

TAXJOURNAL

40 UNDER 40

Ones to watch in tax

2015



Pinsent Masons Tax – a market-leading team

Pinsent Masons is an international law firm, headquartered in London, with over 350 partners and international offices in key jurisdictions. Its tax team is one of the largest teams of true tax specialists in a UK firm, including tax lawyers, senior ex-HMRC officers, chartered tax advisers, those with a 'Big Four' accounting firm background, and accredited mediators. In addition to a strong presence in London and the major regional cities, we now have tax experts in Paris, Munich, Shanghai and the Gulf, who work with our UK team to provide the advice our global client base needs.

What the market says

"The team at Pinsent Masons is the very best available in this sector, in terms of both experience and acumen...a very serious outfit".

(Chambers UK 2015)

Practice group head **James Bullock** is described by clients as having "an outstanding track record in the field....a deep and broad thinker who will put things into a good context". Head of Tax **Jason Collins** has "deep experience of the subject...good at reassuring clients and seeing the big picture".

We are delighted to have two of our team recommended in this year's 40 under 40: **Matthew Findley** (page 15) and **Steven Porter** (page 33) and wish them every success in their future careers.



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TAX JOURNAL

40 UNDER 40

Welcome

Welcome to '40 under 40' for 2015. This publication gives our pick of some of the best young professionals working in tax today. I offer my congratulations to all the individuals profiled here. This is the third time we have published this guide and we received a record number of entries this time around – and the quality of candidates was exceptional.

What sets this guide apart is the methodology behind our selection. Everyone will have an opinion on who should be listed here, so to help us make the best selection, a team of independent and experienced researchers evaluated all submissions. This was no small undertaking as the team took up hundreds of references from clients, employers and peers. We were, in general, looking for technical excellence, commercial nous and first rate client skills. Thank you to everyone involved and in particular to all those who very kindly supplied detailed references. The standard of entries made for some very difficult decisions. Everyone profiled here comes very highly rated indeed.

Paul Stainforth, Editor, Tax Journal

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Methodology & rules

'40 under 40' is a guide to 40 leading tax professionals based in the UK, under the age of 40 on 1 January 2015, 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 from across the tax profession. All submissions were made in accordance with the entry rules and procedures set out on the right.

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 hundreds of references, including from clients, peers and employers. 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, Mary-Carmel Barbour and Jonny Haines.

Entry rules and procedures

- Nominations had to be submitted using a standard form. Additional materials were not considered.
- Nominations were for tax professionals, based in the UK and under the age of 40 on 1 January 2015.
- No more than five individuals per organisation could be nominated. In a change to previous years, previous applicants/ winners could reapply provided other conditions were met.
- Employees and office holders of Tax Journal and its publishing company, LexisNexis, were not eligible to enter.
- 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. Submission of the nomination form was taken as agreement that referees could be contacted by Tax Journal's research team.
- A research team evaluated submissions but the final decisions were made at the discretion of Tax Journal.
- The content of any entry could be used for publication, unless the entrant withheld their consent to this in writing or made it clear it was client confidential.
- 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.
- To help us manage and maintain the reputation of the '40 under 40' 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.



> Anna Anthony

Partner, Head of UK Financial Services Tax

Email: aanthony@uk.ey.com

Tel: 020 7951 4165

Key achievements

- Anna made partner in July 2008 at 30 years of age. She is known for her ability to identify market opportunities and sector trends, including within the financial services sector, in developing a market-leading practice.
- In addition to her UK role, she is now the EMEA financial services tax international tax leader, driving market activity of this practice across 12 countries in Europe.
- Anna is the partner sponsor for one of the firm's junior talent programmes, a mentor for a number of female partner track candidates, and represents the firm in its work with a number of external bodies.

Anna is a partner and the head of EY's UK financial services tax practice. The practice has over 40 partners and 650 tax professionals in the UK and provides tax compliance and consulting services to all sectors of the financial services industry.

Anna has 15 years' experience advising the banking sector on tax matters. She advises on all aspects of international tax, most recently focusing on the potential tax impacts of structural and regulatory reform on the industry. Anna works with some of the largest global retail and investment banks in relation to international acquisitions, disposals, reorganisations and financing.

“ She is very rare in the tax adviser world in that she is able to deliver answers to client problems, not just tax analysis, but solutions that are practical and we can execute. ”

“ Always understands quickly what the issue is, and what we need from the adviser. Not afraid to deliver difficult messages where necessary. Brings the best team with her from EY, and gets the best out of that team. ”

“ Anna is very 'real world' about things and ensures that her team actually deliver what the client needs, rather than getting distracted talking about obscure tax technicalities. ”



> William Arrenberg

Partner, Tax

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Tel: 020 7466 2574

Key achievements

- Acted for AXA REIM and its joint venture partner on the £300m forward funding of BNP Paribas' new office headquarter building at St Pancras
- Acted for Blackstone, the US private equity group, on a number of corporate and real estate acquisitions
- Acted for Time Warner Inc. on tax issues relating to the separation of Time Inc. from Time Warner Inc.
- Acted on a number of finance real estate transactions including: Deutsche Pfandbriefbank's £105m refinancing of 23 Savile Row for a consortium of investors managed by LaSalle Investment Management; Standard Life's €150m refinancing of its European Growth Fund with Credit Agricole; Deutsche Bank's £80m financing of 60 Sloane Avenue.

William has experience across a wide range of corporate tax and structuring matters, including domestic and cross border tax planning and structuring, reorganisations and asset and share acquisitions and disposals. He has extensive experience advising clients in the energy sector and also regularly provides tax advice on high value structured real estate transactions and real estate financing.

Whilst qualified to advise on UK tax law, William also regularly acts in a "lead tax counsel" role, co-ordinating the advice of non-UK tax advisers and working with such advisers in implementing transactions. Since becoming a Partner at Herbert Smith Freehills in 2012, William has acted on a number of complex and high profile transactions in recent years.

“ He is a strong negotiator with the “other side” in M&A deals and both articulates well in discussions and as importantly listens to both his clients and the deal counterparties. ”

“ William managed to guide us through some pretty complex and historic legislation and explain it in a way we could understand and feel comfortable with the outcome. ”



> Marie Barber

Tax Partner

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Tel: 020 7862 0811

Key achievements

- Assisted clients in meeting European regulatory requirements to defer and co-invest remuneration and align objectives of investment managers and investors, whilst ensuring compliance with the UK tax regime including the disguised remuneration and anti-avoidance provisions.
- Assisted with the establishment and initial operation of over 70 international businesses with a UK presence, including: selecting the appropriate legal entity; advising on compliant fee flows and contractual obligations; considering future expansion and flexibility in a tax efficient manner.

Marie qualified in New Zealand as a chartered accountant and as a barrister and solicitor. Relocating to the UK, she worked for three years in Barclays Bank's group tax team, then RSM Robson Rhodes' financial services team before following the lead partner to establish Kinetic Partners in 2005, where she has been a tax partner for nearly six years.

Her specialisms include advising clients on hedge fund tax efficient structuring; issues surrounding offshore funds legislation and compliance related matters including transfer pricing. Marie oversees and manages the tax compliance process for almost 100 UK clients comprising of corporate and LLP entities.

“ She is able to swiftly cut through the noise and get to the heart of an issue. ”

“ Marie is an extremely knowledgeable professional who is a pleasure to work with as she has a very good understanding of the business and industry in addition to the technical tax aspects. ”



> Jo Bateson

Partner

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Tel: 020 7694 5445

Key achievements:

- Created a successful new business initiative, private wealth tax services, which has already generated considerable fees last year and will continue to build revenues going forward.
- Leads KPMG's motorsport private client practice, providing personal tax advice to drivers, team owners and senior management in this sector, in particular Formula 1.
- Key part of KPMG's landed estates practice, in particular London estates, with an expertise in complex trust issues.
- Listed in Management Today's '35 under 35' Women in Business published in The Sunday Times in July 2012. Double winner of Citywealth's Power Women Awards 2015 receiving Woman of the Year.

