

RESUME

Jeffrey Schoenblum
Vanderbilt University
School of Law
Nashville, Tenn. 37203-1181
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Personal Information

Born: Brooklyn, New York, June 8, 1948
Married

Legal Education

Harvard Law School, J.D., 1973

Honors and Activities: Note Editor, Harvard Law Review

Undergraduate Education

The Johns Hopkins University, A.B., 1970

Honors and Activities: Awarded National Science Foundation Fellowship; Woodrow Wilson National Fellowship; Outstanding Undergraduate in German; Phi Beta Kappa

Clerkship

Judge J. Edward Lumbard, U.S. Court of Appeals for the Second Circuit

Employment

- | | |
|--------------|--|
| 1983 to date | Professor of Law
Vanderbilt University School of Law |
| | <ul style="list-style-type: none">• Selected by third-year class to be inaugural faculty speaker at Law School graduation, 2010• Awarded Hall-Hartman Outstanding Professor Award, 2009-2010, 2007-2008, 2006-2007, 2005-2006• Awarded Paul J. Hartman Award for Outstanding Professor, 2001-02; 1994-95; 1986-87. |
| 1980-1983 | Associate Professor of Law
Vanderbilt University School of Law |
| 1977-1980 | Assistant Professor of Law
Vanderbilt University School of Law |
| 1974-1977 | Associate, Wilkie Farr & Gallagher
New York, New York |

Books and Monographs

- Family, Kinship, Descent and Distribution (BNA 2010) (forthcoming)
- Multistate Guide to Trusts and Trust Administration (CCH 2010)
- Multistate and Multinational Estate Planning (two volumes) (CCH 2010 ed.)
- 2010 Multistate Guide to Estate Planning
- Page on Wills (eleven volumes - annual supplementation) (LEXIS 2009)

- “Taxation, the State, and Community,” published in *Taxation, Economic Prosperity, and Distributive Justice* (Cambridge University Press) and also published in 23:2 *Social Philosophy and Policy* (2006)
- *Bilateral Transfer Tax Treaties* (BNA 2003)
- *Estate Planning Forms* (annual supplementation) (LEXIS 2009)
- *A Guide to International Estate Planning: Drafting, Compliance, and Administration Strategies* (Jeffrey Schoenblum ed.) (American Bar Association 2000)
- *International Estate Planning: Principles and Strategies* (Jeffrey Schoenblum and Donald D. Kozusko eds.) (American Bar Association 1991).

Articles

- *Governing Law Clauses for Trusts*, 44 *HECKERLING INSTITUTE ON ESTATE PLANNING* ch. 14 (2010)
- *Taxation, the State, and Community*, 23:2 *SOCIAL PHILOSOPHY AND POLICY* 210 (2006), and also published in *TAXATION, ECONOMIC PROSPERITY, AND DISTRIBUTIVE JUSTICE* (Cambridge University Press)
- *In Search of a Unifying Principle for Article V of the Uniform Trust Code: A Response to Professor Danforth*, 27 *CARDOZO L. REV.* 2609 (2006)
- *Preface, Symposium: International Legal Dimensions of Art and Cultural Property*, 38 *VAND J. TRANSNAT’L L.* 921 (2005)
- *Trusts, Settlers, and Spouses – A Cross-Jurisdictional Analysis of Property and Marital Rights*, *TRUSTS AND TRUSTEES* (June 2003)
- *Myth of Ownership/Myth of Government*, 22 *VA. TAX REV.* 555 (2003)

