

July 2024

## JON ENDEAN

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### ACADEMIC APPOINTMENTS

**BROOKLYN LAW SCHOOL**, Brooklyn, NY 2024–Present  
Assistant Professor of Law  
Courses taught: Federal Income Tax (Fall 2024); Corporate Tax (Spring 2025)

**NEW YORK UNIVERSITY SCHOOL OF LAW**, New York, NY 2022–2024  
Visiting Assistant Professor of Tax Law  
Courses taught: Corporate Tax I & II (Fall 2022, Fall 2023); Tax Policy Seminar (Spring 2023); Partnership Taxation (Spring 2024)  
Assistant Editor, *Tax Law Review*

### EDUCATION

**YALE LAW SCHOOL**, JD, 2016  
Editor, *Yale Law and Policy Review*  
Ludwig Center for Community and Economic Development Clinic  
Extern, U.S. Attorney's Office for the District of Connecticut

**RICE UNIVERSITY**, BA, *cum laude*, in Sociology, 2011  
Awarded Departmental Honors, Outstanding Senior Award  
Honors thesis: *Informal Relationships Matter: Network Brokers and the White House Fellows Program*  
Instructor, "An Olympic Fanfare: What the Olympic Games Mean in Our Society" (student-taught course offered to fellow undergraduates for academic credit)

### RESEARCH AND TEACHING INTERESTS

Primary: Corporate Taxation, Federal Income Taxation, Contracts, Partnership Taxation  
Secondary: Tax Policy, Business Organizations, International Taxation, Bankruptcy

### PUBLICATIONS AND WORKS IN PROGRESS

*Rethinking Valuation* (work in progress).

"For Tax Purposes": *The Vital Role Tax Incongruities Play in Shaping the Tax Law*, 78 TAX L. REV. \_\_\_ (forthcoming 2024) (job talk paper), [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=4535525](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4535525).

*A Payoff to Second Best Pragmatism: Rethinking Entity Classification for Foreign Companies*, 14 N.Y.U. J.L. & BUS. 311 (2017), [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=2967149](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2967149).

## PRESENTATIONS

### Rethinking Valuation

- Junior Tax Scholars Workshop, University of Wisconsin Law School (June 29, 2024)

### “For Tax Purposes”: The Vital Role Tax Incongruities Play in Shaping the Tax Law

- ACP Scholarship Clinic, NYU School of Law (April 21, 2023)
- Lawyering Scholarship Colloquium, NYU School of Law (April 14, 2023)
- Lawyering Scholarship Colloquium, NYU School of Law (July 27, 2023)

### Pillar Two: A Step Towards Ending Base Erosion?

- Quarterly Meeting of the New York State Bar Association Tax Section’s “Under 10” Group (November 15, 2022)

### The Foreign Tax Credit Proposed Regulations

- Quarterly Meeting of the New York State Bar Association Tax Section’s “Under 10” Group (September 19, 2019)

## PROFESSIONAL EXPERIENCE

### **COVINGTON & BURLING LLP**, New York, NY 2017–2022

*Associate.* Negotiated and drafted tax provisions of agreements in connection with M&A transactions. Analyzed tax consequences of taxable transactions and tax-free reorganizations. Drafted legal opinions for clients on various question of tax law. Pro bono work included helping form tax-exempt organizations, assisting nonprofit organizations comply with obligations under section 501(c)(3) of the Code, and serving as counsel to Professor John Inazu as *amicus curiae* in *Our Lady of Guadalupe School v. Morrissey-Berru*, 140 S. Ct. 2049 (2020).

### **SIMPSON THACHER & BARTLETT LLP**, New York, NY 2016–2017

*Associate.* Advised clients on bankruptcy and restructuring matters by helping negotiate restructuring support agreements and plans of reorganization. Drafted memos regarding litigation strategy and pleadings to be filed in bankruptcy court. (Summer Associate, Hong Kong & New York, 2015.)

### **NEW YORK STATE ATTORNEY GENERAL’S OFFICE**, New York, NY Summer 2014

*Law Student Intern.* Assisted in the investigation of civil matters, drafted motions to dismiss and for summary judgment, and helped craft legal arguments in preparation for the office’s defense of state officials.

## BAR ADMISSIONS

New York (2017)