



Randall Fox
HEAD, INTERNATIONAL TRANSFER PRICING

randall.fox@dlapiper.com

London

T: +44 (0)20 7796 6928

F: +44 (0)20 7796 6666

Randall Fox leads an award winning multidisciplinary transfer pricing team based in London as well as leads the growing the international transfer pricing practice across the globe.

Randall joined DLA Piper in London in 2015 from the IRS in Washington DC, where he was an APA Team Leader and Competent Authority Analyst. He principally negotiated 50+ bilateral APAs and MAPs between the US and a number of European countries, gaining an understanding of how a number of countries approach transfer pricing issues. He generally focusing on cases involving intangibles and led teams on some of the largest and most complex APAs and MAPs. Lastly, he also spent some time on secondment to the World Bank Group to help a number of different country tax administrations build their own APA and MAP programs.

- Tax
- Transfer Pricing

Spanish

LANGUAGES SPOKEN

- Spanish

Randall has a one-of-a-kind background in transfer pricing, having spent time in Big4, government (IRS APMA Program) as well as an international organization (World Bank Group) prior to joining DLA Piper. He therefore provides clients with broad perspective and the ability to provide big picture implications of policies and their impact on the US, developing countries, as well as across Europe.

Since joining DLA Piper, he has assisted a number of clients in operating model design and implementation globally, more than 25 bilateral advance pricing agreements and MAPs in 12 countries, financing structures, several large valuations of intangibles for cross border transfer, and defense-related strategies worldwide for a number of US and European-based multinationals.

As Head of the International Transfer Pricing at DLA Piper, Randall leads the cross jurisdictional transfer pricing practice outside the US.

Professional experience

- Provides strategy and client representation on bilateral APAs in 12 countries, including the design and implementation of a global APA strategy for a client in the consumer goods industry

- Called as an expert witness to provide written and oral testimony before a tribunal at the Netherlands Arbitration Institute on a case involving numerous transfer pricing issues
- Forged new client relationships by providing innovative thinking, significant credibility based on past experience, multi-country coverage from a single point of contact, and a client first approach
- As an IRS APA Team Leader, acted in a lead technical and negotiation role in a competent authority on several APAs with the potential for double taxation of more than US\$1 billion
- As an IRS Competent Authority Analyst, negotiated successful and principled transfer pricing MAP and APA case resolutions with foreign competent authorities in 10+ countries on a wide range of transfer pricing issues
- Played a lead role in the development of APA programs and joint transfer pricing training alongside OECD in numerous developing countries while on secondment to the World Bank Group

CREDENTIALS

Prior Experience

Randall joined DLA Piper in 2015, where he has advised clients on preventing and resolving transfer pricing disputes in numerous countries. In addition, he has also been called as an expert witness in an international arbitration hearing involving numerous transfer pricing issues. He joined DLA Piper from the Internal Revenue Service (IRS) in Washington DC, where he was a Team Leader responsible for leading transfer pricing case negotiations on behalf the IRS for some of the largest cases in the history of the IRS Advance Pricing and Mutual Agreement (APMA) program.

His last two years of employment at IRS, he was seconded to the World Bank Group to assist developing country tax administrations around the world with building capacity and developing alternative dispute resolution programs. Randall developed and led training workshops on technical transfer pricing and APA matters, drafted APA guidelines for several countries, and worked directly with tax administrations, finance ministry officials as well as the OECD on numerous policy matters related to transfer pricing. Prior to his time in public service, Randall spent time as a transfer pricing advisor with both a Big4 firm and an economic consultancy firm.

Recognitions

Randall and his London-based transfer pricing team have been consistently rated a Tier 1 firm by World Transfer Pricing. In addition, the team has won International Tax Review's UK Transfer Pricing Firm of the Year in 2017, 2018, and 2019.

Education

- Miami University, Master of Arts, Economics, 2005
- University of Washington, Bachelor of Arts, Economics, 2002

INSIGHTS

Publications

OECD publishes guidance on the tax impact of cross-border working arrangements during the COVID-19 pandemic

27 January 2021

Our observations on the new OECD guidelines and their implications for employers.

Understanding the OECD's guidance on the transfer pricing implications of the COVID-19 pandemic

5 January 2021

A practical look at the new OECD guidance.

Managing exchange of information requests in transfer pricing controversy

5 May 2020

In the post-BEPS era, tax authorities are increasingly reliant upon international cooperation as a means to carry out their enforcement activities in tax and transfer pricing audits. Requests for information between tax authorities and requests for taxpayers to supply the information have become an integral part of the controversy landscape.

HMRC releases 2018/19 data on transfer pricing and the diverted profit tax

7 February 2020

Her Majesty's Revenue and Customs has published tax data for 2018/2019 on transfer pricing and diverted profits tax. The UK's transfer pricing rules and the DPT are both important elements in a range of measures that the UK adopted to make sure multinationals pay the right amount of tax on the share of their profits that belong to the UK.

Randall is a co-author of the World Bank Group Handbook on Transfer Pricing and Developing Economies.

Events

Previous

Transfer Pricing Controversy in Europe: Insights and Solutions from the Front Lines

21 April 2021

Webinar

Session one: Transfer Pricing Controversy in Europe: Insights and Solutions from the Front Lines

21 April 2021

International Tax and Transfer Pricing Webinar Series

Webinar

Webinar: COVID-19 and Transfer Pricing

22 April 2020

Webinar

Japan Tax and Transfer Pricing Seminar

25 Feb 2020

Transfer Pricing Masterclass Series 2019

London

Intra-group Financial Transactions Webinar – OECD’s final say

17 February 2020
Webinar

Randall is a frequent speaker at transfer pricing conferences worldwide.

SPEAKER EVENTS

- Keynote Speaker, *Asia Tax Forum*, (Singapore) 2015
- Panel Participant, "Dispute Resolution and Anti-Avoidance: How taxpayers should manage disputes in 2015", *Asia Tax Forum*, (Singapore) 2015
- Panel Participant, "TP Under Pressure: Insights from Key Policy Makers", *TP Minds Transfer Pricing Americas Summit*, (Miami, Florida) 2015
- Panel Participant, "APAs: Latest Experience and Future Outlook", *TP Minds Transfer Pricing Americas Summit*, (Miami, Florida) 2015
- Keynote Speaker, *Global Transfer Pricing Forum*, (Washington, DC) 2014
- Panel Participant, "Hot Topics in Transfer Pricing", *Global Transfer Pricing Forum*, (Washington, DC) 2014

NEWS

DLA Piper Transfer Pricing team continues strong growth with senior hire in London

8 September 2021

DLA Piper continues to grow its Transfer Pricing offering with the appointment of Melissa Kuster as a director in its London office. This is the firm's third Transfer Pricing senior hire this year, following the recent appointment of partners César Salagaray in Spain and Antoine Faure in France.

DLA Piper strengthens Transfer Pricing offering with new team hire in Spain

18 January 2021

DLA Piper is strengthening its Transfer Pricing offering in Spain with the appointment of César Salagaray as a partner in its Madrid office.
