

2012/13

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40  
UNDER  
40

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TAX JOURNAL

# 40 UNDER 40

## Welcome

I am delighted to introduce '40 under 40' for 2012/13, our pick of some of the best young professionals working in tax today. This is the second year we have published this guide and once again it proved to be highly competitive with many more submissions than we had expected.

All the individuals profiled here come very highly rated indeed. To help us make this selection, a team of independent researchers evaluated all submissions, taking up client and employer references from major FTSE 100 companies to high net worth individuals. We were, in general, looking for technical excellence, commercial nous and good client skills. A number of in-house tax professionals are represented; here, we were looking for evidence of strong contributions made to the tax function and the wider business of their respective employers, in addition to excellent technical know-how.

Putting together a guide like this is no small undertaking, and it would simply not have been possible without the goodwill and support of hundreds of referees – I thank them all for their kind involvement.

Paul Stainforth, Editor, Tax Journal

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# Methodology & rules

## About this guide

**'40 under 40' is a guide to 40 leading tax professionals based in the UK, under the age of 40 as at 1 November 2012, who have demonstrated outstanding achievement in their careers to date, as verified by our independent researchers and by *Tax Journal*.**

In compiling this list, *Tax Journal* received submissions for individuals from a wide range of organisations – including accountancy and law firms, HMRC, the Tax Bar, and from industry. All submissions were made in accordance with the entry rules and procedures set out below.

To assess the submissions, a team of experienced freelance professional services journalists and researchers – all of whom were independent of any of the organisations and individuals who made submissions – took up references from 500+ client and employer referees spanning major FTSE 100 companies to high-net worth individuals. The shortlist was reviewed by the *Tax Journal* team, who finalised the 40 individuals selected. For the avoidance of doubt, firms and individuals cannot pay to be included in this guide.

With acknowledgements to Ben Rigby, Katie Paxton-Doggett, Mary-Carmel Barbour, Santhie Goundar, Jamie Kaffash and Julia Burns.

## Entry rules and procedures

- Nominations had to be submitted using a standard submission form. It was made clear that additional materials were not considered.
- The contact details of at least two (and no more than five) referees had to be supplied for each individual nominated. Where appropriate, client referees were likely to carry more weight.
- Shortlisted entrants were in some cases asked to provide further information.
- Last year's winners were not eligible to enter. Employees and office holders of *Tax Journal* and its publishing company, LexisNexis, were also not eligible to enter.
- No more than 10 individuals per organisation could be nominated.
- A research team evaluated submissions but the final decisions were made at the discretion of *Tax Journal*.
- It was made clear that the content of any entry could be used for publicity purposes unless the entrant withheld their consent to this in writing.
- Entrants were deemed to have accepted these rules and procedures and to have agreed to be bound by them when entering this competition.
- We regret that feedback cannot be provided on individual entries.
- Submitting the nomination form was taken as agreement that referees could be contacted by *Tax Journal's* research team.
- To help us manage and maintain the reputation of this guide, those making submissions were required to inform us about any negative media stories, malpractice or disciplinary issue or other event of which we should be aware that occurred during the preceding 12 months. Such an event did not necessarily mean that the submission was disallowed, however if it was not disclosed the submission could be invalidated.

# The indirect tax specialists

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The quality of BLT's varied client base – a full range of blue chip multinationals, financial services institutions, global professional firms, public sector bodies, boutique consultancies – is mirrored in the quality of the candidates we represent, as well as the quality of your BLT consultant who will work with you every step of the way.

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BLT's Indirect Tax Team is **Liz Watt**, **Guy Barrand** and **Emma Wade**

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### **Tom Wilkinson, Partner**

[tomwilkinson@wilkinsondwyer.com](mailto:tomwilkinson@wilkinsondwyer.com)

Tom graduated from the University of Birmingham with a degree in Accounting and Finance and started his career in tax recruitment eight years ago. Tom has held senior management positions at two of the UK's leading tax recruitment businesses and left in 2011 to set up Wilkinson Dwyer. With a long standing career in the industry Tom holds relationships with the world's leading Corporates, Banks and Professional Services firms.



### **Matthew Dwyer, Partner**

[matthewdwyer@wilkinsondwyer.com](mailto:matthewdwyer@wilkinsondwyer.com)

Matthew graduated from the University of Otago in New Zealand with a Bachelor of Laws and a Bachelor of Arts (Political Science). He qualified as a solicitor with Kensington Swan in New Zealand before working for Hogan Lovells in London as a banking lawyer. Matthew started his career in tax recruitment six years ago and specialises in professional services with a particular focus on tax legal.



### **Sally McIntyre-Brown, Director**

[sallymb@wilkinsondwyer.com](mailto:sallymb@wilkinsondwyer.com)

Sally graduated from the University of Nottingham with a degree in Economics and subsequently trained and qualified as an ACA with KPMG in London. Sally's recruitment career started in 2004 where she worked as an Associate Director for a leading tax agency and holds long standing relationships in the market. Sally joined Wilkinson Dwyer to further bolster their offering to clients and candidates across the professional services, in-house and financial services market.



### **Clare Carpenter, Senior Associate**

[clarecarpenter@wilkinsondwyer.com](mailto:clarecarpenter@wilkinsondwyer.com)

Clare graduated from Bristol University with a Bachelor of Laws. Upon qualification Clare joined Linklaters in 2001 and subsequently worked at Watson Farley & Williams and Mishcon de Reya in an 11 year career as a tax lawyer, advising on structured finance transactions and all aspects of corporation tax. The relationships she has built within the tax industry throughout her legal career provide her with a unique perspective to assist both clients and candidates.



> **Kate Alexander**  
Partner

Email: [kalexander@uk.ey.com](mailto:kalexander@uk.ey.com)  
Tel: 020 7951 8196

### Key achievements:

- Kate has designed bespoke holding and financing structures for a wide range of companies.
- She has recently won a number of competitive proposals to redesign company IP holding structures in order to take advantage of the new patent box regime.
- She continues to lead the firm's response to IP changes.
- Following her recent return to work after the birth of her daughter, she also champions the coaching of other working mothers.

**Kate is a partner in Ernst & Young's London-based international tax services group, which provides tax consultancy services to a wide range of UK and foreign-based multinational companies.**

With 14 years' client experience, including a year in New York, Kate advises on all aspects of international tax planning. Her specialist areas of expertise include structuring international acquisitions and disposals, cross-border financing, together with tax planning for controlled foreign companies. A regular speaker on international tax issues, she was appointed partner in 2009 at age 31, one of the firm's youngest ever partners.

“ Top level technical ability, commercial instincts and client relationship skills ”

“ Kate has provided us with international tax advice which is a strong specialism for her: for example, assisting in cash repatriation out of China, and debt push-down in Spain ”

“ Kate is an outstanding professional and a role model for many ”

“ She was outstanding to work with, and went above and beyond the call of duty, both from a technical standpoint and overall organization ”



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not carrying  
any baggage.**

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See More | Growth



## > William Arrenberg

Partner, Tax

Email: [william.arrenberg@hsf.com](mailto:william.arrenberg@hsf.com)

Tel: 020 7466 2574

### Key achievements:

- William acted for UCC Holdings on its acquisition of United Coffee from CapVest and for Blackstone on its major UK acquisitions of the Triangle and Teal industrial park portfolios for £480m.
- He has acted on a number of other complex and high profile transactions in recent years including acting for Ernst & Young as administrators of Nortel entities on the administration of significant parts of the Nortel Group and sale of various businesses and assets in multiple jurisdictions, and acting for Apache Corporation on its US\$1.7bn acquisition of North Sea assets from ExxonMobil.

William specialises in a wide range of corporate tax and tax litigation issues, with experience in domestic and cross-border tax planning and structuring, company reorganisations, tax on insolvencies, energy sector transactions, high value structured real estate transactions and disputes with HMRC.

He has acted on a number of complex and high profile cases and became a partner earlier this year. He is also a regular contributor to professional publications.

“ Will [has] limitless energy and commitment, coupled with fantastic technical knowledge and a commercial mind ”

“ His ability to simplify complex tax matters is a valuable skill and one that ensures he remains a key advisor ”

“ I like his constant positive attitude and enthusiasm even when working through the night to help us close deals ”



## > Ian Barnes

### Tax Partner

Email: [ibarnes@deloitte.co.uk](mailto:ibarnes@deloitte.co.uk)

Tel: 01727 885 612

### Key achievements:

- Ian personally partnered the development and implementation of a £125m PFP as part of British Waterways' successful transition to the charity sector.
- Since September 2012, Ian has led the St Albans tax practice, overseeing a rapid expansion in its client base and variety of work, including a 25% growth in net revenues with further growth forecast in 2013.
- He has been involved in charity work for Deloitte's Ride Across Britain, to raise £1m for Paralympics GB.