- It's All in the Details: Advising Private Foundations and their Managers on Day-to-Day Operational Problems, 38th SOUTHERN FEDERAL TAX INSTITUTE, W-1-W-31 (2003)
- Reaching for the Sky or Pie in the Sky: Is U.S. Onshore Trust Reform an Illusion?, in EXTENDING THE BOUNDARIES OF TRUSTS AND OTHER RING-FENCED FUNDS IN THE TWENTY-FIRST CENTURY 291 (2002) (David Hayton ed.)
- Estate and Gift Tax Treatment of Diplomatic and Consular Officials, 31 TAX MGMT. INT'L J. 355 (2002)
- Conflicts of Law under the New Uniform Trust Code, 3 TRUSTS E ATTIVITA FIDUCIARIE 16 (2001)
- Fiduciary Duty And The Direct-Derivative Distinction In The Takeover/Merger Context, in L'ALAMBICCO DEL COMPARATISTA: AMMINISTRATORI: FIDUCIARI - MA DI CHI? (2001).
- The Role Of Legal Doctrine In The Decline Of The Islamic *Wakf*. A Comparison With The Trust, 32 VAND. J. TRANSNAT'L L. 1191 (1999)
- Preface, Symposium: The Rise of the International Trust, 32 VAND. J. TRANSNAT'L L. 519 (1999)
- Working with the Newer §2057 Small Business Deduction from the Gross Estate, 33 S. FED. TAX INST. R-1 to R-52 (1998).
- Conflict of Laws; Trusts and Civil Law; Situs Wills -- The American Perspective, in INTERNATIONAL ESTATE PLANNING (1996).
- Tax Fairness or Unfairness? A Consideration of the Philosophical Bases for Unequal Taxation of Individuals, 12 Am. J. TAX POLICY 221 (1995).
- Preface to GLOBAL Estate PLANNING (F. Sonneveldt & H. Bom eds. 1995) (Kluwer).

- The Use of Offshore Trusts by Residents or Nationals of Civil Law Jurisdictions, in INT'L WEALTH TRANSFER TECHNIQUES--1990S AND BEYOND (1995).
- Property Ownership and Succession Planning for the Foreign National: Conflicts of Law; Recognition of Trusts and Testamentary Dispositions; Marital Property Rights and Forced Heirship, in INT'L WEALTH TRANSFER TECHNIQUES--1990S AND BEYOND (1995).
- The Hague Convention on Trusts: Much Ado About Very Little, 3 JOURNAL OF INTERNATIONAL TRUST & Corporate PLANNING 5 (1994).
- The Adaptation of the Asset Protection Trust for Use by the Multinational Corporation -- The American Perspective, in COMMERCIAL ASPECTS OF TRUSTS AND FIDUCIARY OBLIGATIONS (Clarendon Press 1992).
- Multijurisdictional Estates and Article II of the Uniform Probate Code, in Symposium on the Uniform Probate Code: Reflections on Recent Revisions, 55 ALB. L. REV. 1291 (1992).
- An Introduction to Nontax Aspects of International Estate Planning, in INTERNATIONAL ESTATE PLANNING (J. Schoenblum & D. Kozusko 1991).
- Choice of Law and Succession to Wealth: A Critical Analysis of the Ramifications of the Hague Convention on Succession to Decedents' Estates, 32 VA. J. INT'L L. 84 (1991).
- Multistate Probate, Estate Administration, and the Federal Constitutional Limits of State Jurisdiction, 16 ACTEC NOTES 141-85 (Winter 1990).
- International Estate Planning: The Dangers of Multiple Death Taxation, 2 PROB. & PROP. 28 (July/August 1988).
- Will Contests: An Empirical Study, 22 REAL PROP. PROB. & TR. J. 607 (Winter 1987).

- Working with the Unified Credit, 15TH ANNUAL INSTITUTE ON ESTATE PLANNING (1981).
- From De Facto to Statutory Exemption: An Analysis of the Evolution of Legislative Policy Regarding the Federal Taxation of Campaign Finance, 65 VA. L. REV. 513–54 (1979).
- The Changing Meaning of "Gift": An Analysis of the Tax Court's Decision on Carson v. Commissioner, 32 VAND. L. REV. 641 (1979).
- With Charles Kingson, Derivative Foreign Tax Credit and U.K. Act: Dealing with an Integrated System, 45 J. TAX. 266 (1976).

Distinguished Lectures

- Nottingham Lecture, World Offshore Summit, Coral Gables, Florida, *Trusts, Settlers, and Spouses – A Cross-Jurisdictional Analysis of Property and Marital Rights*, October 2002
- Kings College, University of London, London, U.K., *Reaching for the Sky or Pie in the Sky? Is U.S. Onshore Trust Reform an Illusion?*, November 2001
- Paolo Fresco Lecture, Università di Genova, *Family Wealth Transfer Law in the U.S.: Web of Complexity and Lack of Uniformity*, May 2000
- Norton Rose Lecture, First Biennial Oxford Law Colloquium, Oxford University, United Kingdom, *The Adaptation of the Asset Protection Trust for Use by the Multinational Corporation -- The American Perspective*, September 1991.

