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Academic Appointments:

UNIVERSITY OF MINNESOTA LAW SCHOOL
Associate Professor of Law

Minneapolis, MN
July 2004 – present

Courses taught: International Tax, Tax I (Basic Federal Income Tax), Administrative Law

University and Law School Service: Acting Parliamentarian, University and Faculty Senates (Spring 2006); Clerkships Committee (2004-05, 2005-06); Teaching Prospects Committee (2004-05, 2005-06); Grievance – Law School Committee (2005-06); Technology Committee (2005-06); Educational Policy Committee (2004-05); Consultative Committee (2004-05); Ad Hoc Building Committee (Spring 2005).

NORTHWESTERN UNIVERSITY SCHOOL OF LAW
Visiting Assistant Professor of Law

Chicago, IL
Aug. 2003 – Aug. 2004

Courses taught: Business Associations, Administrative Law

Education:

NORTHWESTERN UNIVERSITY SCHOOL OF LAW
J.D. *magna cum laude* 1999

Chicago, IL

Honors/Activities: Order of the Coif
Raoul Berger Prize (awarded to *Chevron's Domain*)
Lowden Wigmore Prize for Significant Contribution to Legal Scholarship
Journal of International Law and Business (Articles Editor, 1998-99; Member, 1997-98)
Julius H. Miner Moot Court (Problem Committee Chair, 1999; Semi-finalist, 1998)
Jessup International Law Moot Court Board, Team (Regional Semi-finalist, 1998)

TRINITY UNIVERSITY
B.S. 1991, Business Administration, Concentration in Accounting, Second Major in History

San Antonio, TX

Publications:

Coloring Outside the Lines: Examining Treasury's (Lack of) Compliance with APA Procedural Requirements (work in progress).

Sheltering the Code: Will the criminal prosecution of tax shelter promoters undermine civil enforcement efforts?, ___ Va. Tax Rev. ___ (forthcoming 2007) (symposium) (work in progress).

The Need for Mead: Rejecting Tax Exceptionalism in Judicial Deference, 90 MINN. L. REV. 1537 (2006).

Evaluating DaimlerChrysler v. Cuno: The Constitutionality of State Tax Incentives, and Standing to Challenge Them, LEGAL TIMES (March 6, 2006) (solicited).

Taxpayer Standing and DaimlerChrysler v. Cuno: Where Do We Go from Here?, 110 TAX NOTES 863 (Feb. 20, 2006), with Donald B. Tobin.

How Did We Get Here Anyway? Considering the Standing Question in DaimlerChrysler v. Cuno, 4 GEO. J.L. & PUB. POL'Y 47 (2006) (symposium).

Foreword: DaimlerChrysler v. Cuno and the Constitutionality of State Tax Incentives for Economic Development, 4 GEO. J.L. & PUB. POL'Y 15 (2006), with Sarah L. Bunce (symposium).

Chevron's Domain, 89 GEO. L.J. 833 (2001), with Thomas W. Merrill.

Comment, *The More Things Change, The More They Stay The Same: Interpreting the Pennsylvania Uniformity Clause*, 62 ALB. L. REV. 1695 (1999).

Comment, *Should Advance Pricing Agreements Be Published?*, 19 J. INT'L L. & BUS. 171 (1998).

Public Presentations:

Upcoming: *Coloring Outside the Lines: Examining Treasury's (Lack of) Compliance with APA Procedural Requirements*, Faculty Presentation Series, Cumberland School of Law, Samford University, Nov. 10, 2006.

Upcoming: Coordinator, Co-Host, and Moderator, *Tax Policy Conference: The Future of Tax Shelters*, University of Minnesota Law School, Minneapolis, MN, October 27, 2006 (with Claire Hill).

Upcoming: *Coloring Outside the Lines: Examining Treasury's (Lack of) Compliance with APA Procedural Requirements*, Faculty Presentation Series, University of Florida Levin College of Law, September 8, 2006.

Coloring Outside the Lines: Examining Treasury's (Lack of) Compliance with APA Procedural Requirements, The First Big Ten Untenured Conference, Indiana University, School of Law – Bloomington, Aug. 2, 2006.

Coloring Outside the Lines: Examining Treasury's (Lack of) Compliance with APA Procedural Requirements, Junior Tax Scholars' Workshop, University of Colorado Law School, June 17, 2006.

The Need for Mead: Rejecting Tax Exceptionalism in Judicial Deference, Faculty Colloquia Series, University of San Diego Law School, March 24, 2006.

