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Tax



Innovation
Branding
Solution
Marketing
Analysis
Ideas
Success
Management

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Who We Are

Felsberg Advogados is a full-service law firm founded in 1970 and defined by its ability to combine experience, tradition and excellence with efficient, fast and focused service, offering innovative solutions in a constantly changing world.

The combination of individual, joint and complementary values, with a tradition established over five decades of service, means that we have a broad and all-encompassing vision that meets the current and future legal requirements of all our clients, from the biggest corporate groups to the freshest of startups.

This is what makes us unique, different and prepared.

Our History

Founded by Thomas Felsberg, the firm has always had an innovative spirit at the core of everything it does.

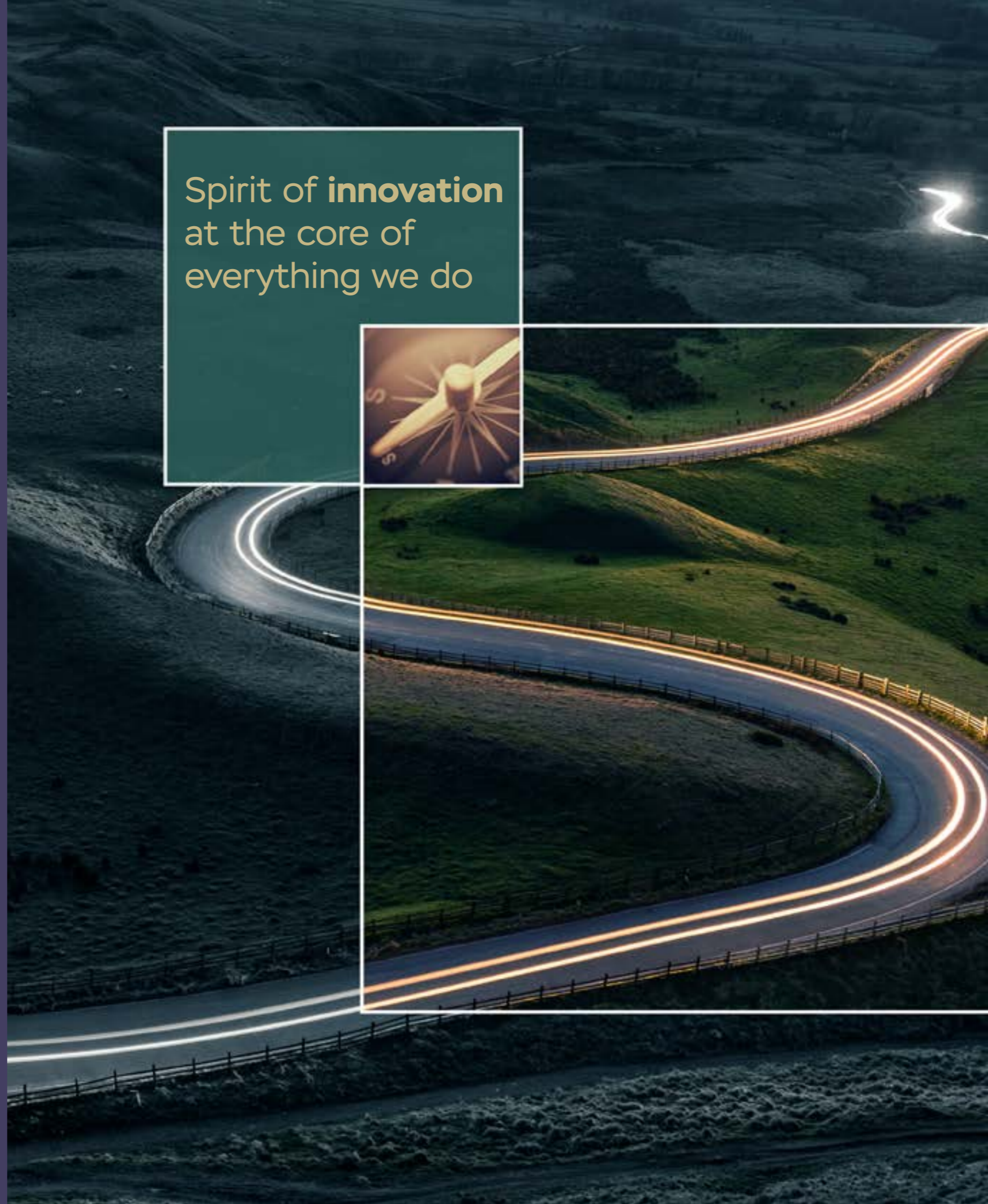
Long before we were recognized as pioneers in judicial restructuring, we were one of the first firms to advise on aviation financing and contribute to the development of project finance and venture capital in Brazil.