Jo is a partner in KPMG's private client advisory practice in London advising a wide variety of clients from former prime ministers, hedge fund managers to motorsport enthusiasts. At 35 years old, Jo's succession through the firm has been rapid. She joined KPMG in 2005 as an assistant manager, after training in a small firm, and has been promoted quickly ever since.

Jo was promoted to director in 2011 - one of the firm's youngest ever. Her appointment to partner was with effect from 1 October 2014.

“ She has excellent commercial awareness. We normally expect a supercharged performance on tax advice from Jo! ”

“ She is excellent at building strong relationships with her clients. She also has strong technical skills and her clients trust her to provide the best possible advice to them. ”

“ She is capable and fun to work with. Jo and her team are responsive and technically accurate. ”



> Jonathan Bremner Barrister

Email: jbremner@pumptax.com

Tel: 020 7414 8080

Key achievements:

- Representing taxpayers (including large multinational groups) in ground-breaking, high-value claims for restitution of tax levied contrary to EU law including a month-long trial in 2014 (FII Group Litigation Order) and appearing unled in High Court proceedings (CFC and Dividend GLO).
- Acting for the successful taxpayers before the FTT in *MG Rover Group Ltd v HMRC* (on appeal to Upper Tribunal): a complex claim to recover overpaid VAT raising novel issues concerning VAT groups.
- Acting for the successful taxpayers before FTT and UT in *Murray Group v HMRC* (the Rangers Tax Case) (on appeal to the Court of Session).

Jonathan's practice focuses on business/corporate tax and VAT. His clients are drawn from a wide range of industry sectors (including finance, retail, entertainment and travel) and have included multinationals, major listed companies, hedge funds and a major football club.

Jonathan has appeared in tax appeals and/or tax-related litigation before the Court of Justice of the European Union, the Court of Appeal, the High Court and the specialist tribunals. He has a particular interest in tax avoidance issues, the interaction of the UK tax code with EU law and claims for restitution of unduly levied tax.

“ Jonathan is one of the most considered and thoughtful lawyers I have come across at the junior bar. I rely very heavily on his judgement as well as on his tax knowledge. ”

“ He is clever, conscientious, analytical and also very easy to work with. ”

“ He was an extremely valuable member of the team, and was very much appreciated by knowledgeable clients for his skill, effort and constructive contributions. ”



> John Brinsmead-Stockham
Barrister

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Key achievements

- Anson v HMRC (Supreme Court – awaiting decision): junior counsel - the treatment of Delaware limited liability companies for the purpose of double tax relief for US income tax.
- Reed Employment v HMRC [2014] STC 1026 (Court of Appeal): junior counsel - recovery of overpaid VAT and the application of the EU law principles of equal treatment, fiscal neutrality and effectiveness.
- Bupa Insurance v HMRC [2014] UKUT 262 (TCC) (Upper Tribunal): junior counsel – meaning of “beneficial entitlement” for the purposes of the UK consortium relief.

John undertakes a wide variety of both advisory and litigation work in all areas of tax law. He has advised on matters ranging from IHT and SDLT planning to major income tax, corporation tax and VAT disputes between multi-national companies and HMRC.

As an advocate he has acted as junior counsel in several major pieces of litigation, and has appeared unled on numerous occasions. As well as acting for taxpayers he is also a member of the Attorney General's Panel of Counsel (C Panel) and so acts as an advocate on behalf of HMRC and the UK Government.

“ He is one of the most consistently impressive juniors out there at present. ”

“ He is both extremely client friendly and presents very well on his feet – factors which, combined with his technical excellence, really mark him out as a future star. ”

“ John is incredibly thorough and meticulous. He immerses himself in the detail of a matter and will ensure that he is on top of every issue. ”



> Nick Clayton
Senior Associate, Solicitor Advocate

Email: nick.clayton@hsf.com

Tel: 020 7466 6409

Key achievements

- Taking the lead on a diverse portfolio of tax disputes. Core issues in recent cases include: whether various commercial mortgage-backed securities constitute QCBs; the availability of corporation tax deductions for certain strict liability fines; and the deductibility of prepaid interest and HMRC's ability to resile from a settlement agreement in relation to the same. He also advises clients participating in group litigation pertaining to portfolio dividends and SDRT.
- Instrumental in settling an investigation into the tax position of an UHNWI in for c.1% of the tax originally sought by HMRC.

Nick is a solicitor advocate. He advises financial institutions, corporate groups and UHNWIs on high value and complex tax investigations and disputes with HMRC (in all levels of the UK's Courts and Tribunals, the CJEU, and the Adjudicator's Office), as well as on the use of mediation and negotiated settlements.

He also advises clients regularly on tax aspects of mis-selling claims (involving tax schemes and investment products) and in connection with HMRC's powers to compel clients to provide documents/information pertaining to other taxpayers. Nick has a particular interest in public law issues pertaining to the use (and abuse) of HMRC's powers, and in Tribunal practice and procedure.

“ His technical knowledge, interpretation of the law and construction of arguments to support our position were all outstanding. ”

“ His attention to detail is meticulous and he remains calm under pressure at all times. ”

“ Superlative communication skills, tactically excellent, incredible breadth of intellect. ”



> Yvonne Cypher

Tax Partner

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Tel: 012 1265 5160

Key achievements

- Led the European restructuring of a consumer packaged goods business across seventeen countries. Managed the full conversion and TP elements of the European restructuring.
- Grown the Midlands TP team, attracting and recruiting quality people from the international network and the external market.
- Led the development of the TP offering on the implications of climate change and sustainability and has presented and published on this topic.

Yvonne leads PwC's Midlands transfer pricing and value chain transformation practice. Yvonne has been a transfer pricing specialist for fifteen years and a Partner since 2010. Yvonne is Global TP leader for a number of clients. She also leads the national VCT Industrial Products sector. She previously spent eighteen months on secondment to PwC Chicago.

Yvonne leads complex global TP projects as well as the TP and conversion elements of VCT projects. She has led projects for iconic companies in consumer goods, automotive, aerospace, pharmaceutical and industrial product sectors. She is a mentor and role model for the firm's senior female leadership agenda.

“ A great person to work with. Knowledgeable with an extensive network of contacts around the world, friendly and approachable but professional, conscientious and always has the client's best interests at the front of her mind. ”

“ Perhaps her strongest and most valuable skill is that she understands her clients' business and brings that into her advice. Her calm composure and affable sense of humour is also a plus. ”

“ She has been outstanding in coordinating large, multi-jurisdictional and cross functional expert teams within PwC. ”

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> Paul Davison

Partner

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Tel: 020 7427 3226

Key achievements:

- Advised on Pearson's 2013 joint venture with Bertelsmann, creating the world's leading consumer publishing business by combining Penguin and Random House.
- Advising Eurotunnel on its transformative 2007 €7bn debt restructuring.
- Undertakes a considerable amount of tax-related pro bono work advising entities, for example, Social Finance Ltd on the structuring of social impact partnerships, in connection with the Department for Work and Pensions' "Innovation Fund".

Paul regularly advises on a broad range of complex tax structured finance and leasing work generally with a cross-border component and on public and private M&As. Another key component of his practice is working on restructurings – most recently he advised the ad hoc bondholders committee in New World Resources plc's €775m debt restructuring.

