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About Us

Boughton Peterson Yang Anderson ("BPYA") is a Hong Kong law firm with an international practice. We provide a wide range of legal services to clients in Hong Kong, China and throughout the world.

Since April 1, 2011, BPYA has become the associated firm of **Zhong Lun Law Firm** ("Zhong Lun"), a leading full service law practice in the PRC. Zhong Lun has over 500 lawyers and has offices in Beijing, Shanghai, Shenzhen, Guangzhou, Wuhan, Chengdu, Tokyo, London and Hong Kong.

BPYA is also the exclusive Hong Kong member of **TerraLex**, a worldwide network of independent law firms.

When you approach us with your proposed transactions or legal issues, we realize that you have a lot at stake. To make the right decisions, you need good legal advice from lawyers who will listen.

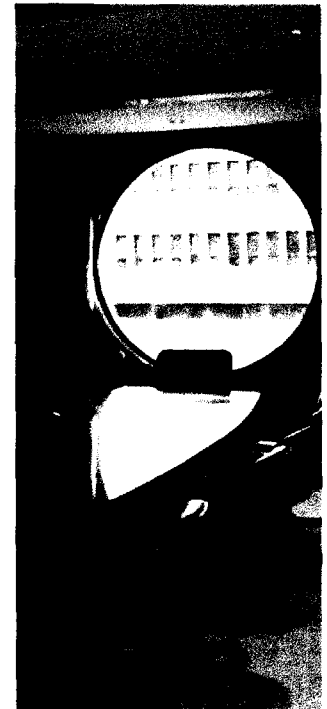
At BPYA, we are attentive to our clients' needs and take pride in providing you with comprehensive legal services.

About Terralex



In a global economy, our clients often need legal representation and assistance outside Hong Kong. Through TerraLex, BPYA has access to an international network of leading independent law firms comprised of over 150 member firms and 15,000 lawyers in nearly 100 countries to advise our clients.

TerraLex members are able to interact seamlessly to provide clients with both global reach and local expertise to meet challenges competently and efficiently regardless of location. This is the to ask any of our lawyers if you are interested in obtaining representation abroad.



Kenneth Lam

Christina Lau

Danny Lau

Howard Lau

Anita Lee

Jessica Leung

Ohad Levitt

Iris Poon

Sandy Shum

Winnie Tse

Wayne Wang

Sandy Wong

Joseph S. Wu



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Legal Professionals



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Practice Areas of Practice

Tax

Private Client

Lawyers

Profile

Mr. Peter Guang Chen

Certified Public Accountant licensed in the United States (in New York State and New Jersey State), and is admitted to practice before the United States Tax Court, and the United States District Courts of New York and New Jersey.

Mr. Chen graduated with a Bachelor of Science degree in Accounting & Economics from New York University and a Master of Business Administration degree in Taxation from New York University. He obtained his Juris Doctor (J.D.) degree from Fordham University and Master of Law in Taxation (LL.M. Taxation) from New York University. He has practiced taxation with major law, accounting and consulting firms in the United States and Hong Kong before joining BPYA in 2012.

Practice Areas

Mr. Chen's taxation, providing tax planning advice to multinational companies making cross border investments and transactions outbound from the United States into China, and vice versa, from China into the United States. Mr. Chen's practice also includes transfer pricing, regulatory and business issues, tax structuring of mergers and acquisitions, and sophisticated income tax and trust/estate tax planning for high net worth individuals in the United States and China.



Formerly Boughton Peterson Yang Anderson and Yam & Company
前名 寶德楊律師行及任蘭光律師行

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WHAT OTHERS SAY ABOUT US:

Best overall PRC Law Firm, 2015

(China Business Law)



On March 30, 2015, the firms Boughton Peterson Yang Anderson, Yam & Company and Zhong Lun Law Firm have combined to form Zhong Lun Law Firm, the Hong Kong office of China's leading business law firm. With over 1,300 lawyers in 12 offices across China and in the international financial centres of Tokyo, London and New York, we look forward to serving you even better through this integrated platform.

WHAT WE DO

We recognize that clients come to us with problems that are not divided by what lawyers call practice areas. That is why we work without artificial boundaries to make sure clients' needs are served by the best team available to address all of the issues. We set out below our experience by practice areas.

BY PRACTICES

ZHONG LUN LAW FIRM

Zhong Lun is China's leading business law firm with offices in 12 locations and over 1300 lawyers throughout major financial centers in China as well as Hong Kong, Tokyo, London and New York. [Click here](#) to find out more about Zhong Lun Law Firm.