We are always attuned to the market and new areas of law.

The firm has formed multidisciplinary internal centers of studies focused on predicting future demands of our clients.

More than service providers, we are partners.

Spirit of **innovation**
at the core of
everything we do





**Our
Principles**

Social Responsibility

We are committed to contributing to a better world through social actions and the creation of values. We believe that community empowerment is essential for humanitarian growth, from the conception of social responsibility to the design of comprehensive support of projects with a vision of the future, following the needs of the regions in which we operate.

We are committed to ethics in the provision of our services and we dedicate our efforts to topics that are linked to the challenges of society, supporting social, cultural and educational projects. We strongly encourage our team to be involved in social responsibility programs.

Diversity

Diversity is a part of the Brazilian people. Difference makes us unique, and every culture and outlook on life must be included in society.

In 2019, **Felsberg Advogados** created the Diversity Committee, **DiversiFeA**, seeking equality for all. There are currently three affinity groups: **EquiFeA** with a focus on gender equality; **FeA Racional** that discusses racial equity; and **Pride to Be FeA** which fights for the rights of the LGBTQIAP+ community.

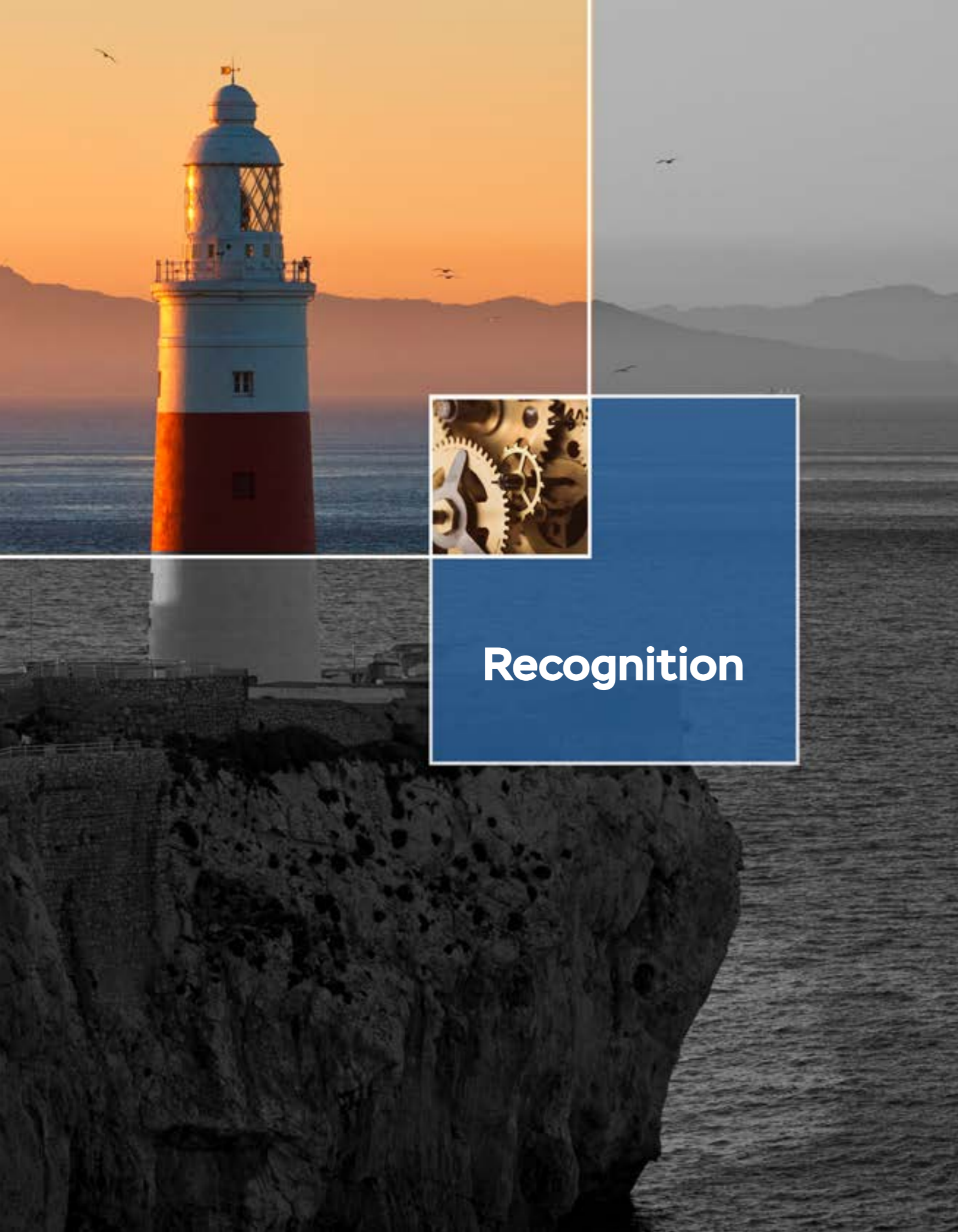
The Committee aims to promote initiatives and regular events to raise awareness and encourage reflection on relevant and necessary topics for a more respectful society.



