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## Education

Second State Exam, Higher Regional Court of Frankfurt a.M., 2017

Dr. jur., University of Bayreuth, 2016

First State Exam, University of Bayreuth, 2012

## Bar Admissions

Frankfurt am Main

## Certifications

Certified Tax Advisor (*Steuerberater*), State of Hesse, Germany, 2022

## Languages

German

English

Dr. Frank-M. Schwarz advises a variety of clients, including multinational corporations, private equity firms and financial institutions, on international and German corporate tax matters. Such tax matters mainly relate to cross-border mergers and acquisitions, management incentive programs and a wide range of complex tax controversy matters, including tax audits. In recognition of his work, Dr. Schwarz was named a Notable Practitioner in general corporate tax by *ITR World Tax* in its 2024 edition.

Dr. Schwarz's recent experience includes advising:

- **TSG Consumer Partners** and **Backcountry** on the tax aspects of the sale of Bergfreunde GmbH, a Germany-based online retailer of premium outdoor apparel and equipment, to DECATHLON S.E., the world's largest sporting goods retailer
- Deutsche Bank, HSBC, UBS, COMMERZBANK and UniCredit on the tax structuring and tax aspects of the issuance of senior unsecured notes in the aggregate principal amount of €1 billion by **ams OSRAM**
- HSBC, Morgan Stanley and UBS on the tax structuring and other tax aspects of the 775 million Swiss franc rights offering of **ams OSRAM**
- **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
- **Energy Infrastructure Partners** on the tax aspects of its acquisition of a 49% stake in Iberdrola's €1.425 billion Wikingen offshore wind farm
- **alstria office REIT-AG** on the tax aspects in connection with the public takeover by Brookfield against a cash consideration of €3.5 billion
- **Færch Group** and its owner, **A.P. Møller Holding**, on the tax aspects of the acquisition of PACCOR Group from U.S. private equity firm Lindsay Goldberg
- **The KraftHeinz Company** on the tax aspects of its acquisition of an 85% stake in Just Spices GmbH
- **Filmbetriebe Berlin Brandenburg** and its controlling shareholders on the tax aspects of the sale of a stake in Studio Babelsberg to TPG Real Estate Partners, followed by a subsequent public tender offer by TPG
- **Armira** and **Boxine** in 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
- **SIGNA Sports United GmbH** on the tax aspects of its US\$3.3 billion initial public offering on the New York Stock Exchange as a result of the de-SPAC merger with Yucaipa Acquisition Corporation. The merger also included the acquisition of WigglesCRC Group
- **MorphoSys AG** in the tax aspects of its US\$1.7 billion acquisition of Constellation Pharmaceuticals, Inc. and its related US\$2 billion financing from Royalty Pharma plc
- **the shareholders of Canyon Bicycles, Roman Arnold** and **TSG Consumer Partners** in the sale of a majority stake in Canyon Bicycles to Groupe Bruxelles Lambert

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- funds advised by **Energy Infrastructure Partners AG** in a €530 million investment for a 49% stake in BayWa r.e. renewable energy GmbH
  - **Black Diamond Capital Management, L.L.C.**, along with InvestIndustrial, in their US\$425 million acquisition of the phenolic specialty resin, hexamine and European forest products resins businesses of Hexion Inc.
  - **The SCP Group** in its €1.2 billion acquisition of the Real Group from METRO AG and sale of the digital business of Real, including the online marketplace operated under real.de, to Schwarz Gruppe
  - **Gulf Energy Development** in its acquisition of a 50% stake in the €2.6 billion offshore wind farm Borkum Riffgrund 2 from Global Infrastructure Partners and its joint venture with Ørsted
  - funds advised by **Credit Suisse Energy Infrastructure Partners AG** in the €500 million acquisition of a 25% ownership interest in the Arkona offshore wind farm in Germany from Equinor ASA
  - **I Squared Capital** in its acquisition of PEMA from Société Générale
  - **Corning Incorporated** in its acquisition of substantially all of the Communication Markets division of 3M
  - **PayPal Inc.** as lead investor in a US\$50 million funding round for PPRO Holding GmbH
  - **Key Safety Systems, Inc.** in its US\$1.6 billion acquisition of substantially all of the assets and operations of Takata Corporation