tax Section (May 2009)

Forecasting from the First 100 Days, Growing A Green Economy Symposium (April 2009)

The Case for the Carbon Tax, University of British Columbia Law School (January 2009)

Fiscal Policy and Senior Citizens: Location, Retirement, Homeownership and Pensions, National Tax Association Annual Meeting (November 2008) (discussant)

Sustainable Transportation: Federal Tax Issues, Problems and Solutions, University of Oregon Journal of Environmental Law Symposium (October 2008)

Tax Platforms of the Presidential Candidates, A.B.A. Tax Section (September 2008) (moderator)

Is Mohammad's Castle His Tax Deduction: Tax Treatment of Islamic Mortgage Alternatives, Law and Society Conference (May 2008)

Home Mortgage Foreclosure Relief, A.B.A. Tax Section (May 2008) (moderator)

Taxation and Housing, National Tax Association Spring Symposium (May 2008) (discussant)

Crouching Lobbyist, Hidden Subsidy: How To Overcome Politics, Implement a Carbon Tax, and Seize Our Green Destiny, Sustainable Business Conference, University of Oregon School of Law; IGEL Conference, Wharton Business School, Widener Symposium on Climate Change (April 2008) (also invited presentation 9th Global Conference on Environmental Taxation, Singapore, November 2008).

When Having Fun is Making Money: Taxation of Hobbies, A.B.A. Tax Section (January 2008) (moderator)

Circular 230 Update, A.B.A. Tax Section (January 2008) (moderator)

Housing Issues (discussant), National Tax Association Annual Meeting (November 2007)

Constitutional Limits on State Taxation, Delaware Tax Institute, November 2007)

Moonshine to Motorfuel: Tax Incentives for Fuel Ethanol, 8th Global Conference on Environmental Taxation (October 2007)

Tax Incentives for Clean Coal, Energy and Environment Committee, A.B.A. Tax Section (September 2007)

Remodeling the Home Mortgage Interest Deduction, Individual and Family Taxation Committee, A.B.A. Tax Section (May 2007)

Tangles of Taxes: Problems in the Tax Code (discussant), National Tax Association Spring Symposium (May 2007).

Will You Still Need Me: Income Tax Issues of Elderly Clients, Individual and Family Taxation Committee, A.B.A. Tax Section (January 2007).

Income Tax Update, Delaware Tax Institute (November 2006).

Family Tax Planning using Conservation and Historic Easements, Individual and Family Taxation Committee, A.B.A. Tax Section (October 2006)

Beyond Enforcement: Encouraging Tax Compliance, Tax Court Judicial Conference (May 2006).

It's Not Easy Being Green: Consumer Tax Incentives from the 2005 Energy Policy Act, Individual Income Tax Committee, A.B.A. Tax Section (May 2006)

Another Day Older and Deeper in Debt: How Tax Incentives Encourage Burning Coal and the Consequences for Global Warming, The Business of Climate Change Conference, Pacific McGeorge Institute for Sustainable Development (February 2006).

You're Perfect, I Love You, Now Change: Tax Planning for Unmarried Domestic Partners, Individual Income Tax Committee, A.B.A. Tax Section (February 2006)

Getting Into the Act: Enticing the Consumer to Become "Green" through Tax Incentives, 6th Global Conference on Environmental Taxation (September 2005)

Beyond Enforcement: Encouraging Tax Compliance, Individual Income Tax Committee, A.B.A.Tax Section (September 2005)

New Flexibility in Corporate Reorganizations: Primer on Moving Assets and Stock Around Acquiring Group and Corporate Tax Development, Federal Bar Association Insurance Tax Seminar (June 2005)

Individual Income Tax Update, Individual Income Tax Committee, A.B.A. Tax Section (May 2005)

Review of Significant Tax Cases and Related Legislative Changes: Federal & Delaware, Delaware State Society of Certified Public Accountants (January 2005)

Hummer Write-offs, Car Donations and other Highlights of the American Jobs Creation Act of 2004 That Affect Individual Taxpayers, ABA-CLE Teleconference (December 2004)

Operating a Family Limited Partnership: Tax Issues, Delaware Tax Institute (November 2004)

Presidential Party Platforms, Individual Income Tax Committee, A.B.A. Tax Section (October 2004)

Transportation Choices and Tax Policy, 5th Global Conference on Environmental Taxation (September 2004)

AMT: What Does It Stand For?, Wilmington Tax Group (May 2004)

Be Careful What You Wish For: The Unintended Consequences of Income Tax Provisions, Individual Income Tax Committee, A.B.A. Tax Section (May 2004)

Did Sarbanes-Oxley Gore the Right Ethical Ox, Delaware Tax Institute (November 2003)

Consolidated Returns Investment Adjustment Regulations, Federal Bar Association Insurance Tax Seminar (June 2003)

Planning with Stock Options and Developments in Executive Compensation Arrangements, Delaware Tax Institute (November 2002)

Climate Change and Tax Policy, Natural Resources Committee, ABA Tax Section (October 2002)

Corporate Inversions: Global Tax Planning and the Bermuda Triangle, Wilmington Tax Group (October 2002)

Taxation of Corporate Acquisitions and Mergers, Executive Enterprises Institute (May and June 2001)

Current Developments in Consolidated Returns, ABA Tax Section (May 2001)

Tax Treatment of Disregarded Entities, Delaware Tax Institute, (December 2000)

Corporate Reorganizations, Federal Bar Association Insurance Tax Seminar (June 2000)

Section 355 Active Trade or Business Requirement, Affiliated and Related Corporations Committee, ABA Tax Section (January 2000)

Tax Shelters of the 80's, 90's and the New Millenium, Delaware Tax Institute (December 1999)

Updates on Sections 382 and 108, Tax Strategies for Corporate Acquisitions, Dispositions, Spin-Offs, Joint Ventures, Financings, Reorganizations & Restructurings, Practising Law Institute (1994 and 1993)

Update on Section 382, District of Columbia Tax Section Luncheon Presentation (1993)

Acquisition of Troubled Banks: Corporate Tax Consequences, (Seminar Sponsored By) Federal Deposit Insurance Corporation (February 1989)

Law School and University

Activities:

Committees: Appoi

Appointments (Chair, 2004 - 2005); Curriculum (Chair, 2012 – 2014); Dean's Faculty Advisory Committee; LLM Admissions; Faculty Affairs; Honor Code; Lectures and Awards (Chair, 2015 – 2016); Loan Repayment Assistance Program; Moot Court Board Advisor (2002 – 2003; 2012 - 2014); National Tax Moot Competition Court Coach; Planning Committee: Delaware Tax Institute (1999 – 2008); Law School Personnel; Public Service Committee (Chair, 2003 - 2004); Self-Study Committee (2004 – 2005); Scholarships; Law School Sustainability Committee (Chair, 2009 – 2010); University Campus Planning Committee (subcommittee chair 2012); University Curriculum Committee (2014 – present); University Faculty Personnel Committee (2011 – 2013); University Senate Transparency Committee (2010); University Sustainability Council (2012 - 2013); University Scholarship Committee

(2013-2017).

International

Programs: Director, Widener University School of Law Geneva Program (Summer

2002)