Practice Areas



- Advertising, Marketing and Media
- Agribusiness
- Antitrust
- Aviation
- Banking and Finance
- Capital Markets
- Commercial Contracts
- Compliance
- Consumer Relations
- Corporate and M&A
- Data Protection and Technology
- Dispute Resolution
- Electric Power
- Environment, Sustainability and Waste
- Fashion
- Fintech and Payment Systems
- Governmental Relations
- Immigration
- Infrastructure
- Innovation, Startups and Venture Capital
- Intellectual Property
- Labor and Employment
- Life Sciences
- Maritime
- Natural Gas
- Oil and Gas
- Privatization
- Public and Regulatory
- Real Estate
- Sanitation
- Sports and Entertainment
- Tax
- Telecommunications
- Transformation, Restructuring and Insolvency
- White-Collar Crime and Corporate Investigations



Recognition





Tax



Our tax department is made up of 20 professionals, headed by five partners with widely recognized experience and excellence. Our subgroups allow our professionals to specialize in tax consultancy and planning, tax litigation and liability management, customs and social security, and wealth planning and succession planning.

Tax Advisory

We provide specialized tax consultancy and planning services for a wide range of businesses, covering direct and indirect taxes, customs duties, social security payments, international operations and transfer pricing. We define and quantify tax risks and exposure; plan for tax structures and facilitation of payments; and assist clients in qualifying for special tax regimes, regional and sector focused tax incentives, as well as incentive-based tax installment programs.

Tax Litigation

In litigation of both administrative and judicial natures, we have expertise in:

- administrative challenges relating to notices of violation and declarations of non-compliance against nonratified tax offsets;
- judicial defenses and appeals in tax foreclosures and tax injunctions;
- judicial measures aimed at reducing the tax burden and reimbursement of overpaid taxes;
- writs of mandamus aimed at restricting the practice of abusive and illegal acts by tax authorities;
- negotiations with public entities for the regularization of tax debts;
- responses to tax inspections; and
- efficient management of materialized tax liabilities.

Customs and Social Security

We advise clients in relation to:

