

TAX INVESTIGATIONS AND DISPUTES

A UNIQUE COMBINATION ASSURES A GREAT RESULT

Our team comprises tax technicians who are expert litigators. Qualified advocates, mediators, accountants and a UK tax tribunal judge, we achieve positive outcomes for clients through negotiation, alternative dispute resolution and litigation, no matter at what stage of the process we are instructed.

Handling investigations and disputes with tax authorities, resolving commercial tax disputes, and advising on tax risks and penalties, our team brings exceptional strategic and technical insights to every engagement.

Forming part of the firm's pre-eminent dispute resolution practice, the team is able to call upon the services of (among others) our market leading arbitration, corporate crime and public law practitioners, and economists, when the case requires it.

We are trusted by clients across all sectors to handle all forms of direct and indirect tax disputes and compliance matters, including:

- contentious business tax and personal tax issues
- civil and criminal tax fraud proceedings
- information exchange, treaty disputes and other cross-border issues
- prevention of liabilities in connection with the corporate criminal tax offences and related penalty regimes
- tax related professional negligence and mis-selling claims

- tax warranty and indemnity claims and other commercial tax disputes
- third party compliance with tax investigations and penalty regimes
- state aid, EU, and WTO issues

RECENT EXPERIENCE

UBER

Defending against claims brought by a Tax QC that it owes over £1bn of VAT and interest

AN ULTRA HIGH NET WORTH INDIVIDUAL

Suing HMRC for breach of contract in connection with the issue of assessments for over £1bn of tax and interest

INVESTMENT PARTNERSHIPS

Challenging successfully in the Court of Appeal the settled view of HMRC as to the tax status of commercial mortgage backed securities

BMBF V MAWSON

Acting for the finance lessee in relation to what is still the leading House of Lords decision on purposive construction

PHILIPS ELECTRONICS

Challenging successfully in the CJEU the legality of the UK's consortium relief rules

THE LAW SOCIETY OF ENGLAND AND WALES

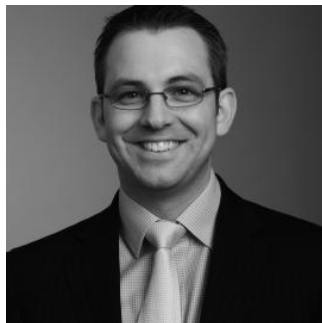
Representing our professional body in Supreme Court proceedings concerning the application of legal professional privilege to tax advice

OUR PEOPLE



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