IN THE GENERAL DIVISION OF
THE HIGH COURT OF THE REPUBLIC OF SINGAPORE

[2026] SGHC 46

Admission of Lawyer (Non-practitioner) No 138 of 2025

In the matter of section 11A of the Legal Profession Act 1966

And

In the matter of Rule 25 of the Legal Profession (Admission) Rules 2024

And

In the matter of Zenn Tan Jia Wei

Zenn Tan Jia Wei

… *Applicant*

Admission of Lawyer (Non-practitioner) No 172 of 2025

In the matter of section 11A of the Legal Profession Act 1966

And

In the matter of Rule 25 of the Legal Profession (Admission) Rules 2024

And

In the matter of Evangeline Koh Yi

Evangeline Koh Yi

… *Applicant*

Admission of Lawyer (Non-practitioner) No 360 of 2025

In the matter of section 11A of the Legal Profession Act 1966

And

In the matter of Rule 25 of the Legal Profession (Admission) Rules 2024

And

In the matter of Zhang Yichao, David

Zhang Yichao, David

… *Applicant*

JUDGMENT

[Legal Profession — Admission — Lawyer (Non-practitioner)]

TABLE OF CONTENTS

Re Tan Jia Wei Zenn and other matters

[2026] SGHC 46

General Division of the High Court — Admission of Lawyer (Non-practitioner) Nos 138, 172 and 360 of 2025
Hoo Sheau Peng J
20 November 2025

3 March 2026 Judgment reserved.

Hoo Sheau Peng J:

Introduction

1 HC/LNP 138/2025 ("LNP 138"), HC/LNP 172/2025 ("LNP 172"), and HC/LNP 360/2025 ("LNP 360") (collectively "Applications") are brought by Ms Zenn Tan Jia Wei ("Ms Tan"), Ms Evangeline Koh Yi ("Ms Koh"), and Mr Zhang Yichao, David ("Mr Zhang") respectively to be admitted as a Lawyer (Non-practitioner) ("LNP") of the Supreme Court of Singapore pursuant to s 11A of the Legal Profession Act 1966 (2020 Rev Ed) ("LPA") and r 25 of the Legal Profession (Admission) Rules 2024 ("LPA Rules").

2 The Applications represent the first few LNP admission cases to which objections have been raised on the ground that each applicant is not presently suitable for admission in terms of his or her character. While the facts of each of the Applications are distinct, as highlighted by the stakeholders, the Attorney-

General ("AG"), the Singapore Institute of Legal Education ("SILE") and the Law Society of Singapore ("Law Society"), the Applications raise two important common issues.

3 First, what the court's approach should be in LNP cases, especially contested ones. Second, as each stakeholder put it – the date from which any "exclusionary period", "preclusion period" or "deferment period" should commence. While the stakeholders have used different terms, as I explain in greater detail below at [10], these expressions are, in substance, similar. They fundamentally refer to a specified period that the court may impose upon the dismissal or the withdrawal of an admission application at hand, during which an applicant should not file a fresh application for admission. Should the court be inclined to grant an adjournment of the admission application at hand, these interchangeable terms refer to the period of adjournment. For the purposes of this judgment, and to ensure consistency, I will refer to such a period as an "exclusionary period".

4 I will address the common issues that arise, before turning to each of the three Applications.

The new admissions framework

5 Prior to the Legal Profession (Amendment) Act 2023, admission as an Advocate and Solicitor ("AAS") involved a single application following a qualified person's completion of their Part B examinations and a six-month-long Practice Training Period ("PTP") ("previous admissions framework").[1]

[1] Attorney-General's Submissions for HC/LNP 138/2025 (Zenn Tan Jia Wei) dated 6 November 2025 ("ZTAGWS") at [24].

6 The Legal Profession (Amendment) Act 2023 introduced a two-stage process ("new admissions framework"). Under this framework, an applicant seeking admission as an AAS must first be admitted as an LNP. Significantly, LNP applicants may serve the 12-month-long PTP while concurrently applying for admission as an LNP. Completion of the PTP is a prerequisite for admission as an AAS, but *not* for admission as an LNP.[2]

The applicable principles for admissions as LNPs

7 In light of the new admissions framework, how should the courts approach applications for admissions as LNPs? When an applicant is said to be unfit for admission, what principles should the court apply in such assessments?

