

Practice Areas

- Tax Controversy & Litigation
- Tax Planning
- Employment Tax
- International & Immigration

Education

- University of Florida, LL.M.T. (Taxation), graduate tax scholar
- University of Chile, LL.M. (International Law), highest distinction
- University of Kansas, J.D. (Law)
- University of Kansas, M.A. (Latin American Studies), honors
- University of Kansas, B.S. (Journalism), distinction

Honors

- Listed, Chambers USA: America's Leading Lawyers for Tax Litigation (2009, 2010, 2011)
- Georgia Super Lawyer (2012)

Bar Admissions

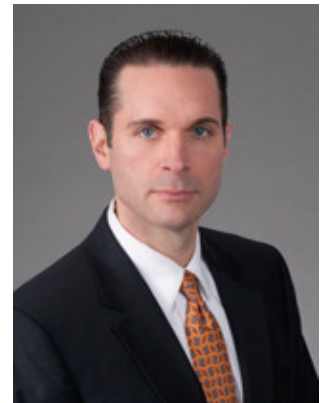
- Georgia Bar
- Florida Bar

Hale E. Sheppard

Shareholder

Atlanta

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Atlanta, GA 30303
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Practice Areas

- **Tax Audits.** Mr. Sheppard handles tax audits before the IRS and state revenue agencies. His cases involve all types of tax, including income, estate, gift, excise, and employment. Mr. Sheppard also regularly files refund claims, penalty abatement requests, and private letter ruling requests.
- **Tax Appeals.** Cases unresolved during audit often go the IRS Appeals Office. Mr. Sheppard routinely prepares Formal Protests and defends cases at the Appeals conference.
- **Tax Litigation.** If a tax dispute cannot be settled administratively, litigation often ensues. Mr. Sheppard has participated in cases before the U.S. Tax Court, Court of Federal Claims, various U.S. District Courts, Fourth Circuit Court of Appeals, and the Office of State Administrative Hearings.
- **Tax Collection Representation.** Mr. Sheppard has negotiated collection freezes, installment agreements, offers-in-compromise, and tax lien releases. In resolving tax payment issues, Mr. Sheppard has participated in numerous collection due process hearings, equivalent hearings, and the IRS's collection appeals program. Mr. Sheppard also regularly defends taxpayers in "trust fund" recovery penalty cases involving employment taxes.
- **International Tax Compliance and Disputes.** Mr. Sheppard frequently counsels clients on tax compliance issues related to foreign financial accounts (Form TD F 90-22.1 or FBAR), domestic entities operating abroad, foreign entities doing business in the United States, and expatriates. Mr. Sheppard has negotiated hundreds of tax settlements with the IRS under the Offshore Voluntary Compliance Initiative, Last Chance Compliance Initiative, and the Voluntary Disclosure Program.

Recent Reported Cases and Rulings

- *IRS Private Letter Ruling 127107-11* (IRS National Office ruling allowing taxpayer to rectify tax non-compliance related to Canadian registered retirement savings plan, RRSP)

- Texas Bar
- Washington, D.C. Bar

Court Admissions

- U.S. Tax Court
- U.S. Court of Federal Claims
- U.S. Court of International Trade
- U.S. Court of Appeals, Federal Circuit
- U.S. Court of Appeals, 4th Circuit
- U.S. Court of Appeals, 11th Circuit
- U.S. District Court, Middle District of Georgia
- U.S. District Court, Northern District of Georgia