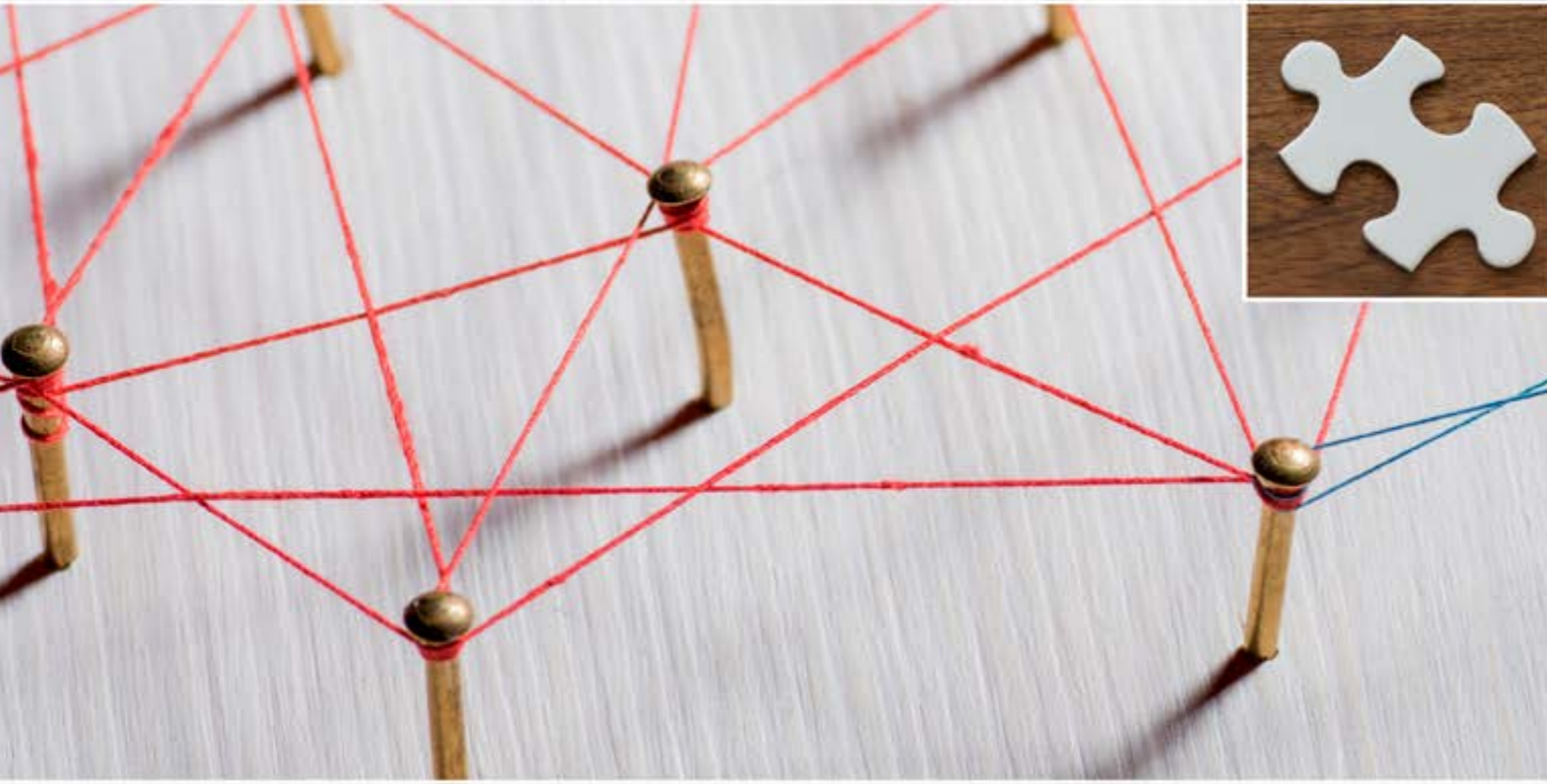
- violation in customs and social security matters;
- legal defenses against tax foreclosures;
- claims in customs tax regimes, including Drawback, Temporary Admission, 'Blue Line', etc.;
- ex-tariff claims and requests for temporary and permanent reduction of importation tax;
- release of unjustifiably retained goods;
- monitoring tax inspections in customs and social security matters; and
- social security planning, remuneration of executives and assistance for foreigners sent to Brazil.

Wealth Management and Succession Planning

We also assist individuals with:

- tax-efficient succession and marriage planning;
- equity protection;
- structuring of investment funds and overseas investments, including advice on definitive or temporary withdrawal from Brazil; and
- advice on the repatriation of financial sums and on the provision of information to inland revenue and bank authorities.

Partners





Anna Flávia Izelli

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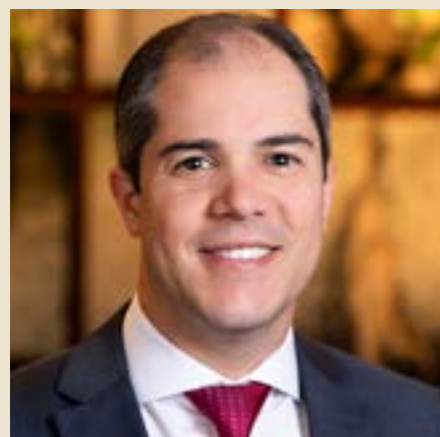
Phone: +55 11 3141-9193

Practice Area: Transformation, Restructuring and Insolvency / Tax

Anna Flávia has a great deal of experience in tax litigation, working in the administrative and judicial spheres, in both defense and the demanding of tax debts, as well as in the filing of court actions aimed at recovering tax credits.

