# UCI Law Graduate Tax Program

# A Message from UCI Law's Graduate Tax Program

Dear Friends of University of California, Irvine School of Law's Graduate Tax Program,

This fall, the <u>UCI Law Graduate Tax Program</u> welcomed its <u>fourth cohort</u> of twelve amazing tax students to the UCI family. This new class of students includes five international students, two veterans and represents countries including China, Columbia, Kenya, Peru and South Korea.

While UCI Law welcomed its third Dean in August, <u>Austen Parrish</u>, our tax faculty Professors <u>Omri Marian</u>, <u>Joshua Blank</u> and <u>Victor Fleischer</u> have been busy teaching <u>core tax coursework</u> as well as publishing articles and speaking at conferences.

We have an exciting and eventful year ahead which includes hosting the <u>Tax Policy Colloquium</u> speaker series, <u>Tax Career Day</u> and the <u>UCI/IFA Careers in Tax Roundtable</u>, among others. This newsletter shares some highlights of the Graduate Tax Program.

Sincerely,



Natascha R. Fastabend Executive Director, UCI Law Graduate Tax Program

## **Faculty Impact**



<u>Professor Joshua Blank</u> is a professor of law and the faculty director of strategic initiatives at UCI Law. His scholarship focuses on tax administration and compliance, taxpayer privacy, and taxation of business entities.

This summer, Professor Blank was appointed Vice Chair of the <u>Teaching Taxation Committee of the American</u>
<u>Bar Association Tax Section</u> and Member of the
<u>Executive Committee of International Fiscal Association</u>.

The Administrative Conference of the United States (ACUS) adopted 20 recommendations regarding

automated legal guidance based on a report Blank coauthored with Leigh Osofsky, Professor at UNC School of Law.

Professor Blank is currently working on two books that are under contract with Cambridge University Press: Automated Agencies: The Transformation of Government Guidance (with Leigh Osofsky; under contract, Cambridge University Press, forthcoming, 2024) and Untaxed: How the Rich Escape the IRS—And How the Law Can Stop Them (with Ari Glogower; under contract, Cambridge University Press, forthcoming, 2023).

Professor Joshua Blank on Twitter.

<u>Professor Omri Marian</u> is an internationally recognized expert in international taxation, comparative taxation and taxation and the blockchain.

Professor Marian authored an article titled Law, Policy, and the Taxation of Block Rewards. He was also highlighted in <u>Forbes</u> on his guest appearance for Tax Policy Center's webcast, "<u>The Prescription: Fiscal Policy for Today's Economy with Omri Marian</u>" where he discusses his recently published article, Taxing Data. Marian is a member of the American Bar Association Section of Taxation Cryptocurrencies Taskforce.



Professor Omri Marian on Twitter.



Professor Victor Fleischer teaches and writes in the areas of corporate tax, international tax, partnership tax, tax policy, and alternative investments. He served as the Democratic Chief Tax Counsel for the U.S. Senate Finance Committee from 2016-17.

A recent scholarly survey ranked <u>Professor Victor</u> <u>Fleischer</u> as the <u>fifth most-cited tax scholar</u> in the United States.

Professor Fleischer's research on the taxation of private equity funds was featured in The New York Times. He was also quoted in Wall Street Journal on latest

attempts to revise tax rate law on carried-interest income.

Professor Victor Fleischer on Twitter.

For more faculty media appearances, please visit our website.

### **Highlights**

- The UCI Law Graduate Tax Program is ranked **No. 1** on the West Coast and **No. 5** nationwide among law schools with a graduate tax program on <u>TaxProf Blog</u>.
- Our founding professors were named in the <u>Top 50 most downloaded U.S. Tax Law Professors on SSRN</u>. Fleischer ranked No. 24, Marian ranked No. 28, and Blank ranked No. 34.
- Our tax program has maintained a 100 percent employment rate for post-graduate students for three consecutive years!
- Our <u>class of 2023</u> consists of amazing students who come from all over the country.
- Our alumni practice tax law in many major cities throughout the United States in top tax-related industries, including major accounting firms, law firms and governmental entities, including the Office of Chief Counsel and the United States Tax Court.
- Our <u>website</u> contains resources about the <u>intersection of tax law and racial inequity</u>.
  It also showcases academic research, stories from popular media outlets, blog posts, podcasts, and personal testimony.

## **Updates**

- The course Entertainment Industry Taxation was offered for the first time in fall 2022. It focuses on tax issues that arise in the entertainment industry with an emphasis on film, television, music and endorsement deals. Professor Shane Nix, Partner, Wilkie Farr & Gallagher LLP, teaches the course.
- In spring 2023, the Graduate Tax Program will welcome two new Adjunct Professors. <u>Steven Wrappe</u>, Tax - Managing Director, Grant Thorton will teach Transfer Pricing, and <u>Mike Shaikh</u>, Partner, Baker & McKenzie LLP will teach CA State Business Tax Class.

