

## Kohei Kobayashi

PARTNER | TOKYO

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### Kohei is a Japan tax partner in Tokyo office.

He is an international tax adviser and licensed tax attorney in Japan. His practice involves advising on international taxation matters of clients and international investors whether institutions or individuals. He has advised various types of funds and transactions on cross-border investments. He has been involved in real estate investments, (re)structuring, reorganization and M&A matters. He also advises high-net-worth individuals on the Japanese and international estate taxation planning matters. He has dealt with various international taxation issues for various international clients and has about 20 years' experience around.

Prior to joining the firm, he had worked in PwC for about 15 years, and served as a director in financial services tax team in Tokyo office. He had also been deployed in PwC London office as a senior tax manager to deal with FS-Tax practice for two years.

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## Track record

### HNWI's international estate planning

Tax advice on the international estate planning matters of the high-net-worth individuals who are linked to Japan.

### Outbound International Tax

Tax advice on the outbound investment by Japanese organization and those overseas ground companies to deal with international tax issues.

## Transaction Deal Tax

Tax advice on the formation of private equity fund, venture capital fund and partnerships and other related transaction matters.

## Inbound Structuring

Tax advice on the real estate funds and those international investors with regard to establishing and investing in the TMK structure and TK-GK structure.

## Fund Raising Tax

Japan tax advice on the establishment of global investment fund and fund raising.

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## External publication

'Tax Planning for International Mergers, Acquisitions, Joint Ventures and Restructurings, Sixth Edition', Japan Chapter - Aug 2023, editor

## Speaking engagements

On 8 November 2023, lectured titled "issues in connection with the establishment of funds in Japan by foreign investors and whose expansion of investments in Japan" at the subcommittee on Startup Policy of Headquarters for Achieving New Capitalism in Liberal Democratic Party and spoke the tax policy issues.

## Admissions

Japan Federation of Certified Public Tax Accountants' Associations as a licensed tax attorney (Zeirishi) in 2005  
Tokyo Zeirishi Associations in 2005

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## Languages

English

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## Key dates

Year joined: 2021

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