

# OFIR LEVY

Partner, Executive Member

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## EXPERTISE

Tax | Family Wealth Management and Private Clients

## BIO

Ofir Levy provides tax advisory services for Israeli and foreign clients, specializing in developing tax-efficient transaction structures. He also renders legal opinions and assists in obtaining tax rulings and other tax arrangements with the Israel Tax Authority (ITA).

From the planning and negotiating stages, through the post-transaction tax planning stage, Ofir helps his clients with tax assessments, appeals, and representation before the ITA and Israeli courts on matters concerning income tax, VAT, and real estate tax.

Recognized by leading rating companies in the field of tax, Ofir's extensive experience includes tax consulting on high-profile international merger and acquisition transactions, restructuring and investments, and representing Israeli and non-Israeli clients in litigating complex tax cases involving business reorganization, transfer pricing, and intercompany arrangements. He also engages in tax planning for high-net-worth individuals and families, including new immigrants and returning residents, and advises on equity-based compensation to employees.

Prior to joining the firm, in 2011 Ofir was head of the tax practice at M. Seligman & Co. From 2003 to 2010, he worked as the Director of the Department of International Taxation in the State Revenue Directorate of the Ministry of Finance, and as a senior professional advisor to the Commissioner of State Revenue. In this role, Ofir was consulted on pre-ruling matters and was involved in tax legislation regarding income tax, trusts, tax incentives for foreign residents, tax incentives for new immigrants, participation exemptions, real estate taxation law, real estate investment trusts (REITs), VAT, encouragement of capital investments and R&D, capital markets, hedge funds and securitization.

In addition, Ofir managed the Israeli tax treaty team in international negotiations with tax authorities of the UK, the US, Germany, and numerous other countries. He also chaired the Israeli working group responsible for the tax aspects associated with Israel's accession to the OECD, was the first Israeli participant in the OECD Working Party on International Taxation, and the first Israeli participant in the United Nations Economic and Social Council's (ECOSOC) working group on business profits.

Ofir lectures in tax courses at the Law School and Business School at the College of Management Academic Studies, and is a member of the Advanced Study Committee of the Institute of Certified Public Accountants in Israel.

Having obtained his B.A. in accounting in 1999 and his LL.B., cum laude, in 2000 from the College of Management, Ofir went on to earn an MBA in business administration (finance) from Tel Aviv University in 2007. He also graduated from

## LEGAL500

*"Ofir Levy is a quick, professional, business-oriented lawyer."*

### Education

2007 Tel Aviv University | MBA Finance

2007 OECD Training Centers (Vienna, Budapest) | International Taxation Seminars - Tax Avoidance and Evasion, Tax Treaties, Tax Negotiations

2007 Israel Tax Authority | Tax Inspectors Course

2000 The College of Management | LL.B., cum laude

1999 The College of Management | B.A. (Accounting)

### Admission

2003 Israel

### Additional roles

2002 Accounting

Member of the Advanced Study Committee of the Institute of Certified Public Accountants in Israel

the tax inspectors course of the Israel Tax Authority, and international taxation seminars (Tax Avoidance and Evasion, Tax Treaties, Tax Negotiations) at the OECD training centers in Vienna and Budapest.

Ofir was admitted to the Israeli Certified Public Accountants Institute in 2002 and the Israel Bar in 2003. Having previously worked in the tax department of PricewaterhouseCoopers (PWC) Israel, he joined the firm as a partner in 2011.

## EXPERIENCE HIGHLIGHTS

Represented Intel Inc. in tax-related issues with respect to its acquisitions in Israel, including the acquisitions of Mobileye in 2017, and of Tower Semiconductor (ongoing).

Represented Palo Alto Networks in numerous acquisitions in Israel, including of CyberArk Software, Talon Cyber Security, Dig Security, Crusoe Security, Cider Security, Bridgecrew, PureSec, and Twistlock.

Represented Tenable in the acquisition of Apex Security, Vulcan Cyber and Ermetic.

Represented CrowdStrike in the acquisition of Flow Security and Bionic.

Represented Innplay Labs in its acquisition by Playtika.

Represented IBM in its acquisitions of Polar Security and Databand.ai.

Represented Snap Inc. in its acquisition of Voca.ai.

Represented PayPal in its acquisition of Curv.

Represented ZoomInfo in its acquisition of Chorus.ai.

Represented gaming company Ilyon Games in its acquisition by Tencent-owned mobile developer Miniclip.

Leads the Arnon, Tadmor-Levy tax team in providing ongoing tax support to various international clients, including IBM, Intuit, Imperva, Oracle, PayPal, Ibex, Zscaler, and many more.

## RECOGNITION