Paul now leads the finance tax group in London and frequently advises on mainstream finance (loans, bonds, swaps, EMTN programmes, structured credit) in addition to HMRC enquiries and tax disputes. He provides tax consultancy to multinationals such as General Motors.

“ Paul's clear, well thought through advice allied with a practical commercial approach is incredibly useful. Paul's calm approach to dealing with these complex issues has helped us get to the correct answer.”

“ He provides a very high quality analysis both of the technical and the practical issues.”

“ Paul is my first choice for complex UK tax issues.”



> Aaron Fairhurst
Partner

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Tel: 020 7367 2863

Key achievements

- Aaron has become one of the (if not “the”) leading tax practitioners advising on the insurance of identified tax risks using W&I insurance, now being used in many M&A deals and regularly acts for all of the major insurers that operate in this sector.
- He regularly advises a number of private equity investors, e.g. Anacap, Hutton Collins, IAC, LDC, LGV, Oakley Capital, Octopus, CBPE and Sovereign Capital in relation to M&A and restructuring of their investments, including acting for the management team on the recent acquisition of thetrainline.com by KKR.
- Aaron led on the tax aspects of Abbey Life Assurance Company Limited’s recent £2bn longevity insurance transaction with the Trustee of the ScottishPower Pension Scheme and on the associated arrangements with reinsurers around the world.

Aaron has been at CMS since 2002. He joined as a trainee and made partner in 2011. His practice has a focus on corporate transactions and the insurance sector. As well as providing general transaction support, he has majored on M&A in the private equity and energy sectors.

Aaron has not only significantly developed the tax team’s Warranty and Indemnity (“W&I”) practice, but has become a conduit for broader corporate W&I work. As such he has proactively developed non-tax business for the wider firm.

“ Aaron is a fantastic, commercially focused lawyer who can provide expert corporate tax advice on deals, being able to distil the complexities of tax into easily digestible pieces of advice for those who are not so well versed on tax matters. In addition, he is an excellent negotiator and through his style achieves great outcomes for clients. ”

“ Aaron is very strong technically and extremely commercial in his advice which is essential in light of the analysis of risk that we carry out in deciding whether to offer insurance on transactions. Aaron is very client focused and has established a very strong reputation in the W&I insurance sector as a leading tax adviser. As a client partner, Aaron constantly demonstrates his commitment to the growth of our business and in this respect, is ahead of his peers at other law firms that we also instruct. ”



> Mark Feldman

Vice President, Tax Strategy
and Business Support

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Key achievements:

- Worked with HMRC and HM Treasury policy teams in amending draft legislation as part of the debt cap working group.
- Led industry responses to the proposed EU Financial Transaction Tax.
- Contributed to a number of professional publications and is a member of the Chartered Institute of Taxation committee organizing the Cross-Atlantic and European Tax Symposium.

Mark is Pearson's head of tax strategy and business support, and a member of Pearson's tax leadership team. After qualifying as a solicitor and chartered tax adviser at what was (then) Herbert Smith, he advised clients on direct and indirect taxes on a wide range of transactions. In 2006 Mark joined KPMG gaining deep international and tax controversy experience advising large multinationals.

After taking an Executive MBA, he moved to BP where he led the tax team supporting BP's European commodity trading business. Since joining Pearson, he has been instrumental in formulating Pearson's future tax strategy. He leads a global team of senior tax specialists located in three countries advising the business.

“ He is immensely bright, but at the same time commercial in his approach, and attuned to business opportunities. He is never afraid to challenge a position put to him by others - always in the most cooperative and urbane way. ”

“ I think Mark is a model example of a tax professional who can articulate complex tax concepts to non-tax colleagues. ”

“ Mark is very clear thinking and technically excellent. ”



> Matthew Findley

Partner & Head of Share Plans & Incentives

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Tel: 020 7490 6554

Key achievements:

- Advising an international insurance intermediary group on various tax efficient equity arrangements, having been instructed by the company secretary who he worked with in his former role.
- Leads Pinsent Masons' client fora – held three times a year – at which a continuing theme is the ongoing development of the tax framework surrounding employee share plans. These events have to place tax in a commercial context given that many of the attendees are non-tax professionals. Matthew's ability to provide this kind of client care is informed by six years' industry experience in a specialist remuneration consulting firm.

Matthew is a partner and head of share plans and incentives in the tax team at Pinsent Masons. He advises companies in relation to the design, implementation and operation of share plans and employee incentive arrangements, both in the UK and internationally.

Matthew has a genuine following and industry profile: quoted extensively in Hansard and in the national and trade press; sits on the UK Chapter Committee of the Global Equity Organisation and is a regular speaker at industry events. Clients include Imperial Tobacco, and IMI.

“ Matthew is highly professional, practical and commercial. He explains and presents things in clear plain language rather than blinding you with “legalese” which many others do. ”

“ He is a great guy to work with – clear and accurate advice. ”

“ His technical knowledge and advice is excellent and he has a very sensible and practical approach when applying his advice in the real commercial world. He is very approachable, has excellent client management skills and always responds in a timely manner. ”



> **Philippe Freund**
Barrister

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Key achievements:

- Counsel for Deutsche Bank in case C-44/11, a reference to the CJEU from the Bundesfinanzhof (Germany) in relation to the VAT treatment of portfolio investment services. The language of the hearing was German.
- Acting in the CFC and Dividend Group Litigation and part of the team acting in the successful Prudential test case which challenged the UK's pre-2009 dividend taxation rules in relation to portfolio holdings.
- Acting in the successful liability hearings in the FII Group Litigation at every stage, from the High Court, the Court of Appeal, the UK Supreme Court and the CJEU.

Before coming to the Bar Philippe Freund read law in Germany and France and speaks a number of foreign languages. His practice focuses on European and international tax disputes against both national and foreign tax authorities and his work usually has an international or multilingual element. His core practice is in contentious corporate tax where he regularly advises claimants in actions such as the FII and the CFC and Dividend Group Litigations.

Phillipe also handles international private client matters as well as indirect tax disputes. He regularly represents clients in UK courts of all levels and in the CJEU and publishes in the specialist press. He acts as pupil supervisor for his firm.

“ He is a unique talent with capabilities that are unmatched by other tax or EU law experts. ”

“ He has an exceptional intellect which is always ready to challenge the conventional analyses of issues. ”

“ Philippe has a very good knowledge of this subject matter, and of litigation, and is able to explain difficult technical matters in a simple fashion. ”

“ A very skilled, smart, brilliant professional. ”



> Jill Gatehouse

Partner

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Key achievements

- Advised Tesco on combining its Chinese retail operations with those of China Resources Enterprises in a joint venture with sales approaching £10bn.
- Advised 3i and Enterprise, one of the UK's leading providers of services to utilities and the public sector, on the agreement to sell Enterprise to Ferrovial Services for £385m.
- Advised Seadrill on the integration of its tender rig division into SapuraKencana Petroleum Berhad for an agreed acquisition price of US\$2.9bn.

Jill specialises in the tax aspects of corporate finance work (including public and private M&A, demergers, IPOs, joint ventures and restructurings), real estate transactions and private equity. Her advice covers the corporate tax, income tax, stamp taxes and VAT aspects of such transactions.

Jill has particular experience of transactions with substantive regulatory considerations. She has worked on insurance business transfers, acquisitions and reorganisations of asset management businesses and financings of insurance groups. Her transactional experience is an asset when negotiating deals in emerging markets, where the tax risks may be less familiar and the approach of the authorities unpredictable. Jill joined the firm in 2000 and became a partner in 2010.