Hale E. Sheppard, *Continued*

- *Tiger's Eye Trading, LLC v. Commissioner*, 138 T.C. No. 6 (2012) (Tax Court decision in TEFRA partnership litigation or jurisdictional issues related to outside tax basis and penalties)
- *IRS Private Letter Ruling 201131017* (IRS National Office ruling granting taxpayer an extension under 9100 regulations to make favorable international tax election)
- *IRS Private Letter Ruling 201149014* (IRS National Office ruling concerning special five-year net operating loss carryback rules)
- *Curtis Investment Company, LLC v. Commissioner*, T.C. Docket No. 10181-08 (pending Tax Court case of first impression concerning proper tax basis in the context of joint and several liability on debt obligations)
- *Landow v. Commissioner*, T.C. Memo 2011-177 (Tax Court case regarding employee stock ownership plans, scope of sales and dispositions, and taxpayer rights in cases of involuntary conversions)
- *IRS Private Letter Ruling 201002030* (IRS National Office administrative ruling allowing taxpayer to make multi-year election to resolve international tax issues on a penalty-free, tax-free basis)
- *Virginia Historic Tax Credit Fund v. Commissioner*, T.C. Memo 2009-295 (case of first impression in Tax Court regarding proper federal income tax treatment of state tax credit partnerships and their investors), rev'd 639 F.3d 129 (4th Cir. 2011)
- *Heartland Automotive Enterprises, Inc. v. United States*, 10 AFTR 2d 2009-2406 (M.D. Ga. 2009) (federal district court case concerning employment taxes and use of electronic tax payment system)
- *LVI Investors, LLC v. Commissioner*, T.C. Memo 2009-254 (Tax Court decision analyzing the statute of limitations on assessment in partnership proceedings)
- *Tiger's Eye Trading, LLC v. Commissioner*, T.C. Memo 2009-121 (decision by Tax Court on the validity of certain tax regulations and the ability to raise penalty defenses during TEFRA partnership litigation)
- *Topping v. Commissioner*, T.C. Memo 2007-92 (significant hobby loss case in which Tax Court ruled in favor of the taxpayer on all major issues concerning an equestrian-based interior design business)
- *IRS Private Letter Ruling 200751012* (IRS National Office ruling granting taxpayer relief from potential back taxes, interest, and penalties resulting from failure to properly report foreign retirement accounts)
- *Vines v. Commissioner*, 126 T.C. 279 (2006) (case of first impression in Tax Court involving the use of mark-to-market accounting by securities traders and the legal standards for extensions to file statutory elections)

Hale E. Sheppard, *Continued*

Articles & Publications

Mr. Sheppard ranks among the most active tax writers in the country, publishing over 70 articles in top trade journals and law reviews. Click on the following articles to access them:

- 1 Direct Sellers Hit by IRS Worker-Classification Audits: An Analysis of the Obscure Rules, Precedent, and Strategies Applicable to These Workers, [] [TAXES – The Tax Magazine](#) [] (2012).
- 2 Limited Liability Company Members and the Passive Activity Loss Rules: IRS Issues Proposed Regulations After Multiple Court Setbacks, 15(1) [Journal of Passthrough Entities](#) 51 (2012).
- 3 Qualified Amended Returns: Case of First Impression Examines Parameters of this Powerful Taxpayer Remedy, 116(2) [Journal of Taxation](#) 96 (2012).
- 4 IRS Introduces New Settlement Program for Worker-Classification Issues: Putting the Latest Employment Tax Offer into Perspective, 90(2) [TAXES – The Tax Magazine](#) 53 (2012).
- 5 Always Say Never: Tax Court Rejects IRS's Extreme Litigation Position in Penalty Cases, 13(5) [Journal of Tax Practice & Procedure](#) 43 (2011).
- 6 Better Late Than Never: The IRS Radically Changes Aggregation Election Procedures in Passive Activity Cases, 13(5) [Journal of Tax Practice & Procedure](#) 25 (2011).
- 7 If You're On Call, You're Out of Luck: Tax Court Limits Hours Counted in Passive Activity Loss Disputes, 86(4) [Practical Tax Strategies](#) 153 (2011).
- 8 The Internal Revenue Service Giveth and the Department of Justice Taketh Away: Recent Court Opinion Jeopardizes Retroactive Administrative FBAR Relief, 114(1) [Journal of Taxation](#) 18 (2011).
- 9 IRS Granted Major Mulligan in TEFRA Partnership Case: Three Novel Rulings Enable IRS to Avoid One-FPAA-Only Restriction, 89(1) [TAXES – The Tax Magazine](#) 47-58 (2011).
- 10 District Court Rules That Where There's No Will, There's a Way to Avoid FBAR Penalties, 113(5) [Journal of Taxation](#) 293-300 (2010).
- 11 Home Sweet "Property"? Tax Court Issues Examines Gain Exclusion on Sale of Principal Residence, 113(3) [Journal of Taxation](#) 175 (2010).
- 12 When Are Hard Times Hard Enough (for the IRS)? Examining Financial Distress as Reasonable Cause for Penalty Abatement During an Economic Downturn. 88(10) [TAXES – The Tax Magazine](#) 37 (2010); selected for republication in 12(5) [Journal of Tax Practice & Procedure](#) 29 (2010).
- 13 No Returns, No Problem: Tax Court Rules in Case of First Impression that IRS Must Consider "Economic Hardship" in Pre-Levy CDP Cases. 12(1) [Journal of Tax Practice & Procedure](#) 27 (2010).
- 14 As the World Turns: Court Rebuffs Novel Spin on International Tax Filing Rules, 36(2) [International Tax Journal](#) 45-48 (2010).
- 15 Strike Three for the IRS in Passive Activity Loss Cases: Courts United in Rejecting Outdated Limited Partnership Theories, 12(5) [Journal of Passthrough Entities](#) 59-69 (2009).

