# Anthony C. Infanti

Christopher C. Walthour, Sr. Professor of Law University of Pittsburgh School of Law 3900 Forbes Avenue Pittsburgh, PA 15260 Tel: (412) 648-1244

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### **Education**

New York University School of Law, New York, NY LL.M. in Taxation, 1996

University of California, Berkeley School of Law, Berkeley, CA J.D., 1993; Articles Editor, International Tax & Business Lawyer

Drew University, Madison, NJ

B.A., *summa cum laude*, in Russian Language and French Literature with a minor in Spanish Language, 1990

Honors: Phi Beta Kappa, Drew Scholar, Burke Prize for Language and Literature

## **Teaching and Administrative Experience**

University of Pittsburgh School of Law, Pittsburgh, PA

Christopher C. Walthour, Sr. Professor of Law (2018–present)

Buchanan, Ingersoll & Rooney Faculty Scholar (2016–2017)

Senior Associate Dean for Administration and Special Projects (2015–2016)

Senior Associate Dean for Academic Affairs (2013–2015)

Associate Dean for Academic Affairs (2011–2013)

Affiliate Faculty, Gender, Sexuality, and Women's Studies Program (2014–present)

Professor of Law (2008–present)

Associate Professor of Law (with tenure) (2004–2008)

Assistant Professor of Law (2000–2004)

Courses Taught: Federal Income Tax, International Tax, Partnership Tax, Estate & Gift Tax, Corporate Tax, Critical Tax Theory Seminar, and Low-Income Taxpayer Clinic

Indiana University School of Law-Bloomington, Bloomington, IN

Visiting Associate Professor of Law (Fall 2006)

Courses: Federal Income Tax and Corporate Tax

Donetsk National University, Law & Economics Faculty, Donetsk, Ukraine

Course: International Tax (May 2002)

### Law Practice

Roberts & Holland LLP, New York, NY Associate, International Tax (1998–2000)

Curtis, Mallet-Prevost, Colt & Mosle, New York, NY Associate, Tax Department (1994–1995 & 1997–1998)

Rosenman & Colin LLP, New York, NY Associate, Tax Department (1996–1997)

### Clerkship

Hon. Edward J. Schwartz, U.S. District Court, San Diego, CA Judicial Clerk (1993–1994)

### **Admitted to Practice**

California (1993) New York (1995) Pennsylvania (2000)

### **Books**

TAXATION AND SLAVERY IN COLONIAL AMERICA (NYU Press, forthcoming).

TAX AND TIME: ON THE USE AND MISUSE OF LEGAL IMAGINATION (NYU Press 2022).

OUR SELFISH TAX LAWS: TOWARD TAX REFORM THAT MIRRORS OUR BETTER SELVES (The MIT Press 2018).

FEMINIST JUDGMENTS: REWRITTEN TAX OPINIONS (Cambridge University Press, Bridget J. Crawford & Anthony C. Infanti eds., 2017).

CONTROVERSIES IN TAX LAW: A MATTER OF PERSPECTIVE (Ashgate Publishing, Anthony C. Infanti ed., 2015) (part of Ashgate's *Controversies in American Constitutional Law* series; solicited by series editors from the Centre for American Legal Studies at the Birmingham City University School of Law, United Kingdom).

CRITICAL TAX THEORY: AN INTRODUCTION (Cambridge University Press, Anthony C. Infanti & Bridget J. Crawford eds., 2009).

EVERYDAY LAW FOR GAYS AND LESBIANS (AND THOSE WHO CARE ABOUT THEM) (Paradigm Publishers 2007) (part of *Everyday Law* series, solicited by series editors Richard Delgado and Jean Stefancic).

