

# Boaz Feinberg

**Partner**

Tel Aviv

972-3--7955590

boazf@zag-sw.co.il

**Practices**

- Corporate
- Digital Currencies
- Finance Regulation
- Tax
- Litigation

**About**

Boaz Feinberg is a partner and the head of the firm's Tax and Financial Regulation Department. In domestic and international tax law, Boaz specializes in advising corporations and high-net-worth individuals on a comprehensive range of subjects relating to taxation and anti-money laundering on both administrative and regulative levels, as well as in litigation.

With more than 17 years' experience in his fields of practice, Boaz advises on the tax planning aspects of M&A and other complex international transactions, providing tax advice to companies and business partnerships, with an emphasis on start-ups, from "seed" to IPO. He brings clients specific expertise in international taxation with respect to planning efficient tax structures and transactions that efficiently maximize the tax opportunities in different tax regimes around the world. He also advises on many aspects, including pre-ruling applications on direct and indirect tax branches, international tax and trusts, hedge funds and venture capital funds and leading negotiations vis-à-vis the Israeli Tax Authorities.

In relation to Financial Regulation, he provides strategic counsel to financial institutions, regularly advising on the regulatory issues and liaising with the different regulatory authorities and officials, including the Central Bank, the Financial Service Providers Registrar, and the Money Laundering and Terror Financing Prohibition Authority.

A diverse and extensive practice also comprises the representation of U.S. resident corporations and individuals with respect to various issues that relate to the U.S. Tax Authorities. This taps into his vast expertise in both the Israeli and the U.S. Voluntary Disclosure Programs.

**Education**

- Bachelor of Laws, LL.B., Bar Ilan University

**Bar Admissions**

- Israel, 2002

## Representative Client Work

- Represents a client in both criminal and civil proceedings on tax, tax evasion and Anti-Money Laundering issues before the District Court of Israel. The indictment that was filed refers to accusations regarding money laundering and tax fraud crimes in the amount of approximately 150 million NIS.
- Represents numerous **clients in Voluntary Disclosure Procedures**, both in Israel and in the US. The US tax treatment is done in collaboration with our firm's tax department in the United States.
- Represents **Diebold Nixdorf** in connection with Israeli Operations. The Company is represented by the department on an ongoing basis, on various Financial Regulation and tax issues.
- Represents the **Israeli subsidiary of Brinks**. The Company is represented by the department on an ongoing basis, on various Financial Regulation and tax issues.
- Represents the **I.C Group**, a group of private companies in the Financial Industry. WorldCom Finance Ltd. which is part of the W.I.C group is represented by the department on an ongoing basis, on various Financial Regulation and tax issues.
- Pursuant to representing a **company and its shareholders**, the department conducted a tax assessment against the tax assessor's decision to charge the shareholders personally to pay a total of 5,000,000 NIS to the Tax Authority for the debt of a Company, on the basis of Article 119 A of the Income Tax Ordinance.
- Represents the client in **the Kfar Saba Magistrate's Court** and on negotiations before the Assessor of Kfar Saba regarding accusations for omitting income of more than 1,200,00 NIS.
- Represented an **Anonymous lawyer** in front of the Assessor of Gush Dan, Tel Aviv Metropolitan Area. The scope of the dispute - tax liability in the amount of 1,000,000 NIS (principal values).
- Represented the client before the Investigations Assessor and the Assessor of Gush Dan's (Tel Aviv Metropolitan Area's) over a criminal investigation that was conducted with respect to a large professional association in Israel. The investigations were initiated with respect to our client due to his role as Director of the Association for many years. It was claimed that our client concealed income and helped others to avoid tax in the amount of approx. 5,000,000 NIS.
- Represented **Anonymous Venture Capital** client with handling Financial Regulations. Specifically FATCA and CRS Regulation requirements. The Tax Department assists the fund in implementing the required manuals and work procedures.
- Represents **Onward Israel Internships and opportunities Ltd** in connection with its ongoing Non-for-Profit activities in Israel, on an ongoing basis, in various areas which includes indirect taxes (including VAT), including assistance for obtaining a ruling from the Israeli Tax Authorities. Value of activity more than 10,000,000 NIS. Also advise in areas including, but not limited to, commercial Law,

Litigation Law, Taxation Law, Regulatory requirements, Labor Law and Tender Law.

- Represents **Tamid Group** in connection with the formation of an Israeli subsidiary who will operate as an NGO under the laws of the State of Israel, counsel the client as the founder of the Israeli subsidiary on the legal aspects of forming the new entity in Israel. In addition, our firm provides various legal services to the client in connection with the Israeli entity's overall activities in Israel on an ongoing basis, in various areas of the Israeli Law, including Commercial Law, Tax Law and specific issues related to circumstances of the Israeli entity being operated as an NGO.

### **Professional & Civic Activities**

- Member of the Money Laundering Prohibition committees of the Israeli Bar Association
- Member of the Business Service Providers Steering Committee of The Israeli Bar Association