Hale E. Sheppard, *Continued*

- 16 Exploring the Limits of State Law in Resolving Federal Tax Disputes: Tax Court Denies the IRS's "Back Door" Approach in Alimony Case, 87(8) TAXES – The Tax Magazine 67-73 (2009).
- 17 Two More Blows to Foreign Account Holders: Tax Court Lacks FBAR Jurisdiction and Bankruptcy Offers No Relief from FBAR Penalties, 11(1) Journal of Tax Practice & Procedure 27-34 (2009).
- 18 How Much Must One Pay to Play? Recent Case Clarifies Jurisdictional Deposit Requirement in TEFRA Litigation, 11(5) Journal of Passthrough Entities 39-46 (2008).
- 19 It's in the Mail, Right? Recent Decision Emphasizes Limitations on the Mailbox Rule, The Practical Tax Lawyer 15-18 (Summer 2008).
- 20 Make a Decision Already! Recent Case Highlights How IRS Inaction Can Stymie Taxpayers Requesting Abatement, The Tax Adviser 256-258 (April 2008).
- 21 From the Cradle to the Grave: What Remains of Interest Suspension under Section 6404(g)? 10(1) Journal of Tax Practice & Procedure 41-50 (2008); selected for republication in 58(10) The Monthly Digest of Tax Articles 51-63 (2008).
- 22 There Are Some "Guaranties" in Life, But Do You Want to Be the One Making Them? Analyzing the Unique Tax Rules for Bad Debt Losses, 10(5) Corporate Business Taxation 29-34 (2009).
- 23 When Bygones Aren't Bygones: Exploring Solutions for U.S. Persons with Undeclared Canadian Retirement Plans and Accounts, 34(4) International Tax Journal 35-43 (2008).
- 24 Beware of the Two-Hatted Tax Matters Partner: Analyzing How Dual Roles Can Impact TEFRA Litigation, 10(6) Journal of Passthrough Entities 31-40 (2007).
- 25 Where There's a Will, There's a Delay: Do Recent Legislative Changes to the CDP Rules Solve the Perceived Problems? 85(11) TAXES – The Tax Magazine 39-44 (2007); selected for republication in 9(5) Journal of Tax Practice & Procedure 41-46 (2007).
- 26 Seeking Cost Reimbursement in Cases of First Impression: Zealous Advocacy or Pushing Your Luck? 21(3) The Practical Tax Lawyer 15-22 (2007).
- 27 Applying Old Theories in New Contexts: Interest Suspension Upheld Where Government Failed to Prove Fraud, 9(3) Journal of Tax Practice & Procedure 15-18, 47-48 (2007).
- 28 The Document Locator Number: Little-Known IRS Notation May Establish Tax Return Filing Date, 78(1) Practical Tax Strategies 4-11 (2007).
- 29 New Penalties for Undisclosed Foreign Accounts: Putting the Cart before the Horse? 8(3) Journal of Tax Practice & Procedure 29-36 (2006).
- 30 Evolution of the FBAR: Where We Were, Where We Are, and Why It Matters. 7(1) University of Houston Business & Tax Law Journal 1-41 (2006); selected for republication in 57(12) The Monthly Digest of Tax Articles 21-41 (2007).
- 31 Repatriating Subpart F Income: A Fresh Look at Electing to be Taxed as a Corporation, 38(2) Tax Notes International 173-178 (2005), 2005 Worldwide Tax Daily 70-21 (2005).
- 32 The Evolving Treatment of Qualified Foreign Dividends: Where Do We Stand Now? 16 Journal of International Taxation 28 (2005).
- 33 You Can Catch More Flies with Honey: Debunking the Theory in the Context of International Tax Enforcement, 83(2) TAXES – The Tax Magazine 29 (2005).

