

# **Stephanie Hunter McMahon**

University of Cincinnati College of Law

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## **TEACHING EXPERIENCE:**

### **University of Cincinnati College of Law, Cincinnati, OH**

*Assistant Professor*, Fall 2008 - present (Federal Income Tax; Business Tax; Tax Policy Seminar; American Legal History)

### **University of Virginia, Charlottesville, VA**

*Teaching Assistant*, 2004 - 2006

Assisted Julian Bond (History of the Civil Rights Movement); Gerald K. Haines (U.S. in Latin America 20<sup>th</sup> Century); Joseph Kett (American History Through 1861); and Olivier Zunz (American History After 1861)

## **EDUCATION:**

### **University of Virginia, Charlottesville, VA**

*M.A. (2004) and Ph.D. (2008)*, American History

*Major Field*: American Legal History

*Minor Field*: European Economic History

*Master's Thesis*: "You Pay For What You Get: Fitting the U.S. Virgin Islands Within the American Territorial Structure During the Period 1917 Through 1936"

Advisors: Chuck McCurdy and Barry Cushman

*Dissertation*: "Money, Sex, and Tax Politics: Developments in Tax Avoidance and Joint Filing, 1913-1948"

Committee: Chuck McCurdy (chair), Cindy Aron, Brian Balogh, Ted White

### **Harvard Law School, Cambridge, MA**

*J.D. (2000)*, cum laude

*Third Year Paper*: "Mark-to-Market: No Magic Answer For Passive Foreign Investment Companies"

Advisor: Diane Ring

*Journal*: Technical Editor of *Journal on Legislation*

### **Oglethorpe University, Atlanta, GA**

*B.A. (1997)*, summa cum laude

*Major Field*: International Studies

*Minor Fields*: Economics; French

*Honors Thesis*: "Democratization in the Russian Federation: A Success or Another Failed Attempt?"

## **FELLOWSHIPS AND AWARDS:**

Samuel I. Golieb Fellow in Legal History, New York University School of Law, 2006-2007, 2007-2008

University of Virginia Summer Travel Grant, 2006, 2007

Robert J. Huskey Travel Fellowship, 2007

University of Virginia Summer Foreign Language Fellowship, 2004

Graduate Fellowship from the University of Virginia, 2003-2006

**PUBLICATIONS / PAPERS:**

- “To Have and to Hold: What Does Love (of Money) Have to Do with Federal Tax Filing?” *Nevada Law Journal* 11 (forthcoming 2011).
- “London Calling: Does the U.K.’s Experience with Individual Taxation Clash With the U.S.’s Expectations?” *St. Louis University Law Journal* 55 (forthcoming 2011).
- “California Women: Using Federal Taxes to Put the ‘Community’ in Community Property,” *Wisconsin Journal of Law, Gender, & Society* 25 (2010): 35-70.
- “Fiscal and Budgetary Policy,” “Securities and Exchange Commission,” “United States Women’s Bureau,” and “Social Welfare Policy,” in *Encyclopedia of U.S. Political History, 1921-1945*, Volume 5, (MTM Publishing, 2010).
- “A Law with a Life of Its Own: The Development of the Federal Income Tax Statutes Through World War I,” *Pittsburgh Tax Review* 7 (2009): 1-41 (peer review).
- “To Save State Residents: States’ Use of Community Property and the Federal System of Government for Tax Reduction, 1939-1947,” *Law and History Review* 27 (2009): 565-625 (peer review).
- “You Pay For What You Get: Fitting the U.S. Virgin Islands Within the American Territorial Structure During the Period 1917 through 1936,” *Journal of Caribbean History* 41 (2007): 109-41 (peer review).
- “Tracking Tracking Stock” in *Tax Strategies for Corporate Acquisitions, Dispositions, Spin Offs, Joint Ventures, Corporate Reorganizations and Restructurings 2002*, written in cooperation with Stuart Finkelstein and Joseph Todd.
- Book Review of *More Guns, Less Crime: Understanding Crime and Gun Control Laws*, by John R. Lott, *Harvard Journal on Legislation* 37 (2000): 293-306.

