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Jason B. Freeman Managing Member

Mr. Freeman is the founding and managing member of Freeman Law, PLLC. He is a dual-credentialed attorney-CPA, author, law professor, and trial attorney. Mr. Freeman has been recognized multiple times by D Magazine as one of the Best Lawyers in Dallas, and by Super Lawyers and Texas Monthly magazine as a Rising Star in tax law.

He serves on the law school faculty at Southern Methodist University's Dedman School of Law, where he teaches a course in the law of federal income taxation, and he is a frequent public speaker across the country, presenting and educating on various legal topics. He is the President of the North Texas chapter of the American Academy of Attorney-CPAs, an executive board member of the Texas Society of CPAs, and member of the Board of Directors for the Dallas Society of CPAs. He is also a council member for the Tax Section of the Texas State Bar.

Mr. Freeman represents clients in litigation and disputes, with a particular focus on federal and state tax controversies, as well as white-collar and financial disputes, both civil and criminal. He handles IRS audits and other investigations, and represents clients facing tax and white-collar or financial-related charges. He also advises and assists clients with tax and regulatory compliance, including domestic and international tax planning and regulatory reporting requirements, as well as cryptocurrency and Blockchain implementations.

Honors and Awards

- 40 Under 40, Dallas Business Journal, 2018
- Best Lawyers Under 40 in Dallas, D Magazine, 2018
- Best Lawyers in Dallas, D Magazine, 2017 White Collar Defense
- Best Lawyers in Dallas, D Magazine, 2016 Tax
- Best Lawyers in Dallas, D Magazine, 2015 Tax
- Super Lawyers Rising Stars 2017, Tax Law, Super Lawyers Magazine
- Super Lawyers Rising Stars 2016, Tax Law, Super Lawyers Magazine
- Super Lawyers Rising Stars 2014, Tax Law, Super Lawyers Magazine
- Young CPA of the Year Award, 2015, Texas Society of CPAs
- Rising Star, 2014, Texas Society of CPAs
- Committee Member of the Year, Dallas CPA Society, 2014
- Member Spotlight: AICPA's Tax Section Feature Member, December 2014



Jason B. Freeman, J.D., CPA 2595 Dallas Parkway, Suite 420 Frisco, TX 75034 Direct: 214.984.3410 Jason@FreemanLaw-PLLC.com

Practices

Tax Litigation
Criminal & White-Collar Defense
Int'l & Offshore Tax Compliance
State and Local Tax Litigation
IRS Audits and Appeals
Business Litigation
Cryptocurrency and Blockchain

Education

The University of Texas School of Law, Austin, Texas
J.D. with High Honors
GPA: 3.95; Order of the Coif
Texas International Law Journal,
The University of Texas at Austin
P.P.A. Program—Joint B.B.A. and
M.A. in Professional Accounting,

Bar Admissions

Texas
U.S. Court of Appeals for the Seventh and Third Circuits
U.S. District Courts for the Northern, Southern, Western and Eastern
Districts of Texas
U.S. District Court for the Northern
District of Illinois; U.S. Tax Court;
U.S. District Court for the U.S.V.I.

U.S. Supreme Court; State Bar of



Professional Memberships and Affiliations

- American Association of Attorneys-CPAs
 - o President of North Texas Chapter
- American Bar Association Section of Taxation
- State Bar of Texas, Section of Taxation
 - o Tax Council Member
 - o Co-Chair of the Committee on Government Submissions
 - o State Bar of Texas Tax Section Leadership Academy
- Dallas Bar Association
 - o Tax Council
 - o Co-Chairman of the Bench Bar Conference Committee
 - o DBA Judiciary Committee (former member)
- Dallas Association of Young Lawyers
 - DAYL Judiciary Committee (former member)
 - o DAYL Leadership Class of 2012
- American Institute of Certified Public Accountants
 - o Tax Practice and Procedures Committee
 - Tax Legislation and Policy Committee (former member)
- Texas Society of CPAs
 - o Member of Executive Board of Directors (2016 2019)
 - o Director at Large (2014 2016)
 - o Editorial Board
 - o Federal Tax Policy Committee
 - Legislative Advisory Committee (2015 2016)
- Dallas CPA Society
 - o Board of Directors
 - Chairman CPE Committee
 - Public Affairs Committee
 - o Graduate of Leadership Development Academy
- Dallas Regional Chamber of Commerce
 - o DRC Young Professionals Board Member
 - o Co-Chair DRC Young Professionals Policy Committee
 - Leadership Development Program (graduate)