Hale E. Sheppard, *Continued*

- 34 Only Time Will Tell: The Growing Importance of the Statute of Limitations in an Era of Sophisticated International Tax Structuring, 30(2) Brooklyn Journal of International Law 453-484 (2005); selected for republication in 57(6) The Monthly Digest of Tax Articles 1-15 (2007).
- 35 Tax Treatment of Foreign Dividends Under the JGTRRA: Further Ambiguities and Opportunities, 15(10) Journal of International Taxation 20-27 (2004).
- 36 Regulating Foreign Disregarded Entities with Proposed Form 8858: Try, Try Again, 33(7) Tax Management International Journal 412-425 (2004).
- 37 The Impact of Recent Events on Section 911: Rocking the Boat or Capsizing the Vessel? 34 Tax Notes International 285 (2004), 2004 Worldwide Tax Daily 75-12 (2004).
- 38 The Foreign Earned Income Exclusion: U.S. International Tax Policy, Political Reality, and the Need to Understand How the Two Intertwine, 37(3) Vanderbilt Journal of Transnational Law 727 (2004).
- 39 Florida Forecast: More Rain on the Offshore Parade, 15(3) Lawyer 36-37 (2004).
- 40 Reduced Tax Rates on Foreign Dividends Under the Jobs and Growth Relief Reconciliation Act: Ambiguities and Opportunities, 15(7) Journal of International Taxation 14-27 (2004).
- 41 The New Federal-State Tax Enforcement Alliance: Carrots, Sticks and Implications for Taxpayers, 13(10) Journal of Multistate Taxation and Incentives 14-23, 46 (2004).
- 42 Fight or Flight of U.S.-Based Multinational Businesses: Analyzing the Causes for, Effects of, and Solutions to the Corporate Inversion Trend, 23(3) Northwestern University Journal of International Law and Business 551-588 (2003).
- 43 Rethinking Tax-Based Export Incentives: Converting Repeated Defeats Before the WTO Into Positive Tax Policy, 39(1) University of Texas International Law Journal 111-142 (2003).
- 44 The Andean Trade Preference Act: Past Accomplishments and Present Circumstances Warrant Its Immediate Renewal and Expansion, 34(4) George Washington University International Law Review 743-788 (2003).
- 45 Privilege, Work-Product Doctrine, and Other Discovery Defenses in IRS's International Tax Enforcement, 32(4) Tax Notes International 377-396 (2003), 2003 Worldwide Tax Daily 207-14 (2003).
- 46 Reduced Tax on Foreign Dividends: A Dose of Holiday Cheer for U.S. Investors, 14(4) Lawyer 34 (2003).
- 47 Revamping the Export-Import Bank in 2002: The Impact of this Interim Solution on the United States and Latin America, 6(1) New York University Journal of Legislation and Public Policy 89-130 (2002).
- 48 The NAFTA Trucking Dispute: Pretexts for Noncompliance and Policy Justifications for U.S. Facilitation of Cross-Border Services, 11 University of Minnesota Journal of Global Trade 235-275 (2002).
- 49 Partial Revocation of the Caribbean Basin Trade Partnership Act: An Analysis of Hemispheric Injuries and Domestic Benefits, 28 University of North Carolina Journal of International Law and Commercial Regulation 101-143 (2002).
- 50 Salvaging Trade, Economic and Political Relations with Mexico in the Aftermath of the Terrorist Attacks: A Call for a Reevaluation of U.S. Policy, 20(1) Boston University International Law Journal 33-72 (2002).
- 51 Reauthorizing the Export-Import Bank Affects Trade in the Americas, 9(8) Inter-American Trade Report (2002).