## **Book Chapters**

- A Taxing Feminism, in THE OXFORD HANDBOOK OF FEMINISM AND LAW IN THE UNITED STATES (Oxford University Press, Deborah L. Brake, Martha Chamallas & Verna Williams eds., 2021) (with Bridget J. Crawford).
- LGBT Rights and Tax Law: A Comparative Perspective, in RESEARCH HANDBOOK ON GENDER, SEXUALITY AND LAW (Edward Elgar Publishing, Chris Ashford & Alexander Maine eds., 2020) (part of Edward Elgar's Law and Society series edited by Austin Sarat and Rosemary Hunter).
- Of Families and Corporations: Erasing the Public-Private Divide in Tax Reform Debates, in Controversies in Tax Law: A Matter of Perspective (Ashgate Publishing, Anthony C. Infanti ed., 2015).
- Bringing Equal Protection Out of the Tax Closet, in Controversies in Equal Protection Cases in America: Race, Gender and Sexual Orientation (Ashgate Publishing, Anne Richardson Oakes ed., 2015).
- Qualification of Taxable Entities and Treaty Protection: United States of America, in CAHIERS DE DROIT FISCAL INTERNATIONAL (International Fiscal Association, 2014) (with Bernard Moens).
- Internation Equity and Human Development, in TAX, LAW AND DEVELOPMENT (Edward Elgar Publishing, Miranda Stewart & Yariv Brauner eds., 2013).
- Special Concerns of Lesbian and Gay Couples, in THE ABA PRACTICAL GUIDE TO ESTATE PLANNING (American Bar Association, Jay Soled ed., 2011).
- Dismembering Families, in Challenging Gender Inequality in Tax Policy Making: Comparative Perspectives (Hart Publishing, Kim Brooks et al. eds., 2011).
- United States, in TAX TREATIES AND DOMESTIC LAW (Guglielmo Maisto ed., IBFD 2006).
- Chapter 43, *Tax Treaty Overrides—Treaties Versus the Code*, *in* RHOADES & LANGER, U.S. INTERNATIONAL TAXATION AND TAX TREATIES (2005) (substantially revised and updated by Anthony C. Infanti).

## Law Review Articles, Essays, and Book Reviews

- Critical Tax Theory: Insights from the US and Opportunities for All, 51 AUSTL. TAX REV. 81 (2022) (with Bridget J. Crawford), reprinted in 164 TAXATION TODAY 16 (2022) (part 1) and 165 TAXATION TODAY 13 (2022) (part 2) (New Zealand).
- Hegemonic Marriage: The Collision of "Transformative" Same-Sex Marriage with Reactionary Tax Law, 74 Tax Law. 411 (2021) (peer-reviewed).
- The Critical Tax Project, Feminist Theory, and Rewriting Judicial Opinions, 16 PITT. TAX REV. 115 (2019).
- Victims of Our Own Success: The Perils of Obergefell and Windsor, 76 OHIO ST. L.J. FURTHERMORE 79 (2015).

- The House of Windsor: Accentuating the Heteronormativity in the Tax Incentives for Procreation, 89 WASH. L. REV. 1185 (2014) (invited contribution to a symposium issue titled "Compensated Surrogacy in the Age of Windsor").
- A Critical Research Agenda for Wills, Trusts, and Estates, 49 ABA REAL PROP. TR. & EST. J. 317 (2014) (peer reviewed) (with Bridget Crawford), reviewed on JOTWELL, <a href="http://trustest.jotwell.com/can-we-talk-wills-trusts-and-estates-critical-issues-that-are-ripe-for-discussion/">http://trustest.jotwell.com/can-we-talk-wills-trusts-and-estates-critical-issues-that-are-ripe-for-discussion/</a>.
- Big (Gay) Love: Has the IRS Legalized Polygamy?, 93 N.C. L. REV. ADDENDUM 1 (2014), reviewed on JOTWELL, <a href="http://tax.jotwell.com/next-up-incest/">http://tax.jotwell.com/next-up-incest/</a>.
- The Moonscape of Tax Equality: Windsor and Beyond, 108 Nw. U. L. REV. COLLOQUY 110 (2013), reprinted in 108 Nw. U. L. REV. 1115 (2014) (sole essay published in the online companion chosen to be republished in the print edition of the Northwestern University Law Review for 2013–2014).
- LGBT Families, Tax Nothings, 17 J. GENDER RACE & JUST. 35 (2014) (invited contribution to symposium titled "Modern Families: Changing Families, Challenging Laws").
- Tax Reform Discourse, 32 VA. TAX REV. 205 (2012).
- LGBT Taxpayers: A Collision of "Others," 13 GEO. J. GENDER & L. 1 (2012) (invited: principal paper for the panel on tax law, gender identity, and sexuality at the journal's symposium on Confronting the Intersection of Tax Law, Gender, and Sexuality).
- *Inequitable Administration: Documenting Family for Tax Purposes*, 22 COLUM. J. GENDER & L. 329 (2011).
- Decentralizing Family: An Inclusive Proposal for Individual Tax Filing in the United States, 2010 UTAH L. REV. 605.
- Taxing Civil Rights Gains, 16 MICH. J. GENDER & L. 319 (2010).
- Surveying the Legal Landscape for Pennsylvania Same-Sex Couples, 71 U. PITT. L. REV. 187 (2009).
- Bringing Sexual Orientation and Gender Identity into the Tax Classroom, 59 J. LEGAL EDUC. 3 (2009) (peer-reviewed journal).
- Deconstructing the Duty to the Tax System: Unfettering Zealous Advocacy on Behalf of Lesbian and Gay Taxpayers, 61 Tax Law. 407 (2008) (peer-reviewed journal published by the ABA Section of Taxation with the support of the Georgetown University Law Center), reprinted in abridged form in 26(2) GPSolo 42 (Mar. 2009) (chosen for inclusion in "The Best Articles Published by the ABA" issue of GPSolo, a publication of the General Practice, Solo & Small Firm Division of the American Bar Association).
- Tax Equity, 55 BUFF. L. REV. 1191 (2008).
- Tax as Urban Legend, 24 HARV. BLACKLETTER L.J. 229 (2008) (book review of AMERICAN TAXATION, AMERICAN SLAVERY by Robin L. Einhorn).
- Havens in a Storm: The Struggle for Global Tax Regulation, 42 LAW & SOC'Y REV. 690 (2008) (review of book with same title by J.C. Sharman).