**Ian is a corporate tax partner who works with a range of companies including large overseas-parented groups, UK-listed and privately owned groups. His work includes coordination of all tax services and covers advice on strategic issues; cross-border and transfer pricing optimization. He became an equity partner in June 2011 at the age of 33, after 12 years at the firm.**

Ian was a key member of the cross-firm Deloitte team who developed the market-leading pension funding partnership (PFP) around funding deferred benefit pension schemes. This has addressed more than £2bn of pension deficit for clients such as J Sainsbury, John Lewis Partnership, ITV and Diageo.

“ Ian manages very successfully to combine his thorough tax knowledge with wider technical application in accounting, pension funding and commercial issues ”

“ We expect not only first class technical knowledge but also a high level of commercialism and practicality to the tax issues we face – Ian delivers on all accounts ”

“ He is able to apply [technical ability] to the relevant client situation, to network with the right persons overseas ... and to communicate this ”



## > Andy Brown

### Head of Tax Litigation and Disputes

Email: [andy.brown@dwf.co.uk](mailto:andy.brown@dwf.co.uk)

Tel: 0191 233 9733

#### Key achievements:

- Andy has recently advised a prominent Middle Eastern family on its UK VAT and tax affairs dealing with both practical and contentious matters.
- He advised a number of UK brewers and retailers on excise duty fraud due diligence procedures, duty point challenges and was involved in the high profile duty 'rounding' litigation.
- Andy is currently advising high street retailers on multi-million pound tax assessments and penalties where excise duty fraud, or missing traders are alleged to be involved in the supply chain.

With almost 20 years' experience of indirect taxes, Andy's career, has seen him being made a director in a large accountancy firm at 27 and then reach partner level in a large law firm six years later. He has made the transition from accountancy to law by combining his practical and technical skills in a way that benefits his clients. Andy is currently building DWF's national tax litigation and dispute practice, following a stint at McGrigors, as its COO for tax.

Andy has a wide understanding of all indirect taxes with a particular specialism in customs and excise duties, advising brewers, warehouse keepers and major high street retailers.

“ Andy has been the first, indeed only, point of call as and when VAT advice, and subsequently tax enquiry and litigation work, have been required. I will work with no-one else when required to engage advice in these fields ”

“ His exposure to professional practice in both accountancy and law has enabled him to meld their differing techniques... which, in my experience, hasn't been bettered in his field ”

“ I will not countenance working with anyone else; I recommend Andy's work unreservedly ”

# Access to talent

## Indirect Tax



BLT's Indirect Tax Team are renowned as the leading recruitment specialists in this field. Back in 1987, we were the first recruiters to identify Indirect Tax as a niche discipline in its own right, and have been instrumental in its growth and development ever since. We are unique in our exclusive focus on and knowledge of the specialism. Our remit covers permanent and interim roles in VAT, Customs, Excise and other Indirect Taxes not only in the UK, but also internationally.

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> **Simon Browning**  
 Tax Partner, East Midlands Head of Tax

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 Tel: 0115 962 9244

**Key achievements:**

- Simon leads the development of PKF's East Midlands tax services delivering the highest technical quality and client service, whilst sharing knowledge and furthering his teams' experiences.
- He has developed expertise in the bioscience and high-tech sector, focusing on companies with a real need for pro-active advice on taxation.
- Simon has spear-headed PKF's partnership with BioCity Nottingham and the University of Nottingham Innovation Park to provide access to expert advice, economically, and support the success of start-up, high growth and entrepreneurial businesses.

**Simon is a hands-on corporate tax adviser who takes time to get to know the people, the business and its strategy in order to develop pro-active tax solutions to real commercial issues for his clients. His specialisms include many aspects of corporation tax, particularly R&D tax credits, international taxation and remuneration and incentive planning.**

Simon heads PKF's tax activities in the East Midlands and advises a wide range of clients, from owner-managed businesses to multinational corporates. Simon achieved ACA and CTA qualifications with Deloitte and he moved to PKF in 2007. He was promoted to partner at the age of 32, becoming one of the youngest partners in the firm.

“ Particular ability to see the bigger picture, understand business needs and offer a service that takes all this into account ”

“ Progressive in his thinking and in his approach to developing a client relationship ”

“ He is a credit to the PKF business and a role model for the profession generally ”

“ I believe from a technical perspective he is first rate ”





> Jeremy Cape  
Partner

Email: [jeremy.cape@snrdenton.com](mailto:jeremy.cape@snrdenton.com)  
Tel: 020 7320 3845

Jeremy has a substantial and wide-ranging UK practice, and has developed an enviable reputation in emerging markets work. He also advises on tax policy, including advising governments on tax reform in areas such as Islamic finance and de-criminalisation of tax disputes, including advising a Central Asian government at Cabinet level.

Jeremy became a partner in 2008 at the age of 32. He has appeared regularly as a commentator on CNBC, including for its live Budget programme.

#### Key achievements:

- Jeremy's international work includes advising Addax Bioenergy on the tax aspects of a biofuels project in Sierra Leone and COMESA on the establishment of a \$1bn infrastructure fund.
- Other recent work includes advising Healthcare Locums plc on a £60m placing and open offer of £4.25m; advising Spinlet on its structure to establish pan-African operations; and advising on the €400m securitisation of the trade receivables of Teva Pharmaceuticals.

“ Jeremy is highly responsive and he has a very good business sense, both of which are very valuable attributes, and which distinguish him from others we have used in the past ”

“ I feel I can pick up the phone for sensible commercial advice from him 'there and then'; Jeremy is a very personable tax lawyer, with whom it is enjoyable to spend time ”

“ He very quickly outlined the tax issues involved which included multiple parties and multiple tax jurisdictions. His work was thorough and precise ”



> Peter Clements  
Senior Associate, Tax

Email: [peter.clements@freshfields.com](mailto:peter.clements@freshfields.com)  
Tel: 020 7785 5750

### Key achievements:

- Peter recently advised on London Metal Exchange's proposed £1.4bn sale, and Rolls-Royce's restructuring and sale of its interest in International Aero Engines.
- Peter helped achieved a settlement for AstraZeneca in the largest and most factually complex transfer pricing case ever to come before the tribunal.
- He advised the Bank of England on tax aspects of its resolution strategy and the Banking Act 2009 and subsequent resolutions of Dunfermline BS and Bradford & Bingley. He also advised on transactions involving Northern Rock and Nomura.

**Peter has been a tax associate at Freshfields since qualifying in 2005 and advises financial institutions, investment funds and corporate groups across a variety of business sectors.**

He specialises in corporate tax and corporate tax planning, with a particular emphasis on tax-structured and asset finance, corporate restructurings and public and private M&A. He also advises on tax disputes and litigation.

“ Peter is one of the best tax advisers I have ever worked with. He is incredibly bright, diligent and responsive but most importantly easy to get on with ”

“ Overall, I have the highest regard for this individual's work and there is no one I would rather have acting for me in this practice area ”

“ Provided excellent advice delivered in a very clear and commercial manner ”

A hand in the foreground holds a spool of white string. A thin white string extends from the spool, curving upwards to a small, colorful kite flying in a clear blue sky. The background is a solid light blue color.

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## > Paul Davison

Partner, Tax

Email: paul.davison@freshfields.com

Tel: 020 7427 3226

### Key achievements:

- Paul advised on Eurotunnel's transformative 2007 €7bn debt restructuring and has advised on continuing balance sheet management and group restructuring since then.
- Since making partner in 2008, Paul has developed a leading reputation in the tax structured finance area, particularly on tax recharacterisation.
- Paul advised on Transco Plc's successful Special Commissioners appeal regarding the deductibility of £200m p.a. of pipe replacement expenditure – distinguishing an adverse Privy Council decision on superficially similar facts (Auckland Gas).

Paul's expertise lies in corporate tax advisory work for international corporates and contentious tax work. His experience includes complex tax structured finance and leasing work (generally cross-border), advising financial institutions on both counterparty and intra-group arrangements; HMRC enquiries and tax disputes; public transactions; corporate finance, particularly restructurings; tax consultancy for multinationals as well as pro bono work.