**CONFERENCES / PRESENTATIONS:**

- “Political Hot Potato: When No One Wanted Responsibility of the Joint Tax Return,” at the University of Kansas School of Law, October 8, 2010.
- “London Calling: Does the U.K.’s Experience with Individual Taxation Clash With the U.S.’s Expectations?” at the Loyola L.A. Tax Policy Colloquium, September 13, 2010.
- “Tax Filing in the U.K.: A Guide for the U.S. When Eliminating the Marriage Penalty,” at the Critical Tax Conference, hosted by St. Louis University College of Law, April 9, 2010 (symposium).
- “Tax Filing in the U.K.: A Guide for the U.S. When Eliminating the Marriage Penalty,” at the Indiana University, Maurer School of Law, Tax Policy Colloquium, April 8, 2010.
- “Tax Filing in the U.K.: A Guide for the U.S. When Eliminating the Marriage Penalty,” at the University of Pittsburgh, January 19, 2010.
- “Tax Filing in the U.K.: A Guide for the U.S. When Eliminating the Marriage Penalty,” at the Central States Law Schools Association 2009 Annual Conference, October 24, 2009.
- “California Women: Putting the ‘Community’ in Community Property,” at the Ohio Legal History Seminar, October 16, 2009.
- “California Women: Putting the ‘Community’ in Community Property,” at the Law and Society Annual Meeting, May 30, 2009.
- “To Have and to Hold and to Shift Between Us: Rethinking Marital Property for Federal Income Tax Return Filings,” at the Law and Society Annual Meeting, May 28, 2009.
- “To Have and to Hold and to Shift Between Us: Rethinking Marital Property for Federal Income Tax Return Filings,” at the Critical Tax Conference, hosted by Indiana University Maurer School of Law – Bloomington, April 2-4, 2009.
- “To Have and to Hold and to Shift Between Us: Rethinking Marital Property for Federal Income Tax Return Filings,” at Villanova University School of Law, February 20, 2009.

“A Life of Its Own: The Rhetorical Power of the Early Income Taxes,” at National Tax Association Annual Meeting, November 20-22, 2008.

“What Does It All Mean? The Rhetorical Power of the Income Tax in the United States, 1861-1918,” at the 2008 Policy History Conference, May 29-June 1, 2008.

“To Save State Residents: States’ Use of the Federal System of Government for Tax Reduction,” at the UCLA Tax History Conference, July 15-16, 2007.

“To Save State Residents: States’ Use of the Federal System of Government for Tax Reduction,” at the Legal History Colloquium, New York University School of Law, January 24, 2007.

“You Pay For What You Get: Fitting the U.S. Virgin Islands Within the American Territorial Structure During the Period 1917 through 1936,” at University of Massachusetts, Amherst, Graduate Student Conference, Our Research Matters: New Dialogues on Latin America, the Caribbean and Latino Studies, April 30, 2005.

#### **RELATED EXPERIENCE:**

**Nixon, Peabody LLP**, Washington, D.C.

**Contract Tax Attorney**, Summer 2005

Performed tax due diligence and assisted with the defense of an Internal Revenue Service audit of tax-exempt bonds.

**Skadden, Arps, Slate, Meagher & Flom LLP**, New York, NY

**Tax Associate**, 2001-2003

Drafted documents establishing private equity and hedge funds incorporating specific provisions to address United States tax considerations. Worked with investment banks to develop new financial products.

Advised clients and participated in negotiations for both public and private acquisitions. Assisted client in tax litigation and bankruptcy proceedings.

**Cravath, Swaine & Moore, LLP**, New York, NY

**Tax Associate**, 2000-2001

Advised major client contemplating sale of domestic and international subsidiaries. Researched tax litigation processes and prepared presentation for department. Researched tax treatment of certain investments by tax-exempt entities.

**Harvard Law School**, Cambridge, MA

**Research Assistant**, 1999-2000

Aided Reuven Avi-Yonah in researching his article, “Globalization, Tax Competition and the Fiscal Crisis of the Welfare State,” *Harvard Law Review* 113, no. 7 (2000): 1573-676.

#### **PROFESSIONAL AFFILIATIONS:**

New York State Bar (admitted 2001)

American Society for Legal History

Law and Society Association

National Tax Association

**LAW SCHOOL AND PUBLIC SERVICE:**

Ohio Supreme Court Commission on the Certification of Attorneys as Specialists (2010-2011)

Faculty Cabinet (2010-2011)

Chairperson of the Research and Scholarship Committee of the Faculty Senate (2010-2011)

Advisory Council of the Center for Enhancement of Teaching and Learning (2010-2012)

Faculty Senate (2009-2011)

Appointments Committee (2010-2011)

Admissions and Financial Aid Committee (2009-2010)

Center for Professional Development Committee (2009-2010)

Bar Passage Committee, ad hoc committee (2008-2009)

Academic Policy and Curriculum Committee (2008-2009)

University of Cincinnati Course Redesign Seminar (2008-2009)