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Mark Stapleton advises on UK and international direct and indirect taxation issues. He has extensive experience in relation to advising offshore funds and the investment management sector, particularly global and international private credit/hybrid debt funds and hedge funds. He also has specialist tax experience of providing structuring and tax advice in relation to CLOs. In addition, he advises on acquisitions of public and private companies, real estate acquisitions, securitisations, structured finance and a variety of other banking, financial and corporate transactions. Mr. Stapleton also advises clients on **Brexit**, helping to shape strategy and provide guidance on related tax issues.

Mr. Stapleton is experienced in advising on structuring and establishing international holding companies and financing companies used in connection with inward investment transactions, cross-border acquisitions and also corporate migrations.

Mr. Stapleton is a member and past chairman of the taxation committee of the Alternative Investment Management Association, a member the tax sub-committee of the Chartered Institute of Taxation (European Branch) and also a member of the International Fiscal Association.

Mr. Stapleton has written articles for a variety of publications and has co-authored a book on stamp duty land tax. He is also a regular speaker at conferences. He has been recommended as a leader in his field in the independent directories *The Legal 500 UK* and *Chambers UK*, in *PLC Which Lawyer* and in *Who's Who Legal*. He is ranked in *Chambers UK*, *Chambers Europe* and *Chambers Global*. Mr. Stapleton is described as "outstanding technically" and "absolutely brilliant with clients" in *The Legal 500 UK*, 2018. Mr. Stapleton was ranked for his tax work in *Chambers UK*, 2019, where clients describe him as "thoughtful, diligent, timely and very proactive" as well as "a good communicator". Mr. Stapleton has also been praised for his "creative, thoughtful and helpful" approach in *Chambers UK*, 2018. Clients say he "stands out for his commercial awareness, practical advice and nuanced understanding of the asset management sector" in *Chambers UK*, 2017. In the 2016 edition of *Chambers UK*, a client cites, "it amazes me how responsive he is, and his knowledge and expertise are also very impressive." He is described as "technically very good. He seems to keep an awful lot of stuff in his head, and I am impressed by the recall he has for complex technical matters." In *Chambers UK*, 2012 Mr. Stapleton is praised for being "very clear and direct" and recommended for his experience in dealing with the UK taxation of offshore funds and investment management, and complex cross-border tax matters. He is ranked in *Chambers Global*, 2017, which states "stands out for his commercial awareness, practical advice and nuanced understanding of the asset management sector." A previous edition of *Chambers Global* states "flexible, straightforward and always aware of clients' needs, Mark Stapleton is prized for his expertise in international direct and indirect taxation issues. He has considerable experience of advising on the structuring and establishing of international holding companies and financing companies in connection with cross-border acquisitions."

EXPERIENCE

- **Phenna Group** in connection with tax matters relating to their MBO of the Phenna Group from Academy Association Inc., supported by a debt placement by CVC Credit Partners.
- **Redding Ridge Asset Management** advising Apollo-backed Redding Ridge in connection with tax structuring and European risk retention advice related to CLO investment management activity.
- **Chenavari Investment Managers** in connection with key tax opinions related to its third European CLO (Toro European III CLO).
- **Rothschild Credit Management** in connection with key tax opinions related to its fourth CLO (Contego IV CLO).
- **Capitalworks Investment Partners** in connection with the establishment of a hedge fund management business.
- **Redline Capital Management** in connection with tax implications to a restructuring of a Luxembourg fund to create a new innovative carried interest arrangement.
- **Glennmont Asset Management** in connection with the establishment of a private credit fund structure investing in debt across Europe and related tax and structuring issues.
- **MetLife Investment Advisors** in connection with international tax advice in relation to withholding tax in 15 jurisdictions.
- **Swiss Capital** in connection with integrated tax advice on the entire debt fund structuring of its European direct lending platform.
- **Cheyne Capital** in connection with the establishment of a new Luxembourg credit fund with various feeder funds.

- **Apollo Global Management** in connection with detailed UK tax advice, on the creation of a new, self-managed global asset management business designed to fulfil US and EU risk retention requirements.
- **EnTrustPermal** in connection with UK tax advice on the merger of EnTrust and the Permal Group and on its future business structure.
- **Ziarco Group Limited** in connection with the sale of the entire issued share capital to Novartis Pharma AG.
- **Petroceltic International plc** in connection with UK tax advice for a group reorganization.
- **AlbaCore Capital Limited** in connection with the establishment of a high-profile new fund management business and investment fund.
- **City Financial Investment Company Limited** in connection with the establishment of a new Cayman Islands hedge fund.

EDUCATION

- The University of Nottingham, LL.B., 1985

ADMISSIONS

- England and Wales

MEMBERSHIPS

- Chartered Institute of Taxation
- International Fiscal Association
- Alternative Investment Management Association

SPEAKING ENGAGEMENTS

- **Common Reporting Standards**, SS&C - London, UK (April 13, 2016)

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