

Thirteen Proposals for \$100bil

1. The money a business gets for locating a sports arena or a factory is an immediate accession to the wealth of the corporation and its owners and should be taxed. Calvin H. Johnson, *'Contributions to Capital' from Nonowners*, 126 TAX NOTES 1127 (March 1, 2010) http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1563464. (\$10 billion a year)
2. The expensing and research credit makes things like Grand Theft Auto IV among the most heavily subsidized activities in America. *Capitalize Costs of Software Development*, 124 TAX NOTES 603 (August 10, 2009). http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1516809
3. The retirement plans that exempt gains from tax reduce national savings. *Repeal Roth Retirement Plans to Increase National Savings*, 128 TAX NOTES 773 (August 16, 2010) http://papers.ssrn.com/sol3/papers.cfm?abstract_id=2070120
4. Fees paid to tax lawyers and accountants for planning and litigation necessarily produce untaxed benefits and also just shift the tax burden to other taxpayers. It is an accounting mismatch to allow them to be deducted. *No Deduction for Tax Planning and Controversy Costs*, 129 TAX NOTES 333 (Oct 18, 2010). http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1710157 (\$38-\$48 b. a year)
5. Calvin H. Johnson, *Don't Let Capital Accounts Go Negative*, 129 TAX NOTES 127 (Oct. 4, 2010), [<http://www.utexas.edu/law/faculty/calvinjohnson/NegCapAcct.pdf>].
6. When the debt-equity ratio gets high, then equity represents an option in which heads equity wins and tails creditors lose. The option position is more valuable the more management can invest in high risk assets. *Corporate Meltdowns and the Deduction of Credit Risk Interest*, 131 TAX NOTES 513 (May 2, 2011), [http://www.utexas.edu/law/faculty/calvinjohnson/johnson_corporate_meltdown_debt.pdf] 1
7. Tax exempt municipal bonds are a major government waste because the federal costs are so much larger than the crumbs delivered to the issuers. *Repeal Tax Exemption for Municipal Bonds*, 117 TAX NOTES 1259 (2007) http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1520000
8. Compensation paid in excess of \$2000 a month would be subject to withholding. Unworkable "control" test would be abandoned. *Settle Withholding by the Dollars, not Control*. Tax Notes (pending August 2012)
9. Publicly traded stock is so much like cash that it should be taxed like cash when received in a corporate merger. *Taxing the Publicly Traded Stock in a Corporate Acquisition*, 124 TAX NOTES 1363 (Sept. 28, 2009). http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1517455.
10. In like kind exchanges, there is always cash just off stage, and no valuation problems. *Impose Capital Gains Tax on Like-Kind Exchanges*, 121 TAX NOTES 475 (2008)]. http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1520734 (\$5 b. a year)

11. Under current law, heirs get imaginary costs for tax. *Elephant in the Parlor: Repeal of Step-up in Basis at Death*, 121 TAX NOTES 1181 (2008)
http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1520739 (\$37 billion a year)

12. Calvin H. Johnson, *Casualty and Business Losses When Basis Has Not Been Lost*, 120 TAX NOTES 357 (2008)
[http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1520725]; see also Letters to Editor, *Applause for Reification of Basis*, 120 TAX NOTES 903 (September 1, 2008) [<http://www.utexas.edu/law/faculty/calvinjohnson/applause-for-reification-of-basis.pdf>].

13. Calvin H. Johnson, *Sale of Goodwill and Other Intangibles as Ordinary Income*, 118 TAX NOTES 321 (Jan. 14, 2008)
[<http://www.utexas.edu/law/faculty/calvinjohnson/sale-goodwill-other-intangibles-as-income.pdf>]