TERRALEX

We are the exclusive Hong Kong member of [TerraLex](#), a global network of over 155 leading independent law firms with over 19,000 lawyers in 100 countries. Our professionals have access to a wide array of lawyers to support our clients wherever they need legal services.

Latest Newsletter

AUGUST, 2016

Newsletter

Zhong Lun shortlisted in 5 categories at the Macallan Asian Legal Business

MARCH, 2016

Newsletter

Zhong Lun Law Firm Acts for Taiwanese Businessman in Cross-Jurisdiction Parental Abduction Dispute

FEBRUARY, 2016

Newsletter

Zhong Lun Advised China Construction Bank on its USD 2.5 billion Syndicated Loan Transactions in Australia

JANUARY, 2016

Newsletter

First Court of Final Appeal case of Zhong Lun HK Office

JUNE, 2015

Newsletter

"Outstanding in Field: Private Wealth,
Tax & Trusts" in Spear's Asia Index

APRIL, 2015

Newsletter

Zhong Lun quoted in the news

FEBRUARY, 2015

Newsletter

Review and outlook of China's private
wealth planning market

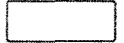
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WE PROVIDE *practical and
commercially oriented advice*



We recognize that clients come to us with problems that are not divided by what lawyers call practice areas. That is why we work without artificial boundaries to make sure clients' needs are served by the best team available to address all of the issues. We set out here our experience by practice areas.

WHAT WE DO

BY PRACTICES

- Capital Markets
- Construction and Engineering
- Corporate
- Employment
- Family
- Intellectual Property
- Litigation and Dispute Resolution
- Mergers and Acquisitions
- Private Client
- Real Estate
- Securities Regulatory and Enforcement
- Tax



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WHAT WE DO



TAX

BY PRACTICES

Capital Markets

Construction
and Engineering

Corporate

Employment

Family

Intellectual
Property

Litigation and
Dispute
Resolution

Mergers and
Acquisitions

Private Client

Real Estate

Securities
Regulatory and
Enforcement

Tax

We have an extensive practice in local and multi-jurisdictional tax. We specialize in Hong Kong, PRC, Canadian and U.S. tax advice and compliance. We also incorporate international tax advice when structuring our clients' transactions with support from our affiliates and consultants in other jurisdictions.

Our tax team services both individual and corporate clients. Whether a client is exploring the options of setting up a base in Asia Pacific or planning an investment into China, good tax advice is crucial to making the correct decisions. We tailor advice to our clients' specific circumstances in a rapidly evolving world of enhanced information exchange. We are experienced with Hong Kong transfer pricing issues, and with helping clients to design multijurisdictional corporate group structures to achieve tax efficiency in view of income tax treaties, impact of host country taxation laws, withholding tax, substance of operations, and other legal and fiscal issues.

We are well positioned to assist with such plans at an early stage, to help assess the most tax efficient structure for a particular client, and to then implement the plan whether in Hong Kong or elsewhere in the region.

Individuals emigrating from the Asia Pacific region to higher tax jurisdictions also require good tax advice. We have over 20 years of experience in migration tax planning.

We present below some representative matters handled by us:

Tax Planning and Advisory

Hong Kong

- advising the air crew union for an international airline on its members' Hong Kong salaries tax exposure on casual layovers and longer stays
- advising a major investment bank on Hong Kong tax matters regarding the share investment activities of a company owned by high net worth clients
- advising U.S. company engaged in frozen meat business on Hong Kong tax matters regarding its business activities in Hong Kong and PRC
- advising a financial data information company on any potential Hong Kong tax issues regarding its cooperation agreement with a PRC company

FOR FURTHER INFORMATION ON
THIS AREA, PLEASE CONTACT:

Kevin Lee

Clifford Ng

Peter Guang

Chen

- tax and transfer pricing planning advice to a cement company with global operations, including the Americas, Asia (PRC and other countries)
- supply chain tax planning and transfer pricing advice to multinational corporation in the pharmaceutical business with operations in PRC and various countries in Asia
- advising foreign trustees on PRC tax issues on trust formation, client intake and trust distributions to beneficiaries in PRC and elsewhere
- advising European based F&B group on tax efficient investment plan for PRC, Hong Kong and Taiwan including repatriation and transfer pricing policy

