

EARNING MY CREDITS: LIFE AT RUCHELMAN P.L.L.C.

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Tags
Extern
Learning Experience

Vanessa Lebbos served as an extern at Ruchelman P.L.L.C. during her last semester at New York Law School. For two days each week, she assisted attorneys in researching issues while learning about the practice of law. Currently, she is studying for the New York State Bar Examination and has a position lined up at PwC.

INTRODUCTION

Credits and externship credits co-mingled during my time at Ruchelman P.L.L.C. While I sought to gain externship credits and learn about the tax world, I spent a lot of time learning about tax credits and the legal field through my mentors at the firm.

In this article, I will share my initial experiences in the tax world. As I look back, I realize how much I benefited from working alongside the team at Ruchelman, P.L.L.C.

WHO AM I?

My name is Vanessa Lebbos, and I'm originally from Detroit, Michigan. Having studied international relations and political economics at Michigan State University, I knew I wanted to pursue the practice of international law when I came to New York City and entered law school.

In August 2021, I began my legal education at New York Law School. Although I am focused on pursuing tax law now, coming in I thought I wanted to pursue IP law, specifically the fashion facet of it all. The experience in my first year looked much like that of any other law student; torts, contracts, property (something I did not think I'd ever have to deal with again, that is, until I began my tax career), Criminal law and other prep courses.

After making it through the first year of required courses, I dove headfirst into I.P.-specific courses. Copyrights, Intellectual Property, Entertainment Law, Fashion Law and Technology – you name it, I took it. And what I encountered was one big disappointment. I learned pretty quickly that none of what I learned prepared be for the intersection of international law and intangible property.

At this point, I finished the first semester of my second year, and I thought pretty much what everyone thinks . . . “Oh no, what now?” Then it hit me. I loved my class on Corporation Law and expected that Mergers and Acquisitions would not be too different from that, right?

Wrong. It was way different, but it led to me tax. I was lucky enough to discover that I really enjoyed learning about the tax aspects in that course and spoke to an esteemed professor (who is now my mentor). He led me on the right track to pursue a career in tax law through his courses. I've taken Individual Tax, Corporate Tax, International Tax and even Tax Research and Writing, all of which have led me to work as an extern at Ruchelman P.L.L.C.

EXPECTATIONS

My externship at Ruchelman P.L.L.C. gave me the opportunity to put my legal education into practice, especially in regard to cross-border tax matters.

Beginning this externship brought on many emotions – excitement, worry, anxiety (though I'm happy to say only the excitement has stuck with me). I was excited to learn how U.S. tax planning intertwined with cross-border tax matters. The diverse client base at Ruchelman P.L.L.C. gave me a unique opportunity to learn these intricacies first-hand.

Aside from the client base, the experience that each individual attorney brought to the office made for a very exciting day at the firm. They bring experience from different countries and nationalities, expanding the client base, and bringing their expertise to matters. Whether the clients are a U.S. based company or a foreign individual, the team always knows how to the matter and taught me as I assisted on projects.

As an extern, my goal was to contribute to the operations of the team and help them with research, while also bringing my knowledge from the tax courses I've taken. I hoped that my knowledge in French, Arabic, and English could also contribute to the firm and be an asset. Aside from contributing my research skills, legal education, and language skills, I hoped to learn how to use these skills in unison to make me a strong extern and future attorney.

WHAT WAS MY EXPERIENCE LIKE?

I got to the office 45 minutes early on my first day and just waited in the lobby waiting for a good time to go upstairs without seeming too eager. I received an email before starting that there would be an office lunch where I'd meet everyone. I remember being too nervous to eat but the attorneys were so friendly that it immediately made the mood lighter. The chairman of the firm, Stanley, took the time to sit down with me and explain the ins-and-outs of the office, what their mission is, and what I can expect from this externship. Then he asked me what I wanted to learn, what my expectations were, and what I hoped to gain from this experience.

Everyone was welcoming and introduced themselves to me. My first day ended up being one of my favorite days at the firm because of how friendly and welcoming the attorneys and staff are here. I felt like an actual colleague and not just an extern while working at Ruchelman P.L.L.C.

Every day on the job brought something new and allowed me to explore the Internal Revenue Code in practice, while observing – and working on – U.S. inbound and outbound financial transactions and tax planning. My first assignment was given to me on my first morning – a memo on the Limitation of Benefits Article in a tax treaty between the United States and Barbados. The Limitation on Benefits Article in an income treaty prevents residents of third countries from treaty shopping and trying to assume favorable U.S. tax treatment that may not be intended for them. This was something I became familiar with more and more as I worked at Ruchelman as proper resort to income tax treaties was an important part of the practice conducted in the office.

Another exciting project was looking into the exchange of information between other nations and the United States. The I.R.S. has the right to exercise its summons power, and it was my job to research cases, citations, and other court holdings to determine when the summons power is likely to be granted. My research didn't stop there, I looked into what is considered U.S. Situs for non-resident/non-citizens, what the exit tax and a covered expatriate are, foreign estate issues, and even newer, complex areas of tax law such as the G.I.L.T.I. tax. Through this work, I was able to learn about new topics I was not exposed to in a classroom setting.

I was lucky enough to join conferences and meetings with external attorneys that were participating in various tax panels to hear about the way U.S. tax law interacts with cross-border tax laws, particularly one about family offices and the ways in which they operate in the U.K. and U.S., and how to help those clients obtain the best tax treatment.

Above all else, my daily work at Ruchelman P.L.L.C. taught me the best ways to do legal tax research and improved my writing skills. I was able to support the team by preparing documents, drafting conference notes, conducting research, and helping write memos. While I mainly worked under one attorney, I was lucky enough to learn from all attorneys at the firm and was given assignments from most of the team. Everyone took the time to explain what they were looking for in my work, went over it with me to supply me with feedback, and allowed me to ask as many questions as necessary to complete the assignment. These same colleagues are the ones I know I will be able to reach out to when I have questions once I begin work after I sit for the Bar exam. I feel very lucky to have been able to work with the team at Ruchelman P.L.L.C., after all, how great it is to have found a place that makes saying goodbye so hard!

CONCLUDING REMARKS, SPECIAL THANKS AND . . . WHAT COMES NEXT?

Following this externship, I graduated from New York Law School in May, and am studying to take my bar exam in July. Then I will begin working for Price Waterhouse Coopers (PwC) as an international tax associate come August. I would like to give a very special thank you to Stanley, who welcomed me with open arms and taught me the ins and outs of tax law. No question was ever too dumb, and he was always willing to teach me. I would also like to give a special thanks to Professor Alan Appel, my mentor who taught me all about the tax world, and to thank him for introducing me to the firm. Thank you to everyone in the office (named in no particular order) Neha Rastogi, Michael Bennett, Wooyoung Lee, Nina Krauthamer, Simon Prisk, Gilda Bueno, Chayene Ross, and Josefa Corpuz for being so welcoming and helpful during my time at Ruchelman. Also, thanks to Galia Antebi who heads our overseas office.

Leaving Ruchelman P.L.L.C., I feel ready to take on the tax world and bring my knowledge to PwC and beyond. The experience of this externship is one I hold in such high regard, and I know it has truly served in making me a more well-rounded lawyer and individual overall. The writing, research, and critical thinking skills I gained are the same skills I will use to further my career no matter what path it may take.



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