Publications

- Bitcoin, Blockchain, and the Revolution to Come, Today's CPA Magazine, January 2018
- A Primer on the Tax Implications of Settlements and Judgments, Dallas Bar Association Headnotes, December 2017
- Held Captive: Micro-Captive Insurance in the Aftermath of Avrahami, *Today's CPA Magazine*, November 2017
- IRS Penalties A Brief Primer, Today's CPA Magazine, September 2017
- Employment Tax Enforcement Rising to a Top Priority, The Journal of Accountancy, July 2017
- Employment Tax Enforcement is Trending, The Tax Advisor, AICPA, July 2017



- Representing Taxpayers in Sensitive Audits: A Look at the Fundamental Challenges of an Eggshell Audit, Today's CPA Magazine, July 2017
- Partnership Tax Audits: The New Rules, AICPA Tax Section Publication, May 2017
- Why (Nearly) Every Partnership Agreement Should be Amended, Today's CPA, May 2017
- Foreign-Owned Domestic Disregarded Entities: The New Reporting Requirements, *The Tax Advisor*, AICPA, April 2017
- An Update on International Tax Enforcement, Today's CPA, March 2017
- Tax Reform Under a Trump Administration, *Today's CPA*, January 2017
- Employment Tax Enforcement is on the Rise, Today's CPA, November 2016
- A Glimpse into the New Partnership Audit Rules, AICPA, The Tax Advisor, October 2016
- Bitcoin and Beyond: The Reality of Taxing and Regulating Virtual Currency, *Today's CPA*, September 2016
- A Brave New World: The Panama Papers and the United States Role as a Tax Haven, Today's CPA, June 2016
- Electing out of the BBA Partnership Rules, AICPA Tax Section, June 2016
- Internet Tax Freedom: State Taxation and the Internet, Today's CPA, May 2016
- The Evolution of Partnerships and Partnership Audits, *Today's CPA*, March 2016
- The IRS Budget: Taking Stock, *Today's CPA*, January 2016
- The New Highway Trust Fund Bill Paves the Way for Major Tax Compliance and Return Due Date Changes, *Today's CPA* Magazine, November 2015
- The U.S. and BEPS: Hurry Up and Slow Down, *Today's CPA* Magazine, September 2015
- A Look Back at More than a Century: The Federal Income Tax, Today's CPA, July 2015
- One Step Forward and Two Steps Back: Identify Theft and Taxes, AICPA Tax Section, June 2015
- Guiding Clients Through the Offshore Voluntary Disclosure Program, The Tax Advisor, AICPA, April 2015
- The Perfect Storm: Has the Tide Turned Against Offshore Tax Evasion?, *The Texas Tax Lawyer*, Winter 2015 Ed., Vol. 42, No. 2, Part 1, March 2015
- The Taxpayer Advocate Service: Taxpayers' Voice at the IRS, AICPA Tax Section Newsletter, February 2015
- The Perfect Storm: Has the Tide Turned Against Offshore Tax Evasion?, *Today's CPA*, January 2015 (Cover Story)
- Voluntary Disclosures and Streamlined Relief, Meadows Collier Newsletter, November 2014



- Funding the Taxman—A Brief Foray Into the IRS Budget Debate, AICPA Tax Section Newsletter, October 2014
- Uncle Sam Wants You—To Pay Your 3.8 Percent Tax On Net Investment Income!, Meadows Collier Newsletter, December 2013
- What Role Should the Guidelines Play in Sentencing White-Collar Offenders?, ABA White Collar Crime Newsletter, Winter 2013 Edition
- Five Things (and Then Some) Every Lawyer Should Know About Tax Law, Texas Young Lawyers Association E-Newsletter, August 2013
- Five Things Every Lawyer Should Know About Tax Law, Headnotes, Dallas Bar Association, August 2013
- There's a First Time for Everything: First-Time Penalty Abatements—What They Are and Why You Should Care, Texas Society of Certified Public Accountants E-Newsletter, July 2013
- Time Sensitive: Preserving More Favorable Franchise Tax Deductions Through Protective Refund Claims, Meadows Collier Newsletter, March 2012
- No Good Deed Goes Unpunished The Limitations and Pitfalls of Tax Code Driven Investment in the U.S. Virgin Islands, Journal of Tax Practice & Procedure, February – March 2012