8 In my judgment, the applicable principles for AAS admission cases should continue to apply to LNP admission applications. The approach is justified for these reasons. First, both LNPs and AAS are officers of the court under s 82(1)(*a*) of the LPA. Second, both categories of applicants must satisfy the statutory requirement of having good character under ss 11B(1)(*b*) and 13(*b*) of the LPA respectively. As Sundaresh Menon CJ emphasised, LNPs have a special duty to play in the administration of justice. And in discharging this special role, LNPs owe an "overriding duty to the court, to the standards of [the] profession and to the public" (Sundaresh Menon, Chief Justice, "The Centrality of Trust in the Legal Profession", speech at the Mass Admission Ceremony 2025 (21 April 2025) ("Menon CJ's Speech")). Consequently, any missteps by legal professionals, including LNPs, may undermine public trust and confidence in both the legal profession and the justice system as a whole (Menon CJ's Speech at [21]).

---

2 ZTAGWS at [26].

9 Given the similar statutory requirements and the important role both LNPs and AAS serve in the legal system, the approach to LNP admission applications should mirror that previously adopted for AAS applications. Accordingly, the central inquiry in LNP applications, where competence and qualifications are not in question, should be whether the applicant possesses suitable character for admission ("Character Principle") (see *Re Ariffin Iskandar Sha bin Ali Akbar* [2025] 4 SLR 887 ("*Re Ariffin*") at [22]). Another principle operates where, despite there being no evidence suggesting that an LNP applicant continues to face unresolved character issues at the time of application, the court, having regard to the nature of the applicant's misconduct, determines that his/her admission as an LNP would risk undermining public trust and confidence in the legal profession and administration of justice (*Re Ariffin* at [24] citing *Re Mohamad Shafee Khamis* [2024] 6 SLR 173 ("*Re Shafee*") at [63(b)] and [120]) ("Protective Principle"). When dealing with the Applications, I shall return to set out more details of the Character Principle and the Protective Principle.

10 Where the court, having regard to the Character Principle and/or the Protective Principle, determines that an applicant is unsuitable for LNP admission, the next issue that arises is the imposition of an exclusionary period. At this juncture, it is apposite to address the nature of exclusionary periods and to clarify the different terms used to describe them (see [3] above). Where the court determines that an applicant is not yet suitable for admission, the court may give effect to an exclusionary period through, amongst others, the following means:

(a) Adjourning the matter. This approach may be appropriate where the court finds that a "relatively short period of deferment" is needed. This would "typically be the cases where the exclusionary period is less

than six months" (*Re Ariffin* at [20(a)]; *Re Gabriel Silas Tang Rafferty* [2024] 4 SLR 401 ("*Re Gabriel*") at [50]).

(b) Permitting withdrawal of the admission application. This approach may be appropriate where a longer period is needed. The court may permit the withdrawal of the application and "defer the filing of any such future application for a specified period" (*Re Ariffin* at [1]; *Re Gabriel* at [50]).

(c) Dismissal of the admission application. This approach may be appropriate where withdrawal of the application is not a suitable means of effecting an exclusionary period. For example, where the court is not satisfied that the applicant can be said to have begun to truly appreciate the ethical consequences of his/her misconduct and the need for reform, let alone embarked on even the first steps of the journey towards rehabilitation, it will be appropriate to dismiss the application (*Re Ariffin* at [2]; *Re Gabriel* at [51]).

The type of order used to give effect to an exclusionary period is a matter of principle, as the signalling effect of each of these orders is different (*Re Ariffin* at [15]). As I noted at [3] above, the stakeholders in these proceedings have used different terms to refer to such a period.

11 I turn now to the aim of imposing an exclusionary period. The well-established position is that the predominant aim of imposing such periods is to "facilitate rehabilitation by affording applicants the opportunity to defer their admission, reflect on their prior misconduct and address their character issues" (*Re Pulara Devminie Somachandra* [2025] 4 SLR 950 ("*Re Pulara*") at [61]). Importantly, the imposition of an exclusionary period is "not meant to punish

applicants for their earlier mistakes", even if such an order may be felt or perceived to have a punitive effect (*Re Pulara* at [61]).