“ Consistently outstanding ”

“ One of the most knowledgeable people I have come across ”

“ Paul is great at instilling confidence in us. You know that when you ask Paul a question, you will get the right answer - well considered and technically justifiable ”

“ I have 100% confidence in the advice that Paul provides, as I know it will be well thought out, balanced and technical ”



> Ed Denny  
Of Counsel

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Tel: 020 7444 3995

#### Key achievements:

- Ed has advised on many high-profile transactions, including: Brit Insurance Holdings on its sale of Brit Insurance; Iberia on its merger with British Airways; AXA on the £2.75bn disposal of its UK life business to Resolution; and HSBC on its £12.5bn rights issue.
- Ed was seconded to the international tax group at HSBC, after a competitive selection process. He was promoted to Of Counsel at Norton Rose in May 2012.

Ed is the first ever London-based tax Of Counsel at Norton Rose. He practised tax law for six years at Slaughter and May and now nearly five years at Norton Rose. He has a general corporate tax practice with a strong focus on the international tax aspects of corporate finance transactions and structures.

Ed combines expertise in corporate restructurings, joint ventures and mergers and acquisitions of public and private companies with particular knowledge and experience in the financial services, pharmaceuticals and technology sectors. He has published many articles, presented at external conferences, and has devised and led bespoke tax training programmes for clients.

- “ Ed exerts a calming influence on those around him which inspires confidence in his ability to deliver – which he does ”
- “ He puts his knowledge and skills to work for the client and is always thinking of possible solutions ”
- “ His technical memoranda are usually full of different alternatives, but what differentiates him from most advisors, these are in every case feasible and realistic ”
- “ From a personal point of view, he is a really nice guy ”



> Alison Fleming  
 Director, Pensions Leader for Scotland

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 Tel: 0131 260 4352

Key achievements:

- Alison manages PwC's Scottish pensions consulting practice which has seen growth of over 10% in the last year alone. She advises a range of businesses from FTSE 100 to smaller privately owned companies.
- She leads PwC's national pension scheme financing team. The team's recent work on flawed traditional valuation approaches and the impact for employers reached the national and professional press.
- Alison assisted a large private business to use its property in a tax efficient way to fund its pension scheme providing greater security for scheme members and benefit for the employer.

Alison joined PwC as a new graduate in 2000 within the tax practice specialising in pensions. She qualified as an actuary in 2004 and spent a year working in London. Alison was appointed as the youngest ever pensions leader for Scotland in 2011 and specialises in helping employers consider pensions as part of reward, modernising pension plans and managing the costs and risks of legacy defined benefit schemes.

Alison regularly speaks to the Scottish press on pension matters and has a national role within PwC, leading the firm's scheme financing specialism.

“ She understands our business - her analysis, suggested solutions and implementation speak volumes... she devoted time to her induction and the on-going nature of the relationship has added weight to her insight and understanding ”

“ Unprompted, she will ensure we are made aware of what is happening in terms of the legislative environment but she will then interpret that from a practical and commercial perspective ”

“ She will always go the extra mile to meet tough deadlines ”



> Catherine Fursland  
Head of Tax Latin America

Email: catherine.j.fursland@gsk.com  
Tel: 020 8047 4585

### Key achievements

- Catherine established and embedded GSK's regional tax team in Latin America, partnering with local finance and commercial teams to identify tax opportunities, manage tax audits, lead M&A tax activity and embed the group's tax policies and strategy in the region.
- She is leading the group's global tax transformation programme to strategically re-shape the structure of the tax function to facilitate the delivery of value to the business.
- Catherine developed GSK's tax risk management programme and is the global tax lead on anti-bribery and corruption provisions.

Catherine is currently GSK's head of tax for Latin America, and a member of the group's tax leadership team. After qualifying as a chartered accountant at the age of 21, at the time one of the youngest ICAEW members in the country, Catherine joined KPMG's corporate tax advisory team focused on telecommunications clients.

In 2008, she relocated to Singapore to develop KPMG's Asia Pacific international tax offering to Singapore headquartered clients. Returning to the UK in early 2011, Catherine joined GSK's global tax team to support the emerging markets and has quickly become an integral part of the tax and wider finance team.

“ She is a leader of people, and a strong advocate of staff development ”

“ Catherine is a great example of someone who doesn't get bogged down in tax straight away but has an eye for wider (non-tax) implications ”

“ Catherine is very accomplished at enterprise thinking for the good of the total business and not just the tax line. She manages stakeholders well ensuring pre-briefing before any projects or changes are executed ”



## > George Gillham

### Legal Director

Email: [george.gillham@pinsentmasons.com](mailto:george.gillham@pinsentmasons.com)

Tel: 020 7054 2551

### Key achievements

- He has used judicial review procedures to force HMRC to abide by representations they had made to a large corporate about capital gains tax treatment on a substantial portfolio of properties; and to provide details of information put before a judge to obtain a warrant.
- Manages the foreign income dividend group litigation (most recently decided as *BT Pension Scheme Trustees v HMRC*).
- Other ground-breaking decided cases in which he has been involved include *Lunn v HMRC*; *Marks & Spencer v Halsey*; the FII group litigation; the thin cap group litigation; and the CFC and dividend group litigation.

George is a legal director with more than a decade of experience of tax disputes. A significant proportion of his work has been group litigation against HMRC for EU law breaches. The remainder of his practice is divided between advising large corporates on disputes with HMRC; settlements; and advising accountancy firms and individuals caught up in civil and criminal investigations. He has extensive HMRC experience as a former inspector of taxes, and policy adviser.

A former inspector of taxes and revenue policy adviser, he is also a CEDR-accredited mediator.

“ George is certainly one of the best non-partner solicitors in practice in this field today ”

“ He is clearly coming up to partnership level and I have been very impressed with his work ”

“ His client management and attention to detail have been outstanding ”



# Pinsent Masons Tax – a market-leading team

The Pinsent Masons Tax team is one of the largest and broadest tax practices in a UK firm, including tax lawyers, senior ex-HMRC officers, advisers with a 'Big Four' accounting firm background and CEDR accredited mediators. With an unrivalled depth of experience in all areas of tax, we are top ranked in the legal directories.

## What the market says

*"Seen as a market leader, the team now has greater resources at its finger tips."*  
**(Chambers 2013)**

*"Deep experience in litigation, good contacts within HMRC and great commitment."*  
**(Chambers 2013)**

*"[The team] combines good technical tax skills with proven litigation experience."*  
**(Legal 500 2012)**

Partner **James Bullock** "has an outstanding track record in the field."  
E: james.bullock@pinsentmasons.com

Partner **Jason Collins** "has deep experience of the subject."  
E: jason.collins@pinsentmasons.com

The team also includes **Eloise Walker** and **Stuart Walsh**, both of whom were recognised in last year's '40 under 40'.



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## > Andy Goodman

### Tax Partner

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Tel: 020 7893 3437

### Key achievements

- Andy joined BDO's tax consulting group as an assistant manager in 2003 directly supporting the partner in building BDO's practice providing reward services which has grown to a business now generating in excess of £2m of revenue.
- Andy became a tax director in 2009. He took responsibility for running the London reward team in September 2011 and was appointed tax partner in July 2012 with responsibility for the firm's national reward practice.

Andy leads the reward practice at BDO, which is a team of six technical staff in London, and 13 nationally, specialising in providing reward services. His particular strength is the design and implementation of tax-efficient incentives for clients which can range from approved share schemes or well-known structures targeted at all employees through to very complex and bespoke structures targeted at a small number of executives.

Andy also has significant experience of providing tax advice to management teams through buy-out transactions. He advises clients on the tax treatment and implementation of share schemes internationally and consults on effective pay and incentive structures.

“ Not only would we work with Andy again but he has become our default font of tax knowledge and his competence and professionalism are exceptional. We now use BDO in various other specialities as a direct result of Andy's work for us ”

“ Andy either has the answers we are looking for at his fingertips, or can revert with considered thought in a short time-frame ”

“ Very personable and hugely professional ”



## > Darren Graves

### Partner

Email: [dgraves@deloitte.co.uk](mailto:dgraves@deloitte.co.uk)  
Tel: 020 7007 1098

### Key achievements

- Darren lead the tax delivery on a number of Deloitte's most significant M&A transactions, including the €1bn acquisition of Global Blue by Silver Lake Partners, the acquisition of Action by 3i and the £1.2bn acquisition of Veolia water by the Infracapital Consortium.
- He possesses an outstanding track record of providing commercial tax advice to solve complex business problems, whilst managing tax risks and providing a stable tax profile.
- Darren is recognised for demonstrating a high level of service for a broad spectrum of clients including private equity, infrastructure and corporate investors.