“ Jill is a consummate professional. ”

“ Good client savvy partner with excellent technical skills. ”

“ Jill is comfortable handling difficult and complex negotiations. ”



> Tim George

Partner

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Tel: 020 7597 6348

Key achievements:

- Advised the Chief Minister's Department of the States of Jersey on how to improve Jersey's regime to attract a larger volume of high net worth individuals.
- Acts as a director of the remuneration committee of several leading hedge funds, providing expert advice and guidance on their remuneration strategies.
- Advised several high profile families in relation to tax planning strategies ahead of their moves to the UK from countries including Canada, France, Poland, Russia and the US.
- Created a private trust company structure for an individual with over £2bn of diverse business and private assets.

Tim is a partner in Withers' wealth planning team and advises high net worth individuals in relation to tax, trusts and estate planning, particularly non-UK domiciled individuals with complex international affairs. His expertise includes defining sophisticated pre-immigration tax planning strategies for individuals moving to the UK, as well as advising entrepreneurs in relation to the tax efficient structuring of their UK businesses and remuneration strategies.

Tim has created holding structures for investment into UK residential and commercial property; and advised in relation to the establishment and operation of private trust companies, family limited partnerships and family offices and advised generally on family governance issues.

“ I have found Tim to be the smartest, most entrepreneurial and effective tax adviser I have met – and I will certainly continue to work with him.”

“ Tim produces materials that are very easy to read and comprehend for somebody without a legal background; a very rare skill which I was really pleasantly surprised by.”

“ Tim is excellent. I can't recommend him more highly.”



> Sonia Gilbert

Partner

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Key achievements:

- Advising a wide range of high-profile companies on Employee Benefit Trust structures in ongoing disputes with HMRC covering legal and tax issues, litigation strategy and negotiations with HMRC.
- Advised Eurasian Resources Group on the complex incentive plan aspects of its c. £3bn offer for the mining company, ENRC.
- As a member of the Share Plan Lawyers Organisation's Tax Committee Sonia has helped shape legislative and policy changes for tax-favourable UK share plans.

Sonia leads the incentives and remuneration practice at Clifford Chance. She specialises in advising companies on employee share plans, incentive arrangements and remuneration issues.

Sonia has particular expertise in the design and implementation of incentive plans for large companies and global incentive plans. She advises on all types of incentive plan ranging from bespoke arrangements for senior executives to all-employee plans and operating in the UK and globally. Sonia also has significant experience of advising on employment tax issues, alternative remuneration structures including employee trusts and tax efficient remuneration.

“ Her calm perseverance and quiet determination were inspirational. She is more than capable of holding her own professionally in her field which is still overly dominated by older men.”

“ Sonia is a commercial lawyer who is able to grasp difficult concepts quickly and cut through them to deliver advice in a practical and solutions driven manner without compromising on the detail. She is a much valued and trusted adviser.”

“ She always has time to help on all professional matters whether it is how to structure a remuneration plan for a client through to how best to encourage and motivate our junior female lawyers.”



> Pete Hackleton

Tax Partner

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Key achievements:

- Negotiated image rights deals with HMRC on behalf of a number of top football players and for a number of clubs, as part of a significant football practice, in which he acts for over 35 players and managers.
- Lobbied on behalf of a number of governing bodies for tax exemptions for sporting events, and for changes to the taxation of non-resident sportspeople coming to the UK, which resulted in the revised practice introduced in the 2012 Budget.
- Worked on the tax implications of major sports events coming to the UK in recent years, including the 2009 ICC T20 Cricket World Cup, London 2012 Olympic Games, and US National Football League games held in the UK.

Having joined Arthur Andersen in Manchester in 1999, and later becoming part of Deloitte in 2002, Pete moved to London in 2005, to work in Deloitte's sports business group, where his clients included major governing bodies of sport and Premier League football clubs.

A partner at Saffery Champness since March 2012, he has played a key role in building the firm's sports and entertainment group of 30 people, generating £6.5m of revenue between four partners in the year to 31 March 2014. His client base includes governing bodies, sports clubs, rights agencies, top sportspeople, as well as entertainment sector clients, owner-managed businesses, and corporate clients.

“Pete's knowledge across all areas is superlative; he was an extremely knowledgeable lead adviser on several complex local and cross-border lending structures from a tax perspective.”

“Pete attended board meetings, dealing with questions in a straightforward and understandable way, which ensured directors understood the tax matters and how it was proposed they be dealt with. Pete's confidence, natural style and easy to understand answers reassured the board it was getting the advice [it] needed.”



> Judy Harrison
Senior Associate

Email: judy.harrison@nortonrosefulbright.com
Tel: 020 7444 2069

Key achievements:

- Advising an international bank on a £600m restructuring of their big ticket leasing portfolio which aimed to improve the regulatory capital position of the banking group and secondly, to ensure that certain tax losses were not stranded in the bank's subsidiaries.
- Advising a technology business moving its headquarters to the UK. This work included coordinating international advice on the implications of the transfer and on the structure of the group.

Judy graduated with a BA in law from Newnham College, Cambridge and trained at Norton Rose Fulbright, qualifying as a solicitor in the tax department in 2003 and as a chartered tax adviser (CIOT) in 2005.

Her practice focuses on advising financial institutions and other multinational corporations on the domestic and international aspects of asset finance, debt finance, capital markets, corporate sales, tax planning, investigations and disputes. In keeping with the firm's focus on its key industry sectors, she has significant expertise in financial institutions, shipping, aviation, rail, real estate and renewable energy projects.

“ Judy is very knowledgeable about asset finance and I have confidence that she will give accurate and relevant advice and guidance. ”

“ Her work is always completed to a very high standard and within agreed time scales. She has the ability to explain complex tax issues in a way that is easily understood to a non-tax person which is a great skill and is an excellent role model for her profession. ”

“ Judy has extensive experience and knowledge and good commercial acumen and client management skills. ”



> David Hewitt

Tax Partner

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Tel: 020 7728 2300

Key achievements

- Led the tax delivery on a number of Grant Thornton's most significant merger and acquisition transactions, including advice to the Kodak Pension Plan on acquisition of Kodak Alaris in the settlement of a \$2.8bn bankruptcy claim, as well as an acquisition of the TGI restaurant chain for \$1bn.
- David has developed a significant reputation advising on all tax aspects of private equity acquisitions and disposals.
- David's practice focuses on private equity funds in particular where he has significant experience including fund structuring, transaction structuring and acting for portfolio companies.

David became an equity partner in July 2012, aged 32 and remains the youngest partner in the firm. He heads Grant Thornton's transaction tax team of which he was a founding member in 2005.

Under his leadership, profits of the team have doubled in a two year period with both scale and quality of transactions increasing significantly. This work totalled deal values in excess of £2bn during the last financial year, with high profile transactions for companies including Kodak. David is a commercially minded problem solver capable of navigating complex domestic and international tax codes to get clients deals done, while providing first rate client care.

“ Great support, pragmatic and straightforward in a situation that was extremely complex and time constrained. ”

“ David is an excellent tax adviser – technically very strong, very responsive, commercial, and user-friendly, I recommend him highly. ”



> Lizzie Hill

Tax Partner

Email: lihill@deloitte.co.uk

Tel: 077 9304 8195

Key achievements

- Lizzie came to Cambridge to build an entrepreneurial business tax team from scratch and subsequently built a team of ten including two directors (both lateral hires from competitors) and two senior managers in the last three years.
- Advising a client company and the shareholders on the \$400m disposal of an early stage life sciences business.
- Acted as lead tax partner on a further completed AIM IPO (completed mid-2014) and on four further IPOs (two completed in late 2014 and two in early 2015).

