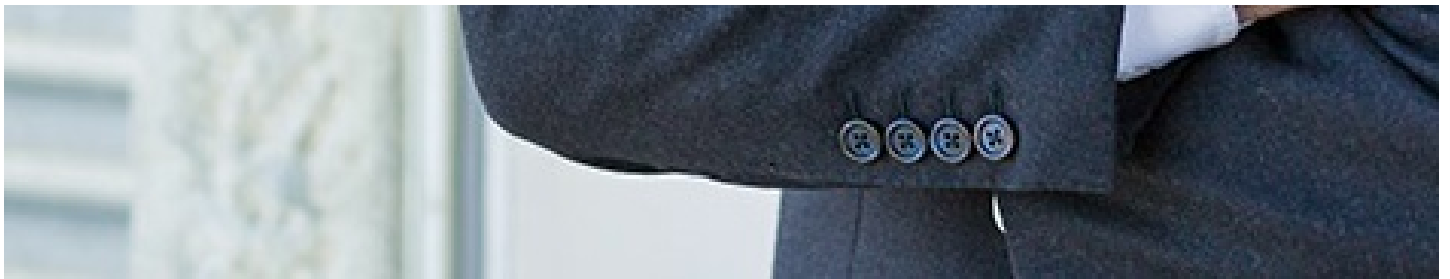




Jáuregui y Del Valle





Luis Gerardo Del Valle Torres

MANAGING PARTNER

Mr. Del Valle is the Managing Partner of Jáuregui y Del Valle, S.C. and over the past 20 years has actively participated in some of Mexico's most important Tax Transactions. Mr. Del Valle is a Tax Lawyer specializing in Tax Consultancy, including Domestic and Cross-border Transactions; Structuring of Real Estate Funds, Infrastructure and Private Equity Funds, Private Clients, Tax Litigation and Tax Policy.

'Luis Gerardo del Valle sets himself apart from his competitors with his high level of knowledge and gift for explaining complicated matters with great ease and simplicity.' Legal 500.

EDUCATION

2002

New York University, School of Law, Master in International Tax Law

2001

University of Cambridge, Faculty of Law, Master of Law, British-Chevening Scholarship

1999

National Autonomous University of Mexico (UNAM), Attorney at Law, Magna Cum Laude

PRACTICE AREAS

Tax Transactions

Tax Legislation & Regulations

Tax Litigation

Tax Controversy

TRANSACTIONS

Advising FINSA CKD I and Walton CKD on the sale of a large portfolio of industrial properties identified as Titan to FIBRA UNO. This transaction represented an important challenge due to the complex structure of both FINSA CKD I and Walton CKD and was considered the largest industrial real estate acquisition in Mexico and in Latam. JDV advised on the proper selling structure, the tax analysis of the transaction, structure of the legal documents, and particular tax documentation to be produced in connection with the sale.

In the past 20 years Mr. Del Valle has actively participated in tax transactions of major importance.

They include matters both public and private, from IPOs, issuance of CKDs, FIBRAs, FICAPs, real estate and infrastructure fund structuring, international and domestic reorganizations, bond issuance, financing, as well as general tax advice to organizations including car manufacturers, manufacturing companies in different sectors, banks, insurance and reinsurance companies, construction companies, retail, oil and telecommunications.

Highlights of Mr. Del Valle's experiences include:

Advising Toyota Manufacturing and Engineering on incorporating and starting operations in Mexico.

Advising IBM on the Lenovo acquisition.

Advising GE Real Estate on the sale of an industrial properties' portfolio for USD\$ 453,000,000.

Advising Walton Street Capital on the issuance of a CKD for an amount of MXN\$ 4,370,000,000. approximately, USD\$ 250,000,000 at the time.

Advising Cobalt, Inc. on obtaining a senior secured guaranteed term loan for the amount of USD\$20,000,000.

Advising Prudential Real Estate Investors in establishing various funds over the last fifteen years acting as investors banks, insurance companies, sovereign wealth funds, family offices and more.

Advising FINSA and Walton Street Capital on the issuance of a CKD for the amount of MXN\$2,750,000,000, approximately USD\$ 150,000,000.

Advising Barnhart in raising a Real Estate Fund for the amount of CAD\$ 160,000,000.

Advising Fibra Terrafina on their IPO for the amount of US\$716,136,381.