Other Presentations

- Panelist and Presentations, "Estate Tax Repeal" and "Foreign Account Tax Compliance Act of 2009," the Second Annual Tax Policy

Symposium, Tax Policy and the Impact of Health Care Reform, Atlanta, Georgia (forthcoming Feb. 26, 2010)

- Presentation, "Looking for Trust Law in all the Right (and Wrong Places): Forum Shopping Opportunities, Unintended Consequences, and the Duties of the Estate Planner," 44th Annual Heckerling Institute on Estate Planning, Orlando, Florida, Jan. 28, 2010
- Commentator, The Law of Succession in the 21st Century, UCLA Law School, Feb. 8, 2008
- Speaker, New Perspectives on the Law of Trusts: International and Comparative Law Aspects, AALS Annual Meeting, Washington, DC, January 2007
- Commentator, Trust Law in the 21st Century, Cardozo Law School, September 2005
- Presentation, "Taxation, The State, and Community," Social Philosophy and Policy Journal roundtable on subject of Taxation, Economic Property, and Distributive Justice, June 2005
- Commentator, International Legal Dimensions of Art and Cultural Property, Vanderbilt University Law School, February 2005
- Presentation, Estate Planning Council of Middle Tennessee, *Jurisdictional and Conflict of Laws Issues under the Tennessee Uniform Trust Code*, Nashville, Tennessee, October 2004
- Presentation, 38th Southern Federal Tax Institute, *It's All in the Details: Advising Private Foundations and their Managers on Day-to-Day Operational Problems*, Atlanta, Georgia, September 2003
- IAETL Lecture, *What A Difference A Day Makes: Shifting Paradigms of International Financial Privacy*, World Offshore Summit, Coral Gables, Florida, October 2001

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- Panelist, The Hague Convention on the Law Applicable to Trusts and Their Recognition, The Offshore Summit, Coral Gables, Florida, October 2001
- Panelist, The Hague Convention on the Law Applicable to Trusts and Their Recognition, American College of Trust and Estate Counsel, Boca Raton, Florida, March 2001
- Chairman and panelist of program, International Estate Planning, at ABA National Convention 2000, New York City, August 2000
- Presentation to International Estate Planning Committee Meeting of the American College of Estate and Trust Counsel re U.S. Ratification of Hague Convention on the Law Applicable to Trusts and Their Recognition, San Francisco, June 2000
- Participant, Two-day international conference, Ubi Fiducia, Ubi Fides?, Institute on Comparative Law, Università di Genova, May 2000
- Keynote Speaker, *Alembic of Comparative Law: To Whom Do Directors Owe Fiduciary Duties?*, Università di Genova, May 2000
- Speaker and Panelist, Settlement of Disputes in Estate and Trust Matters Through Arbitration and Alternative Dispute Resolution, International Academy of Estate and Trust Law, Berlin, Germany, May 2000
- Chairman, Symposium on “The International Trust,” Vanderbilt Law School, Nashville, Tennessee, February 1999
- Moderator, Roundtable discussion dealing with the use of offshore trusts to defeat efforts by creditors of U.S. persons to reach their assets, Symposium on “The International Trust,” Vanderbilt Law School, Nashville, Tennessee, February 1999
- The *Wakf*. The Islamic Alternative to the Trust, Symposium on “The International Trust,” Vanderbilt Law School, Nashville, Tennessee, February 1999

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- An Exploration of the Offshore and Onshore Asset Protection Trust, Bradford Trust Co., Nashville, Tennessee, October 1998
- Presentation, 33rd Annual Southern Federal Tax Institute, *Working with the Newer §2057 Small Business Deduction from the Gross Estate*, Atlanta, Georgia, October 1998
- Wills and Trusts, West Bar Review for Tennessee, Summer 1996–97.
- An Introduction to the Non–Tax Fundamentals of International Estate Planning, St. Louis Estate Planning Council, St. Louis, Missouri, November 1994.
- Residency and Domicile for Purposes of Federal and State Taxation, ABA National Institute on International Wealth Transfers, Santa Barbara, California, May, 1994.
- Residency and Domicile for Purposes of Federal and State Taxation, ABA National Institute on International Wealth Transfers, Hilton Head, South Carolina, May, 1994.
- Ethics in Tax Practice, Chattanooga Tax Practitioners, Chattanooga, Tennessee, January, 1994.
- The Hague Convention on Trusts and Succession -- What is the Status?, IBC Conference on Offshore Trusts, New York, New York, November, 1993.
- Reflections of Vanderbilt Law School, Alumni Board of Directors, October, 1991.
- The Conceptual Framework for and Barriers to the Transfer of Private Wealth Across National Boundaries -- Nontax Aspects, American Bar Association National Institute on International Estate Planning, New York, New York, May, 1990.
- Multistate Probate, Estate Administration and the Federal Constitutional Limits of State Jurisdiction, Annual Meeting of the

