

Arnold & Porter

Evaluation: The comparably small tax practice of the US law firm has succeeded in their field over the past several years and established their strong position in tax controversy proceedings. Through this, the group has ensured a constant workflow of high complex tax controversy work, most commonly for clients that they have already advised with regard to structuring and transactions, which is the original core of the practice. Even if the majority of the competitors may see the practice unobtrusively, the tax team of Arnold & Porter is heavily engaged in several thoroughly remarkable high-profile cases - especially in relation to the size of the team. This was most recently demonstrated during the court proceedings before the German Federal Tax Court, where the team successfully argued as leading tax counsel in favor of a real estate investment company based in Stuttgart concerning important issues in connection with real estate transfer tax law.

Focus: tax audits, proceedings in front of tax courts, out of court tax controversy work and mutual settlement agreement procedures

What others state: “They are visible in several high profile tax controversy cases”

Core Clients: International large businesses in Germany, Investors, high-networth individuals

Top Matters:

- Real Estate company in front of the German Federal Tax Court in a case concerning real estate transfer tax,
- Fabian Thylmann in his tax controversy and criminal tax proceedings.

Additional Matters:

- Canadian IT firm regarding VAT issues;
- investment management firm with regard to tax audit (CFC- and general tax questions); private clients concerning proceedings before tax courts with regard to the withdrawal as a limited partner and determining the capital gain taxation of a released negative capital account;
- high-networth individuals in regard to tax controversy proceedings concerning income tax considering triggered by intransparent investment funds;
- several private clients in disputes concerning income tax, investment tax law, and real estate matters in connection with voluntary disclosure proceedings.

Often recommended

Dr. Martin Weger

Positioning

Size of the team: 3, thereof 1 Partner, 2 additional lawyers

Focus in: Frankfurt

Additions (Partner): None

Departure (Partner): None