Lizzie leads the business tax practice in Cambridge – leading a team of approximately thirty staff. The team has delivered revenue growth of approximately 27% in the last two years. She was promoted to partner aged 31, as one of Deloitte’s youngest ever partners and has been selected for the Deloitte future tax leadership mentoring programme.

Lizzie specialises in advising private, family and smaller listed business; unusually for a ‘Big Four’ tax partner, she possesses cross-tax expertise across corporate, personal and shareholder tax. She has particular expertise in the field of transactions and is one of Deloitte’s experts on corporate reconstructions.

- “ Her breadth of knowledge is frankly unique. She can deliver advice on personal tax issues and complex corporate transactions. Very few people have that bandwidth. ”
- “ Lizzie is a pocket rocket, very dynamic and very swift to grasp what is needed and where the problems may, or will, lie ahead. ”



> Warren Hyams

Managing Director

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Tel: 020 7491 9690

Key achievements:

- Advised the partners and a number of traders within two IPO trading syndicates in respect of HMRC enquiries. HMRC raised protective assessments on the individuals for in excess of £175m. However, Warren was able to defend the offshore structure the syndicates operated under and was able to reach settlement with HMRC for a six figure sum.
- Successfully assisted a number of clients who were subject to a HMRC criminal investigation, demonstrating that any potential tax issues arising were of a negligent or careless nature rather than fraudulent.

Warren has 17 years' experience in the tax investigations field and is the managing director of WLH Tax, a boutique tax investigations practice which he established in February 2008. His objective when establishing WLH Tax was to provide individuals who were seeking tax investigation advice with a credible and cost effective alternative to the tax investigation teams within the large accountancy and law firms.

Warren specialises in advising clients who are under serious tax fraud investigations for direct and indirect taxes within the civil and criminal arena. Warren also specialises in enquiries where there are offshore structures and advising clients who are either non-UK domiciled or non-UK resident.

“ Warren researched some very technical points in defence of my position, points that others had not highlighted. He built a strong defensive case, and has first rate negotiating skills with HMRC. ”

“ Warren has the exceptional ability to identify other avenues of investigation that are not just tax-based. For example, he has good knowledge of the legal principles involved that allow him to obtain information from clients that assist lawyers from the offset, hence expediting proactive next steps for clients. ”

“ At all times I felt I was [Warren's] ultimate focus and had the ability to contact [him] at any time should I remember anything I felt could help our case. ”



WLH Tax is a boutique Tax Investigations practice. The only service we provide is assisting individuals, companies and offshore structures in dealing with HMRC Investigations.

Our people have worked in Tax Investigations teams at 'Big 4' accountancy firms, niche tax investigations practices and within HMRC as Tax Inspectors. They bring with them a wealth of experience and knowledge. At WLH Tax, our personal, friendly and understanding approach ensures that we provide the best possible service at the most competitive prices.

We take time to understand our clients' affairs, so we can represent them in the best possible manner. We operate on the basis that all clients, regardless of size or wealth, receive the highest levels of professional representation, service, courtesy and value for money.



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> James Hume

Associate

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Tel: 020 7090 3953

Key achievements:

- Advising Vodafone on the disposal of its US group (including its 45% interest in Verizon Wireless) to Verizon for a total consideration of \$130bn. The deal involved not only a great deal of tax planning and close discussions with HMRC, but also the development of an innovative structure to implement the largest ever return of value to shareholders in a way that allowed them to choose between income and capital treatment.
- Advising GlaxoSmithKline on a complex, multi-billion-dollar three-part transaction with Novartis, involving the acquisition of Novartis' vaccines business, the disposal of GSK's oncology businesses and the formation of a joint venture for the parties' consumer healthcare businesses.
- Advising Corsair Capital and Centerbridge Partners on a £600m pre-IPO investment in the Williams & Glyn's business which RBS was required to dispose of by the EU.

James joined Slaughter and May in 2006 and became a tax associate in 2008. He advises on all areas of UK tax law and acts for a wide range of clients, including large multinationals, banks, insurers, hedge funds and commodities traders. He has a particularly strong focus on corporate tax and is known for the commercial focus of his advice.

James has extensive experience of domestic and cross-border M&A, joint ventures, returns of value and corporate finance transactions generally. He also has a diverse tax consultancy practice, covering all areas of taxation from transfer pricing to employee remuneration, and has worked on a number of disputes and settlements with HMRC.

- “ James seems to be able to turn the most complex fact pattern into clear, watertight drafting which aligns with commercial reality. ”
- “ He is already operating, in my view, at partner level, and in my view has out-performed partners in other Magic Circle law firms in the transactions we have worked on. ”
- “ What sets James apart from his peers is his ability to quickly and comprehensively understand the commercial drivers to extremely complex financial transactions and to provide very clear and concise advice in a timely fashion. ”



➤ Helena Kanczula
Senior Tax Manager

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Tel: 020 7437 7666

Key achievements:

- Developed extensive expertise in high-growth industries. A recent example is a company which is developing software which forms the operational core of an equity and derivatives stock exchange. She structured the company for EIS and implemented employee remuneration strategies including an EMI scheme and advised on the claiming of R&D tax credits.
- Advised a number of well-known brands in the fashion sector, including a major international high street retailer with an overseas head office on restructuring its intellectual property and transfer pricing matters.

Helena is a chartered accountant and works with an extensive range of businesses, including listed groups with international operations, and owner managed companies.

She heads up the firm's tax technical team, ensuring the dissemination of latest developments and regularly writes and speaks on all aspects of tax. Her corporate experience includes advising on UK and cross-border mergers, migrations, financing and tax planning for transfer pricing and controlled foreign companies.

“ The quality of Helena's work is always excellent. She is always very commercial when solving problems and keeps us up to date with key issues which could affect the group. She is extremely knowledgeable and has a good understanding of the group's businesses. ”

“ Helena is enthusiastic, professional and efficient at getting the job done. She has excellent organisational skills, pays great attention to detail, whilst also seeing the bigger picture, and is highly accessible. She is an excellent communicator and remains calm under pressure. ”

“ Helena is a bit of an 'unsung hero' and I would be thrilled if she were to be selected as a Tax Journal '40 under 40'! ”

“ Helena has demonstrated a powerful ability to simplify and solve complex tax problems, in delivering client friendly commercial solutions. ”



> Paul Knight

Partner, Head of Not for Profit Tax

Email: paul.knight@bdo.co.uk

Tel: 012 9359 1069

Key achievements:

- Advised on more than £1bn worth of private rental development schemes across the Social Housing sector, including joint venture structures, re-financing models, and non-charitable subsidiary models.
- Working closely with many lobbying groups, including recent work on Digital Giving, Feed-in Tariffs, and Gift Aid Online. Paul was on the Charity Tax Group's 'Ask the Expert' panel for their AGM last year.
- Developed one of the UK's leading Gift Aid advisory offerings.

Paul is head of BDO's national not for profit tax team. His clients include charities, social housing providers, higher education providers and membership organisations. With over 16 years' experience, Paul has been involved in a very broad range of not-for-profit tax issues, including the use of subsidiaries and limited liability partnerships, group tax strategy, gift aid, group mergers and charity tax requirements.

Paul began his career with KPMG, working initially with a mixed client portfolio, before specialising in not-for-profit work. He joined BDO in 2008, was appointed head of not-for-profit tax in 2012 and became a partner in 2014. Paul is a chartered tax adviser.

