

Julien Darras

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Work Experience

Arendt & Medernach, Luxembourg

Tax associate (January 2015-Present)

Deloitte Tax & Consulting, Luxembourg

Tax consultant (September 2013-January 2015)

- Advising on tax efficient planning of private equity and real estate funds through the implementation of corporate structures.
- Drafting tax opinions and advance tax analysis letters (tax free repatriations, hybrid instruments, implementation of tax transparent structures, hedging of foreign exchange movements, etc.).
- Spreading computations of arm's length remuneration on intra-group financing activities and drafting transfer pricing reports and advance pricing agreements.
- Tax oriented review of legal documents (articles of association, terms and conditions of financial instruments).
- Preparing tax provisions and tax returns of Luxembourg holdings and financing companies.

C'M'S Bureau Francis Lefebvre, Morocco

Tax associate (August 2010- May 2012)

- Management of tax planning for business investments in Morocco through the implementation of Moroccan entities of foreign companies listed on FTSE, NYSE and CAC 40.
- Assistance in the reorganisations and reconstructions of companies.
- Tax oriented review of legal documents (articles of association, terms and conditions of financial instruments).
- Conducting due diligences and drafting reports outlining tax risks assessments and tax optimisation.
- Assistance in litigation cases against the Moroccan Tax Administration.

TAJ Société d'Avocats, France

Intern (May 2010-August 2010)

- Drafting of technical notes regarding indirect taxes aspects.
- Extensive use of legal databases for legal and tax precedents.

Bachy Valton Krongrad SCP, France

Intern (May-June 2008)

- Developed key skills for the drafting of memoranda on commercial law and deeds.

Criminal court (Juzgado Primero Penal Oral de Cuantía Menor), Mexico

Intern (August-September 2007)

- Strengthened the clerks' staff in hearings of plaintiffs/defendants. Edited and filed the related minutes.

Education

Luxembourg School for Commerce

Luxembourg Tax Law Examination - Cycle B, pending (2015)

Luxembourg Tax Law Examination - Cycle A, with merits (2014)

Queen Mary, University of London, *England*

LLM in Tax Law, with merits (2012-2013)

- **Modules:** Business Taxation, European Union Tax Law, Financial Models and Derivatives in a Legal Context.
- **Dissertation:** The UK's accounting and tax treatment of deposits and prepayments.
- **Training Course:** International Legal English Certificate (ILEC).

University of Rennes 1, *France*

Master in Tax Law (2009-2010)

- **Modules:** Corporate Tax Law, International Tax Law, Tax Engineering, Tax reconstruction, Accounting, Tax Litigation.
- **Dissertation:** The reform of French value added tax applicable to real estate transactions.
- **Study trip to New York:** Attended U.S. tax law conferences organized by the New York Law School and Big4 firms.

University of Rennes 1, *France*

Bachelor of Law (2005-2009)

- **4th year modules:** Direct and Indirect Taxation, Intellectual Property Law, Tax Litigation, Insurance Law, Competition Law, Secured Financing, Insolvency Law.
- **1st to 3rd year modules:** Civil Law, Commercial law, Corporate Law, European Union Law, Civil and administrative Litigation.

Publication

The UK's accounting and tax treatment of deposits and prepayments, The EC Tax Journal, Volume 15, 2014-15.

Professional affiliations

- Member of the Association Des Etudiants et Enseignants Fiscalistes de Rennes 1 (ADEEFR1)
- Member of the International Fiscal Association (IFA)

Other Skills

- **Languages:** Native French, fluent English, fluent Spanish.
- **Computing:** full command of Microsoft Office (Word, Excel, and PowerPoint) and legal databases (LexisNexis, Navis, WestLaw, Curia, Legilux and Legitax).

References

Available on request.