United States

- advising U.S. hardware manufacturer on regional tax issues in connection with its global restructuring
- advising U.S. retail store chain on tax efficient structures for the Asia Pacific region

Canada

- advising on all tax and structuring issues relevant to non-resident trusts with Canadian resident beneficiaries
- advising on departure trusts established by former residents of Canada
- advising on foreign asset reporting requirements for Canadian residents
- advising on issues relevant to termination of trusts with Canadian resident beneficiaries
- advising individual and corporate clients on tax efficient Canadian inbound investment structures including for the real estate, hospitality, resource and energy sectors
- advising Canadian enterprises on tax and transfer pricing on outbound projects into China and the Asia Pacific region
- advising clients on tax efficient planning prior to returning to reside in Canada

Other Jurisdictions

- advising the owner of an international school on tax consequences in the sale of its interest
- advice to the Ministry of Finance of a country in Southeast Asia, on international tax regulations and the audits of multinational corporation
- tax planning advice to a tile and stone manufacturer with factories in Southeast Asia, and with worldwide sales distribution network
- advising international direct selling group on its corporate tax and transfer pricing exposure in various jurisdictions and restructuring the corporate group to minimize exposure to withholding and other taxes

Tax Advocacy and Compliance in Hong Kong

- advising corporate clients on stamp duty relief for group reorganizations and make applications for stamp duty relief

- advising the Hong Kong subsidiary of a U.S. company on Hong Kong tax refund for excessive tax paid in previous years
- advising a capital fund on stamp duty compliance issues regarding stock borrowing and lending

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ALL LAWYERS IN THE TEAM COLLABORATE
CLOSELY WITH EACH OTHER, AND THE

the whole process is seamless



PARTNERS

CONSULTANTS

REGISTERED FOREIGN LAWYERS

ASSOCIATES

TRAINEES

WHO WE ARE

Zhong Lun is China's leading business law firm with offices in 12 locations and over 1300 lawyers throughout major financial centers in China as well as Hong Kong, Tokyo, London and New York. [Click here.](#)

PARTNERS

Mark Bedford Peter Guang Chen Frederick Hui Henry Lau Kevin Lee
Gilbert Leung Clifford Ng Victor Pang Louis Pe Dorothy Siron
Muriel Tsang Howard Wong Stephen Wong Allen Yam Norris Yang
Victor Yang Jane Yao

TOP

CONSULTANTS

Eliza Chan Dora Chow Basil Hwang Robert Jewkes Helen Kwan
Daisy Lam Anita Lee Ohad Levitt

TOP

REGISTERED FOREIGN LAWYERS

Han Bao Wayne Wang

TOP

ASSOCIATES

Shirley Chan Tracy Chan Charity Cheung Roy Chiang Eunice Chiu

Iris Choi Joyce Chung Kenneth Lam Christina Lau Danny Lau

Keith Lee Chloe Leung Jessica Leung Sonia Li Iris Poon

Phillis Tam Winnie Tse Sam Wu Benson Yee

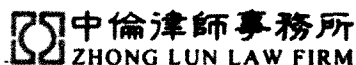
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TRAINEES

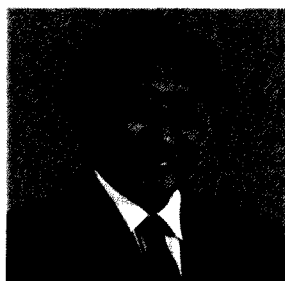
Bian Leung Henry Li Joyce Li Kate Wong Arthur Yan

Janice Yip

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BACK TO
OUR PEOPLE



PETER GUANG CHEN

PARTNER

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Profile

Peter Guang Chen is both a certified public accountant and an attorney with more than 20 years of experience in tax advisory and planning. He has advised China, Hong Kong and US and other multinational corporations and high net worth individuals on their inbound and outbound transactions, China and international tax issues, investment structuring, regulatory, and business issues; mergers, acquisitions; and the reorganizations of multinationals in China and the Asia Pacific region; structuring of trusts, foundations, estate planning and asset preservation for individuals. He has represented companies and individuals to resolve tax disputes with tax authorities in China and the US.

Recently, Peter has been engaged by the Ministry of Finance of a South Asian nation to draft the country's tax regulations and to provide consulting on international tax matters.