Speaking Engagements

- Texas Society of CPAs Tax Course, Tax Reform's Impact on Corporations and Pass-Through Entities – San Antonio, TX – February 6, 2018 (4-hour course)
- Texas Society of CPAs Tax Course, Tax Reform's Impact on International Business – San Antonio, TX – February 6, 2018 (4-hour course)
- Dallas Bar Association, Bitcoin, Blockchain and the Bank Secrecy Act—Taxation, Regulation, and Reporting – Dallas, TX -February 5, 2018
- Texas Society of CPAs Tax Course, Tax Reform's Impact on Corporations and Pass-Through Entities – Fort Worth, TX – February 2, 2018 (4-hour course)
- Texas Society of CPAs Tax Course, Tax Reform's Impact on International Business – Fort Worth, TX – February 2, 2018 (4-hour course)
- Texas Society of CPAs Tax Course, Tax Reform's Impact on Corporations and Pass-Through Entities – Dallas, TX – February 1, 2018 (4-hour course)
- Texas Society of CPAs Tax Course, Tax Reform's Impact on International Business – Dallas, TX – February 1, 2018 (4-hour course)
- Practice Group Webinar, Bitcoin and Blockchain Regulatory Issues – Dallas, TX – January 2018
- American Academy of Attorney-CPAs, The New Partnership Tax Audit and Litigation Rules – Austin, TX – January 2018
- Texas State Bar, Tax Reform: What You Need to Know Now Austin, TX – January 2018



- Dallas Practice Management, Tax Reform's Impact on Businesses
 Frisco, TX January 2018
- Austin CPA Society "The New Partnership Tax Audit and Litigation Rules" – Austin, TX – November 2017
- Texas State Bar International Tax Symposium "Offshore Voluntary Disclosure and Related Procedures Update" – Webcast – November 2017
- Texas State Bar International Tax Symposium "International Criminal Tax" – Dallas, TX – November 2017
- Midland CPA Society "The New Partnership Tax Audit and Litigation Rules" – Midland, TX – November 2017
- Metroplex Practice Group "Blockchain, Bitcoin, and the Bank Secrecy Act – Taxation, Reporting, and Regulation" – Dallas, TX – October 2017
- Texas State Bar Advanced Tax Law Course "Offshore Compliance Options Overview" – Houston, TX – August 2017
- ACPEN, "IRS Penalties How to Get Them Abated" August 2017
- Texas State Bar, "Legal and Ethical Issues with Blockchain" Austin, TX – June 2017
- Texas Society of CPAs, "The New Partnership Audit Rules" Waco, TX May 2017
- Convergence, Dallas CPA Society, "The FBAR: Everything You Need to Know" – Dallas, TX – May 2017
- Dallas Regional Chamber of Commerce, Young Professionals, "Leadership and Career Mapping" – Dallas, TX – March 2017
- Collin County Bar Association Family Law Section, "What Every Family Law Attorney Should Know About Tax Law" – Plano, TX – February 2017
- North Texas MENSA, "An Update on Tax Issues" Dallas, TX January 2017
- Dallas Practice Management Group, "Issues in International Taxation" – Dallas, TX – March 2017
- State Bar of Texas, International Tax Symposium, "Offshore Tax Enforcement and Voluntary Compliance Programs" – Houston, TX – November 2016
- State Bar of Texas, International Tax Symposium, "Offshore Tax Enforcement and Voluntary Compliance Programs" – Dallas, TX – November 2016
- Texas State Bar Advanced Tax Law Course, Texas Law Center, "Offshore Tax Enforcement Update" – Austin, TX – October 2016
- IRS Nationwide Tax Forum, "Time to Pay the Piper: The New Partnership Audit Rules and the Impact on Entities of All Sizes" San Diego, CA September 15, 2016
- IRS Nationwide Tax Forum, "Time to Pay the Piper: The New Partnership Audit Rules and the Impact on Entities of All Sizes" Orlando, Florida September 1, 2016



