

Overview

A high personal net worth carries a unique set of tax challenges and opportunities. With Dentons' lawyers by your side, we will ensure that you avoid the pitfalls and reap the advantages of efficient personal tax planning.

Consult our savvy, experienced global team for advice on a broad spectrum of domestic and foreign tax matters. Defend your assets against the needless complications and liabilities which can stem from becoming a tax resident of a foreign jurisdiction, or earning compensation outside your home country. Structure your investments and business operations efficiently with the guidance of knowledgeable partners. We are one of the few firms that can offer you a truly global solution to your individual tax needs.

No matter where and how your money is working for you, Dentons will protect the fruits of that labor with the most tax-efficient solutions possible.

Representative Experience

- **Bank of Tokyo-Mitsubishi UFJ** : Representing in connection with a US\$400 million syndicated credit facility for CAMI Automotive Inc., a joint venture of General Motors (Canada) Ltd. and Suzuki Motors Co., Ltd.
- **Family offices and ultra high net worth individuals**: Acting for a number of clients providing tax advice on international investments, global portfolio structuring, yacht and jet leasing and acquisitions.
- **High net worth individual**: Representing in an IRS administrative appeal. The aggressive efforts of our tax team helped reduce the client's tax deficiency from approximately US\$12 million to a mere US\$20.
- **Canadian taxpayer**: Represented the taxpayer (Bozzer v. The Queen, 2011 FCA 186) in the Federal Court of Appeal on a landmark decision successfully challenging the Canada Revenue Agency's restrictive interpretation of the "10 year rule" for cancellation of interest under the Income Tax Act. In November 2011, the Canada Revenue Agency issued a news release confirming that it accepted the interpretation of the 10-year limitation period for interest relief established by the Federal Court of Appeal.
- **Polish Ministry of the Environment**: Advising on the terms of the Emissions Reduction Purchase Agreement, and general advice on enforceability, and the Kyoto regime. This transaction concerned the sale of assigned amount units (AAUs) issued under the Kyoto Protocol by the Polish Ministry of the Environment to two of the World Bank's carbon funds: the Spanish Carbon Fund (Tranche 2) and the Carbon Fund for Europe (Window 2). Under the AAU Purchase Agreement, the Polish government agrees to use the proceeds from the sale of AAUs to help increase the energy efficiency of public buildings in Poland, under a Green Investment Scheme.
- **Spanish engineering consortium operating**: Advising on a joint venture project related to the development of a nuclear power reactor located in France. Our tax teams in Spain and France advised the client on the tax treatment of the joint venture, on the establishment of a branch in France, and on the tax implications for the seconded employees. We successfully dealt with complex CIT liability, VAT, PIT, a double tax treaty between France and Spain, and sophisticated permanent establishment issues. We helped the client to reduce tax burdens by avoiding paying double taxation in France and Spain. We also helped the client organize the arrangements between the members of the consortium.
- **Swiss and Liechtenstein professionals**: Advising on criminal tax issues arising from their roles as advisors and directors of a qualified intermediary structure.
- **Various Canadian clients**: Advising on tax concerns with respect to entry into the Middle East and Africa through

a European entity, investment with a US partner into a European operating entity and investments into Central Asia and Australia.

Your Key Contacts

Canada



Mark H. Woltersdorf
Partner, Edmonton
D +1 780 423 7250
mark.woltersdorf@dentons.com

United States

Andrea Sharetta
Partner, New York
D +1 212 768 6710
andrea.sharetta@dentons.com

Latin America and the Caribbean



Camilo Cortés
Partner, Bogotá
D +57 1 746 7000 ext. 255
camilo.cortes@dentons.com



Ernesto López
Partner, Bogotá
D +57 1 746 7000 ext. 267
ernesto.lopez@dentons.com



Carmen Sanabria
Partner, Bogotá
D +57 1 746 7000 ext. 267
carmen.sanabria@dentons.com

Europe



Sandra Hazan
Partner, Paris
D +33 1 42 68 47 85
sandra.hazan@dentons.com

United Kingdom



Alex Thomas
Partner, London
D +44 20 7246 7547
M +44 7825 420644
alex.thomas@dentons.com

Central and Eastern Europe



Karina Furga-Dąbrowska
Partner, Warsaw
D +48 22 242 57 63
karina.furga-dabrowska@dentons.com

Russia, CIS and the Caucasus



Igor Davydenko

Partner, Kyiv
D +380 44 494 4774

igor.davydenko@dentons.com



Dzhangar Dzhachinov

Partner, Moscow
D +7 495 644 0500

dzhangar.dzhachinov@dentons.com



Kanat Skakov

Partner, Almaty
D +7 727 258 2380

kanat.skakov@dentons.com

Middle East



Alex Thomas

Partner, London
D +44 20 7246 7547

M +44 7825 420644

alex.thomas@dentons.com

China



Julianne Doe

Partner, Hong Kong
D +852 2533 3689

julianne.doe@dentons.com