

**Edward G. Fox**  
edfox@umich.edu  
University of Michigan Law School  
Hutchins Hall, 625 S. State St, Room 334 ■ Ann Arbor, MI ■ 734-763-0336

---

## ACADEMIC POSITIONS

*Professor of Law*, University of Michigan Law School 2023-Present  
*Visiting Professor of Law*, New York University 2024  
*Assistant Professor of Law*, University of Michigan Law School 2018-2023  
*Fellow*, N.Y.U. School of Law, Center for Law, Econ., & Org. 2017-2018  
Teaching: Federal Income Taxation, Tax Policy, Business Organizations, Contracts

## EDUCATION

### YALE LAW SCHOOL

J.D., June 2015

*Honors:* Winter Prize for Best Paper in Law and Economics (won in 2<sup>nd</sup> and 3<sup>rd</sup> year)  
William Wang Prize for Best Performance in Corporate Law Course

### UNIVERSITY OF MICHIGAN

Ph.D. in Economics, April 2018 (defended in Dec. 2017)

*Honors:* James Miller Scholarship

### COLUMBIA UNIVERSITY

B.A., *magna cum laude*, Economics and History (with honors), May 2007

*Honors:* Phi Beta Kappa  
Romine Prize for Best Paper Written in Senior Economics Seminar  
Charles Beard Prize for Distinguished Senior Thesis in History

## PUBLICATIONS AND WORKS IN PROGRESS

*How to Tax Business?: Economic Rents, Legibility, and the Corporate–Pass-Through Divide*  
(with Michael Love and Zachary Liscow)

*What Made Income Taxes Possible?* (with Conor Clarke and Wojciech Kopczuk)

*Who Benefits from Corporate Tax Cuts? Evidence from Banks and Credit Unions around the TCJA* (with Ben Pyle) (work in progress)

*The Poison Pill in Canada: A Road Not Taken* (with Gabriel Rauterberg) (work in progress)

[\*The Role of Unrealized Gains and Borrowing in the Taxation of the Rich\*](#) (with Zachary Liscow), XXX *Journal of Public Economics* YYY (2025)

- Coverage in [\*The Atlantic\*](#); [\*TaxProf Blog\*](#)

**[No More Tax-Free Lunch for Billionaires: Closing the Borrowing Loophole](#)** (with Zachary Liscow), 182 Tax Notes 647 (2024)

- Coverage in [TaxProf Blog](#); Policy writeup: [Washington Center for Equitable Growth](#)

**[Do Taxes Affect Marriage? Lessons from History](#)** American Law and Economics Review (2023)

- Coverage in [TaxProf Blog](#)

**[The Psychology of Taxing Capital Income: Evidence from a Survey Experiment on the Realization Rule](#)** (with Zach Liscow) 213 Journal of Public Economics 104714 (2022)

- Coverage in [The Washington Post](#); [Voice of America](#); [TaxProf Blog](#); Featured in [Columbia Blue Sky Blog](#). Op-Ed in [The Hill](#).

**[No New Tax Cuts? Examining the Rescue Plan's New State Tax Limits](#)** (with Conor Clarke) 103 TAX NOTES STATE 1361 (2022)

**[Is There a Delaware Effect for Controlled Firms?](#)** 23 U. PENN. BUSINESS L.J. 1 (2020)

- Featured in the [Columbia Blue Sky Blog](#)

**[Sharp Lines and Sliding Scales in Tax Law](#)** (with Jacob Goldin) 73 TAX LAW REVIEW 237 (2020)

**[A Case for Higher Corporate Tax Rates](#)** (with Zach Liscow) 167 TAX NOTES 2021 (2020).

**[Does Capital Bear the U.S. Corporate Tax After All? New Evidence from Corporate Tax Returns](#)** 17 J. EMPIRICAL LEGAL STUDIES 71 (2020)

**[Strengthening the Passivity Default](#)**, 44 ACTEC L.J. 289 (2019) (with Ian Ayres) (comment).

**[Alpha Duties: Excess Returns and the Evolution of Fiduciary Duties](#)** (with Ian Ayres) 97 Texas L. Rev. 445 (2019)

- Selected as a [Top 10](#) article of the year in corporate and securities law

**[Economic Crisis and the Integration of Law and Finance: The Impact of Volatility Spikes](#)**, 116 COLUMBIA L. REV. 325 (2016) (with Merritt Fox and Ronald Gilson)

Note, **[Perceptions of Taxing and Spending: A Survey Experiment](#)**, 124 YALE L.J. 1252 (2015) (with Conor Clarke)

- Coverage in [The Atlantic](#)

## EXPERIENCE

Hon. Stephen Reinhardt, Ninth Circuit, Los Angeles, CA  
Law Clerk.

2015-2016

Sidley Austin, Washington, D.C.  
Summer Associate.

Summer 2014

<b>U.S. Attorney's Office</b> , Civil Fraud Division, Los Angeles, CA <i>Summer Extern.</i>	Summer 2013
<b>University of Michigan</b> , Ann Arbor, MI <i>Graduate Student Instructor (in courses on economics of antitrust).</i>	2011-2012
<b>NERA Economic Consulting</b> , New York, NY <i>Analyst (promoted from Associate Analyst and Research Associate).</i>	2007-2010

## INVITED PRESENTATIONS AND PROFESSIONAL ACTIVITIES

### Recent Presentations:

2024-2025: National Tax Association Annual Meeting; Conference on Empirical Legal Studies, University of Virginia Law and Economics Workshop, Michigan Tax Invitational.

2023-2024: American Law and Economics Association Conference; National Tax Association Annual Meeting; NYU Tax Colloquium; Columbia Tax Colloquium; Conference on Empirical Legal Studies.

2022-2023 (on parental leave during one semester): Texas Law and Economics Workshop, Independent Commission for the Reform of International Corporate Tax; American Law and Economics Association Conference; NYU/UCLA Tax Conference.

2021-2022: American Law and Economics Association Conference; National Tax Association Annual Meeting; University of Toronto Law School; Oxford University (Center for Business Taxation); Georgetown Law and Economics Colloquium.

2020-2021: (on parental leave during one semester): National Tax Association Annual Meeting; U.C. Irvine Tax Policy Colloquium

2019-2020: National Tax Association Annual Meeting; Loyola Law School Tax Policy Workshop; Georgetown Law School Tax Policy Colloquium, Harvard Law School Law and Economics Seminar.

2018-2019: American Law and Economics Association Conference; Conference on Empirical Legal Studies; National Tax Association Annual Meeting; Northwestern Law School Law and Economics Workshop; Texas Law School Business Law Workshop; Duke Law School Tax Policy Workshop

2017-2018: American Law and Economics Association Annual Meeting; National Tax Association Annual Meeting; Conference on Empirical Legal Studies; NYU Law and Economics Workshop; National Bureau of Economic Research Summer Institute

Referee for *American Economics Review*; *Journal of Public Economics*; *American Law and Economics Review*, *International Tax and Public Finance*.

## PROFESIONAL AFFILIATIONS

National Tax Association, American Law and Economics Association

## BAR MEMBERSHIP

Texas