- Homo Sacer, *Homosexual: Some Thoughts on Waging Tax Guerrilla Warfare*, 2 UNBOUND: HARV. J. OF THE LEGAL LEFT 27 (2006).
- A Tax Crit Identity Crisis? Or Tax Expenditure Analysis, Deconstruction, and the Rethinking of a Collective Identity, 26 WHITTIER L. REV. 707 (2005).
- Tax Protest, "A Homosexual," and Frivolity: A Deconstructionist Meditation, 24 St. Louis U. Pub. L. Rev. 21 (2005) (invited contribution to symposium titled "Out of the Closet and Into the Light: The Legal Issues of Sexual Orientation").
- The Internal Revenue Code as Sodomy Statute, 44 SANTA CLARA L. REV. 763 (2004).
- The Ethics of Tax Cloning, 6 FLA. TAX REV. 251 (2003) (peer-reviewed journal).
- Eyes Wide Shut: Surveying Erosion in the Professionalism of the Tax Bar, 22 VA. TAX REV. 589 (2003), reprinted in 101 TAX NOTES 517 (2003).
- Spontaneous Tax Coordination: On Adopting a Comparative Approach to Reforming the U.S. International Tax Regime, 35 VAND. J. TRANSNAT'L L. 1105 (2002).
- Curtailing Tax Treaty Overrides: A Call to Action, 62 U. PITT. L. REV. 677 (2001), reprinted in abridged form in 23 TAX NOTES INT'L 747 (2001).
- Baehr v. Lewin: A Step in the Right Direction for Gay Rights?, 4 Tul. J.L. & Sexuality 1 (1994), reprinted in abridged form in Same-Sex Marriage: The Moral and Legal Debate 227 (Robert M. Baird & Stuart E. Rosenbaum eds., 1997).

### **Other Publications**

- The Supreme Court Codified Discrimination Against Me, and Possibly You, THE HILL, July 26, 2023, <a href="https://thehill.com/opinion/civil-rights/4118258-the-supreme-court-codified-discrimination-against-me-and-possibly-you/">https://thehill.com/opinion/civil-rights/4118258-the-supreme-court-codified-discrimination-against-me-and-possibly-you/</a>.
- *Build Back Better: The Tax Edition*, THE HILL, Feb. 15, 2022, <a href="https://thehill.com/opinion/finance/593810-build-back-better-the-tax-edition">https://thehill.com/opinion/finance/593810-build-back-better-the-tax-edition</a>.
- How American Tax Laws Encourage Inequality, THE CONVERSATION, Oct. 24, 2018, <a href="https://theconversation.com/how-american-tax-laws-encourage-inequality-104027">https://theconversation.com/how-american-tax-laws-encourage-inequality-104027</a>.
- Why Are Republicans Punishing Sexual Harassment Victims in the Tax Bill?, THE HILL, Dec. 19, 2017, <a href="http://thehill.com/opinion/finance/365592-why-are-republicans-punishing-sexual-harassment-victims-in-the-tax-bill">http://thehill.com/opinion/finance/365592-why-are-republicans-punishing-sexual-harassment-victims-in-the-tax-bill</a>.
- *Lip Service: The President's Tax Plan Is Anything but Simple*, PITT. POST-GAZETTE, May 8, 2017, at A13.
- Why Trump's Tax Returns Really Matter, HUFFINGTON POST, Nov. 2, 2016, <a href="http://www.huffingtonpost.com/anthony-c-infanti/why-trumps-tax-returns-re">http://www.huffingtonpost.com/anthony-c-infanti/why-trumps-tax-returns-re</a> b 12688296.html.
- OUT AND ABOUT: THE LGBT EXPERIENCE IN THE LEGAL PROFESSION (ABA Commission on Sexual Orientation and Gender Identity & National LGBT Bar Association 2015) (contributed an essay discussing my experience as an openly gay academic).