The commencement date for an exclusionary period for admission as LNP

12 Under the previous admissions framework, exclusionary periods imposed by the court generally commenced from the date of the hearing when the court deemed an applicant unfit for admission as an AAS. Specifically, the exclusionary period would run from the date of the court's order granting the applicant permission to withdraw the application or dismissing the application (see *Re Ariffin* at [5]; *Re Shafee* at [9]; *Re Suria Shaik Aziz* [2023] 5 SLR 1272 ("*Re Suria*") at [1]). The practical effect of this approach was straightforward – the applicant's admission would be delayed by at least the duration of the exclusionary period imposed by the court.[3] For completeness, where the court ordered an adjournment of an application, the period of the adjournment imposed would typically commence from the date that the admission hearing was *originally* fixed (see *Re Tay Jie Qi* [2023] 4 SLR 1258 ("*Re Tay Jie Qi*") at [19]).

13 The issue that arises in the present cases concerns when an exclusionary period should start to run for an applicant seeking to be admitted as an LNP under the new admissions framework. Specifically, should the court adopt the same approach applied under the previous admissions framework (see [12] above)? If this approach is applied *ie*, an exclusionary period commencing from the date of the court order granting the applicant permission to withdraw his/her LNP application, or the date that the LNP application is dismissed, the LNP admission would be delayed by at least the duration of the exclusionary period

[3] See also ZTAGWS at [25].

imposed. However, this approach raises certain issues. Given that an applicant may serve the 12-month-long PTP while concurrently applying for admission as an LNP, a relatively short exclusionary period (ranging from a few months to one year) could be completed during, or shortly after, the completion of the PTP. The overlap between the PTP and the exclusionary period imposed may mean that the applicant may secure admission as an LNP during or shortly after the completion of the PTP, resulting in minimal or no delay at all to the eventual AAS admission, if the applicant subsequently applies for that qualification.[4]

14 This issue generated much disagreement amongst the stakeholders. The AG and the SILE contend that any exclusionary period should commence only after the completion of an applicant's PTP.[5] Conversely, the Law Society argues that any exclusionary period should start to run from the date of adjournment, withdrawal or dismissal of the LNP application – similar to the approach taken under the previous admissions framework for AAS applications.[6] I set out the positions in more detail below.

The parties' cases

The AG's position

(1) An exclusionary period should only run after the conclusion of the applicant's PTP

15 As I sketched out at [14] above, the AG takes the view that any exclusionary period should commence only after the completion of the

---

4 ZTAGWS at [27].

5 ZTAGWS at [28]–[38]; SILE's Written Submissions for HC/LNP 138/2025 (Zenn Tann Jia Wei) dated 6 November 2025 ("ZTSILEWS") at [84].

6 Law Society's Written Submissions for HC/LNP 138/2025 (Zenn Tann Jia Wei) dated 6 November 2025 ("ZTLSWS") at [53] and [60]–[64].

applicant's PTP. In support of this position, the AG makes the following main submissions.

16 First, the AG argues that a substantial overlap between the exclusionary period and the PTP is undesirable. The purpose of the exclusionary period is to allow an applicant to resolve all character issues revealed by his/her misconduct. Thus, it is crucial for an applicant whose admission as an LNP is delayed by an exclusionary period to spend that time focussing on reform and rehabilitation, instead of being focused on the completion of his/her PTP.[7]

17 If an exclusionary period overlaps with an applicant's PTP, the applicant may not have time to undertake "legal training" for the development of ethical insight, as that applicant would be focused on completing his/her PTP. A sequential approach to the PTP and exclusionary period would therefore incentivise and provide the applicant with the opportunity to do "*something above and beyond* the basic statutory requirements expected of all applicants (*ie*, beyond the completion of the PTP)" [emphasis in original].[8] In other words, applicants should do "something completely different from what a PTP normally [and] typically would require of them".[9]

18 Second, it may be difficult in practice for the stakeholders to conduct a rigorous examination of the extent to which the applicant has been rehabilitated during the exclusionary period, especially if all the applicant has done during that period is to complete his/her PTP.[10]

