



## Annalie Mitchelson

### Partner

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### OVERVIEW

Annalie Mitchelson has over 20 years' tax and legal experience gained in government and large private practice with a national and international focus. Her experience includes acting in complex tax matters involving transfer pricing, anti-avoidance and R&D disputes, and the detailed collation, analysis and presentation of compelling evidence to drive a successful resolution of disputes.

Annalie assists Australian and multinational clients to develop tax risk management strategies and provides practical and strategic advice to manage risk reviews and audits, from the early stages through to litigation or settlement. Her clients span a broad range of sectors and industries, including agribusiness, energy, financial services, mining and resources, pharmaceuticals, retail, technology and telecommunications.

### PROFESSIONAL BACKGROUND

Prior to joining the firm, Annalie was a partner at a legal advisory firm for six years, following almost a decade at a multinational professional services network in tax controversy. She also brings experience from one of Australia's largest law firms and, earlier in her career, spent several years working with the Australian Government Solicitor, litigating on behalf of the Commissioner.

### EDUCATION

- Master of Taxation, University of Sydney, 2008
- Bachelor of Laws, University of Technology, Sydney, 2004 (*First Class Honours*)
- Bachelor of Business, University of Technology, Sydney, 2004

### ADMISSIONS

- High Court of Australia
- Supreme Court of New South Wales

## NEWS & EVENTS

- 5 August 2025, K&L Gates Bolsters Tax Practice With New Sydney Partner

## OTHER MEDIA MENTIONS

- Mentioned, "K&L Gates takes tax partner from Deloitte", *Lawyers Weekly*, 9 August 2025
- Mentioned, "Week in Insights: Vegas Tourism Dip Shows Tax-Free Tips' Risks", *Bloomberg Law (Excerpt)*, 9 August 2025
- Mentioned, "K&L Gates nabs Deloitte tax partner with transfer pricing dispute chops", *Lawyerly*, 6 August 2025
- Mentioned, "Legal salaries slammed", *Point Blank (Excerpt)*, 6 August 2025
- Mentioned, "Wake Up Call: DOJ, Big Law Alums Form Anti-Trump Nonprofit Firm (Excerpt)", *Bloomberg Law*, 5 August 2025
- Mentioned, "K&L Gates Bring Annalie Mitchelson to Tax Practice in Sydney", *Bloomberg Law*, 4 August 2025
- Mentioned, "Tax team boost for K&L Gates in Sydney", *Global Legal Insights*, 4 August 2025
- Mentioned, "K&L Gates Expands Sydney Tax Practice as HFW Australia Expands Global Shipping Team", *ALM/Law.com International*, 4 August 2025

## AREAS OF FOCUS

- Tax
- Tax Controversy and Litigation

## REPRESENTATIVE EXPERIENCE

- Advised a Japanese conglomerate in an international tax dispute regarding tax treaties and treatment of capital gains.
- Acted in court proceedings for a major agricultural producer in a dispute concerning the research and development tax incentive.
- Advised a large pharmaceutical company in a transfer pricing dispute with the ATO.
- Advised on an ongoing ATO audit of a global acquisition and restructure of a large global chemical group – issues included the tax anti-avoidance rules, tax residency, availability of tax losses, and capital gains tax.
- Advised a global mining group on an ATO audit examining issues arising from a global funding restructure, including Part IVA and transfer pricing.

- Acted for a US-headquartered multinational client responding to an ATO audit regarding the sale of a global business, issues included valuation, transfer pricing, anti-avoidance, and capital gains tax.
- Acted for a multinational telecommunications company in a transfer pricing dispute concerning the arm's length nature of significant intra-group financing arrangements.
- Acted for an Indian technology company in a tax dispute regarding transfer pricing and royalty withholding tax.
- Advised a not-for-profit client responding to a Royal Commission enquiry.