

Jonathan H. Choi  
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## Employment

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**University of Southern California Gould School of Law**, Los Angeles, CA  
Professor of Law, 2023 - present

**University of Minnesota Law School**, Minneapolis, MN  
McKnight Land-Grant Professor (declined), 2023  
Solly Robbins Faculty Research Scholar, 2022 - 2023  
Associate Professor, 2020 - 2023

**New York University School of Law**, New York, NY  
Fellow, 2018 - 2020

**Wachtell, Lipton, Rosen & Katz**, New York, NY  
Associate, 2014 - 2018

## Education

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**Yale Law School**, J.D., 2014

*Yale Law Journal*, Executive *Bluebook* Editor

*Yale Journal on Regulation*, Founding *Bulletin* Co-Director

**Dartmouth College**, B.A., *summa cum laude*, 2011

Triple major: Computer Science (high honors for thesis), Economics, and Philosophy

Thesis: *A Solution to k-Exclusion with  $O(\log k)$  RMR Complexity*

Honors: Phi Beta Kappa, Sigma Xi (scientific honor society), Woodbury Memorial Law Prize

## Scholarship

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### Student-Edited

*Lawyering in the Age of Artificial Intelligence*, 109 MINNESOTA LAW REVIEW (forthcoming 2024) (with Amy Monahan and Daniel Schwarcz)

*Measuring Clarity in Legal Text*, 91 UNIVERSITY OF CHICAGO LAW REVIEW 1 (2024)

*Subjective Costs of Tax Compliance*, 108 MINNESOTA LAW REVIEW 1255 (2024) (with Ariel Jurow Kleiman)

*AI Tools for Lawyers: A Practical Guide*, 107 MINNESOTA LAW REVIEW HEADNOTES 1 (2023)  
(with Daniel Schwarcz)

*Beyond Purposivism in Tax Law*, 107 IOWA LAW REVIEW 1439 (2022)

*Legal Analysis, Policy Analysis, and the Price of Deference: An Empirical Study of Mayo and Chevron*, 38 YALE JOURNAL ON REGULATION 818 (2021)

*The Substantive Canons of Tax Law*, 72 STANFORD LAW REVIEW 195 (2020)

*An Empirical Study of Statutory Interpretation in Tax Law*, 95 NEW YORK UNIVERSITY LAW REVIEW 363 (2020)

*In Defense of the Billable Hour: A Monitoring Theory of Law Firm Fees*, 70 SOUTH CAROLINA LAW REVIEW 297 (2018) (law school paper)

*Early Release in International Criminal Law*, Note, 123 YALE LAW JOURNAL 1784 (2014)

*Tax Commitment Devices*, 15 JOURNAL OF BUSINESS AND SECURITIES LAW 1 (2014) (law school paper)

### **Peer-Edited / Peer-Reviewed**

*How to Use Large Language Models for Empirical Legal Research*, 180 JOURNAL OF INSTITUTIONAL AND THEORETICAL ECONOMICS (forthcoming 2024)

*AI Assistance in Legal Analysis: An Empirical Study*, 72 JOURNAL OF LEGAL EDUCATION (forthcoming 2024) (with Daniel Schwarcz)

*Large Language Models as Tax Attorneys: A Case Study in Legal Capabilities Emergence*, 381 PHILOSOPHICAL TRANSACTIONS OF THE ROYAL SOCIETY A: MATHEMATICAL, PHYSICAL AND ENGINEERING SCIENCES (2023) (with John Ney et al.)

*LegalBench: A Collaboratively Built Benchmark for Measuring Legal Reasoning in Large Language Models*, 37 PROCEEDINGS OF THE CONFERENCE ON NEURAL INFORMATION PROCESSING SYSTEMS TRACK ON DATA AND BENCHMARKS (2023) (with Neel Guha et al.)

*A Limited Defense of Efficiency in a Tax-and-Transfer Framework*, 37 SOCIAL PHILOSOPHY AND POLICY 252 (2023)

*ChatGPT Goes to Law School*, 72 JOURNAL OF LEGAL EDUCATION 387 (2023) (lead author, with Kristin Hickman, Amy Monahan & Daniel Schwarcz)

### **Works in Progress**

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*A Comprehensive Survey of Canon Use at the Supreme Court, 1789 - 2023* (with Nina Mendelson)

*A Highly Tactical Guide to Using Large Language Models in Empirical Research* (invited article, JOURNAL OF LAW AND EMPIRICAL ANALYSIS)

*Capitalization and Tax Subsidies*

*Corpus Linguistics and the Dream of Objectivity*

*Detecting and Correcting Bias in the Law* (with Jonathan May)

*Evidence on Textual Clarity from a Survey Experiment* (with Kevin Tobia)

*Exceptionalism Universalism*

*A Longitudinal Study of Congressional Sentiment Toward the Supreme Court* (with Samuel Simon)

*Measurement Error Correction for Empirical Legal Research* (with Paul Connell)

## Other Writing

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“The Case for a Tilt *Toward* Revenue in Tax Administration”, JOTWELL, Apr. 18, 2023

