Florian Schmid



European Counsel, Frankfurt

Tax



T: 49.69.74220.115

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 Mair

Associations

Member, International Fiscal Association (IFA) and Young IFA

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 repeatedly named one of *Best Lawyers*' Ones To Watch, including most recently in 2024. Since joining the firm, his significant transactions and representations include advising:

- many multinational companies on joint audits, appeals, litigation and other tax proceedings
- **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 pending €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
- **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
- Goldman Sachs, Morgan Stanley, Bank of America, Merrill Lynch and Barclays as joint bookrunners on the €2.3 billion initial public offering and listing on the Frankfurt Stock Exchange of TeamViewer

Florian Schmid

Continued

- **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

"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 Taxaton," *Tax Notes International*, November 23, 2020