

Daniel J. Friel

Partner
Tax

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A partner in our Tax practice, Daniel Friel focuses on complex tax matters.

With more than 30 years of experience, Daniel advises clients on complex multi-jurisdictional tax planning matters, including UK and cross-border mergers, disposals and acquisitions (particularly within the U.S., Europe and Asia), as well as tax-related financings and restructurings.

Daniel works with many global financial institutions and corporations, including Barclays, JPMorgan, Carlyle, SABMiller, LCCG and the Qatar Investment Authority as well as high-net-worth individuals.

Daniel acts for many not-for-profit organisations.

Matters

Representation of numerous **large multinational groups** regarding the tax structuring of their international investment and finance requirements including numerous ‘inversion’ transactions for U.S. and non-US Groups.

Representation of **a major sovereign wealth fund** on numerous of its proposed cross-border Global investments.

Advising many UK and non-UK businesses on the implementation of **cross-border tax structures**, utilising tax treaty and domestic law benefits to obtain tax efficiencies.

Advising and drafting **tax legislation** for sovereign entities including the UK tax authorities on certain aspects of the interpretation of the U.S./UK double tax treaty and Qatar on its entire tax regime.

Acting for **SABMiller** on all of its major M&A transactions including its acquisition of Miller, Fosters, Peroni, its South American beer interests, together with all related financings, its Black empowerment transactions in South Africa, and advising it on various major tax disputes throughout the world but particularly in the U.S., the UK and South Africa.

Acting for **Barclays Bank** on numerous transactions including its numerous high profile M&A opportunities including its acquisition of the Woolwich, numerous assets managers, various of its high profile property transactions including its moves to Canary Wharf and numerous tax

controversy matters.

Acting for **Qatar Holding** on numerous acquisitions including on its acquisition of the Harrods Group.

Acting for **ITV/Granada** on the entire consolidation of the UK ITV franchise network and its satellite TV operations.

Acting for the **Carlyle Group** on many of its portfolio acquisitions and divestments in the UK and Europe.

Representation for a consortium consisting of **the Canada Pension Plan Investment Board and Onex Corporation** on its acquisition of Tomkins plc.

Acting for **the ABI committee** on the highly complex restructuring of Punch Taverns.

Acting for **Aldersgate Investments** on the sale of 49% of its Global Switch shares to a consortium for £2.4 billion with options to purchase the balance at a future date.

Advising **Norsk Hydro ASA** on the acquisition of Vale SA's aluminium business.

Representation for a number of entities on a variety of **international structured finance matters**.

Advising many **major listed UK companies** on disputes with tax authorities.

Restructuring of **an Icelandic bank**, negotiations with tax authorities regarding loss availability.

Advising clients on **contractual disputes involving tax** — very extensive experience here including: SPA Tax Deed and Tax Warranty claims; Interest and Dividend Withholding Tax disputes with counterparties (and with tax authorities); WT disputes with tax authorities on contractual fees under Double Tax Treaties; tax disputes arising from Bilateral Investment Treaties; resolving "gross up" issues and problems; advising on the operation of SPA Tax Conduct provisions; a major mediation (post deal) regarding payments for group relief to Seller (ITV).

Credentials

ADMISSIONS

Law Society of England & Wales

ASSOCIATIONS

Law Society of England & Wales (Admitted 11/15/1990; Reg. # 148093)

Recognition

Leading lawyer for tax, highlighting his "wealth of experience in multi-jurisdictional M&A and structured finance deals.

CHAMBERS UK

Insights

CLIENT ALERT

June 29, 2021

Employees Working Abroad

March 24, 2020

COVID-19: Tax measures announced by Governments in France, Germany, United Kingdom and United States

February 26, 2020

Capital Gains Tax (CGT) payable by non-UK resident investors on direct and indirect disposals of UK commercial real estate

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Events

CONFERENCE

September 12, 2018

Talk im Turm - UK Tax Changes

News

CASES & DEALS

March 2, 2021

QOMPLX Agrees to Combine with Tailwind Acquisition Corp.

IN THE NEWS

March 9, 2021 • Source: Law.com International

Marcus Young, Jules Quinn and Daniel Friel counsel QOMPLX on its deal with RPC

RECOGNITION

Best Lawyers Recognizes Europe-based King & Spalding Lawyers in its 2022 Guides

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