“Democrats Should Finally Close the Carried Interest Loophole for the Wealthy,” op-ed, WASHINGTON POST, September 14, 2021

“A Survey of Law Professors on Tax Reform,” YALE JOURNAL ON REGULATION: NOTICE AND COMMENT, August 25, 2021

“Are Agencies Really More Purposivist than Courts?,” YALE JOURNAL ON REGULATION: NOTICE AND COMMENT, October 2, 2019

“The Most-Cited Tax Articles of All Time,” YALE JOURNAL ON REGULATION: NOTICE AND COMMENT, May 11, 2019

## Academic Presentations

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- 2024 Yale Law School Theories of Statutory Interpretation Seminar; William and Mary Law School Faculty Workshop; University of Southern California Gould School of Law Faculty Workshop; Harvard Law School Seminar on the Legal Profession; Gruter Institute Conference
- 2023 University of Virginia Tax Conference; Yale Law School Law, Economics and Organization Workshop; University of Pennsylvania Law and Economics Seminar; University of Toronto Law School Faculty Workshop; Ohio State University Information Governance Colloquium; National Tax Association Annual Conference; Harvard/Stanford/Yale Junior Faculty Forum; University of Denver Sturm College of Law Faculty Workshop; University of Florida College of Law Faculty Workshop; Northwestern University Tax Colloquium; Loyola Law School, Los Angeles Faculty Workshop; Georgetown University Law Center Legislation Roundtable; Max Planck Institute Conference on Machine Learning and Law; Florida State University Tax Scholarship Workshop; University of San Francisco Law School Tax Policy Colloquium; Association of American Law Schools Panel on “Statutory Interpretation in the Era of High Textualism”
- 2022 University of Virginia School of Law Faculty Workshop; Cornell Law School Faculty Workshop; University of Miami Law School Faculty Workshop; Northwestern/Penn/Stanford Junior Faculty Forum for Law and STEM; American Law and Economics Association Annual Meeting; Junior Tax Scholars Workshop; Max Planck Institute Law and Economics Seminar; National Tax Association Annual Conference; University of Minnesota Law School Faculty Squaratable; University of Illinois College of Law Faculty Workshop; Conference on Empirical Legal Studies; Singapore Management University Computational Legal Studies Conference; Online Workshop for the Computational Analysis of Law; Duke Law School Tax Policy Seminar; Boston College Tax Policy Workshop
- 2021 University of Minnesota Public Law Workshop; University of Minnesota Law School Faculty Squaratable; UC Irvine Law Tax Policy Colloquium; University of Wisconsin Faculty Workshop; University of Toronto Faculty Workshop (COVID-19 cancellation); Indiana University Maurer School of Law Tax Policy Colloquium; Break into Tax Series; University of Florida Tax Policy and Public Finance Colloquium; USD-Davis-Hastings Tax Law Speaker Series; Online Workshop for the Computational Analysis of Law Conference; Duke University Annual Administrative Law Symposium; Association of American Law Schools New Voices in Administrative Law and Legislation Panel; Association of American Law Schools New Voices in Taxation Panel; Arizona State University Justifying Taxation Conference
- 2020 Law and Society Association Conference; New York University Lawyering Scholarship Colloquium; National Tax Association Conference; Florida-Michigan-Virginia Virtual Law and Economics Workshop; University of Oregon Law Tax Policy Colloquium; University of Minnesota Law School Faculty Squaratable; University of Toronto Law & Economics Colloquium (COVID-19 cancellation); Junior Tax Scholars Workshop; Critical Tax Conference; AALS Annual Meeting

2019 Conference on Empirical Legal Studies; Harvard Law School Caselaw Access Project Summit; New York University Lawyering Scholarship Colloquium; Law and Society Association Conference; Critical Tax Conference

2018 New York University Lawyering Scholarship Colloquium

## Selected Media

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*ABA Journal, ABC News, Bloomberg News, Bloomberg Law, Business Insider, CBS News, CNN, Fast Company, Fox News, Mother Jones, NBC Nightly News, NPR, Reuters, The Daily Mail, The New Yorker, The Practice, The Star Tribune, USA Today*

## Other Selected Presentations

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American Bar Association, Law School Admissions Council, West Academic, Minnesota State Bar Association, Sansad TV (Indian parliamentary TV station)

## Teaching

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AI and the Future of Law, Corporate Taxation, Federal Income Taxation, Legislation and Regulation

## Grants

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OpenAI Researcher Access Program, Keston Exploratory Research Award, Kommerstad Faculty Imagination Fund

## Service

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**Advisor:** Asian Pacific American Law Students Association, Venture Capital and Technology Association, Privacy, Cybersecurity, and Technology Law Association

**Committees:** Dean Search Committee, Tenure and Promotion Committee, Academic Affairs Committee, Faculty Works in Progress Committee, Faculty and Staff Recognition Committee, SJD Admissions Committee

**External Service:** Executive Committee Member, AALS Section on Legislation and Law of the Political Process

**Reviewer:** *Journal of Law and Economics, Journal of Empirical Legal Studies, Journal of Law and Empirical Analysis*

## Bar Admission

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New York, 2015