“ He demonstrates clear knowledge of the sector he works in and tends to have a practical approach, rather than overcomplicate matters. ”

“ I think Paul's work is of a really high quality and he delivers outcomes in a really 'easy-to-understand' way, without ever dumbing down what are highly technical and tricky issues. ”

“ He has a good style and approach and is always clear in his communications. ”



> Jonathan Legg

Tax Partner

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Tel: 020 7440 7092

Key achievements:

- Advising blue-chip clients on high profile transactions. This includes working with Capital & Counties Properties PLC as sole legal adviser on its Covent Garden estate.
- Developing expertise in property tax. This has been achieved by authoring various articles, as well as practitioner texts on Revenue Law. He has also acted as an examiner for the 2014 examinations for entry into the Institute of Indirect Taxation, and regularly speaks at conferences.

Jonathan is an experienced corporate tax practitioner, who is known in particular for his expertise in the real estate sector, with an emphasis on Stamp Duty Land Tax and VAT.

Jonathan's work will typically involve advising on real estate investment; development, finance, and funds work for a wide variety of clients, from blue-chip corporates and sovereign wealth to ultra-high net worth individuals. His role in transactions will range from providing tax support on straightforward property deals to much more complex projects requiring detailed tax consultancy advice.

- “ Jonathan is clearly a market leader in the Real Estate Funds tax field and his knowledge and advice has been of paramount importance in the tax-efficient structuring of our funds and their investments. ”
- “ He is a leader in terms of specialist knowledge, but it is the application and commercial advice he offers that is what makes his service offering so strong. He seems to put himself in the shoes of his client which aids him in providing advice which is as useful as possible. ”
- “ Jonathan's advice is invaluable as he is able to structure the tax advice in a way which fits with the commerciality of the transaction – in some instances commerciality will outweigh any potential tax efficiencies. ”



> Richard Montague

Tax Partner

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Tel: 020 7893 2213

Key achievements:

- Developed the international private wealth team, growing staff numbers from 10 to 25 people in the last two years, while tripling the fee income of the team.
- Played an influential role in how BDO works with intermediaries and their clients, building an impressive portfolio of wealthy global families in his first two years as partner. Much of the work has been won in a competitive pitch scenario in the external market and from client referrals.
- Created the *Global Opportunities Report*, a report looking at tax efficient countries around the world, in partnership with Knight Frank in 2012.

Richard has 18 years' tax experience, with his main focus being on international wealth structuring. His clients are predominantly entrepreneurial and of foreign origin who are living and working in the UK.

Richard's strength is working with clients, and their other advisers, to understand both their long and short term objectives from a business, personal and family perspective. This enables him to provide tax efficient solutions to their wealth structuring needs which take into account both local and international tax legislation.

“ Richard is commercially strong with clients, pro-active, determined and focused and communicates very effectively with entrepreneurs. He is experienced beyond his years.”

“ He is technically excellent and has a relaxed style with an exceptional team to support him.”

“ He always provides quick and precise answers. He always immediately offers several solutions.”



> Rory Mullan Barrister

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Tel: 020 7242 2744

Key achievements

- Acted for *Volaw and Larsen* in the case of *Volaw & Larsen v The Comptroller of Taxes*, regarding their appeals regarding the Tax Information Exchange Agreement (TEA) between Jersey and Norway. The matter has now been referred to the European Court of Human Rights in Strasbourg, the first time the compatibility of global TIEAs with human rights legislation is to be considered at that level.
- Acted for the taxpayer in *Fisher v HMRC*, an important direct tax case addressing a number of previously unanswered issues concerning the transfer of assets abroad code.

Rory focuses on advising taxpayers on UK tax matters including tax planning, disputes or other HMRC issues. He is the co-author of *The Interaction of EU Treaty Freedoms and the UK Tax Code*, and he is a regular writer and speaker on tax issues.

Rory is a member of the Revenue Bar Association, the Chancery Bar Association and the Stamp Taxes Practitioners Group. He is also qualified as a chartered tax adviser and sits on the CIOT EU and Human Rights sub-committee.

- “Rory shows very careful attention to detail and yet can see the wood for the trees. He is also very quick, he makes himself available and he is very user-friendly.”
- “His opinions are very thorough technically and I consider him good value for money overall. The quality of his legal drafting of documentation for any tax planning is also very impressive.”
- “Rory is clearly frighteningly intelligent and also very hard working.”



> Prabhu Narasimhan

Partner

Email: PNarasimhan@whitecase.com

Tel: 020 7532 2174

Key achievements

- Advising on a number of high value transactional and advisory matters for key clients. Prabhu's recent work ranges from advising on a number of strategic investments (both from a structuring and advisory perspective) to advising on the raising of circa €1bn capital in the high yield arena.
- Advising Digital Realty, GSO, Deutsche Bank, Thomas Cook, Rhone Capital and HSBC on a number of high value transactions/tax advisory and planning matters.

Originally a dual-qualified (both in India and UK) counsel in White & Case's London tax practice, Prabhu was promoted to partner with effect from 1 January 2015. Prabhu advises high-value clients on a broad range of transactional and advisory matters, including corporate mergers and acquisitions, joint ventures, private equity, investment and hedge funds, banking and finance, asset finance and real estate.

Prabhu has particular expertise in advising on and implementing tax efficient cross-border structures for multinational companies, financial institutions and funds. A growing part of his practice is advising clients on the structuring of their inbound investments into emerging markets (including India).

“ Prabhu has an innate ability to absorb information instantly and deliver top class tax advice and innovative solutions to complex business problems. Prabhu is commercially very switched on.”

“ I am impressed by his knowledge on an extremely broad range of tax issues, be it VAT, personal income tax, corporate income tax, double taxation and even internal tax rules of other jurisdictions.”

“ He is incredibly knowledgeable, very good at client management and is extremely clear and succinct in his advice.”



> Steven Porter
Senior Associate

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Tel: 016 1662 8050

Key achievements

- Acted in the First-tier Tribunal (tax) case of JIB Group Limited, one of the first of its kind using the Tribunal's Lead Case Procedure.
- Conducted one of the first tax mediations with HMRC outside of the pilot project.
- Lead solicitor in the successful First-tier Tribunal decisions of James Glyn concerning the taxpayer's UK residency status (currently under appeal at the Upper Tribunal); and Avon Cosmetics Ltd, including the continuing reference to the CJEU concerning the UK's VAT regime affecting direct sellers.

Steven is a senior tax lawyer, known for his expertise in advising, litigating and resolving complex disputes with HMRC on indirect taxes, property taxes and high net worth individuals' UK residency status. He heads the firm's highly regarded contentious tax practice in Manchester; he also works as part of the firm's market-leading national and international tax team.

Steven has extensive experience of managing large pieces of litigation from the tax tribunal through to the higher courts including the Court of Justice of the European Union. His clients include corporates (especially large FTSE 100 companies), high net worth individuals and foreign royal families.

“ Steven has an exceptional ability to fully understand and advise on the complexities of tax in particular VAT and then be able to explain this to ourselves as the client in a way that makes a complex subject understandable. ”

“ His great skill is being able to marshal all of the litigation but also to manage it in such a way that we are always ahead of the opposition and always being proactive rather than reactive. ”



> Gregory Price

Associate

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Tel: 020 7090 5055

Key achievements:

- Advising on an appeal challenging HMRC's view of key concepts used in the loan relationships regime (to be heard by the Tribunal in early 2015).
- Advising the administrators of one of Iceland's largest banks on the international tax aspects of resolving the estate following the global financial crisis.
- Working with the Department of Energy & Climate Change in relation to the framework for construction and operation of the next generation of nuclear power stations.
- Advising the largest shareholder in Zoopla on its recent IPO.

Gregory's practice has a particular focus on tax consultancy, providing constructive and innovative tax solutions to challenges faced by UK and international clients. He has also advised on a number of high value tax investigations and disputes, including bringing appeals to the Tribunal.

