

CURRICULUM VITAE - BRUCE NEIL EDWARDS

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Born: September 5, 1954 / Des Moines, Iowa (U.S. Citizen)

**Admitted to
Practice Law:** 1979 (Washington State) #9661
2000 (Alaska) #200009051

Academic:

1976 Bachelor of Arts, The Colorado College
1979 Juris Doctorate, The University of Washington
1980 Master of Laws (Taxation), New York University

Professional:

1990 - Present Sorensen & Edwards, P.S. (Tax Principal)
701 Fifth Avenue, Suite 3300
Seattle, WA 98104
1984 - 1990 Mackin, Sorensen, et al. (Tax Principal)
Seattle, Washington
1982 - 1984 Bassett, Morrison, et al. (Tax Associate)
Seattle, Washington
1980 - 1982 Law Clerk to The Honorable Shiro Kashiwa
Associate Judge, United States Court of Claims
Washington, D.C.

***Professional Memberships,
Awards & Recognitions:***

1979-present Washington State Bar Association
1984-present Martindale Hubbell Rating: AV
1994-present Fellow, American College of Tax Counsel
2000-present Alaska State Bar Association
2003-present Selected as Washington "Super Lawyer"

***Professional Writings
And Engagements:***

- 2019 *Author*, Portfolio #615, Income Taxation of Native Americans (including Alaska Natives) (Bloomberg Bureau of National Affairs, Washington, D.C.)
- 2018 *Author*, "The 2017 Tax Act and Settlement Trusts," 35 Alaska Law Review 1 (Duke University 2018).
- 2014 *Author*, Portfolio #610-3, Timber Transactions (Bloomberg Bureau of National Affairs, Washington, D.C.)
- 2013 *Author*, Portfolio #568-4, Involuntary Conversions (Bloomberg Bureau of National Affairs, Washington, D.C.)
- 2012 *Author*, Portfolio #594-3, Tax Implications of Home Ownership (Bloomberg Bureau of National Affairs, Washington, D.C.,)
- 2011 *Author*, "Fundamentals of Deferring Home Sale Gain," 27 Tax Management Real Estate Journal 472 (Bloomberg Bureau of National Affairs, Washington, D.C., 2011)
- 2004 *Author*, "Understanding and Using 'Partnership Redemptions' In the Context of Section 1(h)," 45 Tax Management Memorandum No. 19, 1 (2004)
- 2004 *Author*, T.P.S. Chapter 1530, Nonrecognition Transactions Upon Sale of Principal Residence (2004, Bureau of National Affairs)
- 2001 *Author*, "Understanding And Making The New Section 646 Election For Alaska Native Settlement Trusts", 18 Alaska Law Journal 217 (Duke University 2001)
- 2000 *Author*, Tax Practice Series, Chapter #2650, Taxation of Timber (Bureau of National Affairs, Washington, D.C.)
- 2000 *Author*, Tax Practice Series, Chapter #1520, Involuntary Conversions (Bureau of National Affairs, Washington, D.C.)
- 2000 *Author*, Tax Practice Series, Chapter #1510, Like Kind Exchanges (Bureau of National Affairs, Washington, D.C.)
- 1998 *Author*, Tax Practice Series, Chapter #3880, Tax Court Litigation (Bureau of National Affairs, Washington, D.C.)
- 1998 *Author*, Tax Practice Series, Chapter #3890, Refund Litigation (Bureau of National Affairs, Washington, D.C.)

- 1997 *Author*, Tax Practice Series, Chapter #3860, Statute of Limitations (Bureau of National Affairs, Washington, D.C.)
- 1997 *Author*, Tax Practice Series, Chapter #3850, IRS Audit Procedures (Bureau of National Affairs, Washington, D.C.)
- 1992 - present *Lead Taxpayers Counsel, IRS National Office Private Letter Rulings* PLR 201527004, 201523017, 200913001, 200927022, 200532041, 200127012, 2000128894, 199917036, 9839037; 9824014; 9713015, 9644039, 9631014, 9628009, 9516023, 9502011, 9433021, 9329026
- 1991 - 1993 *New Decisions Editor*, Journal of Taxation (Warren Gorham & Lamont, New York, New York)
- 1985 *Author*, Portfolio #33-7, Involuntary Conversions (Bureau of National Affairs, Washington, D.C.)
- 1984 *Author*, Washington Business Law Reporter, “Courts Improvement Act Creates New Forum for Suing Government”

Courts:

United States Supreme Court
United States Courts of Appeals

- 9th Circuit
- D.C. Circuit
- Federal Circuit

United States District Court for Western District of Washington
United States District Court for Eastern District of Washington
United States Tax Court
United States Court of International Trade
Yakima Nation Tribal Court

Washington State Supreme Court

Alaska State Supreme Court