BCLP. Client Intelligent

TAX RISK MANAGEMENT AND DISPUTES

OVERVIEW

The global tax environment is increasingly marked by stricter corporate and tax regulations and legislation, resulting in increased scrutiny from tax authorities. This is leading to protracted investigations and often damaging costly litigation which carries reputational risk.

BUILDING INTELLIGENT TAX SOLUTIONS

Businesses trust us to manage their tax risks and resolve disputes at every stage of the tax life cycle. We frequently advise on novel and often untested law, which have significant industry wide implications. Starting by listening carefully to our clients' challenges and needs, we truly understand their businesses and desired outcomes, and provide tailored solutions to help reduce risk. This includes designing robust processes and controls to avoid disputes and manage tax responsibly.

When a tax dispute arises, we're fully equipped to handle every stage of the process. From risk assessment and compliance to litigation, our team ensures clients are protected and represented effectively. As proficient litigators in all courts, we provide innovative solutions tailored to jurisdictional requirements.

Renowned for our strategic, technical and commercial insight, our expert team is committed to delivering the best outcomes with exceptional service and support. By applying legal expertise through a commercial lens, we empower clients to manage tax risk and disputes with confidence.

OUR SERVICES

Our expertise spans the full range of tax risk management and disputes, including:

- Advice on information requests and audits from tax authorities across all taxes
- Representation in civil and criminal tax proceedings before federal, state, local and global tax authorities
- Corporation tax disputes
- SDLT enquiries

- Customs and transfer taxes investigations
- VAT claims and audits
- Enquiries relating to The Criminal Finances Act 2017
- Employment tax related enquiries (PAYE and NICs)

A GLOBALLY RECOGNIZED TEAM

Renowned for delivering exceptional results in an increasingly complex tax landscape, our team has consistently received excellent client feedback from our clients. These insights have been independently researched by tax specialist industry publications such as the International Tax Review, and leading legal directories Chambers and Partners and Legal 500.

MEET THE TEAM

Kate Ison

Partner, London

kate.ison@bclplaw.com
+44 (0) 20 3400 4488

Elizabeth Bradley

Partner and Global Practice Group Leader - Tax, Employee Benefits and Private Client, London

elizabeth.bradley@bclplaw.com
+44 (0) 20 3400 2323

Oran Gelb

Partner and Co-Global Practice Group Leader – Business and Commercial Disputes, London

oran.gelb@bclplaw.com
+44 (0) 20 3400 4168

RELATED CAPABILITIES

- Tax & Private Client
- Investigations
- International Trade

EXPERIENCE

- Acting for a German real estate investment firm on a multi-million pound SDLT litigation against HMRC;
- Advising a multi-national on a customs investigation by HMRC, which was resolved with no assessment to tax or criminal sanctions;
- Advising a hedge fund on a £20 million PAYE and NICS enquiry;
- Acting for a multi-national corporate on VAT repayment claims which involve complex issues of domestic and EU law;
- Acting for a number of banks in relation to risk assessment and measures to govern risk in connection with the corporate criminal offence of failure to prevent tax evasion introduced by the Criminal Finance Act 2017
- Represented a US multi-national Fortune 50 company in connection with a multi-year IRS audit on transfer pricing issues, debt financing, research and development credit, deductibility of transaction expenses, captive insurance matters, in which we reduced the proposed assessment by 80%
- Defended IRS' denial of $19.3 million in deductions for transaction expenses claimed by a target company and obtained settlement with IRS Appeals permitting more than 80% of the claimed deductions
- Defend engineering company in connection with audit of ozone depleting chemicals excise tax, research and development credit and domestic production activities deduction, each resulting in no tax due

- Served as quasi-internal tax counsel for Fortune 50 corporation supervising tax counsel and accountants with more than 100 active state tax controversies. Additionally, served as primary State tax counsel in several states and as primary federal tax counsel on audits related to the research and development credit and the domestic production activities deduction
- Assisted payroll processing company in defending the imposition of over $6.4 million in penalties
- Defend and appeal coal producer's depletion deductions
- Assist various corporations and non-profit organizations in obtaining penalty abatement for the failure to timely file tax returns, pay taxes, and make timely deposits

RELATED INSIGHTS

Awards
Oct 16, 2025
BCLP'S UK tax team recognized in ITR World Tax rankings 2026

News
Oct 01, 2025
The Legal 500 UK 2026

Insights
Jul 21, 2025
Qualified Small Business Stock Benefits Expanded Under the One Big Beautiful Bill Act

News
May 14, 2025
BCLP Strengthens Corporate and Finance Transactions Department with Strategic Partner Hires

Awards
Aug 28, 2024
BCLP's UK Tax Team recognized in ITR 'World Tax' rankings 2025

News
Jul 29, 2024
BCLP and Elizabeth Bradley shortlisted for three ITR EMEA Tax Awards 2024

News
Jul 18, 2024
Chambers High Net Worth 2024 Guide

Insights
Mar 06, 2024
Spring Budget 2024

It has been a busy Budget for the real estate sector today, particularly for the residential sector. The big announcement was the proposal to abolish SDLT's multiple dwellings relief ("MDR"). This came as a surprise and for those seeking to rely on the relief for a completion on or after 1 June 2024, they may have been racing to exchange today to lock in MDR on the acquisition. However, there was some good news for those trying to access the housing market. The government is proposing to withdraw the furnished holiday letting regime and reduce the higher rate of CGT for those who pay CGT on selling residential properties as these are intended to improve access to housing. But elsewhere reform for SDLT was relatively light. The government did not respond to lobbying in a few targeted areas. A downsizer's relief and keeping the current lower thresholds beyond March 2025 were not mentioned. In fur...

News
Sep 07, 2023
BCLP recognized in 'World Tax' rankings 2023