

RAJESH SIMHAN

Partner, Anagram Partners



Professional Summary

Rajesh has around two decades of experience in advising clients on tax structuring and navigating tax controversies, both in transactional and international tax matters. He has extensive experience advising private equity funds and strategic investors on structuring their investments, exits and restructurings. He advises private equity funds on fund structuring, including on issues relating to carried interest. His advice extends to tax and regulatory matters relating to business transactions and business models, with a focus on cross-border issues. These span multiple industry sectors including IT&ITES, media, gaming & entertainment, e-commerce, digital, infrastructure, real estate etc.

Prior to Anagram Partners, Rajesh headed the tax practice at a leading law firm in the country. Rajesh has been recognized for his work in tax across several global directories including Chambers and Partners, Financial Times RSG and Asia law. He is also active in speaking engagements at events including International Bar Association, Foundation of International Taxation, International Fiscal Association-India, Inter Pacific Bar Association, etc.

Practices

Taxation
Tax Litigation
Transaction Structuring
Regulatory
Private Equity
Mergers and Acquisitions

Education

LL.M. in Taxation
Georgetown University Law
Center, Washington D.C
B.A. LL.B (Hons.)
National Law School of India
University, Bangalore

Bar Admissions

Bar Council of India

Contact

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Transactional Matters

Represented several private equity funds and other investors in transaction structuring, documentation, negotiations and other tax advice including tax insurance.

Tax & Regulatory Advisory

Advised clients in several matters relating to digital taxation, tax structuring (with emphasis on inter-play between tax and regulatory issues) and cross border taxation on issues such as permanent establishment, GAAR, income characterization issues, treaty benefits, etc.

Tax Controversy

Represented clients before various High Courts, Tribunals and AAR and High Courts on issues such as application of indirect transfer tax provisions, application of treaty benefits on various issues, non-discrimination provisions, permanent establishment issues, income characterization, beneficial ownership etc.

Representative Experience

Transactional Matters

- Advised ReNew Power on the sale of ReNew Sun Waves, which operates a 300 MW solar power asset to AnZen India Energy Yield Plus Trust for USD 193 million.
- Advised Renew Power in relation to various structuring matters including its acquisition of Ostro Renewables, De-Spac and multiple other transactions undertaken by them.
- Advised Avenue Capital Group and MAVCO Investments consortium in the acquisition of Huber group.
- Advised RL Holdings on the USD 570 million sale of IGI to Blackstone.
- Advised Avenue Capital on multiple structured deals.
- Advised Leap India on its majority sale to KKR.
- Advised various funds such as Actis, Investcorp, Nexus and Everstone on various deals.

- Represented several insurers and clients on various tax underwriting products including on treaty benefits, indirect transfer tax and beneficial ownership related issues.

Tax & Regulatory Advisory

- Representing a global communications intelligence platform in proceedings in respect of transfer pricing related issues and advising on pre-litigation and litigation strategy.
- Advising a large house of brands in respect of their entire group re-structuring encompassing multiple jurisdictions.
- A large gaming company in respect of tax obligations in respect of business operations in a cross-border context.
- Advising a leading crypto-exchange company undertaking crypto derivatives across several regulatory and tax issues relating to their structure and business model.