- AAA-CPA, "Understanding the Stages & Strategies in a Criminal Tax Case" – August 30, 2016
- CPA Academy, "The Bank Secrecy Act & Beyond: Understanding Currency and Monetary Reporting Requirements" – August 25, 2016
- CPA Academy, "International Tax and Asset Reporting Compliance for the Everyday Client" – August 7, 2016
- Fort Worth Tax Institute, Fort Worth CPA Society, "Tax-Related Identity Theft" August 4, 2016
- Bloomberg BNA, "The Nuts & Bolts of a Criminal Tax Case" July 27, 2016
- Metroplex Practice Group, "International Tax" July 26, 2016
- AICPA, "Understanding the Stages & Strategies in a Criminal Tax Case" – July 19, 2016
- CPA Academy, "Understanding the IRS's Offshore Voluntary Disclosure Program" – June 22, 2016
- CPA Academy, "International Tax and Asset Reporting Compliance for the Everyday Client" – June 7, 2016
- CPA Academy, "Understanding the IRS's Offshore Voluntary Disclosure Program" – June 6, 2016
- CPA Academy, "Understanding the IRS's Offshore Voluntary Disclosure Program" – May 20, 2016
- San Angelo CPA Society, "The Offshore Voluntary Disclosure Program and Related Procedures" – San Angelo, TX – May 12, 2016
- AICPA (American Institute of CPAs), "International Tax and Asset Reporting for the Small Tax Practitioner" – May 10, 2016
- CPA Academy, "International Tax and Asset Reporting Compliance for the Everyday Client" – May 9, 2016
- CPA Academy, "International Tax and Asset Reporting Compliance for the Everyday Client" – May 4, 2016
- American Bar Association Symposium, "The Evolution of a Criminal Tax Case" – Washington, DC – April 1, 2016
- CPA Academy, "Understanding the IRS's Offshore Voluntary Disclosure Program" – March 18, 2016
- CPA Academy Webinar, "International Tax and Asset-Reporting Compliance for the Everyday Client" – February 26, 2016
- CPA Academy Webinar, "Bank Secrecy Act & Beyond Understanding Currency and Monetary Reporting Requirements" – February 12, 2016
- CPE in conjunction with the 2016 TSCPA Mid-Year Board Meeting, "Offshore Voluntary Disclosure Program" – January 27, 2016
- TSCPA CPE Expo, Houston, "International Tax and Asset Reporting Compliance for the Everyday Client" December 11, 2015
- International Tax and Asset-Reporting Compliance for the Everyday Client, AICPA Practitioners Symposium & TECH Conference in partnership with the AAA Practice Management Conference & AAM Summit, Orlando, FL June 10, 2015
- CPA Academy Webinar, "Bank Secrecy Act & Beyond: Understanding Currency and Monetary Reporting Requirements"
 December 28, 2015



- CPA Academy Webinar, "International Tax and Asset Reporting Compliance for the Everyday Client" – December 29, 2015
- TSCPA CPE Expo, San Antonio, "International Tax and Asset Reporting Compliance for the Everyday Client" – December 8, 2015
- Dallas Bar Association Tax Section, Dallas, "The Offshore Voluntary Disclosure Program and Related Procedures" – December 7, 2015
- TSCPA CPE Expo, Arlington, "International Tax and Asset Reporting Compliance for the Every Day Client" – December 3, 2015
- Offshore Voluntary Disclosure Program, 2015 International Tax
- Symposium sponsored by the International Tax Committee of the Tax Section of the Texas Bar – November 12 (Dallas) and November 13 (Houston)
- 17th Annual MC Taxation Conference, Dallas November 3, 2015
- Partnership Audits & Litigation (TEFRA), Advanced Tax Law Course sponsored by the Tax Section of the State Bar of Texas – October 29, 2015
- Offshore Voluntary Disclosure Program: An Update, The Knowledge Group Live Webcast – October 28, 2015
- The Bank Secrecy Act & Beyond, CPE Think Tank August 26, 2015 International Tax and Asset Reporting Compliance for the Everyday Client, CPA Academy August 25, 2015
- The Bank Secrecy Act & Beyond: Understanding Currency and Monetary Reporting Requirements, CPA Academy – August 13, 2015
- The IRS's Offshore Voluntary Disclosure Program and Related Procedures, CPE Think July 29, 2015
- Understanding the IRS's Offshore Voluntary Disclosure Program, CPA Academy – July 27, 2015
- International Tax for the Everyday Client, AICPA Webcast on the Voluntary Disclosure Program July 23, 2015
- International Tax and Asset-Reporting Compliance for the Everyday Client, CPA Academy Live Webinar June 15, 2015
- Important Criminal Tax Developments, American Bar Association Section of Taxation May Meeting, Washington, DC – May 9, 2015 Initiating a New Client Engagement: What Kinds of Ethical and
- Practice Standards Questions Arise for a New Client Representation, American Bar Association Section of Taxation May Meeting, Washington, DC – May 8, 2015
- Report on Important Criminal Tax Developments, American Bar Association Section of Taxation Annual Midyear Meeting, Houston, TX – January 31, 2015