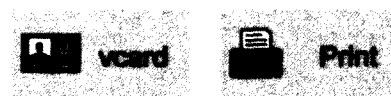
Previously, Peter was a with a major economic consulting firm and also was a tax partner at a Big 4 accounting firm, where he was responsible for the China Desk in New York, and served as China leader at the firm's International Centre of Excellence.

Recognitions

Peter is a recipient of the "Outstanding Professional Achievement Award" by the New Jersey China American Chamber of Commerce. He has also been ranked by the Chambers and Partners Global Guide as a foreign expert in the Corporate/M&A category.

Memberships and Pro Bono Services

- Vice Chair, Tax Committee, American Chamber of



PRACTICE AREAS

Corporate
Mergers and Acquisitions
Private Client
Tax

PROFESSIONAL QUALIFICATIONS

Solicitor
Hong Kong

Attorney at Law, New York and New
Jersey
United States

United States Tax Court (Admitted to
practice)

Notary Public, New York and New
Jersey
United States of America

Certified Public Accountant, New
York and New Jersey
United States

EDUCATION

LL.M. (Taxation)
New York University
United States

J.D. (Law)
Fordham University
New York, United States

M.B.A. (Taxation) Privacy Policy | Legal Notice
New York University
United States

Commerce in HK

- Member of Board of Directors, Executive Committee and Chairperson of the Audit Committee (appointed by the Governor of New Jersey) (2005-2014), New Jersey Cultural Trust
- Recipient of "Outstanding Professional Achievement Award", New Jersey China American Chamber of Commerce
- Chair (2007 to 2009), International Tax Committee of New York Society of Certified Public Accountants
- Member, American Bar Association
- Member, American Institute of Certified Public Accountant
- Member, International Fiscal Association

BS (Accounting & Economics)
New York University
United States

Presentations

(partial listing):

- 17 May 2016
China Tax Development
Speaker
Sullivan & Worcester 9th Annual Worldwide Tax Update
2016 (United States)
- 17 September 2015
Investing in the U.S. Real Estate Market: U.S. Tax
Considerations
Speaker - Joint Presentation with Wade R. Wagatsuma
American Chamber of Commerce (Hong Kong)
- 21 May 2015
US Tax Compliance and Planning Issues for Americans
and Others
Speaker - Joint Presentation with Zhong Lun Law Firm
American Chamber of Commerce (Hong Kong)
- 18 November 2014
The Foreign Account Tax Compliance Act (FATCA) -
Implications for Hong Kong
Speaker - A joint presentation with BPYA (Hong Kong)
- 22 October 2014
Taxation Issues in China
Speaker - Joint Presentation with Russell Brown, Lehman
Brown & Co.
CPAs (Hong Kong)
- 5 September 2014
U.S. Tax Planning, Income/Estate/Trust Pre-Immigration
Planning

Speaker - Client Seminar
Zhong Lun Law Firm (Guangzhou, China)

- 20 February 2014
Tax Disputes - Audits, Litigation & Resolutions
Speaker
ASEAN Tax Summit (Bangkok, Thailand)
- February 2014
Intellectual Property Tax Planning Issues
Speaker
3rd Annual Intellectual Property Conference (Shanghai, China)
- November 2013
Succession Planning for High Net Worth Client
Speaker - Joint Presentation with Clifford Ng, Kevin Lee, Dorothy Siron, Muriel Tsang, Zhong Lun Law Firm
Courses & Seminars (Hong Kong)
- November 2013
M&A Tax Issues
Speaker
China M&A Conference (Shanghai, China)
- May 2013
Tax Compliance, Transfer Pricing and Tax Planning Issues
Speaker
3rd Annual International Tax Seminar (United States)
- May 2013
Recent Tax Developments in Asia
Chair & Moderator
Annual Asia Tax Forum, Singapore
- April 2013
Issues of Tax Planning and Transfer Pricing Involving Intellectual Property
Speaker
Annual Intellectual Property Conference (Shanghai, China)
- November 2012
Foreign Exchange Issues and the Business Environment in Asia
Speaker
Fiduciary Future Conference (Nicosia, Cyprus)
- May 2012
Recent Tax Developments (Transfer Pricing Developments)
Speaker
TEI New England Chapter Conference & Tax Executive Institute (United States)
- May 2012
China Tax Developments
Chair & Moderator

Asian Tax Executives Forum (Singapore)