Gregory's work with Slaughter and May's major UK corporate clients includes advising on a wide range of corporate and financing transactions, in particular public and private acquisitions, group reorganisations and raising funds in the debt and equity capital markets.

“ Greg is an asset to the Slaughter and May brand. He provides clear, commercial and practical support at the drop of a hat. ”

“ I have been extremely impressed not only by his tax and legal skills, but also by his interpersonal skills, diplomacy and maturity in managing a large project involving many people with differing agendas and personalities. ”

“ Greg is a very impressive and trustworthy advisor. He is technical, personable and able to juggle competing requirements and demands very well. ”

“ In summary, Greg delivers a 'Triple A' performance: Affable, Available, and very clearly, Able. ”



> Dawn Register
Partner, Tax Dispute Resolution

Email: dawn.register@bdo.co.uk

Tel: 020 7893 2653

Key achievements

- Advised hundreds of taxpayers through the Liechtenstein Disclosure Facility process since 2009. She is a recognized industry expert regarding the LDF and UK/Swiss Tax Agreement.
- Spearheaded the formation of BDO's alternative dispute resolution practice and as a CEDR trained mediator, has helped to resolve long running tax disputes with HMRC.
- Dawn is a contributor to the new edition of Bloomsbury Professional tax investigation handbook, and is frequently quoted in the trade and national press.

Dawn Register, TEP, is a chartered tax adviser and partner at BDO LLP in London. Dawn manages complex tax return enquiries, voluntary disclosures and tax fraud investigations conducted by HMRC under Code of Practice 8 and 9. She specialises in personal and international tax issues, including offshore trusts, property, residency and domicile.

Her recent work has focused on changes in HMRC powers, penalties and appeals, international information exchange and the tax disclosure opportunities or 'amnesties'. Dawn is a CEDR accredited mediator and is using the alternative dispute resolution process to resolve tax disputes with HMRC. Dawn is also a regular author and speaker on tax investigations issues.

“ Dawn knew all of the angles to use in what is a very delicate field and deployed her chosen tactics confidently and skilfully. ”

“ Dawn possesses all of the interpersonal skills to allay concerns and manage client's expectations realistically. ”

“ Exceeding expectations where her continued support and encouragement were second to none. ”



> Nicola Roberts

Partner

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Tel: 020 7007 3763

Key achievements

- Advised and led on the structure and acquisition of significant UK real estate by a number of clients which has also involved extensive advice on the application of 'business investment relief' for non-domiciled clients.
- Advised on a number of high value divorce cases, often involving complex overseas structures.
- Nicola is lead tax partner on a number of Deloitte's most significant private clients and has successfully grown her revenues by 100% in the three years she has been a partner.

Nicola is a leading specialist in the taxation of international, ultra high net worth ('UHNW') clients in the UK. She services an unrivalled client base of some of the UK's most prestigious private clients.

Nicola's clients are internationally mobile families (and their family offices) with complex international structures who require clear and unequivocal advice on personal tax matters. Nicola participates in discussions with the Treasury and HMRC especially on internationally focused issues such as residence and domicile matters. Nicola was admitted to the partnership in June 2011, age 33.

“ Has delivered an excellent service over complex issues. ”

“ She is professional and has a real commerciality in her approach meeting very tight deadlines and managing expectations well. ”

“ She is experienced beyond her years. ”

“ Has an ability to distill her analysis, to focus on the key points and to give salient advice. ”



> Lachlan Roos

Partner

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Tel: 020 7213 1309

Key achievements

- Selected to take part in the *PwC Financial Services Future Leaders program*, of which only 25 are chosen from around the globe.
- Leads the Financial Services Tax “Key Accounts” program at PwC in the UK.
- Leads the UK tax hedge fund team at PwC.

Lachlan is a London based partner at PwC, and the UK tax hedge fund leader. Lachlan is focused on advising the asset management industry and is primarily responsible for a portfolio of high profile and well established Chinese, US and European alternative asset management clients. He spends his time working between each location.

Lachlan is experienced at advising on a range of structuring issues, including fund, management team and portfolio structuring, permanent establishments, the UK offshore funds regime, corporate residency and the application of the UK’s Investment Manager Exemption.

“ Lachlan always gives balanced and considered advice acting in the best interests of the client. He can always be relied upon for relevant, current thinking on matters impacting on the tax landscape, including HMRC consultations or proposed legislation. ”

“ We love working with PwC, Lachlan Roos and his staff. We consider them part of our team. ”

“ Lachlan is a trusted adviser. ”



> Paul Rutherford

Partner

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Tel: 020 7796 6300

Key achievements

- Advised Discovery Communications on several recent high-profile multi-jurisdictional acquisitions including SBS Nordic, Eurosport and All3Media.
- Tax counsel advising Eagle Star Insurance (part of the Zurich group) in relation to an insurance business portfolio transfer to Riverstone.
- Advised the Trustee of the Royal and Sun Alliance Group Pension Scheme on RSA Insurance Group's plc £1.9bn longevity, inflation and interest rate hedging transaction with Goldman Sachs, one of the first major transactions of its type in the UK.

Paul advises on all aspects of UK corporate taxation with a particular focus on mergers and acquisitions, re-organisations, joint ventures and other transactional work both domestic and cross-border. He also has considerable expertise in the insurance and pensions sectors having advised on several insurance portfolio transfers and longevity risk transfer transactions.

Paul counts among his clients major multi-nationals such as Discovery Communications, Inc and Linde AG as well as private equity houses such as Partners Group.

“ His breadth of knowledge, his judgment, and the care he brings to his engagements are remarkable. ”

“ Paul provides excellent advice which always seems spot on in terms of the right balance between legal technicality and commercial reality. ”

“ Exceptional client service. ”



> **Paul Scully**
International Tax Partner

Email: paul.scully@uk.gt.com
 Tel: 077 9549 4820

Key achievements:

- Growing the international and large corporate tax practice from £200k of inherited fees up to a £1.2m business.
- Winning a number of FTSE-250 businesses and household names as new clients including Xchanging Plc, PACE Plc and Tata Global Beverages amongst others.

Paul has a track record for setting and achieving impressive growth targets, while earning national recognition as an expert in his field. With over 15 years' client experience he supports listed and owner managed businesses with establishing operations overseas, managing withholding taxes, arranging their supply chain tax efficiently and with reorganisations, acquisitions and disposals.

He is proud of his work on a number of inversion transactions and implementation of CFC finance company structures at Grant Thornton.

“ Paul is very much client focused with a strong desire to add value, with in-depth tax knowledge and a team orientated approach. ”

“ He provides solutions that are both technically sound, but are also mindful of the larger tax agenda, and the internal and external political environment in which our company works. ”

“ Clients want advisers that are technically superb, understand your business, are available when needed and act as a commercial partner to the business. Paul fits these criteria. ”

“ Paul has made a very positive impact to our business, strengthening our tax knowledge and position to ensure a robust and suitably low risk profile for our organisation. ”



> Chris Springett

Associate Director,
Private Client Tax Services

Email: christopher.springett@smith.williamson.co.uk
Tel: 020 7131 4412

Key achievements:

- Advised on the use of a put and call option to underwrite a share acquisition by an employee from an employer, saving the client £630,000.
- Played an integral role in advising various senior executives as part of a realignment exercise by a large multinational financial services company, ensuring they understood the tax implications of compromise agreements and share option plans after their departure.
- Advised a number of investment bankers on the efficiencies of using a combination of a family open-ended investment company and a family limited partnership.

Chris joined Smith & Williamson as a graduate in 2000 and quickly progressed to associate director. He advises on a wide variety of private client tax matters, including, non-UK domicile and non-UK resident tax issues, personal direct tax issues, owner-manager tax issues; and property related tax issues. Currently, his client base predominantly comprises executives and high-paid employees, with a specific focus on the investment banking and hedge fund sectors.

