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Education

Second State Exam, State of Baden-Württemberg, 2018

LL.M., Queen Mary, University of London, 2016

Doctorate In Law, University of Munich, 2015

First State Exam, University of Heidelberg, 2014

Bar Admissions

Frankfurt am Main

Associations

Member, International Fiscal Association (IFA) and Young IFA Network

Languages

German

English

Dr. Florian Schmid represents multinational corporations and financial institutions through the full range of tax controversy proceedings, including audits, administrative appeals, judicial proceedings and mutual agreement procedures. He also advises on cross-border tax planning and transactions, including mergers and acquisitions, restructurings and transfer pricing.

In recognition of his work, Dr. Schmid has been honored as a Rising Star by *ITR World Tax* and repeatedly named one of *Best Lawyers' Ones To Watch*. Since joining the firm, his significant transactions and representations include advising:

- many multinational companies on joint audits, appeals, litigation and other tax proceedings
- **CureVac N.V.** on the tax structuring of its business combination and all-stock acquisition by BioNTech SE that values CureVac N.V. at US\$1.25 billion
- **International Flavors and Fragrances Inc.** on the tax aspects of the sale of its nitrocellulose business, associated production facilities and the Walsrode Industrial Park to Czechoslovak Group A.S.
- **United Talent Agency (UTA)** on the tax aspects of its acquisition of European soccer agency ROOF Group GmbH, UTA's largest M&A transaction to date
- **SDCL Edge Acquisition Corporation**, an NYSE-listed SPAC, on the tax structuring aspects of its business combination with cunova GmbH, a leading global manufacturer of high-end specialty copper alloy products
- **MorphoSys AG** on the tax structuring and tax aspects of its €2.7 billion sale to, and public takeover by, Novartis and the simultaneous disposition of the worldwide marketing rights of its antibody drug Monjuvi to Incyte Corporation
- **alstria office REIT-AG** on the tax aspects in connection with the public takeover by Brookfield against a cash consideration of €3.5 billion
- **Hillenbrand, Inc.** on the US\$730 million acquisition of the Food and Performance Materials business of Schenck Process and the post-closing reorganization
- **BlackRock** on a cross-border reorganization
- **Hermann Rosen**, founder of **ROSEN Group**, a global leader in inspection and integrity management services for energy transmission pipelines, on the tax structuring and tax aspects of the carve-out of the company's New Ventures division, the sale of ROSEN Group to Partners Group AG and a significant reinvestment by Mr. Rosen in the new ownership structure
- **Trimble** on its €1.9 billion acquisition of Transporeon, a leading cloud-based transportation management software platform, from Hg
- **FINN**, a leading car subscription platform, on its US\$110 million Series B financing round led by Korelya Capital, including both new and existing investors, with an implied company value of more than US\$500 million

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- **Armira** and **Boxine** on Boxine's €1 billion business combination with 468 SPAC I SE, one of the first de-SPAC transactions in the market involving a German-listed blanc cheque company
 - **The SCP Group** on its acquisition of Real GmbH from METRO AG
 - **Intel Corporation** on its US\$1 billion sale of its smartphone modem business to Apple Inc.
 - funds advised by **Credit Suisse Energy Infrastructure Partners AG** on the €500 million acquisition of a 25% ownership interest in the Arkona offshore wind farm in Germany from Equinor ASA
 - the joint bookrunners, including **Morgan Stanley**, **Bank of America Merrill Lynch** and **Barclays**, in the €2.3 billion initial public offering and listing on the Frankfurt Stock Exchange of TeamViewer
 - **Perella Weinberg Partners LP** on the restructuring of its London office and workforce to reflect its longer-term strategic and expansion goals
 - **Communications & Power Industries LLC** on its acquisition of SATCOM Technologies from General Dynamics Mission Systems, Inc.
 - **I Squared Capital** on its acquisition of PEMA from Société Générale

Publications

- "Die globale Mindeststeuer schafft keine Verlässlichkeit," *FAZ Einspruch*, February 13, 2024
- "The Global Minimum Tax Raises Many Questions in Practice," *Börsen-Zeitung*, January 20, 2024
- "Veräußerung vs. Überlassung von IP-Rechten," *ISTR*, 2023
- "Steuerrecht im Wandel: Restriktive Steuertrends aus M&A-Sicht," *M&A Review*, June 29, 2023
- "Die Registerbesteuerung Bleibt Ein Problem," *Frankfurter Allgemeine Zeitung*, March 13, 2023
- "Free Lunch oder Bumerang?" *Börsen-Zeitung*, November 6, 2022
- "'Catch-56,' Germany's Proposed Extra-territorial IP Tax," *Tax Notes International*, 2022
- "Back to the Future, oder: Verstößt die Handhabung der Registerfälle gegen EU-Grundfreiheiten und - wenn ja - wer trägt die Risiken?" *ISTR*, 2022
- "International Taxation of Intellectual Property," *Börsen-Zeitung*, August 30, 2021
- "Internationale Besteuerung von geistigem Eigentum," *Börsen-Zeitung*, August 28, 2021
- "Schranken der Besteuerung extraterritorialer Lizenzeinkünfte (Teil 1)," *ISTR*, 2021
- "Schranken der Besteuerung extraterritorialer Lizenzeinkünfte (Teil 2)," *ISTR*, 2021
- "Germany's U-Turn to Extraterritorial IP Taxation," *Tax Notes International*, 2021
- "Nexus Limitations on German-Source IP Taxation," *Tax Notes International*, November 23, 2020 Die globale Mindeststeuer schafft keine Verlässlichkeit