SQUIRE PATTON BOGGS

James D. Gray

Partner

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About James

James Gray's practice focuses on general corporate taxation and international taxation. He has extensive experience advising clients on tax- free reorganizations and spin-offs, and is one of the firm's principal authorities on tax issues arising in cross-border and foreign acquisition, disposition and restructuring transactions including corporate inversion transactions.

James also has extensive experience advising clients on structuring and investing in private equity and joint venture arrangements and the structuring of captive insurance company relationships.

His recent experience includes serving as the principal US tax adviser in the organization of domestic and international private equity investment funds and advising funds and asset management groups in structuring domestic and foreign acquisitions. In addition, James serves as US tax adviser to two publicly held multinational corporations engaged in the manufacture and sale of consumer and industrial products. He also serves as US tax adviser to other publicly held multinational corporations operating in the IT solutions/business information services and energy sectors. In that capacity, he has advised these companies concerning various reorganization, spin-off, acquisition and disposition transactions.

James also has significant experience in bankruptcy tax matters. He has lectured to bar association and client groups on the tax issues arising in domestic and international corporate spin-off, reorganization and corporate inversion transactions. He also has served as panel chair for the Cleveland Tax Institute.

James is a member of the Cleveland International Tax Forum and the Cleveland Metropolitan Bar Association.

Experience

- Negotiating, on behalf of a public corporate client, a groundbreaking private letter ruling from the Internal Revenue Service (IRS), in which the IRS for the first time approved the tax-free spinoff of a recently purchased business, despite its previous standard of requiring a longer period of ownership following such a purchase.
- Advising a publicly held US-based multinational corporation in connection with the €700 million sale of its worldwide precious metals business to a Europe-based metals company.
- Advising a publicly held non-US-based multinational corporation with respect to the US$3 billion spin-off of one of its worldwide business segments.
- Counseling a large, non-US-based public company on its US$200 million acquisition of a US-based educational publishing company and purchase of a legal publisher in Mexico.
- Advising an asset management company on its US$110 million acquisition of the river transportation operations of a US-based insurance company.
- Advising a non-US-based company in its US$37 million acquisition of a vehicle inspection and testing company located in the United States.
- Advising a US-based investment management company in the formation of a US$50 million private equity fund focused on investments in franchises.
- Advising a non-US-based public company in its US$445 million acquisition of a business information service provider located in the United States.

Credentials

Education

- The Ohio State University, J.D., with honors, Order of the Coif, *Ohio State Law Journal*, 1991
- Kent State University, B.S., *magna cum laude*, 1989

Admissions

- Ohio, 1991

Recognitions

- Recognized in *The Best Lawyers in America* 2023 for Tax Law
- Listed in *Ohio Super Lawyers*, a distinction honoring the top lawyers in the state

Expertise

Services

- Tax Strategy & Benefits

About our firm

One of the world's strongest integrated law firms, providing insight at the point where law, business and government meet. We deliver commercially focused business solutions by combining our legal, lobbying and political capabilities and invaluable connections on the ground to a diverse mix of clients, from long-established leading corporations to emerging businesses, startup visionaries and sovereign nations. More than 1,500 lawyers in over 40 offices across four continents provide unrivaled access to expertise.