



Press Release from the Taipei Branch, Administrative Enforcement Agency, Ministry of Justice

Release Date: July 18, 2025

Issuing Unit: Enforcement Unit

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Taipei Branch of the AEA Enforces Tax Claims — Successfully Recovers Over NT\$30 Million in Tax Arrears from Responsible Person of TCM Group

The Taipei Branch of the Administrative Enforcement Agency (AEA), Ministry of Justice, recently succeeded in recovering a substantial sum of monetary debt under Public Law. The obligor, Mr. Li, who acted as the actual person in charge of a group of traditional Chinese medicine (TCM) clinics, was suspected of a large amount of individual income tax evasion. Through the AEA's rigorous enforcement actions, partial recovery of the outstanding tax was achieved, demonstrating the government's resolution in upholding public authority.

Mr. Li was reported for allegedly underreporting Income from Professional Practice for Year 2013 and 2014. Following an investigation, it was discovered that although the clinics were nominally registered under various employed physicians, they were not involved in actual operations, which were entirely managed and controlled by Mr. Li. He admitted to the accusations and agreed to pay the overdue taxes. Accordingly, the National Taxation Bureau of Taipei assessed Mr. Li's comprehensive income tax liability at over NT\$64.3 million for 2013 and NT\$66.95 million for 2014, totaling more than NT\$131.25 million. As Mr. Li filed a recheck for administrative reconsideration in accordance with the Tax

Collection Act upon receiving the assessment notice and payment demand, the case was temporarily withheld from enforcement proceedings.

However, The National Taxation Bureau of Taipei discovered that despite the reported large cumulative losses of Mr. Li's various companies, several of them held substantial bank deposits and showed abnormal increases in real estate holdings—strong indications of income concealment and tax evasion. To secure the state's claims, the Bureau successfully petitioned the Taipei High Administrative Court in 2022 for a provisional attachment order. In accordance with The Administrative Execution Act, taking the order as writ of execution, the case involving the NT\$131.25 million in tax arrears was formally transferred to the Taipei Branch for enforcement on April 7 and July 19 of the same year.

Upon receiving the case, the Taipei Branch immediately launched a comprehensive investigation. Although the referring authority had previously requested that the land office register a restriction on disposal for all real estate Mr. Li owned in Taipei City, the Taipei Branch discovered that these properties were secured mortgage with a maximum amount claim of NT\$108 million by the bank. This meant that even if the properties were auctioned off, the proceeds—after settling prior-ranking claims—would likely be insufficient to satisfy the full amount of tax owed, thereby significantly increasing the difficulty of enforcement. Undeterred by these obstacles, the Taipei Branch proceeded to conduct a deeper asset investigation into Mr. Li and found that he owned numerous other assets and income—for example, annual interest income from bank deposits alone exceeded NT\$4 million—indicating his substantial financial ability.

To effectively recover the outstanding taxes, the Taipei Branch implemented a series of stringent compulsory enforcement measures. These included the immediate seizure of Mr. Li's bank deposits, and the attachment of all investments, including shares, stocks, dividends, capital contributions, and profit distributions. In addition, the Branch swiftly requested the Land Affairs Office and Taipei City Motor Vehicles Office to register attachments on Mr. Li's real estate and vehicles, and personally visited the sites to enforce real estate seizures, thereby ensuring that all executable assets were fully identified and secured. These coordinated and forceful enforcement actions effectively prevented the obligor from concealing or disposing of his assets.

By the Taipei Branch's active and thorough enforcement, the case made significant progress. Following the administrative reconsideration process, the referring authority revised the tax liability for the 2013 fiscal year, reducing the amount to over NT\$36.51 million. Subsequently, due to the enforcement pressure, Mr. Li voluntarily paid off all outstanding taxes for 2013 in a lump sum exceeding NT\$30 million in April 2025. This clearly demonstrates the effectiveness of the Taipei Branch's enforcement measures. From now, Mr. Li's request for reconsideration of the 2014 tax liability remains pending.

Since the referring authority had already registered restrictions on the disposal of Mr. Li's real estate and the Taipei Branch has now successfully recovered the 2013 tax arrears, the secured real estate is deemed sufficient to safeguard the remaining tax claims. As such, the referring authority has requested the Taipei Branch to partially revoke the orders of enforcement to maintain enforcement on the remaining amounts.

The Taipei Branch reminds the public not to ignore any enforcement notifications. For delinquent public law monetary debts, individuals should face their obligations honestly and proactively resolve them. Engaging in asset concealment or disposal will not only expose them to petitions for arrest and detention—resulting in the loss of personal freedom—but will also fail to absolve them of their monetary obligations under Public Law. To ensure recovery of state claims and uphold social justice and equity.