

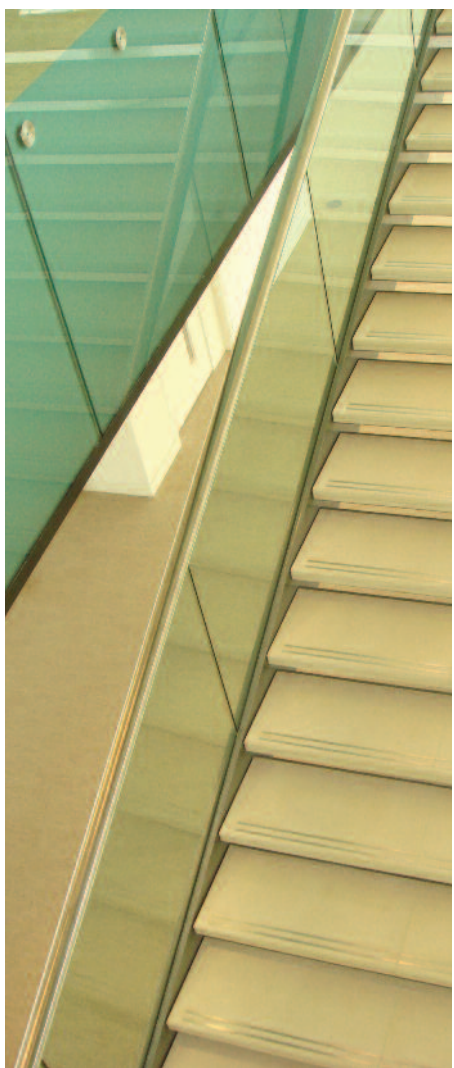
Tax resolution services



Tax resolution services

Introduction and experience

- We offer a comprehensive service covering pre-emptive advice on the whole range of risk issues, formal enquiries and investigations by HMRC, in addition to litigation before all courts. **Our experience in this area includes:**
- Advising investors into UK tax efficient partnership structures currently under enquiry by HMRC
- Advising and representing an individual before the High Court and Court of Appeal
- Advising on HMRC enquiries in connection with tax structured products eg capital deduction schemes, finance leasing, application of main purpose tests
- Advising on availability of foreign losses
- Advising a 'not for profit' organisation winning a dispute with HMRC over the method of calculation of the organisation's input tax recovery as a result of its partially exempt VAT status



Our services

- Formulation of tax risk policies eg in connection with tax residence of companies
- Advising on the robustness of particular tax positions, eg whether expenditure should be classed as revenue or capital, application of main purpose tests and other anti-avoidance rules
- Reviewing documentation available to support a tax position
- Advising on key areas of HMRC scrutiny such as company residence, transfer pricing and permanent establishments
- Providing advice on information powers available to HMRC
- Advising on penalties available to HMRC and how these can be mitigated
- Litigation, for direct taxes and VAT, before the First Tier Tribunal, Upper Tribunal, Court of Appeal, Supreme Court and the European Court of Justice



Key contacts



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