Darren joined Deloitte in 2002 in the multi-nationals corporation tax team, before specialising in M&A tax in 2005. Since joining the M&A team Darren has become one of Deloitte's leading M&A tax professionals, advising on a number of high profile transactions including the acquisition (for \$2bn) and disposal (for \$8bn) of Skype by Silver Lake Partners, as well as the acquisition of Gatwick Airport and Edinburgh Airport by Global Infrastructure Partners. He is one of Deloitte's youngest partners, admitted as a tax partner at the age of 33 in June 2012.

“ In my experience of tax advisers, over a number of years of investing, he is in a class of one ”

“ Although perhaps a small part of the overall Deloitte offering, his advice, knowledge and dedication is a huge differentiator for Deloitte's business proposition to us as clients ”

“ He has a truly extraordinary, almost encyclopaedic knowledge of global tax ”

“ He succeeds where many fail in delivering seamless multi-territorial advice in a format that is easily accessible ”



> **Kylie Gregge**  
Partner

Email: [kgregge@deloitte.co.uk](mailto:kgregge@deloitte.co.uk)  
Tel: 020 7007 0264

**Key achievements**

- Kylie has built an R&D tax relief business particularly in the energy & resources industry where she has led the preparation and agreement of R&D claims totaling over three quarters of a billion for the majority of the UK North Sea oil and gas operators and a large proportion of oilfield services. Kylie has agreed all of the claims in this industry without amendment.
- Her revenues have grown by over 50% in the last two years.
- She has established the International Oilfield Services Tax Network (Aberdeen) for tax directors and managers from large multinational companies.

**Kylie is a founding member of the multi-award winning, multi-disciplinary national R&D tax services team – now the largest R&D team in the UK with nearly 40 R&D tax relief professionals.**

Kylie is the talent partner for the R&D services team and as a result of her extensive experience is a member of Deloitte’s energy and resources tax leadership team. She has more than 11 years’ experience specialising in R&D tax relief in UK and Australia across a broad range of clients and industries, and was promoted to partner in 2011.

- “ Kylie is certainly a people person and is willing to invest time in getting to know the person and the business ”
- “ She demonstrates strong R&D tax technical skills in her work but ensures that technical conversions are adapted accordingly depending on the type of audience ”
- “ Kylie has overcome some of the technical problems and information problems we had and, over a number of years, helped us to deliver a cost effective and increasingly efficient service ”



## > Andrew Gwyther

Partner

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Tel: 020 7303 4051

### Key achievements

- Andy leads multinational compliance engagements, where technology and process transformation can differentiate by scale and service quality. He recently won one of the firm's largest ever engagements: 17,000 filings per annum across various taxes in 15 countries.
- He created and now leads Deloitte's innovative XBRL practice.
- Andy also created Deloitte's 'Fast Close' monthly tax reporting solution for UK Life Insurers. This reduced the time for year-end tax work from two weeks to two hours, through automating tax calculations and data flows.

**Andy started his career as a corporate tax adviser in financial services. In 2000, Andy became the founder member of a tax technology and compliance business; he had responsibility for consulting services and talent, growing the team to 100 people.**

Andy moved to Deloitte in 2002 and became a partner five years later. His clients include FTSE 100 and US-led multinationals, providing tax transformation, risk and compliance services. In 2010, he was appointed XBRL leader for Deloitte UK. He has established teams in India, Cambridge and London with tax, IT and accounting specialists, before reinventing delivery using automation and data analytics, promoting further growth in clients.

“ His successful delivery of these projects was a significant part of changing our group tax function and played an important part in us winning the LexisNexis 'Best in-house tax team award' ”

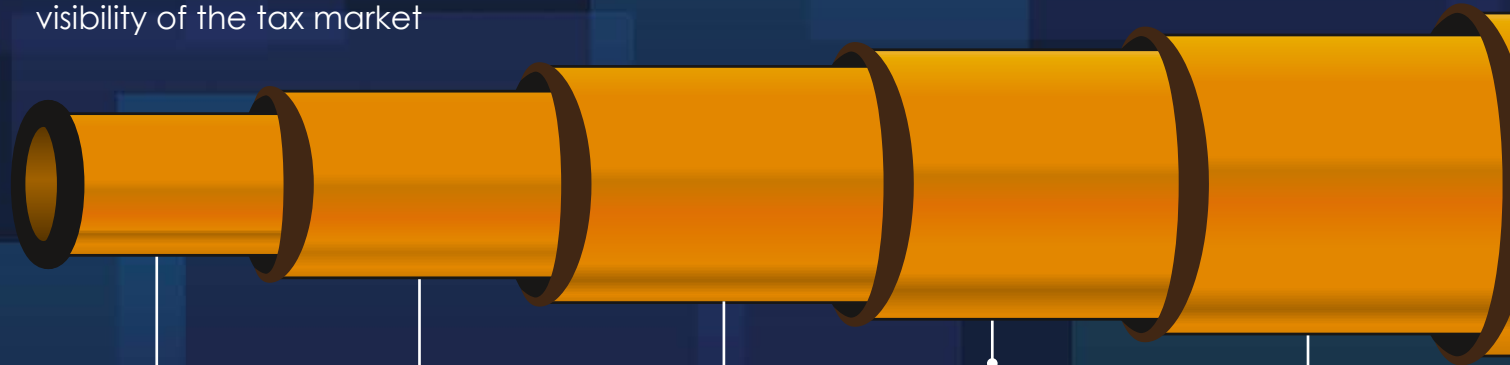
“ Andy definitely has the commercial nous to understand what is good for the client and politically savvy to know what is not worth pursuing ”

“ In the area of tax technology, and in particular his knowledge and experience in the area of electronic filing requirements, he is a world leader ”

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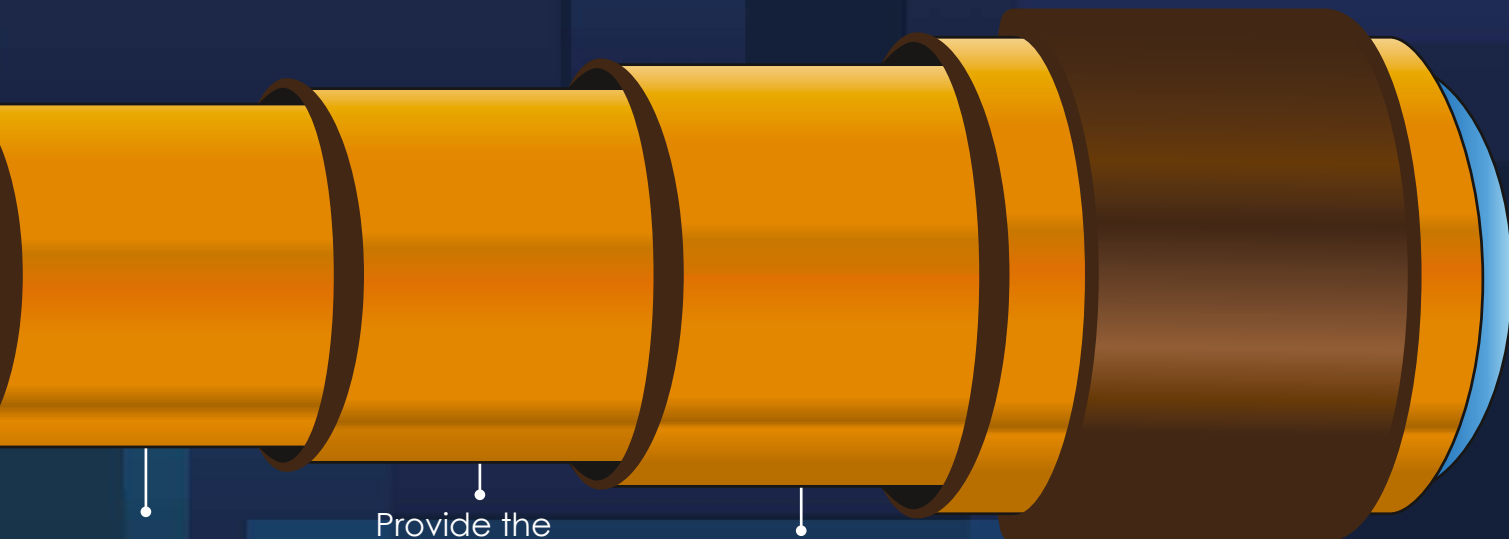
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## > Tom Jarvis

Tax associate

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Tel: 020 7090 5007

### Key achievements

- Tom advised on the tax consequences of Punch Taverns on the demerger of the Spirit group; Ocado on its group reorganization, re-financing and flotation; Subsea 7 Inc. on its cross-border combination with Acergy; and Standard Chartered on a cashbox rights issue to raise approximately £3.3bn.
- He advised Unilever on its acquisition of the worldwide body care and European detergents businesses of Sara Lee and subsequent sale of the Global Sanex business.
- Tom advised AngloGold Ashanti on the acquisition of the remaining 50% stake in the Serra Grande mine in Brazil from Kinross Gold Corporation.

