

Charles Usen

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SUMMARY

Experienced Tax Counsel with 10+ years of legal and tax expertise, including 5+ years specializing in tax planning, compliance, and risk mitigation for corporate transactions. Licensed attorney (J.D.) with an LL.M. in Corporate & Trade Law as well as a Postgraduate Diploma in Taxation, combining deep knowledge of IRS regulations, FAR/DFAR, and international tax frameworks (OECD, BEPS) with practical business acumen. Proven ability to develop tax-efficient structures, analyze legislative changes (e.g., TCJA), and advise on mergers, acquisitions, and global value chains. Skilled in project management, leading cross-functional teams to align tax strategy with organizational objectives. Collaborative leader who shares knowledge, mentors colleagues, and builds scalable compliance processes to strengthen team capabilities. Adept at translating complex tax laws into actionable insights while mitigating risks and optimizing financial outcomes.

WORK EXPERIENCE

Getcorp Payroll Accounting and Tax

Texas, USA

Tax Counsel

Jul 2023 - Present

- **Tax-Aligned Contract Structuring:** Draft and negotiate sales contracts, NDAs, and service agreements with tax-efficient terms, ensuring compliance with IRS regulations and state/local tax laws.
- **Tax Risk Assessment:** Identify and mitigate tax exposure in contractual terms, including liability clauses, indemnification, and cross-border transactions.
- **Regulatory Compliance:** Monitor changes in tax codes (e.g., TCJA, OECD guidelines) and update contract templates to reflect new reporting requirements.
- **Stakeholder Collaboration:** Advise executive teams on tax implications of business deals, mergers, and partnership agreements.
- **Process Improvement:** Implement a centralized tax clause database to streamline compliance and reduce audit risks.

Hoop Telecoms Limited

Tax and Regulatory Compliance

Jan 2021 - Jun 2023

- **Tax Compliance Oversight:** Ensured contracts adhered to Nigerian tax laws (CITA, VAT, WHT) and international tax treaties, minimizing penalties.
- **Transactional Tax Analysis:** Reviewed business operations, investments, and supply chain agreements for tax optimization opportunities.
- **Regulatory Reporting:** Coordinated with finance teams to ensure accurate tax filings and transfer pricing documentation.
- **Dispute Resolution:** Assisted in tax audit defenses and mediated disputes with regulatory authorities.

Curtis Legal Practitioners & Solicitors

Associate, Commercial and Regulatory Practice

Dec 2015 - Dec 2020

- **Tax Advisory in M&A:** Conducted tax due diligence for acquisitions, identifying risks in carryforward losses, asset valuations, and deferred tax liabilities.
- **Legislative Monitoring:** Analyzed new tax policies (e.g., BEPS, Digital Tax) and advised clients on restructuring strategies.
- **Contractual Tax Safeguards:** Drafted clauses addressing permanent establishment risks, withholding tax obligations, and VAT applicability in cross-border deals.

EDUCATION

University of Illinois, Urbana-Champaign, Illinois College of Law
Master of Laws (LL.M.), Corporate, Commercial Law & Trade

Illinois, USA
May 2023

Nigerian Law School
Post-Graduate Diploma in Legal Practice, Legal Practice

Abuja, Nigeria
Dec 2015

University of Uyo
Bachelor of Laws (LL.B./J.D.), Law

Akwa Ibom State, Nigeria
Oct 2014

CERTIFICATIONS

Postgraduate Diploma in Taxation, ACTI
Postgraduate Diploma in Corporate Compliance and Governance, ACIS
Nigerian Call to Bar Certificate

SKILLS

Tax Planning & Risk Management • Mergers & Acquisitions (Tax Structuring) • Transfer Pricing • IRS/FAR/DFAR
Compliance • OECD Guidelines • BEPS Action Plan • NDA/MSA Negotiation • Dispute Resolution • Regulatory
Reporting • GovWin | Deltek | LexisNexis