- April 2012
Transfer Pricing Developments in China
Speaker
GTS International Tax Conference (Shanghai, China)
- March 2012
Taxation and Planning for High Net Worth Individuals in the
U.S. and Other Countries - Use of Life Insurance Products
Speaker
HSBC (Shanghai, China)
- March 2012
China Tax Workshop - Transfer Pricing and Other
Developments
Presenter and Leader (London)
- December 2011
U.S. and China Taxation Issues
Chairperson
China Tax Directors Forum (Shanghai, China)
- October 2011
Transfer Pricing and Taxation Issues of Intangibles
Moderator
Transfer Pricing Summit (Hong Kong)
- August 2011
U.S. Taxation Issues of Investments by Chinese
Companies into the U.S.
Speaker
Golden Summit International Tax Conference (Shanghai,
China)
- May 2011
4th Annual International Tax Conference
Chair/Moderator
Tax Executives Institute (Singapore)
- May 2011
3rd Annual Global Tax Update
Speaker
Sullivan & Worcester (United States)
- April 2011
International Tax and China Tax Update
Speaker
International Fiscal Association (United States)
- December 2010
Outbound Investments of Chinese Companies: U.S. Tax &
Legal Aspects
Speaker
DeHeng (Beijing, China)
- November 2010

Chinese Companies Operating in the U.S.A.: U.S. and
China Taxation Issues
Moderator & Speaker
China Business Lawyers Association (New York, United
States)

- July 2010
BRIC Countries: Structuring Aspects - Structuring
Investments in China
Speaker
Practicing Law Institute (New York, United States)
- June 2010
China, U.S. and European Tax Considerations
Speaker
China Outbound Investments (DeHeng Corporate Client
Tax Seminar) (Beijing, China)

Publications (partial listing).

- "Outbound Investments from China: China and US Taxation
Issues and Planning", China Tax Intelligence (a CCH
publication), February 2010
- "Transfer Pricing - Challenges in Hong Kong, China, and
the United States", China Tax Intelligence (a CCH
publication), November 2010.
- "Mergers & Acquisitions in China—Regulatory & Taxation
Considerations" - China Tax Intelligence (a CCH
publication), March 2011 and April 2011
- "Financing Operations in China" – CRA Insights,
September 2011
- "Valuation of Equity Transfers in Chinese Companies" –
CRA Insights and China Tax Intelligence (a CCH
publication), September/October 2011
- "Taxation of the "International" American" – TerraLex
eNewsletter Publication, September 2013
- "Tax in China – Optimizing Intellectual Property
Transactions", a joint effort with other tax practitioners, Asia
IP, May/June 2014
- "The Global Testator - Legal and Practical Considerations
for Multi Jurisdiction Clients" - STEP Hong Kong Branch
Bulletin, December 2015
- "Wills, Probate and Private Client - an online research tool
and resource", Lexis Private Client Guide, joint contributor/

co-author of the tax content, January 2016

- "US Tax Implications of US Individuals with Investments Abroad and of Non-Residents with Assets in the US" , The Investment Advisor, 2016 □

Languages

English

Chinese (Cantonese)

Chinese (Mandarin)

Chinese (Shanghainese)

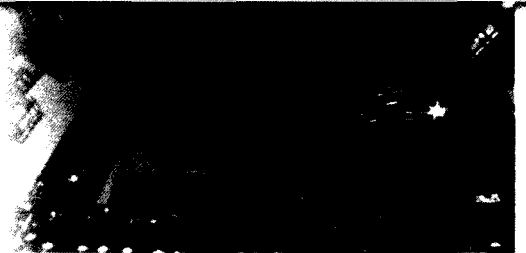
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*internal resources and
our external network*