Hale E. Sheppard, *Continued*

- 52 The Continued Dumping and Subsidy Offset Act (Byrd Amendment): A Defeat Before the WTO May Constitute an Overall Victory for U.S. Trade, 10 Tulane University Journal of International and Comparative Law 121-155 (2002).
- 53 Trade Promotion Authority: Current Status and Potential Effects on U.S.-Latin America Trade, 9(4) Inter-American Trade Report 1-11 (2002).
- 54 U.S. Action to Freeze Assets of Terrorism: Manifest and Latent Implications for Latin America, 17(3) American University International Law Review 625-639 (2001).
- 55 The International Monetary Stability Act: Recognizing the Ripeness of this Economic Legislation to Render Benefits for the United States and Mexico, 32(3) University of Miami Inter-American Law Review 375-435 (2001).
- 56 Cross-Border Financing: The Impact of Recent Legislation on NAFTA Signatories, 15(2) Texas Transnational Law Quarterly 6-13 (2001).
- 57 Overcoming Apathetic Internationalism to Generate Hemispheric Benefits: An Analysis of and Arguments for Recent Secured Transactions Law in Mexico, 10(2) Florida State University Journal of Transnational Law & Policy 133-181 (2001).
- 58 U.S. Export Control Changes Concerning Cuba – Potential Gains for U.S. Agriculture, 8(15) Inter-American Trade Report 2139-2147 (2001).
- 59 Introduction of U.S. Currency in Ecuador: Arguments for External Participation, 16(2) Florida International Law Quarterly 12-18 (2001).
- 60 The New Mexican Insolvency Law: Imperative Judicial Modernization and Policy Justifications for U.S. Assistance, 6(1) UCLA Journal of International Law and Foreign Affairs 45-87 (2001).
- 61 Pensions in Brazil: Time for the Harvest, 3(1) Latin Insurance, 22-24 (2001).
- 62 Dollarization of Ecuador: Sound Policy Dictates U.S. Assistance to This Economic Guinea Pig of Latin America, 11(1) Indiana University International and Comparative Law Review 79-114 (2000).
- 63 Reinsurance in Brazil: The Rough Road to Privatization, 7(2) Journal of Reinsurance 1-12 (2000).
- 64 Transformation of the Costa Rican Insurance Market: Losing the Battle, Winning the War, 9(4) Global Reinsurance, 50-52 (2000).
- 65 Healthcare in Brazil: Bring Your Own Aspirin, 48(3) Health Insurance Underwriter 35-40 (2000).
- 66 Legalities vs. Realities: Privatization of the Nicaraguan Telecommunications Industry Gives New Meaning to the Phrase Caveat Emptor, 15(1) Texas Transnational Law Quarterly 7-11 (2000).
- 67 One Step Closer to Privatization? Legal Horizons (2000).
- 68 La internacionalidad de los mercados, la responsabilidad objetiva y la comercialización de productos defectuosos provenientes de Chile, 206 Universidad de Concepción (Chile) Revista de Derecho 43-73 (1999).
- 69 MERCOSUR and the Insurance Sector: At the Integration Crossroads, 2(3) Latin Insurance 24-27 (1999).
- 70 Native Forest Protection in Chile: The Inadequacies of the Recent Environmental Framework Law, 14(1) University of Oregon Journal of Environmental Law and Litigation 225-299 (1999).
- 71 El trabajo infantil en América Latina y Perú: un programa para su reducción, 29 Debate Agrario (Peru): Análisis y Alternativos 81-112 (1999).

