



Charles Li
Associate Director, Tax & Private Client Services

BAcc (summa cum laude), Singapore Management University (2006)
Juris Doctor (magna cum laude), Singapore Management University (2013)
Associate Chartered Accountant, England & Wales (2010)
Advocate & Solicitor, Singapore (2014)
T: +65 6531 4134 F: +65 6535 4864 E: charles.li@drewnapier.com

ABOUT CHARLES

Charles is dual-qualified as a lawyer and accountant.

He advises on income tax, goods and services tax, property tax, stamp duties, withholding tax, casino tax, international tax and transfer pricing.

He also advises on exchange of information (EOI) matters and is familiar with mutual legal assistance (MLA) requests under the Mutual Assistance in Criminal Matters Act (MACMA).

Charles has broad experience in both the private and public sectors, and in law and accountancy. This enables him to understand and explain issues with legal, commercial and regulatory acumen.

He was formerly a Senior Legal Specialist in the Litigation Branch of the Inland Revenue Authority of Singapore (IRAS). He was also a Senior Tax Prosecutor dealing with major tax and money laundering offences.

Before commencing legal practice, Charles spent three years with a Big Four accounting firm in London where he specialized in auditing the processes and internal controls of banks and insurers. He earned his associate chartered accountancy (ACA) qualification and passed the certified information systems auditor (CISA) examination in England.

He returned to Singapore in 2010 to study law and worked for Drew & Napier LLC for about three years before joining the IRAS in 2015. He re-joined Drew & Napier LLC in 2019.

EXPERIENCE

Charles is a strong advocate.

He has experience in tax appeals, judicial review and prosecutions.

He has also negotiated many successful settlements on behalf of clients and the tax authority. In one case, he was instrumental in helping a client obtain a US\$90m property tax refund.

Such negotiations often require the drafting of persuasive submissions and representations to the authorities, which Charles is adept at.

Clients also look to him for assistance with internal reviews, and with their applications for advance rulings, adjudications, reliefs and remissions.

On the litigation front, Charles has been involved in several notable civil and criminal tax cases, including:

AXY and others v Comptroller of Income Tax [2018] SGCA 23; [2017] SGHC 42

- A landmark case on the exchange of information (EOI) regime.
- Charles was one of the four counsels who successfully acted for the tax authority before the Court of Appeal and the High Court.

BRE v Comptroller of Income Tax [2018] SGHC 77; GBX v Comptroller of Income Tax [2017] SGITBR 4

- The first reported case in Singapore on the taxation of illegal income.
- Charles successfully acted as lead counsel for the tax authority before the High Court and the Income Tax Board of Review.

Comptroller of Income Tax v AQQ [2014] SGCA 15

- The landmark case on the general anti-avoidance provision under section 33 of the Income Tax Act.

- Charles was involved in preparing the written submissions for the taxpayer before the Court of Appeal.

GBT v Comptroller of Income Tax [2017] SGITBR 2

- The main issue in this case was whether a commission agent was entitled to claim a deduction equal to his entire commission income, such that his net commission income was nil.
- The alternative issue was whether the general anti-avoidance provision under section 33 of the Act could be invoked.
- Charles successfully acted as assisting counsel for the tax authority. He led the cross-examination of a key witness.

GBU v Comptroller of Income Tax [2017] SGITBR 3

- The first reported case in Singapore concerning the taxation of gains on the sale of shares by a company under section 10(1)(g) of the Income Tax Act.
- Charles was assisting counsel for the tax authority.

Public Prosecutor v Karunanithi Saravanan and four others

- The first case in Singapore where the IRAS exercised its arrest and forfeiture powers.
- The matter involved fraudulent claims under the Tourist Refund Scheme. More than 1,300 charges of goods and services tax (GST) and money laundering offences were tendered against the five accused persons.
- Charles was the lead tax prosecutor for this case, which was jointly prosecuted with the Attorney-General's Chambers.

Zhao Hui Fang and others v Commissioner of Stamp Duties [2018] SGHC 105

- A landmark case on charitable purpose trusts, life interests and additional buyer's stamp duty (ABSD).
- Charles was co-counsel for the tax authority and successfully argued the issue on life interests before the High Court.

MEMBERSHIPS

- Member, Law Society of Singapore
- Member, Singapore Academy of Law
- Member, Institute of Chartered Accountants in England and Wales