#### **Events**



# Tax Law & Policy Colloquium Series 2022

In October and November, leading tax scholars and tax policy experts were invited to present their works-in-progress to a tax law seminar class. Papers were discussed ahead of the presentations and students wrote short response essays that were shared with the presenters, allowing students to engage in cutting-edge tax policy research. Our colloquium sets itself apart from similar workshops with its strong emphasis on current tax issues.

Colloquium presenters included (pictured top left to bottom right):

- Alex Raskolnikov, Columbia University presented "Should Only the Richest Pay More?"
- **Leandra Lederman**, Indiana University: "How Did Luxemburg Become a Tax Rulings Haven?"
- Michael Love, UC Berkeley: "Who Benefits from Partnership Flexibility?"
- Susan Morse, University of Texas: "Out of Time? APA Challenges to Old Tax Guidance and the Six-Year Default Limitations Period."
- John Vella, Oxford University: "Pillar 2's Impact on Tax Competition."

#### **Tax Career Day**

UCI Law Graduate Program hosted its on-campus interview program in October welcoming employers interested in hiring tax students for full-time post graduate positions. We were thrilled to host the following firms:

- Bechtel
- Edwards Lifesciences
- Franchise Tax Board
- Gilead Sciences
- Grant Thornton
- Herbalife

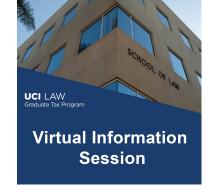
- Law Offices of A. Lavar Taylor
- Mayer Brown
- Office of Tax Appeals
- PwC, EY, KPMG, Deloitte
- Rutan & Tucker
- U.S. Tax Court

The UCI Law Graduate Tax Program encourages employers to meet their tax-hiring needs by submitting job postings on UCI Law's online job <u>database</u>.

#### **Virtual Information Sessions**

The Graduate Tax Program faculty and Executive Director

host multiple informational sessions throughout the academic year. They discuss the Program's curriculum that provides both the doctrinal depth and practical skills needed to practice tax law at the highest levels in the United States and abroad. Our upcoming information session, led by Professor Josh Blank, will be held on November 17. If you are interested in attending, please RSVP here.





# UCI/IFA Careers in International Tax Panel

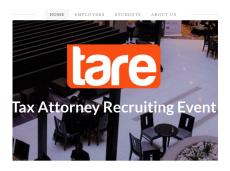
The International Fiscal Association (IFA) USA Southern California and UCI Graduate Tax Program hosted its annual roundtable on alternative pathways for those considering or starting careers in tax. Representatives from Big 4, Big-Law, Industry, the IRS and Tax Court, met to discuss employer expectations, mentorship, career transitions and tax careers post-pandemic.

The event was sponsored by the IFA YIN and WIN networks, IFA Southern California and the UC Irvine Graduate Tax Program.

Speakers included (pictured left to right):

- Moderator Michael Lebovitz, Tax Partner, Mayer Brown and Regional IFA VP
- Anne Kim Tax Partner, Kirkland & Ellis
- Jimeel Hamud Associate Area Counsel, IRS Office of Chief Counsel
- Chan Chea Vice President, Global Head of Tax, Gilead Sciences
- Bart Stratton Partner, PwC Southwest Global Tax Structuring Leader
- Connor Jordan Judicial Law Clerk, US Tax Court





The Tax Attorney Recruiting Event (TARE) brings together more than 150 graduate tax students from the LL.M. in Taxation programs at Boston University School of Law, the University of Florida Levin College of Law, Northwestern Pritzker School of Law, and the University of California, Irvine School of Law.

TARE 2023 will be held on **February 23**, **2023**. **Register as an employer**.

For more information on UCI Law Graduate Tax Program news & events, please visit our <u>website</u>.

### **Student Testimonial**

"The decision to attend UCI's Graduate Tax Program is a decision I am happy to have



Connor Jordan, UCI Law LLM '22 Clerk, U.S. Tax Court made early in my career. For those seeking a program with top tier faculty, an engaging support staff, and a tight-knit student body, UCI's Graduate Tax Program is the perfect choice. The defining aspect of the program is the holistic and hands-on nature of the program: the Grad Tax Program trains tax *professionals* and focuses on providing more than just high quality academics. The experiential course requirements and career workshops with one-on-one support are an aspect that cannot go unappreciated for an aspiring tax professional."

### **Connect with us!**











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