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72 Certificación forestal: una opción medioambiental de vanguardia para Chile, XV(4) Ambiente y Desarrollo 54-57 (1999).

73 Pension Reforms in Latin America, Legal Horizons 22-24 (1999).

74 Timber Certification: An Alternative to the Destruction of the Chilean Forests, 14(2) University of Oregon Journal of Environmental Law and Litigation 301-350 (1999).


75 The Lome Convention in the Next Millennium: Modification of the Trade/Aid Package, 7(3) University of Kansas Journal of Law & Public Policy 83-104 (1998).

Tax Blawg

- The Parameters of Qualified Amended Returns Examined by Tax Court in Case of First Impression
- LLC Members and the Passive Activity Loss Rules: IRS Issues Proposed Regulations After Multiple Court Setbacks
- Settlement Program for Worker-Classification Issues: Putting the Latest Employment Tax Offer into Perspective
- If You're On Call, You're Out of Luck in Passive Activity Cases
- Better Late than Never: IRS Radically Changes Aggregation Election Procedures in Passive Activity Cases
- Always Say Never: Does Financial Distress Create Reasonable Cause Sufficient To Abate Tax Penalties?
- As the World Turns: Court Rebuffs Novel Spin on International Tax Filing Rules
- Where There's No Will, There's a Way to Avoid FBAR Penalties
- IRS Giveth and DOJ Taketh Away: Recent Opinion Jeopardizes Retroactive FBAR Relief

Citations as Legal Authority

In addition to publishing numerous articles, Mr. Sheppard has been cited as a legal authority in many prestigious journals over the years, such as:

- Harvard Law Review
 - Yale Law Journal
 - Columbia Law Review
 - Georgetown International Environmental Law Review
 - NYU Tax Law Review
 - Virginia Tax Review
 - Florida Tax Review
 - The Tax Lawyer
 - Michigan Journal of International Law
 - George Washington International Law Review
 - Fordham Urban Law Journal
 - UCLA Law Review
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- Northwestern Journal of Criminal Law and Criminology
- Boston College Law Review
- California Western International Law Journal
- Washington University Global Studies Law Review
- Pittsburgh Journal of Law and Commerce
- Wisconsin International Law Journal
- DePaul Law Review
- Georgetown Law and Policy in International Business
- Texas Law Review
- Suffolk Law Review
- Thomas M. Cooley Law Review
- South Texas International Trade Law Journal
- Columbia Journal of Transnational Law
- Air Force Law Review
- San Diego International Law Journal
- Southwestern University Journal of Law and Trade in the Americas
- Florida Journal of International Law
- Loyola International and Comparative Law Review
- Colorado Journal of International Environmental Law and Policy
- University of Denver Transportation Law Journal
- American University International Law Review
- UCLA Journal of Environmental Law and Policy
- North Carolina Journal of International Law and Commercial Regulation
- University of California-Davis Law Review
- University of California-Hastings Law Journal
- Wake Forest Law Review
- Southern Methodist University Law Review
- New Mexico Law Review
- Case Western Reserve Canada-United States Law Journal
- Washington Pacific Rim Law and Policy Journal
- Texas Tech Journal of Administrative Law