Coordinator, Host, and Moderator, *Tax Policy Conference: State Tax Incentives for Economic Development*, University of Minnesota Law School, Minneapolis, MN, October 7, 2005.

Judicial Deference Principles: Recent Trends, Chicago Bar Association Federal Tax Committee, Corporations (Business Taxation), Feb. 2002.

Citations in Selected Reported Judicial Opinions:

United States v. Mead Corp., 533 U.S. 218, 230 n.11 (2001) (citing *Chevron's Domain*, 89 GEO. L.J. 833, 872 (2001)).

Olson v. Federal Mine Safety & Health Review Com'n, 381 F.3d 1007, 1014 (10th Cir. 2004) (citing *Chevron's Domain*, 89 GEO. L.J. 833, 908 (2001)).

PDK Labs Inc. v. U.S. D.E.A., 362 F.3d 786, 803 n.3 (D.C. Cir. 2004) (citing *Chevron's Domain*, 89 GEO. L.J. 833, 900-01 (2001)).

Air Brake Systems, Inc. v. Mineta, 357 F.3d 632, 643 (6th Cir. 2004) (citing *Chevron's Domain*, 89 GEO. L.J. 833, 855-56 (2001)).

Community Health Center v. Wilson-Coker, 311 F.3d 132, 138 (2d Cir. 2002) (citing *Chevron's Domain*, 89 GEO. L.J. 833, 872 (2001)).

Jones v. Dep't of Transp., 295 F.3d 1298, 1307 n.5 (Fed. Cir. 2002) (citing *Chevron's Domain*, 89 GEO. L.J. 833, 849 & n.85 (2001)).

Chao v. Russell P. Le Frois Builder, Inc., 291 F.3d 219, 228 (2d Cir. 2002) (citing *Chevron's Domain*, 89 GEO. L.J. 833, 836, 855 (2001)).

Citations in Selected Appellate Briefs:

Brief for Petitioner, *DaimlerChrysler Corp. v. Cuno*, No. 04-1704, at 13, 18 (citing *How Did We Get Here Anyway? Considering the Standing Question in DaimlerChrysler v. Cuno*, 4 GEO. J.L. & PUB. POL'Y 47 (2006)).

Brief for Respondent, *DaimlerChrysler Corp. v. Cuno*, No. 04-1704, at 25 (citing *How Did We Get Here Anyway? Considering the Standing Question in DaimlerChrysler v. Cuno*, 4 GEO. J.L. & PUB. POL'Y 47 (2006)).

Brief for the Respondent, State of Oregon, *Gonzales v. State of Oregon*, 126 S.Ct. 904 (2006), No. 04-623, at 31 (citing *Chevron's Domain*, 89 GEO. L.J. 833, 873 (2001)).

Brief for the Cable-Industry Petitioners, *National Cable & Telecomm. Ass'n v. Brand X Internet Serv.* 125 S.Ct. 2688 (2005), Nos. 04-277, 04-281, at 31, 33 ((citing *Chevron's Domain*, 89 GEO. L.J. 833, 916, 917 (2001)).

Bar Admissions and Professional Certification:

MEMBER OF THE BAR

Illinois, admitted 1999

United States Court of Appeals for the Seventh Circuit, admitted 2001

CERTIFIED PUBLIC ACCOUNTANT

Texas, certified 1994

Other Legal and Professional Experience:

SKADDEN, ARPS, SLATE, MEAGHER & FLOM (ILLINOIS)

Associate Attorney, Tax Department

Summer Associate

Chicago, IL

Sept. 2000 – July 2003

May 1997 – Aug. 1997, Aug. 1998, May – July 1999

U.S. COURT OF APPEALS, DISTRICT OF COLUMBIA CIRCUIT

Law Clerk for Judge David B. Sentelle

Washington, D.C.

Aug. 1999 – Aug. 2000

GOODWIN, PROCTER & HOAR

Summer Associate

Boston, MA

May 1998 – July 1998

NORTHWESTERN UNIVERSITY SCHOOL OF LAW

Teaching Assistant to Professor Martin Redish

Chicago, IL

Fall 1997

FARMER, FUQUA, HUNT & MUNSELLE, P.C.

Tax Manager

Dallas, TX

July 1993 – Aug. 1996

DOLLINGER, SMITH & CO.

Staff Accountant

Denver, CO

Oct. 1991 – May 1993