

# Bettina Banoun

Partner

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Bettina Banoun has extensive experience in work related to tax law, litigation, company law and EEA law. Bettina is admitted to the Supreme Court and litigates regularly before Norwegian courts of justice. She also has experience in litigation before the EFTA Court and with complaints before the EFTA Surveillance Authority. Ms. Banoun has a PhD from the University of Oslo and wrote her thesis on "Tax avoidance", and she has legal training from Oxford University, University of Oslo and Harvard Law School. She is the author of several articles regarding tax law. She is ranked as one of Norway's most prominent tax law experts by Chambers and Partners, Legal 500 and in the Norwegian Financial Daily's annual lawyers survey, where she was awarded "Legal performance of the year" in 2019 for her work with the property tax case against the Municipality of Oslo.

*Practice head Bettina Banoun focuses on contentious tax mandates, acting for corporate clients as well as high-wealth individuals. Satisfied sources describe her as "extremely knowledgeable and competent, with a pleasant and likeable personality."*

**Chambers Europe, 2019**

## Industry expertise

Real Estate

Shipping and Offshore

Private Equity

## Areas of practice

Litigation and Dispute Resolution

Tax

Value added tax and excise duties

M&A and Corporate Law

## **Selected projects**

### **Wealth tax/trust**

Members of the Olsen family are beneficiaries of a trust registered in Liechtenstein (Ptarmigan Trust). The trust is i.e. the owner of the Timex Group. It has been disputed whether the Olsen family can be taxed in respect of the trust's income and wealth for the years 2001-2018. The case involved the use of the Norwegian wealth tax rules, the CFC rules and the EEA Agreement. Wiersholm has been legal counsel for the Fred. Olsen family in litigation against the State. Oslo District Court and Borgarting Appeal Court abolished the wealth tax. In spring 2018 the Supreme Court dismissed the appeal from the State. During the course of the trial, the parties settled other parts of the case in favour of the beneficiaries. In an advisory opinion, the EFTA court agreed that a trust is protected by the EEA-agreement and that the Norwegian CFC rules and wealth tax rules are discriminatory. The tax office accepted that the CFC rules could not be applied on the trust income, as the Ptarmigan trust is established and carries out activity within the EEA-area.

### **Work experience**

Partner, Wiersholm, 2004

Senior Associate , BA-HR, 2002

Fellow , University of Oslo , 1997

Associate , Associates in Telenor , 1996

### **Education**

Dr. juris (Phd), University of Oslo, 2003

Visiting Scholar, Harvard Law School, 1997

Cand. jur., University of Oslo, 1995

Magister Juris in European and Comparative Law, Oxford University, 1993

### **Membership**

Accountant for the Nobel Prize Committee, 2017

Board member, Vistin Pharma, 2018

Member of PhD evaluation boards ,

## **Awards**

Tax, Chambers Europe, Band 2, 2019

Tax, Legal 500, Leading individuals, 2019

Årets prestasjon, Finansavisen, Property tax case , 2019