- Demeaning Democracy at the Supreme Court, HUFFINGTON POST, June 29, 2015, <a href="http://www.huffingtonpost.com/anthony-c-infanti/demeaning-democracy-at-th-b-7674632.html">http://www.huffingtonpost.com/anthony-c-infanti/demeaning-democracy-at-th-b-7674632.html</a>.
- Messing with Texas on Marriage, HUFFINGTON POST, May 13, 2015, <a href="http://www.huffingtonpost.com/anthony-c-infanti/messing-with-texas-on-marriage">http://www.huffingtonpost.com/anthony-c-infanti/messing-with-texas-on-marriage</a> b 7277334.html.
- Forget Reading the Tea Leaves on Marriage Equality, HUFFINGTON POST, Apr. 29, 2015, <a href="http://www.huffingtonpost.com/anthony-c-infanti/forget-reading-the-tea-leaves-on-marriage-equality">http://www.huffingtonpost.com/anthony-c-infanti/forget-reading-the-tea-leaves-on-marriage-equality</a> b 7171942.html.
- Reform Pa. 's Flat Tax Rate, Philadelphia Inquirer, Jan. 2, 2015, <a href="http://www.philly.com/philly/opinion/inquirer/20150102\_Reform\_Pa\_s\_flat\_tax\_rate">http://www.philly.com/philly/opinion/inquirer/20150102\_Reform\_Pa\_s\_flat\_tax\_rate</a> .html.
- Strange Tax Bedfellows, JURIST, Oct. 30, 2013, <a href="http://jurist.org/forum/2013/10/anthony-infanti-tax-bedfellows.php">http://jurist.org/forum/2013/10/anthony-infanti-tax-bedfellows.php</a>.
- The IRS vs. Same-Sex Couples, PITT. POST-GAZETTE, Sept. 26, 2013, at B5.
- Employers Need to Get Ahead of Same-Sex Marriage Issue, PITT. BUS. TIMES, Aug. 30, 2013.
- *The DOMA Tax*, POLITICO (Aug. 13, 2013), <a href="http://www.politico.com/story/2013/08/the-doma-tax-95480.html">http://www.politico.com/story/2013/08/the-doma-tax-95480.html</a>.
- Why Gay Couples Hate the IRS More Than You Do, BLOOMBERG (Aug. 6, 2013), <a href="http://www.bloomberg.com/news/2013-08-06/why-gay-couples-hate-the-irs-more-than-you-do.html">http://www.bloomberg.com/news/2013-08-06/why-gay-couples-hate-the-irs-more-than-you-do.html</a>.
- At What Price Victory? Same-Sex Marriage Rulings Leave Couples with Quandaries, PITT. POST-GAZETTE, July 9, 2013, at B7.
- Foreword: On Publishing Anonymously, 8 PITT. TAX REV. 1 (2010).
- Dissecting O'Donnabhain, 126 TAX NOTES 1403 (2010).
- Don't Tax Students: It's Not Fair to Tax Those Least Able to Pay, PITT. POST-GAZETTE, Nov. 19, 2009, at B7.
- Discrimination Bill Affects Us All, HARRISBURG PATRIOT-NEWS, Apr. 14, 2009, at A11, available at
  - http://www.pennlive.com/editorials/index.ssf/2009/04/discrimination\_bill\_affects\_us.html (correction printed on Apr. 15, 2009, at A2).
- From the Sidelines: A Deconstructionist View of Circular 230, 107 TAX NOTES 1575 (2005), printing error corrected at 108 TAX NOTES 344 (2005), reprinted in MONTHLY DIGEST OF TAX ARTICLES, Aug. 2006, at 30.
- Property Tax Is Ripe for Change, PITT. POST-GAZETTE, May 29, 2005, at J1.
- A Different Kind of Tax Reform, JURIST (2005).
- At Our Expense, PITT. POST-GAZETTE, Nov. 13, 2004, at A15.