**Tom has been a tax associate at Slaughter and May since 2007. His practice covers all direct taxes, stamp duties and value added tax, with a strong focus on corporate tax.**

Since joining Slaughter and May, Tom has advised a variety of clients, including several large multi-nationals, on a wide range of corporate transactions (including mergers and acquisitions (public, private, domestic and cross-border), demergers and joint ventures), group reconstructions and debt and equity capital markets (including IPOs). Over the last couple of years Tom has expanded his practice and now has extensive experience of advising on investments in UK real estate, structured finance and leasing.

“ Tom is happy to take the time to explain complex matters either from a pure tax technical basis or the way in which an agreement is constructed ”

“ He went above and beyond to assist us, came up with creative and practical solutions to problems and worked extremely well with a multi-disciplinary, multi-jurisdictional team, even at absurd hours of the morning ”

“ When dealing with other legal teams he is tenacious and will put his point across but at the same time conducts himself with confidence and professionalism ”





## > Helen John

### Tax Manager

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Tel: 020 7131 4428

### Key achievements

- Helen helped win a tender for the preparation of partners' personal tax returns for a large law firm. She was personally responsible for managing these new clients, and as a result of the excellent client service received, the partnership transferred their entire tax compliance and advisory work to Smith & Williamson without a formal tender process.
- She is the coordinator for a large family office client and is responsible for ensuring that a cohesive approach to client service is achieved, coordinating all aspects of providing tax advice to the family.
- Helen provides analysis and budget comparisons for national newspapers.

**Helen joined Smith & Williamson as a tax trainee after graduating with a degree in Mathematics and Management from Kings College, London in 2004, and qualified as a chartered tax advisor in November 2006.**

She advises high net worth individuals and is a key member of Smith & Williamson's professional practices team, advising partnerships and LLPs on all aspects of taxation, particularly tax computations, tax provisions and leaving and joining partners. Helen has also been involved in the merger of a UK and US partnership.

“ Helen has a great skill of being organised as well as being able to organise a team around her (which at times includes partners) and clients ”

“ Were it not for the fact that other partners also wish her to work on their clients, I would monopolise her time ”

“ Not only is Helen strong technically, her client handling skills are excellent always displaying a positive and professional manner ”



## > Pippa Johnson Head of Group Tax

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Tel: 020 3356 9444

### Key achievements

- Pippa established an intra-company forum for the Network Rail in-house advisor community, increasing the amount of information shared with relevant stakeholders, as well as the speed at which that information is passed on.
- She devised, designed and implemented an intranet presence for group tax. This has proved to be a valuable communication tool, and is also used to continually improve customer service.
- The Network Rail group tax team was shortlisted for Taxation magazine's 'In-House Tax Team of the Year' award in 2012.

Pippa qualified as an ACA within tax at PwC in London, dealing mainly with FTSE 100 and multinational clients. In 2008, after four years with PwC, she moved to Network Rail as tax manager focusing on corporate tax compliance and reporting. The role also allowed her scope to expand into other areas of tax, most particularly environmental taxes and SDLT.

Pippa took over as head of group tax in October 2010, and is responsible for all taxes impacting the group. Describing her group tax team as 'excellent', her tax work now generally revolves around communications, larger transactions and tax strategy.

“ I am constantly impressed by the depth of her knowledge and understanding of all aspects of what is a diverse and unique business ”

“ Pippa definitely leads her team, keeps oversight and guides where needed, but she also respects and trusts her team to know its job ”

“ Through an inclusive management style, she allows team members to take on responsibility and develop in their roles, she enhances those roles, attracts team loyalty which leads to increased effort, makes their jobs more interesting and satisfying and retains their talent ”



## > Sue Knight

### Tax Director

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Tel: 0121 232 5167

### Key achievements

- Sue's reputation is that of a trusted adviser to a range of very wealthy clients with complex, often multi-jurisdictional issues. She combines a strong technical grasp with an ability to match technical insight to wider personal and commercial objectives.
- Since 2004 Sue has made a huge contribution to the growth of Grant Thornton's award winning private client team in Birmingham.
- Sue has personally developed her own ideas, working with tax counsel and others resulting in innovative proprietary planning ideas for the whole firm's EPC business.

**Sue started her career in Arthur Andersen's private client team, passing her ATT and CTA exams and the financial planning certificate all at the first attempt.**

She joined Grant Thornton in 2001 and in 2004 she took a leading role in the development of the Birmingham entrepreneur & private client (EPC) team, and won promotion to Director in 2010. She now leads the Birmingham EPC team on a day to day basis, specialising particularly in multi-jurisdictional tax issues, estate and inheritance tax planning and structuring for non-UK domiciliaries. Sue has also recently received a distinction in the STEP advanced certificate in family business advising.

“ An unparalleled ability to explain complicated tax matters in a clear, concise and easy to understand manner ”

“ I [am] delighted with her ability to use [tax] knowledge in designing solutions which meet my objectives, both personal and financial, but also with her ability to negotiate the subsequent acceptance of those solutions with HMRC. In addition, her professional acumen and her client management skills are outstanding, but just as important, she is fun to work with ”

“ I regard her as the safest pair of hands in the whole firm as regards the technical grasp of her subject, which is hugely impressive ”



## > Robert Langston

### Senior Manager

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Tel: 020 7841 4129

### Key achievements

- Robert is trusted by clients to provide practical and commercial advice, and understands that businesses often need quick and clear recommendations before taking action. He has recently advised a long-standing property developer client to claim business premises renovation allowances on an £80m data centre development.
- He advised a listed online gaming company on the £200m acquisition of a competitor's European business.
- Robert assisted a well-known UK retail business in structuring their first expansion outside the UK through a US joint venture agreement.

**Robert provides advice to companies and their shareholders on UK and cross border tax issues. He advises privately owned and smaller listed groups in a number of sectors, including property and online gaming. Robert is a leading author on UK and international tax issues.**

Until 2011, Robert was a Tax Director with Grant Thornton UK, where he worked in a number of different roles, including national technical, transactional tax advisory and international corporate tax advisory roles, including internal training courses on both UK and international tax matters. In 2011, Robert joined Saffery Champness where he has been instrumental in building the firm's international and corporate tax advisory offering, alongside the firm's core private client offering.

“ Robert is always more than willing to give his opinions on anything related to international tax and his passion and commitment to the practice area are obvious ”

“ Robert really is a delight to work with ”

“ An outstanding individual and one of the most significant advisors to our group. He loves working with entrepreneurs and their businesses in emerging industries ”

“ He has impressed us with his broad knowledge and experience across multiple tax disciplines, his commercial acumen as well as delivering actionable advice ”



## > Jonathan Legg

Partner

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Tel: 0207 440 7092

### Key achievements

- Jonathan has advised various blue-chip clients on high profile transactions, including assisting client Capital & Counties Properties with the tax aspects of its long-term project at Earls Court, one of the largest developments in Europe.
- He has carved out a reputation in corporate tax, particularly on the property tax related side. He is a regular contributor to trade publications and a speaker at practitioner conferences.
- Jonathan is a member of technical groups and was an examiner for the 2012 examinations for entry into the Institute of Indirect Taxation.

Jonathan has experience of all areas of corporate tax, with an emphasis on Stamp Duty Land Tax and VAT. A significant part of Jonathan's work involves advising on real estate investment, development, finance, and funds work. This ranges from providing support on straightforward property deals to much more complex projects requiring detailed tax input. As a result, Jonathan has gained a reputation in the market for expertise on the real estate tax side.

Jonathan has previously worked at Slaughter and May and LG. He joined Mishcon de Reya in May 2010. He became a partner in 2010 at the age of 33.

