

Admissions

- 2026 – Admitted as a Barrister
- 2019 – Admitted as a Solicitor of the Supreme Court of NSW

Qualifications & Education

- **2025, Master of Laws, University of Sydney:** High Distinction in every subject (average mark >90%); University of Sydney Foundation Prize for Australian International Taxation; 2026 George and Matilda Harris Scholarship Prize for the Master of Laws
- **2017, Juris Doctor, University of Sydney:** High Distinction average; Ashurst Prize for First Place in Australian Income Tax; Dean's List of Excellence in Academic Performance; George and Matilda Harris Award for Most Proficient Student in Second Year of Juris Doctor; LexisNexis Book Prize No. 6 for Most Proficient Student in Juris Doctor Year II; Wigram Allen Scholarship for academic merit, leadership, work experience and creativity
- **2008, Bachelor of Arts (Media & Communications) (Honours), University of Sydney:** First Class Honours; Scholarship with Distinction; 2007 Dean's List of Meritorious Students in Arts Faculty; 2007 Walter Reid Memorial Prize for Academic Excellence
- **2003, St Joseph's College, Hunter's Hill:** Dux of college, Premier's Award

Professional Experience

- 7 years as a Solicitor (2019-2022) and then Senior Associate (2022-2026) in the dispute resolution and tax practices of Mallesons (formerly King & Wood Mallesons).
- Highlights at Mallesons include: The Tax Institute – Emerging Tax Star of the Year 2022 (finalist); The Tax Institute – Committee member 2024 National Transfer Pricing Conference; 2026 paper on Australia's tax consolidation system "highly commended" by IFA.
- 2 years as a tax consultant at EY Sydney.
- Prior to his legal career, David spent 10 years as a business journalist and content marketer. Highlights include: Founder and Content Director at content marketing agency DB Communications; Founding Director and Communications Director at incorporated educational organization Think Twice (focus on educating South Sudanese teenagers in Australia); Founding Partner of NSW Hunter Valley's lifestyle magazine *Coalface Magazine*; Journalist and Online Editor at *AdNews Magazine*.

Areas of Expertise

- Administrative law
- Alternative Dispute Resolution
- Appellate
- Capital gains tax
- Commercial
- Contracts
- Corporate Tax
- Corporations
- GST
- Income Tax
- Insolvency
- Land Tax
- Payroll Tax
- Stamp duty
- Taxation & Revenue
- Trusts
- Class Actions

Selected Publications

David was author or co-author of the following articles:

- *Understanding intangibles in a cross-border MNE context* (2025) – The Tax Institute – The Tax Specialist
- *Finding the green: Draft ATO PCG sets out low-risk software payments* (2025) – Thomson Reuters Weekly Tax Bulletin, Issue 33
- *Putting royalties on the map: Oracle denied stay of domestic tax proceedings* (2024) – Thomson Reuters Weekly Tax Bulletin, Issue 45
- *Embedded royalties not just "the flavour of the month": Federal Court scrutinises PepsiCo's intangibles arrangements* (2024) – Thomson Reuters Weekly Tax Bulletin, Issue 4
- *Tangling with transfer pricing – practicality of TP disputes* (2023) – The Tax Institute – Tax Knowledge Exchange
- *Taxpayers face two-pronged franking credit denial* (2023) – CCH Australian Tax Week, Issue 48

Selected Matters as solicitor

- *Equity Financial Planners Pty Ltd v AMP Financial Planning Pty Ltd* [2023] FCA 741 - acted for AMP Financial Planning Pty Ltd in the class action, as well as a related dispute with an individual financial planner;
- *Commissioner of Taxation v Glencore Investment Pty Ltd* [2021] HCATrans 98 - acted for Glencore Investment Pty Ltd in the Commissioner of Taxation's application to the High Court of Australia for special leave to appeal from *Commissioner of Taxation v Glencore Investment Pty Ltd* (2020) 384 ALR 252;

- *Dental Corporation Pty Ltd v Moffet* [2021] HCATrans 16 - acted for Dental Corporation Pty Ltd in its application to the High Court of Australia for special leave to appeal from *Dental Corporation Pty Ltd v Moffet* [2020] FCAFC 118;
- Altium Limited on income tax and GST issues regarding the \$9 billion takeover by Renesas Electronics under scheme of arrangement;
- Altium Limited in its dispute with the ATO regarding complex cross-border issues involving IP migration, resulting in settlement;
- A major media conglomerate in relation to its dispute with the ATO regarding complex foreign branch issues and involving a disputed amount totalling around \$195 million, and successfully advising the client in relation to the ~\$70m mediated settlement of the dispute;
- Westpac in relation to the Australian tax consequences for the sale of its general insurance business to Allianz;
- A multinational mining conglomerate in relation to its transfer pricing disputes with various taxing authorities globally, including in relation to mutual agreement procedure between 2 competent authorities (MAP);
- Dexu as to the stamp duty consequences and available exemptions regarding a restructure of billions of dollars' worth of real property holdings;
- Brookfield on its \$2 billion Sydney CBD development above Wynyard Train Station;
- A global tech giant on direct and indirect tax treatment of a new cryptocurrency;
- A multinational tech and trading firm on the direct and indirect income tax consequences and the structuring of a complex cross-border IP migration;
- High net worth individuals in relation to disputes with the ATO, focusing on proper treatment of various loan arrangements;
- A major property developer in relation to its large-scale automation project of the compliance function for its entire corporate group, with a focus on legal and tax risks inherent in automation projects;
- The liquidator of a food manufacturing conglomerate in relation to liquidation of the corporate group, including successful mediation in relation to unfair preference claim;
- Major W&I insurers in relation various tax risks relating to corporate tax, tax treaties, source of income, capital gains tax, cross-border taxation, tax avoidance, withholding tax and related exemptions, capital and imputation benefits, dividend streaming and other corporate tax issues;
- Financial institutions in relation to securitization, taxation of trusts, withholding tax, tax consolidation and GST issues.
- Successfully achieving pre-litigation resolution or mediated settlement with the ATO in multiple transfer pricing and tax avoidance disputes (often involving disputed tax liabilities in the tens to hundreds of millions of dollars);

- Managing review teams for discovery and statutory notice response projects involving reviews of millions of documents.