- Prying Open the Closet Door: The Defense of Marriage Act and Tax Treaties, 105 TAX NOTES 563 (2004), reprinted in 36 TAX NOTES INT'L 765 (2004).
- Marriage or Bust?, JURIST (2004).
- Cross-Border Outsourcing: U.S. International Tax Pitfalls, Pratfalls, and Opportunities, 81 Taxes 19 (2003), reprinted in 2 J. Tax'n Corp. Transactions 15 (2003).
- A Credit to Their Brackets, PITT. POST-GAZETTE, June 29, 2003, at B2.
- The Proposed Domestic Reverse Hybrid Entity Regulations: Can the Treasury Department Override Treaties?, 30 TAX MGM'T INT'L J. 307 (2001).
- Why the City Should Ditch the Two-tier Property Tax, PITT. POST-GAZETTE, Feb. 9, 2001, at A25.
- Structuring Inbound Investments: A Primer on Exit Issues, 79 TAXES 22 (2001).
- APA Disclosure: Can the Process Survive?, 47 CAN. TAX J. 1048 (1999) (with Peter A. Glicklich).
- Lessons in Avoiding Transfer-Pricing Penalties: DHL Corp., 47 CAN. TAX J. 382 (1999) (with Peter A. Glicklich & Sanford H. Goldberg).
- Laidlaw *Taxpayer Crashed and Burned, Losing Billion-Dollar Debt-Equity Case*, 46 CAN. TAX J. 1380 (1998) (with Peter A. Glicklich & Sanford H. Goldberg).
- Just When You Thought It Was Safe to Go Back in the Water: Recharacterizing Debt as Equity, N.Y.L.J. (Aug. 27, 1998) (with Elliot Pisem).

### **Panels & Presentations**

- Introduction to Pro Bono Tax Representation: A Young Lawyer's Guide, American Bar Association, Section of Taxation, Fall Meeting, October 2023.
- Stonewall to Today: Tax Issues with LGBT+ Clients, American Bar Association, Section of Taxation, Fall Meeting, October 2023.
- The Anti-LGBTQ+ Legislative Landscape and the University Classroom, Provost's Diversity Institute, University of Pittsburgh, May 2023 (panelist).
- Taxation and Slavery in Colonial America: Reparations in Historical Perspective, American Tax Policy Institute Conference, "Federal Income Tax: Racially Blind but Not Racially Neutral," Washington, DC, February 2023.
- Identifying and Confronting Unconscious Bias: Moving Beyond Diversity, Equity, and Inclusion, American Bar Association, Section of Taxation, San Diego, CA, February 2023.
- Tax and Time: On the Use and Misuse of Legal Imagination, Author-Meets-Reader Session, Annual Meeting of the Law & Society Association, Lisbon, Portugal, July 2022.
- Keeping the "Crit" in Critical Tax: Lessons from LatCrit and CRT, ClassCrits Roundtable Discussion, March 2022.

- Tax and Racism: Slavery, Immigrant Exclusion, and the Holocaust, University of Oregon, March 2022.
- *New Voices in Taxation*, Annual Meeting of the Association of American Law Schools, January 2022 (senior commenter).
- Keynote: Critical Tax Theory: Insights and Opportunities, Critical Junctures/Critical Perspectives—A Call for New Voices in Tax Reform, Monash University, Melbourne, Australia, July 2021 (with Bridget J. Crawford).
- Tax as an Engine of Injustice, Annual Meeting of the Law & Society Association, May 2021.
- Tax Policy and Justice: Confronting Bias in the Tax Law and in Our Profession, California Lawyers Association, Annual Meeting of the California Tax Bar and California Tax Policy Conference, November 2020 (webinar).
- Tax and Social Justice, Vermont Bar Association, October 2020 (webinar).
- Our Taxing Selves, Provost's Inaugural Lecture, Christopher C. Walthour, Sr. Professorship of Law, University of Pittsburgh, Pittsburgh, PA, January 2020.
- Our Selfish Tax Laws: Toward Tax Reform That Mirrors Our Better Selves, Author-Meets-Reader Session, Annual Meeting of the Law & Society Association, Washington, DC, May 2019.
- Tax Time: The (In)Justice of Unleashed Legal Imagination, The Utopia/Dystopia Project: Speculation, Legal Imagination, Becoming, and Possibilities, Tulane Law School, New Orleans, LA, April 2019.
- Power & Privilege: The Social and Cultural Implications Arising from Our Federal Tax System, American Bar Association, Section of Taxation, New Orleans, LA, January 2019.
- Tax Law Needs Couples Therapy: Alimony, Voss, and Policy Considerations in Taxing Divorced and Unmarried Couples, American Bar Association, Section of Taxation, New Orleans, LA, January 2019.
- Unintended Gender Bias in Our Tax Laws, American Bar Association, Section of Taxation, New Orleans, LA, January 2019 (moderator).
- Feminist Judgments: Rewritten Tax Opinions, Author-Meets-Reader Session, Annual Meeting of the Law & Society Association, Toronto, Canada, June 2018.
- Our Selfish Tax Laws: Toward Tax Reform That Mirrors Our Better Selves, Allegheny Tax Society, Pittsburgh, PA, May 2018.
- Feminist Judgments: Rewritten Tax Opinions, American Bar Association, Section of Taxation, Washington, DC, May 2018.
- Federal Tax Reform: Beyond Dollars and Cents, American Bar Association, Section of Taxation, Washington, DC, May 2017.
- IRS Notice 2017-15, American Bar Association, Section of Taxation, Washington, DC, May 2017.

