



letters to the editor

More Praise for Lee Sheppard

To the Editor:

I was amused by Sheldon Banoff's letter, "Is Lee Sheppard Suffering From P—— Envy?" *Tax Notes*, Apr. 24, 2000, p. 577. Mr. Banoff is right that, whatever her views may be, Lee Sheppard is masterful at stirring up controversy and masterful at expressive writing. Since she combines these skills, she is quite quotable. I have my own list of Lee Sheppard quotes, collected in my one face-to-face Lee Sheppard encounter at the USC Tax Institute a couple of months ago. Before many witnesses, while taking on "corporate tax shelters," Lee said:

"What's going on is not tax planning, because there is no such thing as tax planning."

"We as lawyers should be ashamed that we have to write an economic substance law into the tax law."

"You can buy any legal opinion you want."

"And now, for a less popular suggestion of mine . . ."

At this point in my quote scribbling I frankly ran out of steam, but I think Lee's last (supposedly even more unpopular suggestion) had something to do with attempting to import the tort concept of attractive nuisance into the tax law.

I'm still speechless (but Lee decidedly isn't). What an asset she is to Tax Analysts, even if I disagree with just about everything she says!

Kind regards,

Rob Wood
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