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**Book Chapters**

*Regulating Tax Competition in Offshore Financial Centers*, in OFFSHORE FINANCIAL CENTERS AND REGULATORY COMPETITION (Andrew P. Morriss ed., 2010).

**Law Review and Other Scholarly Articles**

*Optimal Tax Treaty Administrative Guidance*, 88 TEX. L. REV. 175 (2009).

*Change, Dependency, and Regime Plasticity in Offshore Financial Intermediation: The Saga of the Netherlands Antilles* (with Andrew P. Morriss), 45 TEX. INT'L L.J. 377 (2009).

*Breaking Open Offshore Piggybanks: Deferral and the Utility of Amnesty*, 14 GEO. MASON L. REV. 667 (2007.)

*Playing With Monopoly Money: Phony Profits, Fraud Penalties and Equity*, 90 MINN. L. REV. 144 (2005).

*Tax Fraud and Inflated Corporate Earnings: Is There an Alternative to the Missing Legislative Fix?*, 106 TAX NOTES 191 (2005).

**Reports to Governmental Bodies and Professional Associations**

Amicus Brief in Support of Appellant Richard A. Levin, Tax Commissioner of Ohio, *HealthSouth v. Levin*, 903 N.E.2d 1179 (2009) (No. 2007-2281), 2008 WL 1927262.

Amicus Briefs in Support of Appellee Richard A. Levin, Tax Commissioner of Ohio, *MCI Metro Access Transmission Services, LLC v. Levin*, 2008-Ohio-5057 (2008) (Nos. 07AP-398, 07AP-399), 2008 WL 4416665.

Amicus Briefs in Support of Appellee Richard A. Levin, Tax Commissioner of Ohio, *MCI Metro Access Transmission Services, LLC v. Levin*, (2007) (No. 2004-K-749).

**Other Reports, News and Commentary**

*A Tightened Bar Passage Standard is Needed*, (with Daniel Rodriguez), NAT. L.J. Sept. 19, 2016, <http://www.nationallawjournal.com/id=1202767658112>.

*Practical and Policy Considerations in Corporate Inversion Transactions* (with James C. Koenig), 3 CORP. BUS. TAX'N MONTHLY 3 (Sept. 2002).

*Contingent Consideration: The Taxation of Earnouts and Escrows* (with James C.

Koenig), 2 MERGERS & ACQUISITIONS: MONTHLY TAX J. 3 (July 2001).

**Book Reviews**

*Slicing the Global Tax Pie*, JOTWELL (June 28, 2010) (reviewing M. F. de Wilde, SOME THOUGHTS ON A FAIR ALLOCATION OF CORPORATE TAX IN A GLOBALIZING ECONOMY, 38 Intertax 281 (2010)), <https://tax.jotwell.com/slicing-the-global-tax-pie/>.