She also works with customs issues, providing assistance and advice on overseas trade operations, and with defense as well as with demands for taxes or penalties arising from non-compliance with customs systems.

Additionally, she provides due diligence support in M&A operations and in the restructuring of companies subject to judicial reorganization. Anna Flávia has been recognized by Latin Lawyer, ITR World Tax, The Legal 500, Benchmark Litigation, *Análise Advocacia*, *Análise Mulher* and Leaders League.



Rodrigo Prado Gonçalves

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Practice Area: Transformation, Restructuring and Insolvency / Tax

Rodrigo is a partner in the firm's Tax department. He has substantial experience in tax litigation, working in the administrative and judicial spheres, in both defense and the demanding of tax debts, as well as

in the filing of court actions aimed at recovering tax credits.

He works with payroll taxation issues, providing assistance and advice regarding the proper compliance with social contribution legislation. In addition, he provides support in M&A operations, through the performance of due diligence. Rodrigo has been recognized as a Next Generation Partner by The Legal 500, and is also recognized by Latin Lawyer, Benchmark Litigation, ITR World Tax, Leaders League and *Análise Advocacia*.



Ivan Campos

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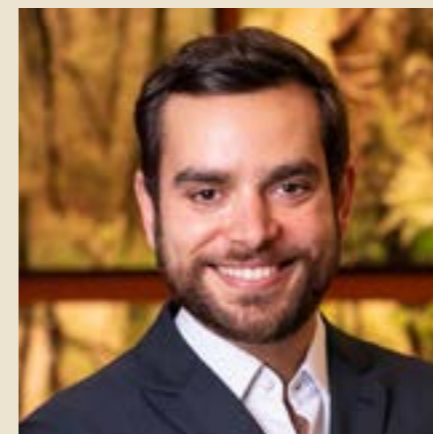
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Practice Areas: Tax / Telecommunications

Ivan is the partner in charge of the tax consulting and litigation department in the Rio de Janeiro office. With over 35 years of experience, he previously worked at Veirano Advogados and at auditing and consulting firms (KPMG and Coopers & Lybrand), serving clients

in the segments of wholesale and retail trade, service providers, pharmaceutical, telecommunications, technology, oil and gas, tobacco, sugar and alcohol, and beverages, among others.

His team was recognized in Chambers Brazil: Transactional 2022, ITR World Tax 2023, Leaders League 2022, and *Análise Advocacia* 2022.



Gabriel Paranaguá

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Practice Area: Tax

Gabriel is a partner in the Tax area of Felsberg Advogados and has more than 20 years of experience in tax consultancy. With specializations in International Taxation and Tax Planning (ABDF), Tax Auditing (UFRJ, 2013), and Tax Litigation (Universidade Cândido Mendes, 2008), his experience

includes advising on tax planning in M&As and business restructuring, operations with telecommunications operators and satellites, software, new technologies and cryptoassets, estate planning and debt profiling, transactions with works of art and antiques, and assistance to various players in the fashion industry.

Recognized by Chambers Global (2024) and Chambers Brasil (2023) as "Up and Coming" (Tax: Non-contentious) and by The Legal 500 (2024) as a "Next Generation Partner" (Tax Advisory), Gabriel is a member of the Association of Brazilian Financial Law (ABDF/RJ), the Legal and Fiscal Committee of the Brazilian Association of Infrastructure and Basic Industries (ABDIB) and the firm's Development and Equity, Diversity and Inclusion Committees (DiversiFeA), as well as coordinator of the Taxation nucleus under Felsberg Advogados International.

Experience



- Advising creditors on extent and effects of accounting inconsistencies as well as tax impact of different alternatives in the judicial reorganization plan for one of the largest retail chains in Brazil.
- Representing a very well-known non-profit organization in relation to the payment of Social Contribution (COFINS) over the revenues derived from what is considered core business.
- Advising a leading Brazilian internet meal delivery platform on drafting tax policy proposals that incentivize the use of sustainable packaging by its partners.



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