- Hegemonic Marriage: The Collision of "Transformative" Same-Sex Marriage with Reactionary Tax Law, Jean Monnet Center of Excellence Faculty Research Workshop: Marriage Equality in Advanced Industrialized Democracies, University of Pittsburgh, Pittsburgh, PA, March 2017.
- Deductible Medical Expenses Under § 213 Take on New Meaning, American Bar Association, Section of Taxation, Orlando, FL, January 2017.
- Our Selfish Tax Laws, Annual Meeting of the Law & Society Association, New Orleans, LA, June 2016.
- Try to See It My Way: Technical, Policy & Advocacy Perspectives on the Home Mortgage Interest Deduction for Same-Sex Couples, American Bar Association, Section of Taxation, Washington, DC, May 2016.
- Keynote Address: Tax Law and Politics: Seeing Self and Other in the Tax Mirror, Second Annual Conference of the Centre for Tax Governance (on the theme of "Taxation as a Social and Political Institution"), University of Birmingham Business School, Birmingham, England, March 2016.
- Presumptuous Selfishness: The "Other" in Tax Law, Critical Tax Conference, Northwestern University School of Law, Chicago, IL, April 2015 (incubator session).
- The House of Windsor: Accentuating the Heteronormativity in the Tax Incentives for Procreation, Reproductive Rights, Health, and Access Conference, University of Pittsburgh, Pittsburgh, PA, March 2015.
- Teaching Tax/Business Law Courses Through a Social Justice Lens, 2014 Biennial SALT Teaching Conference, UNLV Boyd School of Law, Las Vegas, NV, October 2014.
- The House of Windsor: Accentuating the Heteronormativity in the Tax Incentives for Procreation, Second Annual Tax Symposium, University of Washington School of Law, Seattle, WA, October 2014.
- Breaking Down Barriers into the Profession: Perspectives on Diversity and Professional Development, American Bar Association, Section of Taxation, Denver, CO, September 2014.
- Big (Gay) Love: Has the IRS Legalized Polygamy?, AALS Midyear Meeting, Workshop on Sexual Orientation and Gender Identity Issues, Washington, DC, June 2014.
- Of Families and Corporations: Erasing the Public-Private Divide in Tax Reform Debates, Annual Meeting of the Law & Society Association, Minneapolis, MN, May 2014.
- Qualification of Taxable Entities and Treaty Protection: United States of America, Joint U.S.-Canadian International Tax Conference, International Fiscal Association, Toronto, Canada, May 2014.
- Big (Gay) Love: Has the IRS Legalized Polygamy?, Critical Tax Conference, University of Baltimore School of Law, Baltimore, MD, April 2014.
- A Critical Trusts and Estates Research Agenda, Conference on Wills, Trusts & Estates Meets Gender, Race and Class, Oklahoma City University School of Law, Oklahoma City, OK, September 2013 (with Bridget Crawford).