American College of Probate Counsel, San Diego, California, March, 1990.

- Debate on the Ratification of the Hague Convention on the Law Applicable to the Estates of Decedents, American Bar Association, Colorado Springs, Colorado, October, 1989.
- Current Developments, Tennessee Tax Institute, Nashville, Tennessee, December, 1986.
- The Multi-State Client, Comprehensive Estate Planning, Vanderbilt University, June, 1984.
- The Use of Life Insurance, Comprehensive Estate Planning, National Law Foundation/Vanderbilt University, June, 1983.
- The Multi-State Client, Comprehensive Estate Planning, National Law Foundation/Vanderbilt University, June, 1982.
- Working with the Unified Credit, 15th Annual Institute on Estate Planning, University of Miami, Florida, January, 1981.

Appointed or Elected Memberships

- Advisor, American Law Institute, Restatement (3d) of Property -- Donative Transfers (rewriting Restatement (Second) as it pertains to wills and other donative transfers)
- Life Member, American Law Institute
- Academician, International Academy of Estate and Trust Law
- Academic Fellow, American College of Trust and Estate Counsel
- U.S. Legal Advisor, International Trust Companies Association, 1998–2000

- Member, Uniform Probate Code Study Committee, State of Tennessee, 1995–97.
- Various committees of the ABA sections on Taxation, on International Law, and on Real Property, Probate, and Trust Law
- Chairman, Committee on International Property, Estate and Trust Law, American Bar Association, 1986–1992.
- Associate Editor, ABA Real Property, Probate & Trust Journal, 1988–89

Law School and University Committees

- Member, Faculty Promotion Committee, Fall–Spring 2008–09
- Chair, Investigatory Committee re Alleged Student Cheating Violations, Fall 2008
- Chair, Faculty Appointments Committee/Entry–Level and PhD. Program in Law and Economics, Spring 2007
- Member, Faculty Appointments Committee/Laterals and Visitors, 2005–06
- Chair, Dean Search Committee, 2004
- Member, Faculty Appointments Committee, 2002–03
- Chair, Faculty Promotion Committee, 2001–02
- Curriculum Committee, 2001–02
- Member, Faculty Promotion Committee, 2000–01
- LLM Program Subcommittee, Curriculum Committee, 2000–01
- Chairman, Faculty Appointments Committee, Law School, 1999–00

- Member, Admissions Committee, 1999
- Member, Scholarly Programs Committee, 1998–99
- Member, University Benefits Committee, 1997–00
- Member, Faculty Appointments Committee, 1995–98
- Member, Law School Admissions Committee, 1993–94, 1994–95
- Member, Law School Building Committee, 1993–94
- Member, Law School Ad Hoc Legal Writing Committee, 1993–94
- Member, Law School Administrative Committee, 1992–93
- Chairman, Law School Student–Faculty Relations Committee, 1988–92
- Member, Law School Placement Committee, 1991–92
- Member, University Major Gifts Committee, 1986–91
- Senator, University Senate, 1989–90
- Member, Business and Non–Academic Affairs University Committee, 1989–90
- Member, Consultative Committee, 1989–90
- Member, University Research Council, 1989–90
- Chairman, Law School Grading Committee, 1986–88
- Member, Law School Faculty Selection Committee, 1986–87
- Member, Dean Search Committee, 1984–85

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- Chairman, Judicial Clerkship Committee, 1985
- Faculty Advisor, Vanderbilt Law Review, 1981–84

Representative Courses Taught

- Contracts
- Drafting and Analysis of Business Documents
- Estate Tax and Planning
- Federal Tax Law
- Taxation of Transnational Operations
- Wills and Trusts