

Morag Ofili

Barrister - Partner

Tax



Morag is a Barrister and Partner in the Tax team, specialising in litigation and the settlement of disputes.

She is experienced in helping clients find bespoke legal solutions to the most complex tax problems, and acts for clients from all over the world – including household names in sport, film and TV; international families; and other prominent individuals.

Prior to entering private practice, Morag spent time at the independent Bar, the Big Four and in-house at an investment management firm. Her deep understanding of tax and litigation procedure, coupled with her extensive experience in advising on the lawfulness of HMRC's decisions ensures that she is able to develop strategic solutions that both assist and protect clients.

Morag offers a wide range of private client litigation and contentious tax services ranging from tribunal litigation and complex tax investigations, to cases of suspected fraud, settlement of marketed tax avoidance schemes, conduct/fairness proceedings against HMRC, and claims where incorrect tax advice has been given.

She is known for her inter-disciplinary approach to tax, which often includes working with other experts and specialists, leveraging insights from different areas of law – securing good outcomes for clients both in and out of the courtroom.

In addition to contentious work, Morag is also able to advise clients on their business interests and any possible tax risks when structuring their affairs around the world and regularly advises on the tax consequences of living or working abroad, the purchase and movement of luxury assets, and the tax implications of divorce for international couples.

Experience

Advisory

- Advising Premier League footballers on agent fees, image rights and HMRC enquiries.
- Advising musicians on the tax consequences of the sale of their back catalogue.
- Tax risk advisory for trust companies and family offices.
- Tax advice for digital nomads, influencers, actors and entrepreneurs.

Disputes

- Acting for investment banker in Tribunal appeal regarding his residency status and the correct tax treatment of payments made into an EBT.
- Acting for trustees during the course of an HMRC enquiry into the settlor and beneficiaries in relation to distributions from the trust.
- Advising on alleged mini umbrella company fraud.
- Acting on claims against accountants/lawyers for the provision of incorrect tax advice.

- Advising clients on how best to settle their involvement in mass marketed tax avoidance schemes. This may also include consideration of a potential claim against advisers or promoters.
- Bringing claims against HMRC in respect of their conduct.
- Advising on tax dispute strategy – scoping legal issues, identifying approach to evidence, gathering, organising and safeguarding all relevant documents and records.

Expertise

- [Tax: Overview](#)
- [Tax Advisory Services – Individual](#)
- [Tax Investigations and Voluntary Disclosures to HMRC](#)

- [Taxation of Non Domiciled individuals](#)
- Professional Negligence
- Tax Litigation
- Judicial Review

Credentials

- [Named in the Citywealth Top 50 Tax Professionals List 2024](#)
- [Recommended in the Citywealth Leaders List](#)
- [Ranked as Up and Coming for Tax: Private Client in Chambers High Net Worth 2024](#)
- [Recommended in Legal 500 2024](#)
- Named in eprivateclient NextGen Leaders List 2024
- [Listed in Spear's 500 2024 as Top Recommended](#)
- Named in eprivateclient 35 under 35 2020
- Shortlisted for the Rising Star Award at the 'We Are The City' Awards 2021
- Shortlisted for the Rising Star Award at the Taxation Awards 2020

Contact

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