“ Jonathan is client friendly and is able to provide sound but commercial advice – specifically, he does not get lost in the detail and always keeps an eye on the commercial realities of what is going on ”

“ Very professional, he always gives clear concise and relevant advice - is very quick to pick up on new initiatives that the client is undertaking ”

“ His knowledge of legislation is next to none and this aligned with his commercial approach puts him above most tax advisors in the profession ”



## > Jamie Morrison

### Tax Principal

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Tel: 07860 413 433

### Key achievements

- As head of private client tax at Target Accountants, Jamie trebled the size of the Reading private client practice and almost doubled the size of the team in less than two years.
- Has given a wide range of advice, such as sale of a £5m construction business through to film financing for an animation project and unwinding offshore trust structures for non-domiciled UK residents.
- Jamie established new working practices and risk management procedures for DOTAS schemes of Target Accountants to boost efficiency, generating significant fees.

**Having started his training contract at MacIntyre Hudson in 2004, Jamie became ATT-qualified just a year later and became CTA-qualified a year after that with first time passes.**

In 2008 he took over the running of the tax department in Bedford focusing on the owner-managed business sector. In 2010 Jamie moved to Target Accountants as their their head of private client and was part of the management team involved in the sale of the Target Reading practice to Chantrey Vellacott. Jamie moved to HW Fisher in 2012 as tax principal, where he advises a portfolio of high net worth individuals and owner-managed businesses.

“ Outstanding. Provides a concise answer in layman’s terms and most important of all responds within the deadline required and is available/contactable as and when required ”

“ He knows what he is doing and has on a number of occasions made suggestions that have saved us money. Jamie is very approachable and willing to spend time with you ”

“ He relates very well to a wide range of clients and works in an efficient manner which gains high client loyalty and response ”



## > Rebecca Murray

### Barrister

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Tel: 020 7353 7884

Since completing pupillage in January 2010, Rebecca has built a solid practice in direct and indirect tax litigation and advice, and a reputation for consistent excellence amongst Treasury Solicitors, the 'big four', the 'magic circle' and boutique firms. Rebecca prides herself on maintaining a positive attitude for success and being a team player.

Rebecca is also the author of 'Tax avoidance' (published by Sweet & Maxwell, May 2012).

### Key achievements

- Rebecca was Junior Counsel for HMRC in the two biggest tax avoidance cases in 2011 and 2012: *Tower MCashback* (a landmark case in the Supreme Court), led by Kevin Prosser QC; and *Eclipse Film Partners (No. 35) LLP* (FTT), led by Malcolm Gammie QC, schemes involving tax of over £3 billion.
- She was Junior Counsel for the taxpayer in the Court of Appeal in *BAA v HMRC* (July 2012), led by Roderick Cordara QC, where a principle of European law is at issue on the recovery of VAT on the takeover of a group.

“ She is a fantastic character and great fun to work with. The team really buzzes when she is there ”

“ She goes the extra mile for clients ”

“ Rebecca is charming and easy company and also a fighter, well able to think nimbly on her feet and producing convincing (and winning arguments) in front of the Tribunal ”



## > Terence O'Beirne Head of Tax

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Tel: 020 3214 9169

### Key achievements

- On moving into industry Terry led the tax function on a £1.2bn joint venture between J Sainsbury and British Land, working closely with the British Land tax team.
- On taking the head of tax position at Capco, Terry built the group's internal tax compliance function while also leading the implementation of a group-wide simplification exercise.
- He is also heavily involved in Capco's recently signed joint venture agreement which involves the redevelopment of the Seagrave Road car park in addition to the groups wider Earls Court Master Plan which consists of the regeneration of a 73 acre site in West London.

**Terry has experience in all areas of UK and Irish corporate tax with an emphasis on the retail and real estate sector. Since taking the position, at the age of 34, of head of tax for Capital & Counties Properties Plc (Capco), he has been responsible for the group's direct and indirect tax function, both compliance and advisory.**

Prior to joining Capco, Terry had worked at J Sainsbury where he headed the Sainsbury's property investment tax function and was involved in a number of high profile property and finance transactions. While in practice, Terry worked for both KPMG (Dublin) and Grant Thornton (London).

“ He has an exceptionally clear grasp of the commercial ramifications of the analysis. This makes him a very user friendly tax adviser ”

“ Not only is he able to analyse the tax impact, but he is adept at re-working structures to maximise tax efficiencies. I rate him very highly indeed ”

“ Terry has always been a very capable tax adviser – with the ability to dovetail tax advice with practical and commercial considerations ”





> Darren Oswick

Partner

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Tel: 020 7825 3546

Darren qualified as a solicitor in 2001, and was made a partner in May 2010 at the age of 33. He specialises in corporate tax advisory work, principally M&A and cross-border restructuring, and employment taxes (overlapping with structuring of private equity, real estate and debt funds, including carried interest for employees). His clients are principally in the financial institutions sector, focusing on investment banks and asset managers. He is a long-standing and active member of the Law Society's Income Tax Sub-Committee.

Key achievements

- Darren was heavily involved in HMRC's consultation process on the disguised remuneration legislation, submitting detailed comments on the legislation and meeting with HMRC on behalf of the Law Society and successfully lobbying on behalf of clients for a number of changes to the initial draft of the legislation.
- He led the Simmons & Simmons response to the introduction of the bank payroll tax, advising more than ten different financial institutions on the potential effects of the legislation, including successful settlement negotiations with HMRC.

“ He is extremely user friendly, down to earth, cost effective, has an excellent understanding of the issues and technically excellent ”

“ A very reliable and commercially minded adviser, who is always prompt and committed to customer service. He is available 24/7 including weekends, which is extremely helpful ”

“ An all-round nice guy with a very open and professional approach. Darren is a credit to the legal profession ”

“ We will categorically work with him in the future ”



> **Joanne Pleasant**  
**Partner, International Tax**

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 Tel: 020 7007 3409

**Key achievements**

- Jo’s secondment experience at HM Treasury gives her a rare combination of policy insight and technical knowledge which she has deployed in lobbying for policy change, both within Deloitte and as part of the CBI International Tax Working Group.
- She worked closely with the British Property Federation after her secondment, successfully lobbying for changes to the worldwide debt cap and CFC reform proposals to address property industry concerns.
- Jo led the Deloitte team advising clients on the implications of the worldwide debt cap proposals.

Jo was promoted to partner in 2012 and specialises in international tax. During 2008 Jo spent nine months on secondment to HM Treasury working as part of the team responsible for the policy development for the taxation of foreign profits reform package. Her policy responsibilities included CFC reform and since her secondment she has become recognised as a specialist in the areas of the worldwide debt cap rules and CFC reform.

Jo plays an active role in Deloitte’s training programme, helping to develop more junior staff members. She is both ICAEW and CTA qualified.

- “ She effectively became the most important adviser-member of a working group on CFC reform in successfully persuading the government that property income was neither ‘mobile’ nor ‘passive’ ”
- “ Jo was always in complete command of her subject and her contribution was of key importance in ensuring [our] policy objectives were properly translated into proposals for implementation ”
- “ Jo’s ability to very quickly translate and apply her technical, commercial and client management skills from advisory role to a policy one is most impressive ”



## > Victoria Robinson Partner

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Tel: 07843 368 488

### Key achievements

- Victoria completed a transformation project for a FTSE 100 company tying its talent programme into its mobility programme. This project was about ensuring the right people had access to international opportunities and included reviewing the profile of assignees and mapping processes and policies to strategic objectives.
- Victoria helps clients by designing tax-efficient reward structures aligning performance with reward.
- She has assisted FTSE 100 senior executives with their personal taxes in addition to managing clients' internationally mobile employees and ensuring both the individual and the company are compliant.

With a background in UK and US personal tax, Vicky works in PwC's HRS practice advising individuals and companies around people issues within their organisation. This includes assisting companies with mobilising their workforce and talent pools globally, developing and designing tax efficient reward structures and advising on all areas of employee and employer compliance and regulation. She also acts for a number of FTSE 100 main board directors advising them on their personal taxes.

“ When I left practice for industry, I moved the entire expatriate tax account to PwC on the proviso that Victoria would be allowed to run it in her own way ”

“ [Victoria's team] work long hours when required, and actually enjoy it, which is down to her leadership and encouragement ”

“ She builds rapport quickly and clients are always willing to share their personal agendas with her so she can work with them to achieve the right outcomes for their business and themselves ”

“ She is known as someone who gets things done ”



> David Scorey  
Barrister

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Tel: 020 7813 8000

## Key achievements

- David has a long list of reported VAT decisions which demonstrate his ability as a litigator and his VAT expertise, most notably *Chalke & Barnes*, *WM Morrison Supermarkets*, *Esporta*, *LMUK & Baxi*, *Everest*, *NHBC*, and *ATEC v HMRC*. Impressively, in *LMUK & Baxi*, David acted (without a leader) for Baxi in a long-running saga about reward schemes. He appeared at every stage in the process, including appearing in the House of Lords on his own and then in a reference to the CJEU. In *ATEC*, he appeared in the first case in the Upper Tribunal, on how the transitional regime for the new tribunal regime applied to appeals straddling both old and new rules.