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- Fordham International Law Journal
- Minnesota Law Review
- Northwestern Journal of International Law and Business
- University of California-Davis Journal of International Law and Policy
- Tulsa Journal of Comparative and International Law
- New York International Law Review
- Southern Methodist University Law and Business Review of the Americas
- University of the Pacific Transnational Lawyer
- Widener University Law Review
- Revista Juridica de Puerto Rico
- Brooklyn Journal of International Law
- Tulane Journal of International and Comparative Law
- University of Cincinnati Immigration and Nationality Law Review
- Florida State Journal of Transnational Law and Policy
- Berkeley Journal of International Law
- Boston College International and Comparative Law Review
- American Journal of International Law
- Syracuse Law and Technology Journal
- International Business Lawyer
- Georgia Law Review
- Journal of International Economic Law
- Ohio State Law Journal
- Catholic University Law Review
- Pace International Law Review
- Texas International Law Journal
- U.S. Joint Committee on Taxation
- University of Connecticut Insurance Law Journal
- NYU Law Review
- Columbia Business Law Review
- Villanova Law Review
- Houston Journal of International Law



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- Cornell International Law Journal
- Fordham Law Review
- Federal Circuit Bar Journal
- Fordham Intellectual Property, Media, and Entertainment Law Journal

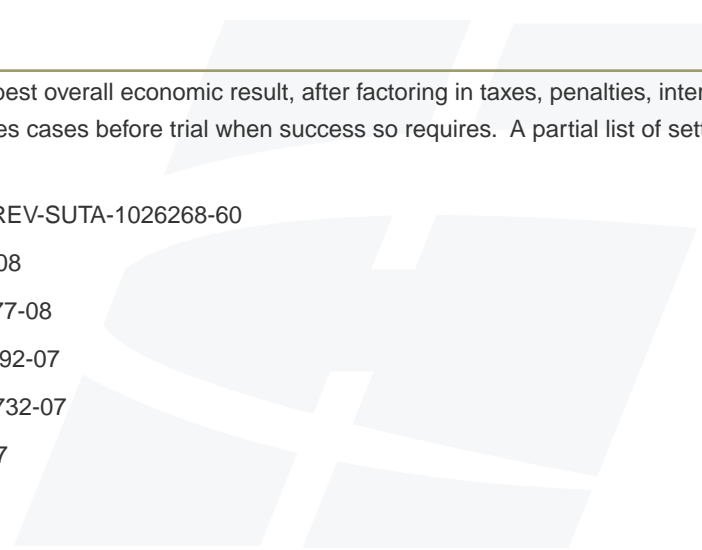
Speaking Engagements

Mr. Sheppard is a frequent speaker on tax topics, having presented before the following groups:

- Southern Federal Tax Institute
- National Association of Tax Professionals
- Southeastern Accounting Show
- American Woman's Society of Certified Public Accountants
- Atlanta Association of Former IRS Agents
- North Atlanta Tax Council
- Institute of Continuing Legal Education
- Georgia Tax Forum
- Atlanta Bar Association
- Georgia Association of Enrolled Agents
- American Society of Women Accountants
- Technology Association of Georgia
- National Association of Enrolled Agents National Convention
- Georgia Society of Certified Public Accountants (North Perimeter, Gwinnett, West Georgia, Buckhead, Savannah, Augusta, Southeast Georgia, Valdosta, Middle Georgia, Rome, Southside, Dekalb, and North Atlanta Chapters)

Unreported Cases

For taxpayers, "success" is measured by obtaining the best overall economic result, after factoring in taxes, penalties, interest, legal and accounting costs, etc. Accordingly, Mr. Sheppard resolves cases before trial when success so requires. A partial list of settled tax cases is provided below:

- *A.I. Enterprises v. Georgia Dept. of Revenue*, OSAH-REV-SUTA-1026268-60
 - *Asper v. Commissioner*, Tax Court Docket No. 14456-08
 - *Atkinson v. Commissioner*, Tax Court Docket No. 20377-08
 - *Baltimore v. Commissioner*, Tax Court Docket No. 24592-07
 - *Bonaventura v. Commissioner*, Tax Court Docket No. 732-07
 - *Byrd v. Commissioner*, Tax Court Docket No. 19218-07
- 

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- *Carr v. Commissioner*, Tax Court Docket No. 14192-11
 - *Carspecken v. Commissioner*, Tax Court Docket No. 6168-05
 - *Clark v. Commissioner*, Tax Court Docket No. 26201-10
 - *Deems v. Commissioner*, Tax Court Docket No. 13054-06
 - *Dixon v. Commissioner*, Tax Court Docket, No. 24439-09
 - *Edwards v. Commissioner*, Tax Court Docket No. 4480-08
 - *Entrekin v. Commissioner*, Tax Court Docket No. 13512-09
 - *Foster v. Commissioner*, Tax Court Docket No. 14907-08
 - *Graham v. Commissioner*, Tax Court Docket No. 17876-08
 - *Harp v. Commissioner*, Tax Court Docket No. 28603-10
 - *Hendrick v. Commissioner*, Tax Court Docket No. 8805-08
 - *Herrera v. Commissioner*, Tax Court Docket No. 21709-08
 - *Hogan v. Commissioner*, Tax Court Docket No. 17280-10
 - *Leroque v. Commissioner*, Tax Court Docket No. 13253-09
 - *Lockhart v. Commissioner*, Tax Court Docket No. 17809-06
 - *McAlister v. Commissioner*, Tax Court Docket No. 18584-08
 - *McGovern v. Commissioner*, Tax Court Docket No. 8145-09
 - *Mundy v. Commissioner*, Tax Court Docket No. 13500-08
 - *Murray v. Georgia Dept. of Revenue*, OSAH-REV-ITA-0904170-60
 - *Perez v. Commissioner*, Tax Court Docket No. 24434-09
 - *Schoen v. Commissioner*, Tax Court Docket No. 449-10
 - *Shofner v. Commissioner*, Tax Court Docket No. 5065-11
 - *Simmons v. Commissioner*, Tax Court Docket No. 5058-06
 - *Stringer v. Commissioner*, Tax Court Docket No. 15898-07
 - *Swan v. Commissioner*, Tax Court Docket No. 29465-08
 - *Terpstra v. Commissioner*, Tax Court Docket No. 12825-10
 - *Vintage at Mt. Vernon, LP v. Commissioner*, Tax Court Docket No. 15973-10
 - *Wasson v. Commissioner*, Tax Court Docket No. 8108-09
 - *Weller v. Commissioner*, Tax Court Docket No. 28236-08
 - *Wright v. Commissioner*, Tax Court Docket No. 5491-10
- 

Hale E. Sheppard, *Continued*

Academic Awards

- Janice Dawson Quinn Tax Scholarship
- Harry S. Truman Foundation Scholarship
- Tinker Foundation Scholarship
- National Security Education Program Fellowship
- Senator James B. Pearson International Fellowship
- Kansas Journal of Law & Public Policy, member and note contributor
- Florida Tax Review, graduate editor

Professional Affiliations

- Journal of Taxation, former Editorial Board member and tax columnist
 - IRS-Practitioner Liaison Committee, Georgia Bar representative
 - Journal of Tax Practice & Procedure, Editorial Board member
 - John Marshall Law School, former adjunct professor of taxation
 - Georgia Bar Tax Section, President
 - Georgia Bar Journal, former Editorial Board member
 - GSU Low-Income Taxpayer Clinic, Advisory Committee member
 - American Bar Association Tax Section
 - Atlanta Bar Association, Tax Section
 - Georgia Council for International Visitors, Citizen Diplomat
 - Chamberlain Hrdlicka – Executive Committee Member
 - American Citizens Abroad, Tax Advisory Council member
- 