

Overview

Depend on our full-service Tax practice, which is widely regarded as one of Colombia's leading players in the field. We regularly counsel local and foreign clients on the whole range of tax concerns affecting their businesses, providing tailored advice focused on minimizing your tax burdens to meet the specific objectives of your business.

We are renowned for advising on complex tax issues affecting mergers, acquisitions, spin-offs and corporate reorganization schemes. Following changes to Colombia's tax system in 2012, our team has been regularly called upon to assist a range of industries with funds and other investment vehicles, including insolvency proceedings.

Our tax litigation track record encompasses complex, high-stakes tax and customs disputes before all levels of local courts. Our lawyers regularly represent clients before government entities and in tax-related litigation proceedings, including handling matters before tax authorities related to refunds, appeals and claims linked to private tax returns.

Additionally, we help in the construction and implementation of transfer pricing policies, and diagnose and provide advice in the negotiation of advance pricing agreements (APAs). Our team provides support in the preparation and filing of formal obligations in Colombia and abroad, and we offer support in conflict resolution processes and preparation of documents for assets, liabilities, capital, income and expense attributions for permanent establishment.

Our services include:

- Tax advisory
- Transaction structuring
- Transfer pricing
- Internal reorganizations and corporate restructurings
- Tax litigation

Our experience in foreign investment and foreign exchange issues, a roster of available accountants and the support of our global Firm's other market-leading practice groups provides you with an efficient and holistic service, wherever in the world your legal issues may arise.

Representative Experience

- **Colombia Telecomunicaciones S.A. E.S.P.:** Counseling on the review of tax conditions and consequences for note holders in a subordinated perpetual note emission for up to approximately US\$750 million, including review and comment on the Offering Memorandum's tax and foreign exchange issues.
- **American Energy Fund:** Advising to generate a tax efficient structure for the reorganization of the company's participation in Colombia. The matter's value was more than US\$20 million.
- **Clorox de Colombia S.A.:** Advising on the depreciation of assets for tax purposes, the tax consequences of VAT discounts, industry and commerce tax and income tax, and the legal consequences of amendments to the financial statements before the Superintendency of Companies. The amount at issue was approximately US\$50

million.

- **Hidrocasanare S.A.S.:** Advising on the US\$20 million merger of Prosecas, Hidrocol, and Hidrocarburos del Casanare (with a branch in Colombia), previous mergers, and a corporate restructuring. The merger brought to Colombia an investment involving more than 16 local individuals and companies located in Panama.
- **WPP Group:** Advising on its US\$10 million merger between Ogilvy and Mather Colombia S.A.S., David Studios S.A.S., and Ogilvy Action S.A.S.

Your Key Contacts

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