After lecturing in English contract and tort law at Leiden University in The Netherlands and in EU law at the London School of Economics, David joined Essex Court Chambers in 1998.

In addition to advisory work, David has considerable litigation experience in respect of VAT and frequently appears on behalf of the taxpayer before the tribunals both in England and in Scotland, and on appeal in the higher courts and the CJEU. He has also acted in numerous judicial review applications against HMRC and many tax disputes between private parties arising from share sale agreements, usually resolved in arbitration.

- “ David is very commercially focused, and it is one of the things that set him apart from other barristers ”
- “ Rather than just giving us the law and the likely litigation outcome, David will examine practical ways to solve things ”
- “ Clients seem to love David as he is personable, and practical ”
- “ He inspires confidence both with practitioners and in-house teams ”



> **Michael Shaw**  
**International Issues Manager**

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Tel: 0115 974 0929

## Key achievements

- Michael has worked with many large global multinational groups and advisers on issues including corporate residence, permanent establishments, transfer pricing, thin cap, arbitrage, debt cap, controlled foreign companies and interpretation of treaties. This work has consisted of risk assessments, enquiries, formal and informal clearances and advance pricing agreements, with Michael's efforts bringing several hundreds of millions of pounds of profits into the UK tax net.
- He has created and delivered training for HMRC staff on a wide range of international tax issues, putting his experience as a qualified teacher to good use.

After graduating Michael taught foreign languages before joining the Inland Revenue's Fast Stream Programme in 2000. After qualifying as an Inspector he moved to the Large Business Service, taking personal charge of resolving transfer pricing issues with dozens of the world's biggest and best-known multinational groups. From there, he expanded his role and now acts as a technical lead for large business on the full range of international issues. He represents HMRC in external meetings with businesses and advisers to resolve enquiry and clearance issues, while within HMRC he provides technical guidance and training to colleagues. Michael recently took on a leading role in a project looking to streamline and improve HMRC's processes for risk assessing specialist international issues on large corporate groups.

“ His skills as a communicator and an educator stand out amongst his peers ”

“ He has a refreshingly open but firm approach – he is able to argue his points cogently but always from the perspective of understanding the customer's point of view ”

“ Michael is a real role model for how we want our tax professionals to operate ”

“ We have a policy of openness with HMRC, which Mike responds to by showing trust on minor issues, whilst being very effective at focusing on the major points ”



> Nicola Shaw QC  
Barrister

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Tel: 020 7242 2642

## Key achievements

- Nicola has been involved in some of the most important cases in tax in the past 12 months, including *Marks and Spencer plc; R (oao Davies and James) & R (oao Gaines-Cooper) v HMRC; Hutchison 3G Ltd; Deutsche Bank; Volkswagen Financial Services*; and *Secret Hotels 2*.
- Her cases have seen important tax points litigated, whether over a claim for cross-border group relief on appeal to the Supreme Court, or on appeal to the CJEU (on cross-border consortium relief), whilst one case, on the application of VAT to the law of agency in cross-border supplies of hotel accommodation, is currently on appeal to the Court of Appeal.

**Nicola is a specialist tax litigator, acting on behalf of taxpayers and HMRC alike, dividing her time equally between direct and indirect taxes. In 2005 she was appointed Junior Counsel to the Crown; in 2012, she was appointed Queen's Counsel.**

Nicola won 'tax junior of the year' at the Chambers and Partners Bar Awards in both 2009 and 2011; she also won the 'rising star' award at the *Tax Journal Indirect Tax Awards* in 2009. Nicola is recommended for both direct and indirect tax in Chambers and Partners (where she is listed as the 'star individual').

“ Excellent. A first class litigator who gives 100% ”

“ Every client I have introduced to Nicola has been impressed with her manner and her approach. I would have no hesitation in introducing any clients to her and knowing that she will advise them excellently, but also she will work very well with us in partnership ”

“ If I am going to counsel, I first think of Nicola as she would be my preferred choice for many areas of indirect tax – both in terms of technical knowledge but more so for attitude, commercial application and the overall client experience ”



> **Damian Shirley**  
**Head of Indirect Tax**

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 Tel: 0845 4971423

**Key achievements:**

- Damian has represented clients on a number of contentious transactions, including a leading First-tier Tribunal case on abuse. He has also advised the lead government-owned financial institutions on an option to tax issue, which resulted in a change of law.
- Damian is an active participant in law change. Projects include advising the Association of Colleges regarding the consultation on the service sharing exemption, and acting as sole adviser for the first ever UK host of a European Research Consortium (ERIC). He is negotiating the introduction of law changes with HMRC regarding ERICs within the current UK domestic zero rate.

**Damian is UK head of indirect tax for Eversheds. He is responsible for the co-ordination and leadership of the delivery of indirect tax advice within the firm's pan-EU network of offices and transposing UK model practice into Europe. Damian is a partner (non-solicitor), and was the first legal adviser within Eversheds to attain partner (non-solicitor) status. He joined Eversheds in 2001 from KPMG.**

Damian's areas of expertise include corporate and commercial transaction support and strategy, real estate, tax litigation and international supply and distribution chain analysis.

“ He evidently has the respect of his colleagues and therefore makes a strong team leader in a given transaction, co-ordinating all other aspects, such as banking, construction and property law ”

“ He has a non-arrogant, non-confrontational style but goes the extra mile to ensure his company's overall service is to the highest standard. For someone specialising in a relatively technical area, he has the rare ability of being able to see the bigger picture ”

“ Damian is first class, analytically and tactically; he's a creative and energetic litigator ”



## > Paul Spindler Partner

Email: [pspindler@kingstonsmith.co.uk](mailto:pspindler@kingstonsmith.co.uk)  
Tel: 020 7566 4000

Paul is a partner in the tax consultancy, head of the Spain and Latin America Desk, and tax partner for the technology sector. He has advised small start-up businesses and independent contractors on the application of government incentives for investment, rewarding key management through share and share option based payment schemes as well as dealing with re-organisations when business partners have gone their separate ways. Paul advises businesses of all sizes on entering and structuring investment into Spain and Latin America and vice versa.

### Key achievements

- Paul's exposure to the Latin American market has given him a unique insight into the operation of markets in this continent, growing Kingston Smith's presence from virtually zero to a significant area of expertise for the firm.
- Paul has recently advised contractors and the agencies and end clients that use them, on the application of IR35, MSC legislation and disguised remuneration.
- He has also advised a Spanish bank on the structure of the UK retail derivative market; a multi-national business on the structuring of its operation in Latin America in a tax-efficient manner; and a European shipping group on its international transfer pricing policy.

“ I cannot think of one piece of advice or piece of work that has not been successful in both its planning and implementation ”

“ I cannot speak more highly of Paul's professionalism, commitment, abilities and advice, and Paul will continue to be our advisor of choice ”

“ Paul has been doing outstanding and visionary work to catalyze synergies between the UK and countries such as Colombia where he has successfully created the proper tax foundations and financial mechanics necessary for companies to proceed with [their] business ventures ”





## > Jon Stevens

Partner

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### Key achievements

- Jon advised on the first BPRA syndicate transaction and becoming the leader on advising on such transactions recently having advised on Cumberland House, the largest Hampton by Hilton, in Europe as well as many others.
- He has advised on cross-border work including advising Doppelmayr Seilbahnen GmbH, the world leader in ropeway engineering, on the London Cable Car for the 2012 Olympics.
- Jon advised Taylor Wimpey, the UK's second largest house builder, on the tax consequences of a corporate consolidation and re-organisation.

**Jon's expertise covers advising on all aspects of tax planning on corporate and property transactions. This includes the sale and purchase of companies, businesses and properties and joint venture arrangements.**

Jon has extensive experience of advising on the tax issues associated with property development. Over the last few years he has developed a particular expertise on advising in relation to property funds and has become one of the leading advisers in relation to business premises renovation allowances (BPRA). In the last three years alone, Jon has advised on more than ten BPRA transactions. Jon made partner at Squire Sanders before the age of 35.