- The Impact of U.S. v. Windsor on Civilian and Military Taxpayers, American Bar Association, Section of Taxation, San Francisco, CA, September 2013 (moderator).
- The Moonscape of Tax Equality, Workshop on After Equality: Family, Sex, Kinship, McGill University Faculty of Law, Montreal, Canada, April 2013.
- LGBT Families, Tax Nothings, Panel on LGBT Families, Symposium: Modern Families: Changing Families, Challenging Laws, presented by Journal of Gender, Race & Justice, University of Iowa College of Law, Iowa City, IA, March 2013.
- Tax Reform Discourse, Critical Tax Conference, Seton Hall Law School, Newark, NJ, April 2012.
- *Internation Equity and Human Development*, Saint Louis University School of Law Faculty Workshop Series, Saint Louis, MO, October 2011.
- Critical Tax Theory: The Impact of the Tax Code on Traditionally Subordinated Groups, American Bar Association, Section of Taxation, Denver, CO, October 2011.
- Internation Equity and Human Development, Critical Perspectives on Tax Policy Conference, Emory University School of Law, Atlanta, GA, September 2011.
- Internation Equity and Human Development, Annual Meeting of the Law & Society Association, San Francisco, CA, June 2011.
- Presentation on Same-Sex Couples and Transfer Taxes, Panel on Elder Law and Services, Queering Age: Exploring the Lived Experience of LGBT Youth and Elders, 6<sup>th</sup> Annual Harvard Lambda Legal Advocacy Conference, Harvard Law School, Cambridge, MA, April 2011.
- LGBT Taxpayers: A Collision of Others, Panel on Tax Law, Gender Identity, and Sexuality (Principal Speaker), Symposium: Confronting the Intersection of Tax Law, Gender, and Sexuality, presented by Georgetown Journal of Gender and Law, Georgetown University Law Center, Washington, DC, March 2011.
- Inequitable Administration: Documenting Family for Tax Purposes, Annual Meeting of the Association for the Study of Law, Culture, and the Humanities, UNLV Law School, Las Vegas, NV, March 2011.
- Inequitable Administration: Documenting Families for Tax Purposes, Third National People of Color Legal Scholarship Conference, Seton Hall Law School, Newark, NJ, September 2010.
- Dismembering Families, Workshop on Challenging Gender Inequality in Tax Policy Making, International Institute for the Sociology of Law, Oñati, Spain, May 2009.
- Dismembering Families, Critical Tax Conference, Indiana University Maurer School of Law, Bloomington, IN, April 2009 (incubator session).
- Taxing Civil Rights Gains, Section on Taxation: The Family and Taxation, AALS Annual Meeting, San Diego, CA, January 2009.
- Bringing Sexual Orientation and Gender Identity into the Tax Classroom, Sexual Orientation and Gender Identity Across the Curriculum: The Challenges of Keeping Law Schools Current with Recent Developments in LGBT Issues: Break-out Session

- on Property, Conflict of Laws, Income Tax, and Employee Benefits, AALS Annual Meeting, San Diego, CA, January 2009.
- Taxing Civil Rights Gains, University of Cincinnati, Cincinnati, OH, October 2008.
- Resource Panel, Deliberative Poll on the Issue of Marriage in America, Southwestern Pennsylvania Program for Deliberative Democracy, Carnegie Mellon University, Pittsburgh, PA, September 2008.
- *Keynote Address*, Western Pennsylvania Diversity Initiative, Symposium on Domestic Partner Benefits, Pittsburgh, PA, September 2008.
- Taxing Civil Rights Gains, Pace Law School, White Plains, NY, September 2008.
- Roundtable: Same-Sex Tax Issues in Transnational Perspective: United States and Canada, Joint Meeting of the Law & Society Association and Canadian Law & Society Association, Montreal, Canada, May 2008.
- Deconstructing the Duty to the Tax System: Unfettering Zealous Advocacy on Behalf of Lesbian and Gay Taxpayers, Annual Meeting of the Association for the Study of Law, Culture, and the Humanities, Berkeley, CA, March 2008.
- *Tearoom*, Andy Warhol Museum, December 2007.
- *Tax Equity*, 2007 Meeting of the Canadian Law and Economics Association, University of Toronto Faculty of Law, Toronto, Canada, September 2007.
- *Tax Equity*, Texas Junior Legal Scholars Conference, Texas Wesleyan School of Law, Fort Worth, TX, August 2007.
- *Tax Equity*, Annual Meeting of the Law & Society Association, Humboldt Universität, Berlin, Germany, July 2007.
- Law, Society, and Taxation VIII: Culture, Family, and Taxes, 2007 Annual Meeting of the Law & Society Association, Humboldt Universität, Berlin, Germany, July 2007 (chair/discussant).
- *Tax Equity*, Critical Tax Theory Conference, UCLA Law School, Los Angeles, CA, April 2007 (incubator session).
- Homo Sacer, *Homosexual: Some Thoughts on Waging Tax Guerrilla Warfare*, Joint James Hausman Tax Law & Policy Workshop and Diversity Workshop, University of Toronto Faculty of Law, Toronto, Canada, January 2007.
- Homo Sacer, *Homosexual: Some Thoughts on Waging Tax Guerrilla Warfare*, Critical Tax Theory Conference, Mercer University, Macon, GA, April 2006.
- You're Perfect, I Love You, Now Change: Tax Planning for Unmarried Domestic Partners, American Bar Association, Section of Taxation, San Diego, CA, February 2006.
- Perspectives on Taxing Same-Sex and Unmarried Couples, American Bar Association, Section of Taxation, San Diego, CA, February 2006 (moderator).
- U.S. Country Report, Conference on Domestic Law and Tax Treaties, sponsored by the Italian Council of Ministers and the Organization for Economic Co-operation & Development, Milan, Italy, November 2005.

