



## Jessica N. Cory

### ATTORNEY

Jessica N. Cory represents businesses and individuals in a wide range of transactional matters, with an emphasis on tax planning.

### CONTACT

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#### Dallas

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#### Oklahoma City

405.235.4100 Main  
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### PRACTICE AREAS

- Healthcare Law
- Mergers and Acquisitions
- Private Wealth, Estate Planning and Business Succession
- Tax Controversy
- Tax Law

### EDUCATION

- Southern Nazarene University (B.S., summa cum laude, 2009)
- University of Oklahoma College of Law (J.D., with highest honors, 2012; Order of the Coif; Order of Barristers; Oklahoma Law Review)
- New York University (LL.M., Taxation, 2015; Tax Law Review Graduate Editor)

### BIOGRAPHY

As a tax attorney, Jessica N. Cory represents businesses and individuals in a wide range of matters, including general tax planning, business succession planning, and the structuring of complex transactions.

Jessica has advised clients regarding corporate and general business matters, including choice of entity, formation, tax-free reorganizations, acquisitions and dispositions, and tax planning. She has particular experience working with flow-through entities, including disregarded entities, limited liability companies, partnerships, and S corporations. Jessica has also successfully represented clients in disputes with the Internal Revenue Service.

Prior to entering private practice, Jessica gained valuable experience service as a judicial clerk for United States District Court Judge Robin Cauthron in the Western District of Oklahoma. She then received her Masters of Law in Taxation at New York University School of Law and worked for a law firm in Houston, Texas before joining Phillips Murrah. Jessica is licensed in both Oklahoma and Texas.

Jessica has written and presented on a variety of tax topics, including choice-of-entity in light of the 2017 tax reform, the tax implications of foreign ownership of real property, changes to the partnership audit procedures enacted in 2015, and defending against the trust fund recovery penalty.

Jessica grew up in Killeen, Texas but now lives in Oklahoma City, Oklahoma. In her free time, she enjoys spending time with friends and family, traveling, and training for her next race.

### EXPERIENCE

- Represented large privately-held companies and their owners in tax-free reorganizations and taxable acquisitions and dispositions
- Drafted opinion letter for a \$500+ million Section 355 split-off transaction
- Assisted foreign individuals with U.S. tax compliance and investment structuring
- Represented individuals and businesses during examination, at IRS Appeals, and in court

## ADMISSIONS

- Oklahoma (2012)
- Texas (2015)
- United States Tax Court
- United States District Court for the Western District of Oklahoma
- United States District Court for the Southern District of Texas
- United States Court of Appeals for the Fifth Circuit

## PROFESSIONAL ORGANIZATIONS

- Oklahoma Bar Association
- State Bar of Texas
- American Bar Association, Tax Section

## RECOGNITION

- Super Lawyers by Thomson Reuters: Rising Star (2019)

## PUBLICATIONS

- Jessica N. Cory et al., Effectively Representing Your Client Before the IRS: A Practical Manual for the Tax Practitioner with Sample Correspondence and Forms, Ch. 16, "Defending the Trust Fund Recovery Penalty - Section 6672" (2018)
- Larry A. Campagna & Jessica N. Cory, The BBA Rules Are Coming: Is Your Oil and Gas Partnership Ready?, Oil & Gas Financial J. (2017)
- Jessica Cory, Comment, The Gap Created by E-Commerce: How States Can Preserve Their Sales and Use Tax Revenue in the Digital Age, 8 Okla. J. L. & Tech. 57 (2012)
- Jessica Cory, Oklahoma's Taxation of Intangible Property, 60 St. Tax Notes 715 (2011)
- [Phillips Murrah announces 17 attorneys named to 2019 Super Lawyers list](#)
- [Are partners employees? What the IRS says about taxing partnerships](#)
- [Income tax challenges for medical marijuana businesses in Oklahoma](#)
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- [Phillips Murrah's legal team welcomes tax attorney](#)