Advising Planigrupo on the issuance of a CKD for the amount of MXN\$ 2,475,200,000, approximately USD\$ 150,000,000.

Advising Prudential Real Estate Investors on the issuance of a CKD for the amount of MXN\$ 3,095,000,000, approximately USD\$ 200,000,000 at the time.

Advising West LB on the issuance of CBs in a financing to CEMEX.

Advising numerous companies on mergers and acquisitions of the greatest importance.

Advising ING on the structuring of a Real Estate Fund in Mexico.

Advising Clarion in one of its real estate funds in the acquisition of a most relevant retail real estate acquisition for approximately USD\$ 200,000,000.

Advising Terrafina on the acquisition of an industrial portfolio from KIMCO of approximately USD\$800,000,000.

Legislation & Regulations

Mr. Del Valle has advised Chambers and Governmental and non-Governmental Organizations during legislative discussions with the Government.

Litigation

Mr. Del Valle has been successful in cases spanning federal and state tax and administrative litigation. This litigation has led to numerous provisions of tax law being either repealed or amended by Congress. These cases include:

Representing an international transportation company in obtaining a permit to operate in Mexico as a multi-national where a favourable final decision was obtained.

Representing a gold trading company in litigation against a tax credit of approximately USD\$3,000,000,000 where a favourable final decision was obtained.

Representing companies within the food sector in litigation against tax credits or refusals to grant tax refunds because of the 0% VAT rate applicability for amounts ranging between US\$ 10,000 to US\$ 300,000,000.

Representing real estate funds in litigation over tax credits issued by tax authorities owing to international reorganizations.

Representing clients in litigation against credits caused by transfer pricing issues.

Representing a range of companies in litigation on tax refund claims.

Representing different companies in litigation on penalties.

Representing numerous companies in litigation against legislation issued by Congress which is considered to have been issued in violation to the Mexican Constitution.

Tax Controversy

Mr. Del Valle has successfully represented numerous companies in tax examinations before the tax authorities. This includes tax refund claims and controversies between tax authorities of different countries relating to the limitation of benefits, transfer pricing, exchange of information or applicability of Tax Treaties.

MEMBERSHIPS

Mr. Del Valle is President of the Board of Directors of Pueblo Hacia Arriba Foundation (Fundación Pueblo Hacia Arriba). He is Board Member of the American Chamber Mexico and President of the Fiscal Committee of this Organization. He is Member of the International Fiscal Association, the International Academy of Trust and Estate Law, the Ilustre y Nacional Colegio de Abogados, the Mexican Bar Association (Barra Mexicana, Colegio de Abogados), the College of Professors and Researchers of Tax Law and Public Finance (Colegio de Profesores e Investigadores de Derecho Fiscal y Finanzas Públicas), the National Association of Business Lawyers (Asociación Nacional de Abogados de Empresa), the STEP México (Society of Trust and Estate Practitioners), the National Legion of Honor of Mexico, President of the Board of Trustees of The Aspen Institute México, A.C., for the period 2019 - 2021, Board member of the International Tax Specialist Group "ITSG" and Member of the Young Presidents Organization "YPO".

CONTACT

☎ Call (52 55) 9126-1588

✉ Email lvalle@jaurequiydelvalle.com

☎ Fax (52 55) 5258 0348

🗣 Speaks Spanish English French

AWARDS

Mr. Del Valle has been ranked by Chambers & Partners Global and Latin America in Tax non-Contentious. Additionally, he is recognized by Legal500 as leading Individual Tax Lawyer, and by Best Lawyers and by IFLR1000 on Tax matters.

Mr. Del Valle received from the National Autonomous University of Mexico (UNAM) the Eduardo García Maynez and Gabino Barreda medals for obtaining the highest academic achievement in his class.

He has also been awarded with the first place in the National Prize of Administrative Justice organized by the Federal Tax Court. Mr. Del Valle was named the "Ernesto Flores Zavala" Professor of the Faculty of Law of the Mexican National Autonomous University in 2015 and 2021 respectively. In 2021 was awarded, a Doctor Honoris Causa degree by the Mexican Institute of Leaders of Excellence. He is currently Professor at the National Autonomous University of Mexico.



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RANKED IN
Chambers

Latin America
2021

A green laurel wreath with 15 leaves, one at the bottom center, framing the text.

Luis Gerardo Del Valle Torres

