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MICHAEL HUNT

PARTNER

[London](#)

Michael is a Partner in the tax investigations and dispute resolution group.

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BACKGROUND

Michael trained and qualified as a chartered accountant with Arthur Andersen in London. He then worked as an internal auditor for Morgan Stanley in London and New York. He went on to train as a solicitor at Herbert Smith Freehills LLP, and qualified in 2008.

KEY SERVICES

[Dispute Resolution](#)
[Tax Investigations and Disputes](#)

KEY SECTORS

[Banks and other Financial Institutions](#)
[Technology, Media and Telecommunications](#)

EXPERIENCE

Michael is a dual-qualified solicitor and chartered accountant specialising in tax disputes and investigations. He has extensive experience of a broad range of tax disputes across multiple sectors including Banks, Insurance, Energy, Real Estate and Technology, Media and Telecommunications, including tax appeals in the First-tier Tribunal, Upper Tribunal and Court of Appeal.

Michael advises across the full range of taxes including corporation tax, income tax and NICs on employment income, capital gains tax, inheritance tax, VAT, stamp duty reserve tax and stamp duty land tax. He is particularly interested in tax disputes involving accounting-driven corporation tax provisions. He also advises on general commercial disputes involving tax issues, including in High Court proceedings, and on claims in judicial review relating to tax matters. He regularly provides strategic advice on international tax disputes, including on the application of international tax treaties. He is a member of the firm's Private Wealth and Charities group, and is experienced in advising on the structure and registration of new charities. He has also qualified as a solicitor advocate and is consistently recognised as a ranked practitioner for contentious tax matters both by Chambers UK and by the Legal 500 UK.

Michael's experience includes advising:

- A life assurance company on a successful challenge to a corporation tax assessment by HMRC
- Bank of Ireland in tax appeals up to the Court of Appeal in relation to interest rate swaps
- Corporates and an HNWI on proposed changes to IR35 rules
- A global telecoms group on an international transfer pricing dispute
- Uber in High Court proceedings relating to its VAT position