“ Overall I consider Jon to be the best property tax solicitor in the country ”

“ My status as client has been at the forefront of his provision of service. He has made time to meet with me as an individual client on a regular basis despite my erratic work schedule and location ”

“ He has a natural professional acumen in as much as clients are always valued and welcomed whether they are massively wealthy or relatively modest ”



## > Toby Tallon

Associate Director, Private Client Tax

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Tel: 020 7131 4277

### Key achievements

- Toby's recent work includes helping a client restructure a £9m property portfolio owned jointly between different family members so that one family member could sell their interest whilst allowing the others to retain their interests, resulting in saving a large CGT saving.
- Toby co-led the firm's barrister initiative, writing a three year business plan and preparing a rolling annual programme of seminars. He also created a 'breakfast club' for senior clerks/chief executives to discuss topical issues in an open forum, and arranged a survey of the sector with over 100 senior clerks/chief executives taking part.

Toby has spent 10 years at Smith & Williamson, during which time he obtained accountancy (ACA) and tax (CTA) qualifications and also enjoyed a secondment to the heritage and tax department at Christie's. His clients range from barristers, owner-managers, individuals with rural and urban estates, to non-domiciled individuals and entrepreneurs. He looks after family and business groups to provide an all-round service.

A regular presenter, Toby has led seminars and lectures internally and externally on a variety of issues. He co-leads the firm's barrister initiative and is also a member of the property and partnership groups. Toby was promoted to associate director in July 2011 at the age of 32.

- “ Toby is a dynamic, proactive and very knowledgeable tax advisor who has proven his worth time and time again on a range of complex matters ”
- “ As a direct result of working with Toby, we have been able to restructure our business more effectively ”
- “ He is extremely prompt and it feels as though he is always available and only a call away ”
- “ His advice has always been extremely informative and has given us alternative options to those previously considered ”



> **Robin Walduck**  
 Partner, International Tax Services

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 Tel: 0207 311 1816

### Key achievements

- Robin has led the development, origination and execution of a number of private high value cross-border financing and leasing transactions both in banking and at KPMG (for financial services and corporate clients).
- He is also one of the key advisers within KPMG in relation to the taxation of Islamic Finance products.
- In addition, he specialises in the taxation of complex derivative products, having spent considerable time working with these products in the front office structured finance division of a bank.

With a fifteen year background in international tax, seven of which in investment banking (in London and Hong Kong), Robin has gained considerable international structured transaction experience, designing, originating and executing complex cross-border financing products on a proprietary basis and for clients.

Having re-joined KPMG in 2007, he now leads the international tax team, providing international tax advice to large corporates and financial institutions. Recent projects have included intra-group cross-border financing, global legal entity rationalisations, group restructuring, and the setup of international holding and treasury companies.

“ Very smart and sees things from my point of view ”

“ He delivers advice taking into account what is commercially practical and relevant ”

“ He co-ordinates the input from his global network so that the advice he gives is clear and comprehensive notwithstanding this is often required at very short notice. Furthermore the advice is precise and balanced enabling us to understand the issues and make a decision based on his recommendations ”



> Adam Waller  
Partner

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Tel: 0161 245 2757

### Key achievements

- Adam has had a significant impact on the PwC private client business since joining the team a little over a year ago, increasing its presence in the market and helping to grow practice revenues by over 30%.
- He has established himself as a trusted adviser to a number of HNWIs and private companies.
- Recent work includes tax advice on the tax-efficient structuring of three families' private wealth in order to protect long-term capital. He has also been involved in the demerger and re-structuring of shareholdings in two large privately held companies and advising on the establishment of a property investment fund.

Adam joined the private client practice in 1995, initially with Arthur Andersen and subsequently Deloitte. After completing his tax qualifications, he undertook an MBA at Manchester Business School and was admitted as an equity partner in 2008. In June 2011 Adam joined PricewaterhouseCoopers to lead the North-West Private Client team.

Adam specialises in advising clients in relation to their personal and business affairs. His clients include entrepreneurs and wealthy individuals as well as their families, trusts and related business interests. Adam also advises professional partnerships on taxation matters.

“ He has fantastic client handling skills – clients love him! His technical knowledge is up there with the best in his particular specialist area ”

“ Adam takes a considered approach to matters and is keen to ensure the client understands all the costs and implications when considering a particular strategy... this gives clients tremendous reassurance when making very important decisions ”

“ Adam is a very knowledgeable and caring advisor who ... attempts to understand his clients' requirements with regard to family matters and advise accordingly ”



> Chris Williams  
Corporate Tax Partner

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Chris began his career in Cardiff advising locally-based quoted and inbound companies on corporate and international tax issues, before being seconded to the large corporate tax team in PwC London where he worked on one of the largest demergers of a US listed group. Chris is now based in Cardiff and Bristol, and was promoted to partner in 2011. He specialises in providing corporate tax advice to overseas-parented groups and private equity-backed businesses. He has advised many of the leading businesses in Wales and the West and has established himself as a leading tax practitioner in the region.

### Key achievements

- Chris is a member of PwC's national inbound tax leadership team and leads the development of the inbound tax business in Wales and West, which accounts for about a third of PwC's tax business there.
- He is a recognized international tax specialist in Wales and West and is able to provide clients with expert international tax and structuring advice locally.
- Chris also leads PwC's private equity-backed company tax business in the region and is a recognised thin capitalisation expert.

“ Chris is invaluable. I would rank him overall as my most highly ‘trusted advisor’ and as such, have every intention of working regularly with Chris in the future ”

“ Chris brings technical brilliance and a total lack of arrogance with it ... he shares his knowledge generously and matches his responses seamlessly to the understanding/perspective of the recipient ”

“ He will always do/say the right thing – whether to his benefit or his detriment ”



> Tim Woodthorpe

UK Tax Counsel

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Tel: 020 8047 4606

Key achievements

- Tim played a key role on the formation of ViiV Healthcare, a joint venture between GSK and Pfizer specialising in HIV treatment.
- He has worked closely with HMRC and HM Treasury policy teams and several FTSE 100 heads of tax in various CFC consultation working groups, including reviews of draft legislation.
- Tim designed and implemented tax-efficient intercompany financing arrangements, including a zero-balance multi-currency cash pool, and provides tax support for GSK's corporate treasury function.

Tim qualified as a solicitor in 2006, practising in Slaughter and May's tax department. He advised a wide range of clients on both direct and indirect taxes, with particular focus on M&A transactions and tax disputes, including settlements with HMRC.

In 2010 he joined GlaxoSmithKline as their first in-house UK tax lawyer. Working in the corporate tax strategy team he specialises in the design and implementation of global strategic projects, group financing arrangements (internal and external), and the resolution of contentious issues with HMRC. He plays a leading role in GSK's participation in legislative consultation with HMRC and HM Treasury.

“ Tim is unassuming, analytical, proactive, and insightful ”

“ Tim manages his advisor relationships very well and understands the importance of managing costs ”

“ His open and honest communication style is important ... he engenders trust with the advisors he works with ”

“ He has a very straightforward approach at delivering excellent quality at whatever he does and is also very engaging and a positive team player ”



## > Robert Young

### Partner

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Tel: 020 7300 4201

### Key achievements

- Rob has provided M&A tax support for a number of high-profile transactions in the past 18 months, including Rutland Partners' acquisition of the Pizza Hut UK restaurant business, and has advised on tax structuring for a wide range of real estate and corporate clients, including the management team of high-end mobile phone business Vertu on its buy-out by private equity house EQT.
- Perhaps unusually for a tax team within a law firm, Rob has a growing practice of attracting direct instructions from corporate finance advisers and firms without a tax capability.

**Rob trained as a solicitor with Herbert Smith, qualifying into the tax group in 2000. He joined Taylor Wessing in 2007, becoming a partner in 2009.**

Rob advises clients across the firm, with particular focus on clients in the private equity, real estate, technology and media sectors. Within these areas, Rob has developed a strong expertise in venture capital, particularly EIS, SEIS and VCT advisory work, and a complementary practice of advising SME clients, particularly on the tax structuring of M&A. Rob's real estate focus includes corporate real estate advisory and transactional work, stamp taxes and VAT.

“ Robert is an exceptional asset to the ‘Silicon Roundabout’ community, through his involvement with Tech City, and pro bono/reduced rates for emerging companies ”

“ Robert is exceptionally strong, and has made Taylor Wessing our legal adviser of choice when working on complex M&A transactions ”

“ Our positive experience with Robert as a tax expert has evolved into having Robert acting as the lead partner on select M&A transactions, where tax/ structuring issues have been major hurdles ”

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