



Representative Legal Matters

Dennis G. Dimagiba

- Handle for a listed software company and its subsidiaries seven ongoing Bureau of Internal Revenue (BIR) assessments with a substantial aggregate value. Assist in guiding tax examiners through the volume of supporting documents, which requires intimate knowledge of clients' accounting and financial reporting processes.
- Advise and assist an American healthcare company on the tax efficient options to repatriate cash.
- Advise and assist an American healthcare company in obtaining exemption from capital gains tax and donor's tax in relation to the transfer of shares of stock of the two Philippine subsidiaries of Client, pursuant to the reorganization of the various worldwide subsidiaries of Client. Assist in availing of Tax Amnesty following the lapse of seven years from the application of exemption.
- Advise and assist a global logistics company on the tax aspects of the post-acquisition integration of an acquired entity.
- Advise an exclusive distributor of an American Fortune 500 corporation that designs, manufactures, and distributes engines, filtration, and power generation products in the Philippines on local business tax deficiency assessments for calendar years 2013 to 2017.
- Advise a leading music streaming service provider on the proper characterization of payments it was receiving monthly from a partner telecommunications company in the Philippines.
- Advise a US-based global healthcare industry leader on the tax implications of its excess accumulated retained earnings.
- Advise an online hotel booking services on the tax issues related to the client's establishment of a Philippine office, as well as tax issues related to the closing down of the client's representative office.
- Assist and advise an industry-leading manufacturer of water systems equipment and machinery in connection with the deficiency tax assessments issued by the Bureau of Internal Revenue for taxable year 2004.
- Assist a renowned fashion brand in the registration of its different branches with the relevant Revenue District Offices of the Bureau of Internal Revenue and enrolment in the BIR's online systems. Provide advice on various tax matters.
- Advise a global investment advisory firm on the tax and securities law implications of the proposed structure for the establishment of an offshore trust by a Filipino settlor.

Baker McKenzie.

- Advise a global business support services company, with clients in the communications, financial services, healthcare, retail and tech industries on options available and most efficient manner of repatriating cash out of the country with a view to minimizing tax leakage.
- Advise several private banks on tax and estate planning, for their ultra-high net worth customers.