

Jon Lang Mediation

Tax - mediation examples

a transfer pricing dispute involving discussion of OECD Transfer Pricing Guidelines and appropriate methodologies for measuring arm's length transaction values e.g. CUP and TNMM;

a professional negligence action against a firm of accountants arising out of a film sale and leaseback scheme falling within the Disclosure of Tax Avoidance Schemes (DOTAS) regime, subsequently challenged by HMRC resulting in the issue of PPN's, raising issues as to the precise scope of advice given, due diligence and level of acceptable risk;

an accountants negligence action arising out of tax advice given on the purchase of a luxury yacht;

a dispute arising out of various restructuring arrangements alleged to be a mechanism designed to avoid, or mitigate, liability arising under "APNs" issued by HMRC in respect of historic employee benefit trust arrangements ("EBT's"), which HMRC had contended were disguised remuneration schemes;

a negligence action brought against accountants in relation to the setting up of a share option plan and the tax consequences thereof;

a multi-party professional negligence claim arising out of advice given in relation to tax losses intra-group of companies;

a professional negligence action in connection with the setting up of a disabled persons trust, its conversion to a relevant property trust on death of a beneficiary and the IHT ramifications of the arrangements, including the availability of the spousal exemption;

a claim against a barrister arising out of a failed tax scheme;

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