Chris is a member of the Association of Taxation Technicians and the Chartered Institute of Taxation. He completed an MA in Taxation in 2010, through the Institute of Advanced Legal Studies, at the University of London.

“ Chris is a very knowledgeable adviser and has an amazing ability to make complicated matters seem straightforward. He manages clients' expectations and is a pleasure to work with. ”

“ Excellent, empathetic and gets the point. ”

“ He has a relaxed but assured manner which is well received by clients and colleagues. ”

A service as individual as you are



Uniquely placed in the industry, Smith & Williamson combines tax and accounting, financial planning and investment management services.

Because everyone's financial needs are different, we work closely with our clients to provide a bespoke service – with direct access to a team of professionals from each service area, who can give specialist advice on a wide range of financial issues.

If you would like to find out more about our services, please contact Chris Springett at christopher.springett@smith.williamson.co.uk or phone 020 7131 4412.

smith.williamson.co.uk



> Nick Skerrett

Head of Contentious Tax

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Tel: 020 7825 3975

Key achievements:

- In less than a year, Nick has secured a host of instructions from blue chip clients to act on disputes worth in excess of £500m.
- Delivered a number of successful and legally significant cases, such as: representing Vodafone before the FTT in *Vodafone Group Services Ltd v HMRC* [2014] concerning the substitution of bases of claim for VAT repayments; obtaining a barring order against HMRC in *BPP University College of Professional Studies v HMRC* [2014] UKFTT 644 for procedural non-compliance; and securing permission to seek judicial review of HMRC's policy on landfill tax 'fluff' claims on behalf of Veolia, which has become the industry test case.

Nick is dual qualified as a chartered tax adviser and solicitor. He joined Simmons & Simmons LLP in November 2013 to develop and lead the contentious tax practice from PwC Legal LLP, where he was responsible for a number of significant tax cases, having been appointed as a partner and head of indirect tax litigation, at the age of 33.

Nick specializes in the litigation and resolution of technically complex, high value tax disputes. His practice covers all areas of civil and criminal tax disputes, including commercial litigation concerning tax. He has been involved in a number of major tax cases in recent years.

“ Not only does Nick have an uncanny ability to identify opportunities to mitigate a client's exposure to tax and/or to secure sizable repayments, Nick is also able to narrow the scope of a potential dispute to his client's advantage through clever pre-trial positioning. ”

“ I think he is one of best tax litigators in the City at the moment, regardless of age or seniority. ”

“ He has a very good knowledge of tax law and excellent judgment. ”



> Matt Townsend

Partner

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Tel: 020 7007 1952

Key achievements:

- Made equity partner at 35, Matt now leads Deloitte's real estate private equity practice. He has made significant progress in aligning Deloitte's real estate capabilities to the key funds in the market and broadly doubling the size of the practice.
- At the forefront of using alternative investment structures for European real estate transactions over the last 18 months having advised on significant transactions using UK REITs, French OPCI's, Spanish SOCIMIs, Italian SGRs and Polish Fizans as investment/JV vehicles.

Matt has sixteen years' experience in corporate tax specialising in providing tax advice in relation to real estate, or real estate backed transactions. He has provided tax advice and led cross service line transaction teams on a number of significant UK, European and Asian real estate transactions including acquisitions, re-financings (including complex securitisation opinions), exits and other restructuring projects.

Matt's technical expertise and pan-European experience coupled with his commercial approach makes him the favoured adviser for many of the principals in his market.

“ Matt Townsend is peerless. ”

“ He has a very wide base of tax knowledge, which is very important for me given that we do acquisitions throughout Europe, and [alongside] good working tax knowledge of European taxes...[is his] ability to manage deals, both in terms of managing me as his client and also managing the delivery by his various teams in Europe. ”

“ He always frames his advice with a commercial slant and is always quick to challenge his overseas colleagues to make sure we get the best advice. ”



> Heather Williams

Senior Manager

Email: h.williams@uhy-uk.com

Tel: 020 7216 4660

Key achievements:

- Heather's clients include those in the public eye and recently settled a property development case for a sporting personality, reducing the tax determined, from £1.8m to just over £10,000.
- Recently instructed in a bankruptcy hearing where the judge ruled, based on submissions, that the debt was not due and the matter was finally settled with HMRC with a reduction of over 60%.
- Successfully restructured a complex £35m family trust to incorporate legislative changes whilst maintaining the original wishes of the settlor.

Heather is a senior manager who recently joined the firm to drive forward the private client and tax investigations teams in the London office. She is a chartered tax adviser and also a member of the Association of Tax Technicians, with over ten years' experience of advising clients in relation to their personal and business affairs. Her clients include entrepreneurs and wealthy individuals as well as their families, related business interests and tax structures.

Where matters are challenged by HMRC, she has experience of taking cases forward both in Tax Tribunal and higher courts and regularly instructs and works with counsel at both the formative stages of planning and during the litigation process.

“ Heather deals with extremely complex and time sensitive issues with a calmness and authority which inspires confidence both from other professionals and clients. To put it simply she makes the client feel like they are in safe hands. ”

“ She gets to grips quickly with the complex and technical legislation and case law. She is also great at unravelling complex trust arrangements. ”

“ [Her work is] first class. Her attention to detail is meticulous. ”

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UK business development director



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Owner of a financial services company



For further information on the services we can provide, please contact our specialist:

Heather Williams

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e: h.williams@uhy-uk.com

www.uhy-uk.com



Helping you prosper



> Matthew Woods

Partner

Email: matthew.woods@withersworldwide.com

Tel: 020 7597 6496

Key achievements:

- Led a review of the family trust arrangements, land ownership and farming partnership for a large estate, simplifying the trusts and reorganising the land ownership to collapse various tenancies and maximise inheritance tax reliefs.
- Acted in the reorganisation of a client's estate ownership through the surrenders and re-grants of agricultural tenancies to minimise potential inheritance tax, together with ancillary instructions to act on a wide array of commercial property transactions with potential tax implications.

Matthew is joint head of Withers' landed estates group. He focuses on the mitigation of inheritance and capital gains taxes and the long term devolution of private wealth - particularly landed estates and owner managed businesses.

His practice includes advising international clients on suitable structures to manage their multi-national and multi-generational needs.

“ He has the great ability of translating difficult concepts into language that all can easily understand. ”

“ I have been much impressed by his maturity and hard work in technically complex tax cases. He is pleasant, easy to work with, highly commercial and explains issues in a comprehensible manner to clients. He is still young, and is certainly a rising star in this tax field. ”

“ Matthew takes time to get to know a client. He listens well, and has a great bedside manner. He is commercially astute, both from his own firm's point of view, and that of the client, quickly recognising issues and offering elegant solutions. He has great knowledge, which he shares in a careful and understated manner with clients. ”



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TAX JOURNAL

This year's 40 under 40

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Tax Partner Search

Tax Partner vacancies are at record levels. Below is a small selection of the live roles we are working on. Call Pat or Hew to discuss the most sought after vacancies in the market.

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London & Birmingham
Contact Hew quoting Ref: 10675

Tax Technology Partner

£700,000 - £1,200,000
London
Contact Hew quoting Ref: 10098

Global Mobility Tax Partner

£500,000 - £800,000
Midlands
Contact Pat quoting Ref: 10965

Pat Keogh

Managing Director
020 7269 6311
pat.keogh@pro-tax.co.uk



Hew Scott-Wilson

Head of Partner Search
020 7269 6331
hew.scott-wilson@pro-tax.co.uk



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