

## Neal Todd Partner

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## Overview

Neal Todd is a partner in the corporate department at Fladgate.

He is also head of the tax group and specialises in tax planning for corporates and high net worth individuals with business interests.

Neal acts for private equity funds, family offices, major corporates and leading investment banks.

He has recently completed a major reorganisation of a private equity group with significant business interests around the world. Even more importantly, the planning resulted in a structure which should be tax efficient going forward and is acceptable to all stakeholders, including the tax authorities in the countries in which the business operates.

Neal is recognised as an expert in tax law by both Chambers and Legal 500.

He has spent a significant amount of his career working outside the UK and retains a keen interest in international tax planning.

## Experience

### *High net worth individuals*

- Assisting two UK resident non-domiciliaries on a reorganisation of their UK private equity business.
- Advising an Italian resident with significant hotel and other interests in continental Europe on the transfer of his residence and business interests to the UK.

### *Intermediaries/family offices*

- Advising a financial institution on various tax enhanced products for individuals

## Expertise

### Corporate law

- [Capital Markets](#)
- [Corporate Real Estate](#)
- [Investment Funds](#)
- [Mergers & Acquisitions](#)
- [Private Equity](#)

### Private Wealth

- [Contentious Trusts](#)
- [International Private Wealth](#)
- [Trusts & Tax Planning](#)

### Dispute Resolution

- [Contentious Trusts](#)
- [Real Estate Litigation](#)

### Tax law

- [Transactional Tax](#)
- [Real Estate Tax](#)

## Industry

### Private Client

### Owner Managed Businesses

### Hotels

### International

### Financial Institutions

## International

## Location

Fladgate LLP  
16 Great Queen Street  
London  
WC2B 5DG

## Contact Us

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(including an offshore partnership structure designed to achieve inheritance tax advantages).

- Assisting a bank on situs issues for non-domiciliaries.

#### *Mergers and acquisitions*

- Advising Crédit Mutuel on its acquisition of GE's European leasing and lending business for €11bn.
- Acting for a South African retailer, The Foschini Group Ltd, on its acquisition of an 85% stake in Poppy Holdco Limited, which trades as Phase Eight – the international multichannel retailer – for £238m.

#### *Structured and asset finance*

- Devising a tax and regulatory capital efficient structure for a Swiss bank.
- Assisting a major financial institution on a number of tax driven lease financings.

#### *Tax litigation*

- Advice to a major UK bank on a dispute involving the tax treatment of financial traders in partnerships where the amounts at stake exceed US\$500m.
- Advice to the promoter of a partnership claiming Business Premises Renovation Allowances, which is the lead case in a series of disputes with HMRC.

#### *Private equity*

- Advice on fund formation and downstream acquisitions with particular emphasis on use of international holding structures to maximise after tax returns for investors.
- Advice to managers on tax efficient carry structuring especially in the cross-border context.

United States  
Russia/CIS  
South Africa  
Offshore  
French speaking  
Asia Pacific

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## Testimonials

Neal Todd is highly recommended by clients, who say he is “very good, very efficient and very knowledgeable”. He possesses extensive experience in M&A, structured and asset finance and general corporate tax planning.

*Chambers UK 2017*

Impressed sources say that Neal Todd “is an excellent technician, and a very reassuring presence in a transaction”. He has a wealth of experience representing financial institutions in relation to tax structuring, and maintains a particular focus on matters with an international element.

*Chambers UK 2016*

Neal Todd is an experienced tax lawyer with expertise in a variety of key areas, including M&A and structured and asset finance.

*Chambers UK 2015*

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