

About the Authors

Jeffrey W. Koonce

Jeffrey W. Koonce is Vice-President and General Counsel of Bernhard Capital Partners Management, LP, a private equity management firm. He oversees the firm's legal and regulatory affairs and corporate governance activities, and he frequently deals with the business and tax issues related to limited liability companies in this capacity. Prior to joining Bernhard Capital Partners Management, LP, Mr. Koonce was a partner at Phelps Dunbar, LLP where he focused on federal and state taxation, business formations and business transactions. Mr. Koonce is a Tax Law and Estate Planning and Administration Specialist certified by the Louisiana Board of Legal Specialization.

Mr. Koonce has been recognized by *Chambers USA: America's Leading Lawyers for Business* and *Louisiana Super Lawyers* in the areas of tax and estate planning and probate and was recognized as "Lawyer of the Year" in tax law by *The Best Lawyers in America*. He was previously a member of the Baton Rouge Business Report's "Top 40 Under 40." He is the Past-President of the Baton Rouge Chapter of the Society of Louisiana CPAs, a Past-Board Member and Federal Tax Committee Member of the Louisiana Society of Certified Public Accountants, Past-President of the Baton Rouge Estate Planning Council and Past-Chairman of the Louisiana State Bar Association Tax Law Advisory Commission. He is also a Certified Public Accountant (inactive). He received his J.D. from the Louisiana State University Paul M. Hebert Law Center where he was Moot Court Chairman. Mr. Koonce earned his L.L.M. in Taxation from Boston University School of Law. He is a fellow of the American College of Trust and Estate Counsel.

Mr. Koonce is involved in his community as Past-Chairman of the Board of Trustees for the Louisiana Arts and Science Museum, Secretary and board member of the Louisiana Association of Nonprofit Organizations, an advisory board member for the Lighthouse for the Blind, Past-President of Capital City Kiwanis, a graduate of Leadership Baton Rouge, a graduate of Leadership Louisiana, Past-Chairman of the Baton Rouge Area Foundation Professional Advisors Committee, and a past Board Member of the Early Learning Center.

Mr. Koonce has served as an adjunct professor at the Louisiana State University Paul M. Hebert Law Center since 2004

where he teaches federal income taxation, and he has previously served as an adjunct professor at the Louisiana State University E. J. Ourso College of Business where he taught income taxation of corporations and partnerships. He is a frequent lecturer on estate and gift tax matters, business formations and federal income tax issues for universities and professional associations.

Philip T. Hackney

Philip T. Hackney is the James E. & Betty M. Associate Professor of Law at the LSU Law Center. He joined the faculty in 2011 after spending five years at the Office of the Chief Counsel of the IRS in Washington D.C. in its national office in Exempt Organizations. There he drafted IRS regulations, advised the TEGE commissioner, and litigated exempt organization tax issues. Professor Hackney earned a BA in political science at Southern Methodist University in 1992. Professor Hackney earned his JD at the LSU Law Center in 2001 where he was the Executive Senior Editor of the LSU Law Review and a member of The Order of the Coif.

Professor Hackney started his legal career as a law clerk to the late Honorable Henry A. Politz on the United States Fifth Circuit Court of Appeals. He joined Baker Botts LLP in Houston, TX in 2002 as a corporate associate working on mergers & acquisitions, securities offerings, public company corporate compliance, and investigations into accounting irregularities. In 2006, he obtained an LLM in Taxation from the New York University School of Law and joined the Office of the Chief Counsel of the IRS in its Exempt Organizations branch in that same year.

Professor Hackney writes and speaks regularly about non-profit organizations, tax exempt organizations, and partnership tax law. His two most recent articles are *Should the IRS Never "Target" Taxpayers: An Inquiry into the IRS Tea Party Affair*, and *Taxing the Unheavenly Chorus: Why Trade Associations are Undeserving of Tax Exempt Status*. Professor Hackney teaches Federal Income Tax I and II, Partnership Taxation, Nonprofit Organizations and a Tax Policy Seminar. Utilizing his experience with the IRS working with tax-exempt organizations and the nonprofit community, his scholarship focuses on nonprofit organizations and the tax issues associated therewith. He is particularly interested in the intersection between for-profit and not-for-profit activities within these organizations.