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Books:

FEDERAL INCOME TAXATION: DOCTRINE, STRUCTURE AND POLICY (Lexis-Michie, 3rd ed. 2004; 2nd ed., 1999; Michie-Butterworth, 1995) (with J. Clifton Fleming, Jr. and Deborah A. Geier).

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FEDERAL INCOME TAXATION (Casenotes Outline Series, 1990, and 2d ed., Casenotes-Aspen, 1999).

THE LOGIC OF TAX (West, 1989).

WILLS, TRUSTS, AND ESTATE PLANNING (West, 1988).

FEDERAL INCOME TAXATION: POLICY, PRINCIPLES, PLANNING (West, 1985). Also TEACHER'S MANUAL.

FEDERAL TAXATION OF ESTATES, TRUSTS, AND GIFTS (West, 1981). Also TEACHER'S MANUAL and 1982 Supplement.

Chapters:

The Story of Glenshaw Glass: Toward a Modern Concept of Gross Income, in Paul L. Caron, ed., TAX STORIES: AN IN-DEPTH LOOK AT TEN LEADING FEDERAL INCOME TAX CASES (Foundation Press, 2003).

Law Review and Journal Articles:

Replacing the Estate Tax with a Re-Imagined Accessions Tax, 60 HASTINGS LAW JOURNAL ____ (forthcoming 2009).

What Federal Taxes are Subject to the Rule of Apportionment, 11 UNIVERSITY OF PENNSYLVANIA JOURNAL OF CONSTITUTIONAL LAW 839 (2009).

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What's Wrong With Carryover Basis Under H.R. 8, 91 TAX NOTES 961 (2001).

Accessions to Wealth, Realizations of Gross Income, and Dominion and Control: Applying the "Claim of Right Doctrine" to Found Objects, Including Record-Setting Baseballs, 4 FLORIDA TAX REVIEW 685 (2000).

Lifting the Shroud Over Estate of Hubert: The Logic of the Income and Estate Tax Treatment of Estate Administration Expenses, 3 FLORIDA TAX REVIEW 647 (1998).

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The Free Exercise of Religion: A Sociological Approach, 67 MICHIGAN LAW REVIEW 679 (1969).

Monographs (Tax Management Portfolios, BNA Inc.):

TRANSFERS WITH RETAINED INTERESTS AND POWERS, 50-5th T.M. (1986, rev. ed. 1992).

BOOT DISTRIBUTIONS, 81-3d T.M. (1972, 1982).

REAL ESTATE LEASES AND IMPROVEMENTS, 47-3d T.M. (1973, 1979) (with Adlman).

BAD DEBTS, 19-6th T.M. (1973, 1977) (with Noel and Huffaker).

TRANSFERS TAKING EFFECT AT DEATH, 256 T.M. (1972).

Essays and Reports:

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Book Reviews:

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