WHERE WE ARE

ZHONG LUN LAW FIRM

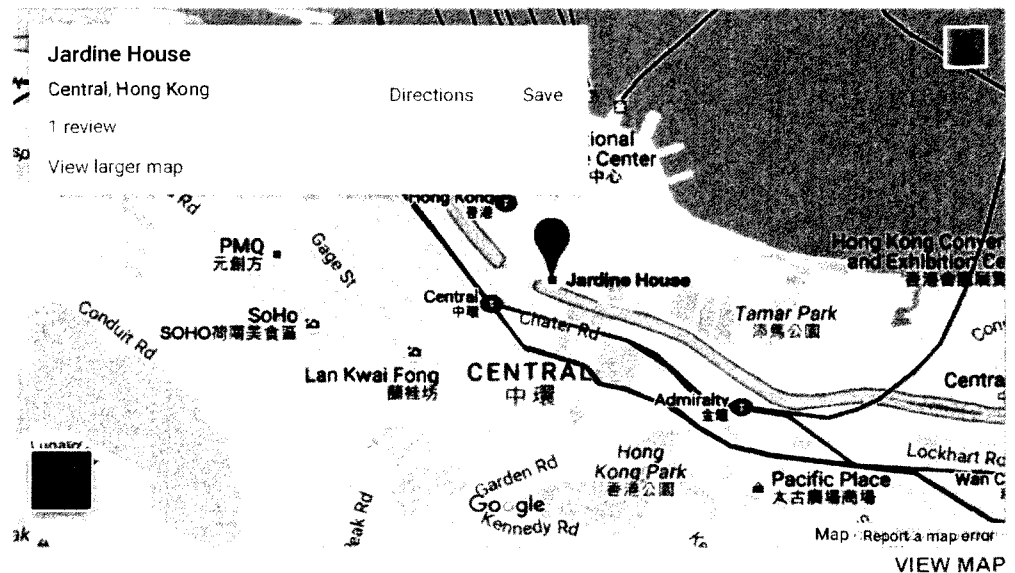
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Email lawyers@zhonglun.com



ZHONG LUN LAW FIRM

Leveraging our internal resources and our external networks, we work on inbound and outbound China-related matters involving counter-parties in scores of countries and territories around the world.

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VIEW MAP

San Francisco Office

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Proposal

Preparation of Illustrations & Examples for Interpretation of the Timor Leste Chapter IX (Taxes & Duties Act) Regulations And Taxation of Bayu-Undan Contractors Regulations, 2013

January 25th 2013



**Boughton Peterson
Yang Anderson**
Solicitors, Agents For Trademarks

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中倫律師事務所

ZHONG LUN LAW FIRM

Scope of Work

- Prepare illustrative examples to serve as interpretation and clarification of the Chapter IX (Taxes and Duties Act, 2008) Regulations, 2012 of Timor Leste (referred to as “TDA Regulations”) and the Taxation of Bayu-Undan Contractors Regulations, 2013 (“TBUCA Regulations”)
- The illustrative examples are to be prepared in English and presented in clear and easily understandable language and format, with the objective of allowing a reader / user of the TDA Regulations and TBUCA Regulations to understand the meaning Regulations, by the application of the concepts of the Regulations to common hypothetical facts

Scope of Work (continued)

- The number of illustrative examples prepared will depend on the context of the TDA Regulations and TBUCA Regulations, based on our review. For example, there may be sections for which no illustrations are required., such as Section 1 (Preamble & Purposive interpretation, etc) and Section 2 (Definitions Extend to Other Forms of Words). On the other hand, there are sections for which multiple examples for each section will be required, such as Section 16 (Depreciation), Section 16 (Amortization), and Sections 21, 22 (Transfer Pricing)
- The illustrative examples will use a numbering reference system which makes it easy to cross reference to the relevant TDA and TBUCA Regulations section number(s)

Timing of Work and Delivery

- Work will begin immediately upon entering of agreement
- The target date of delivery is March 31 2013

Fees

- The fee will be based on actual time incurred, based on an hourly billing rate of US\$700 / hour
- It is estimated that the total fee will be US\$295,000
- Payment terms:
 - 35% at commencement
 - 35% upon the submission of the draft
 - 30% upon the submission of the final documents

Proposal

**Preparation of Transfer Pricing Study Report on
“Capacity Reservation Charge” for purposes of a gas
Transportation agreement
January 10th 2013**



**Boughton Peterson
Yang Anderson**

Solicitors, Agents For Trademarks

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中倫律師事務所

ZHONG LUN LAW FIRM

Scope of Work

- Review and analysis and the preparation of a study / report on the agreement between the government of Timor-Leste and the pipeline owner(s), as to the reasonableness of the methodology on the calculation of the Capacity Reservation Charge (“CRC”), in the context of a gas transportation agreement
- The Timor Leste Ministry of Finance will be using the methodology examples which we provide to consider for the reasonableness of the CRC methodology currently being used and in the future, from a transfer pricing perspective of whether a particular methodology is reasonable in the given context

Timing of Work and Delivery

- Work will begin immediately
- The target date of delivery is 31st March 2013

Fees

- The fee will be based on actual time incurred, based on an hourly billing rate of US\$700 / hour
- It is estimated that the total fee will be US\$45,000
- Payment terms:
 - 50% upon signing of agreement
 - 50% upon delivery of work