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Books:

FEDERAL INCOME TAXATION, 6th ed. (Foundation Press, 2007) (with Paul R. McDaniel, Martin J. McMahon, Jr., and Daniel L. Simmons).

Law Review and Journal Articles:

Taxing Structured Settlements, 51 BOSTON COLLEGE LAW REVIEW ____ (forthcoming 2010) (with Brant J. Hellwig).

End the Yield Exemption Loophole Created by Childs, 123 TAX NOTES 1141 (June 1, 2009) (with Brant J. Hellwig).

Private Equity Management Fee Conversions, 122 TAX NOTES 743 (February 9, 2009).

Controlling Executive Compensation Through the Tax Code, 64 WASHINGTON & LEE LAW REVIEW 877 (2007).

A Tax Lawyer's Perspective on Section 527 Organizations, 28 CARDOZO LAW REVIEW 1773 (2007).

Reforming the Taxation of Deferred Compensation, 85 NORTH CAROLINA LAW REVIEW 571 (2007) (with Ethan Yale).

The Employment Tax Challenge to the Check-the-Box Regulations, 111 TAX NOTES 1039 (May 29, 2006) (with Brant J. Hellwig).

Regulating Section 527 Organizations, 73 GEORGE WASHINGTON LAW REVIEW 1000 (2005) (with Guy-Uriel E. Charles).

Taxing the Promise to Pay, 89 MINNESOTA LAW REVIEW 1092 (2005) (with Brant J. Hellwig) (reprinted at 2005 TAX NOTES TODAY 121-70 (June 24, 2005) and at 11 JOURNAL OF DEFERRED COMPENSATION 55 (No. 4, Summer 2006)).

Litigation Expenses and the Alternative Minimum Tax, 6 FLORIDA TAX REVIEW 899 (2004) (with Brant J. Hellwig (reprinted at 2005 TAX NOTES TODAY 135 (July 15, 2005))).

Employment Discrimination and Tax Gross-Ups, 90 IOWA LAW REVIEW 67 (2004) (with Stephen F. Befort) (reprinted in the July 2005 volume of THE MONTHLY DIGEST OF TAX ARTICLES).

The Contingent Attorney's Fee Tax Trap: Ethical, Fiduciary Duty & Malpractice Implications, 23 VIRGINIA TAX REVIEW 615 (2004).

Can Treasury Overrule the Supreme Court?, 84 BOSTON UNIVERSITY LAW REVIEW 185 (2004).

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A Correct Analysis of the Tax Treatment of Contingent Attorney's Fee Arrangements: Enough with the Fruits and the Trees, 37 GEORGIA LAW REVIEW 57 (2002) (reprinted at 2004 TAX NOTES TODAY 119 (June 21, 2004)).

Debunking the Crop-Share Analogy to Contingent Attorney's Fee Arrangements, 97 JOURNAL OF TAXATION 320 (2002).

Another Gitlitz Windfall: Double Basis Increases for S Corp. Shareholders?, 92 TAX NOTES 314 (July 9, 2001).

Taxing Contingent Attorneys' Fees: Many Courts Are Getting It Wrong, 89 TAX NOTES 917 (November 13, 2000).

Installment Reporting for Sales of S Corporation Stock with a Section 338(h)(10) Election, FLORIDA BAR JOURNAL, July/August 2000, at 44.

Other Publications:

What are the Tax Consequences for Plaintiffs Who Hire Their Attorneys on a Contingency Fee Basis?, PREVIEW OF U.S. SUPREME COURT CASES, November 1, 2004, at 73.

Contingent Fees: The Partnership Theory Isn't Sound, 105 TAX NOTES 612 (October 25, 2004) (Letters to the Editor)

Treasury Should Not Have Promulgated the Check-the-Box or INDOPCO Regulations, 23 ABA SECTION OF TAXATION NEWSQUARTERLY, Summer 2004, at 14.

Supreme Court to Decide Contingent Fee Issue, LABOR AND EMPLOYMENT LAW, Summer 2004, at 7 (with Stephen F. Befort).

Tax Bomb, Aimed at Middle Class, MINNEAPOLIS STAR TRIBUNE, March 7, 2004, at p. AA-3.

How Should an FLP's Note Be Treated? The Debate Continues, 98 TAX NOTES 1171 (March 17, 2003) (Letters to the Editor).

Why the FLP Note Used in the ECS Deal is "Property," 98 TAX NOTES 1160 (February 17, 2003) (Letters to the Editor).

