



Jaehong LEE

Attorney

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Profile

Education

Harvard Law School (LL.M., 2019)
School of Law, Seoul National University (Completed Coursework, LL.M., 2015)
Judicial Research and Training Institute of the Supreme Court of Korea (2012)
Seoul National University (B.S., Business Administration, 2004)

Qualifications

Admitted to bar, Korea, 2012
Certified Internal Auditor, USA, 2006
Certified Public Accountant, Korea, 2003

Languages

Korean and English

Areas of Expertise

M&A Tax
VAT & Indirect Tax
Outbound Investment and Transactions Tax
Inheritance and Gift Tax & Corporate Governance
Tax Audit & Tax Dispute Resolution
Tax Litigation
Technology, Media & Telecommunications
Antitrust & Competition Tax

Jaehong Lee is an attorney/CPA in Kim & Chang's Tax Audit & Tax Dispute Resolution Practice, Technology, Media & Telecommunications Practice, and Antitrust & Competition Practice. He also regularly advises clients on digital economy-related tax matters.

Mr. Lee has extensive experience in international tax cases involving foreign corporations and individuals and has also been involved in cases related to the OECD-led Base Erosion and Profit Shifting (BEPS) Action Plan. Drawing on his vast experience in VAT and related tax criminal cases, Mr. Lee also provides tax advisory services to clients across various industries facing VAT-related problems. He was the core member of a team which acquired the milestone en banc Supreme Court decision which ruled that redeemed customer royalty program points should be deducted from the VAT base.

Prior to joining Kim & Chang in 2012, Mr. Lee worked as a certified public accountant at the Seoul office of PricewaterhouseCoopers and served as an accounting officer at the Korean Army. He also served as a member of the Research & Analysis Support Bureau of the National Assembly Research Service from 2014 to 2016.

Mr. Lee received his LL.M. from Harvard Law School in 2019. After studying at Harvard, Mr. Lee joined Caplin & Drysdale, Chartered in Washington D.C. as a Visiting Attorney and practiced various cases involving US aspects of international tax including matters involving global intangible low-taxed income (GILTI), base erosion anti-abuse tax (BEAT) and other novel regimes under the Tax Cuts and Jobs Act (TCJA). Mr. Lee completed his master's course with a focus on taxation at Seoul National University in 2015. He also completed his study of law at the Judicial Research and Training Institute of the Supreme Court of Korea in 2012 and received his B.S. from Seoul National University in 2004.

Experience

- Visiting Researcher, Georgetown Law Center (2020)
- Caplin & Drysdale, Chartered, Washington D.C. (2019-2020)
- Member, Research & Analysis Support Bureau, National Assembly Research Service (2014-2016)
- Kim & Chang (2012-Present)
- Accounting Officer, Republic of Korea Army (2005-2008)
- Samil PwC (2003-2004, 2008)

Representative Matters

- Successfully represented a major Korean retail company in seeking a refund of VAT on the redemption of customer royalty program points (en banc decision from the Korean Supreme Court).
- Successfully represented a major tobacco company in canceling VAT and excise tax on transactions involving export of special tobaccos.
- Successfully represented a client in a milestone Investor-State-Dispute (ISD) arbitration case involving the beneficial ownership issue of foreign fund's investment in a Korean company.
- Advised on numerous tax audit cases against companies in various industries including ICT, auto and consumer goods.
- Advised on cases involving VAT invoice non-compliance.
- Advised on cases involving beneficial ownership issue in connection with capital gains and dividends derived by MNEs and private equity funds.
- Advised on cases involving the permanent establishment issue in connection with digital economy business such as cloud computing, online marketplace and social network.

Representative Activities

Awards

- Rising Star, Legal Times: Tax (Legal Times, 2021-2022)
- Leading Lawyers, Legal Times: Tax (Legal Times, 2021-2022)

Publications/Activities

- Digital Assets and Accounting, BFL Vol.116 (Co-author, Center for Financial Law, 2022)
- The Corporate Tax Planning Law Review (Edition 4): Korea Chapter (Co-author, Law Business Research, 2022)
- CFCs and the Individual Shareholder, Tax Notes International/Tax Notes Federal (Co-author, Tax Notes, 2020)