

## Jeff Millington

PARTNER | LONDON

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### Jeff is a partner in the private client and tax team, specialising in UK tax investigations.

He advises both businesses and individuals facing all manner of civil or criminal tax fraud enquiries. Not afraid to challenge requests and assumptions from HMRC, Jeff's priority is guiding his clients through complex, crisis scenarios - defending against allegations and inaccurate representation of information, and partnering with white collar and media and reputation specialists to ensure his clients' reputations and careers remain intact. He is currently working on a number of HMRC criminal investigations.

Jeff also advises trustees and senior executives at financial institutions when making disclosures to HMRC, as well as advising them on the best way to structure their affairs in a tax compliant way.

Jeff has a particular focus on the sports sector, advising clubs and agents on a range of issues related to tax and investigations. During his time at the HMRC, Jeff headed up the project into image rights within football clubs which has influenced his work in practice, having represented football clubs with regards to image rights and enquiries from HMRC concerning agents' fee payments on player transfers. He also advises on individual player image rights contracts.

Before joining legal practice, Jeff was a fully trained inspector at HMRC for 24 years working in specialist investigations, giving him unique insight into what HMRC look for when investigating individuals or businesses. He has been listed as a recommended tax advisor in Spears 500 and applauded for his 'gamekeeper turned poacher' experience, which makes him perfectly placed to advise individuals or businesses facing tax scrutiny.

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# Track record

## Tax compliance

I have worked with a number of trust companies and banks, in a mixture of helping clients and trustees make disclosures to HMRC and also advising on the best way to structure their affairs in a tax compliant way. During the disclosure period of the LDF and the WDF I was involved in several hundred disclosures to HMRC and helped hundreds of people regularise their tax affairs in the UK.

## HMRC practice

Attention to detail and in particular HMRC practice can prove critical. In one case where HMRC were seeking upwards of £4m in taxes and interest covering a number of years, in an enquiry, which had been ongoing for nearly ten years. Having come late to the enquiry I was asked whether there was any new technical argument I could forward. Having looked at all of the correspondence going back ten years, I noticed that there did not appear to be any opening letters that had been sent directly to the client. Once I queried this it was established that although HMRC had written to the client's agent they had never written to the client to notify him he was under enquiry. After 12 months of correspondence with HMRC, they reluctantly accepted that they did not have open enquiries into the client and as a result they closed the matter down with no tax due.

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## Talks

- Transcontinental trust conference May 2019

## Languages

English

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## Key dates

Year joined: 2019

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