The Annual Tax Lawyering Workshop: Beyond Tax Shelters: Written Tax Advice in Practice and Circular 230, New York Law School, New York, NY, April 2005 (commentator).

Everyday Law for Gays & Lesbians: An Introduction, Critical Tax Theory Conference, Seattle University, Seattle, WA, April 2005.

A Tax Crit Identity Crisis? Or Tax Expenditure Analysis, Deconstruction, and the Rethinking of a Collective Identity, Critical Tax Theory Conference, Rutgers University—Newark, Newark, NJ, April 2004 (incubator session).

Cross-Border Outsourcing, Pittsburgh Tax Club, Pittsburgh, PA, April 2003.

Current Developments: Inbound, American Bar Association, Section of Taxation, Washington, DC, May 2001.

Exit Issues, American Bar Association, Section of Taxation, Los Angeles, CA, Fall 2000.

### Honors and Awards

Fellow, American College of Tax Counsel (2015–present)

Fellow, Educating Tomorrow's Lawyers (2013-present)

Chancellor's Distinguished Teaching Award (2010)

Life Fellow, American Bar Foundation (2010–present)

Elected Member, American Law Institute (2008–present)

Excellence in Teaching Award (2002) (awarded by the graduating class)

## Law School & University Service

Distinguished Faculty Committee, Chair (Chair, 2021–2022; Member, 2020–2021, 2023–2024)

Nondiscrimination, Equal Opportunity, and Affirmative Action Policy and Procedure Review Committee (Chair/Cochair, 2020–2022; Member, 2018–2019)

Faculty Representative, Audit Committee of the Board of Trustees (2019–2021)

Faculty Senate (2018–2020)

Faculty Assembly (2017–2020)

Provost Search Committee (2018)

Provost's Advisory Council on Instructional Excellence (2013–2016)

Provost's Ad Hoc Committee on Sexual Assault and Harassment (2015–2016)

Chief Faculty Editor, Pittsburgh Tax Review (2003–2012, 2014–2015, 2017–2022)

Faculty Editor, Pittsburgh Tax Review (2012–2014, 2016–2017, 2023–present)

Chair, Faculty Steering Committee (2002–2003, 2004–2005, 2018–2019)

Chair, Petitions & Academic Standards Committee (2018–2019, 2023–2024)

Chair, Appointments Committee (2007–2008, 2016–2017)

Chair, Teaching Committee (2010–2011)

Chair, International Programs Committee (2005–2006)

Chair, University Appeals Panel (2005)

### **Other Service**

Vice Chair for Pro Bono & Outreach, Section of Taxation, American Bar Association (2022–present)

Council Director, Section Council, Section of Taxation, American Bar Association (2018–2021)

Publications Committee, Section of Taxation, American Bar Association (2021–2024) (appointed by the Chair of the Section)

Appointments to the U.S. Tax Court Committee, Section of Taxation, American Bar Association (2019–2024) (appointed by the Chair of the Section)

Public Service Fellowship Committee, Section of Taxation, American Bar Association (2020–2023) (appointed by the Chair of the Section)

Chair, Teaching Taxation Committee, Section of Taxation, American Bar Association (2015–2017)

Nominating Committee, Section of Taxation, American Bar Association (2015–2018) (appointed by the Chair of the Section)

Vice Chair, Teaching Taxation Committee, Section of Taxation, American Bar Association (2011–2015)

Board of Directors, Pittsburgh Chapter, ACLU of Pennsylvania (2008–2012)

Board of Directors, ACLU of Pennsylvania (2007–2010)

Legal Committee, Pittsburgh AIDS Task Force (2001–2011)

#### **Affiliations**

Member, American Bar Association, Section of Taxation

Member, International Fiscal Association

Member, Law and Society Association

Member, Society of American Law Teachers

### Languages

French

Spanish

Russian