---

7 ZTAGWS at [29].

8 ZTAGWS at [31].

9 Certified Transcript for the hearing of the Applications on 20 November 2025 ("Transcript") at p 73 lines 8–20.

10 ZTAGWS at [34].

19 Third, adopting the AG's approach would "maintain a degree of parity with previous AAS cases", particularly in relation to the rehabilitative effect of the exclusionary period. The AG explains that this rehabilitative effect is contributed by the applicant's delay in admission as an AAS, which has "a practical effect on his or her practising rights, seniority, etc, thereby signalling to the applicant the gravity of the matter to be addressed, and providing an impetus for reform and rehabilitation". The AG draws an analogy to criminal punishment, which, according to the AG, the courts have recognised may provide impetus for an offender to understand the nature of their offence and to reform themselves.[11]

20 In the premises, the AG submits that unlike in AAS admission applications under the previous admissions framework, "the delay in an applicant's LNP admission *alone* [would have] little practical effect on him or her (save that the applicant would not be able to obtain a provisional practising certificate under s 18 of the LPA)".[12] At the hearing, counsel for the AG elaborated on this point. He emphasised that running the exclusionary period together with the PTP would mean that an LNP applicant (who declares some misconduct and is subjected to an exclusionary period) would be "in [*sic*] the same footing as all other applicants … who [have] never committed [any misconduct]".[13] In other words, the AG argues that there would thus be "no real effect of the exclusionary period" and which would be unfair.[14]

---

11 ZTAGWS at [32].

12 ZTAGWS at [33].

13 Transcript at p 71 lines 28–31.

14 Transcript at pp 71 to 72.

21 For these reasons, the AG argues that the impetus for reform and any rehabilitative effect of the exclusionary period would be "significantly diminished" if an exclusionary period is ordered to commence from the date of the conclusion of the relevant LNP admission hearing, rather than at the conclusion of the applicant's PTP.[15] Thus, any exclusionary period imposed should commence only after the conclusion of the applicant's PTP.

(2) The AG's proposed approach

22 To address the issues outlined above at [16]–[20] above, the AG proposes that the commencement of any exclusionary period imposed in LNP applications should be determined by the following scenarios:

(a) For applicants serving (or intending to serve) a PTP with a view to being admitted as AAS: the exclusionary period should start to run from the conclusion of the applicant's PTP. Where the applicant's intention is unclear from the materials before the court, clarification can be sought from the applicant where it is assessed that the applicant's admission should be deferred.[16]

(b) For applicants not serving or not intending to serve a PTP: the exclusionary period should commence from the date of the order or for exclusionary periods effected by way of an adjournment, from the date the admission hearing was fixed (on the applicant's undertaking that they will not commence their PTP during that period).[17]

---

15 ZTAGWS at [33].

16 ZTAGWS at [35(a)].

17 ZTAGWS at [35(b)].

23 The AG contends that the appropriate duration of the exclusionary period would depend on the facts of each case and the rehabilitative needs of each applicant. The AG submits that the proposed approach set out at [22(a)] above would: (a) provide the applicant with sufficient time to engage in rehabilitative opportunities, above and beyond any PTP served; and (b) allow the relevant parties to continue to refer to prior cases (without adjustment) for guidance in calibrating an appropriate exclusionary period, where the rehabilitative needs are assessed to be similar.[18]

The SILE's position

24 The SILE takes a similar position to that of the AG, save for certain differences which will be discussed in greater detail below at [58]–[60].

25 The SILE submits that any exclusionary period imposed should run only after the completion of the applicant's PTP.[19] An exclusionary period is a protected "time-out" period for reflection and rehabilitation. The SILE submits that the rationale of exclusionary periods could therefore be rendered "nugatory" or at least "diluted" if the exclusionary period were to run from the date of the court's decision in an LNP case. This is because the LNP applicant "may still be able to meet the same timelines for admission to the Bar [as an AAS] as if no [exclusionary] period had been ordered".[20]

26 At the hearing, counsel for the SILE explained that running the exclusionary period only after the conclusion of the applicant's PTP would provide a "sting" and "impetus [for the applicant] to reform". In contrast, there

---

18 ZTAGWS at [36].

19 ZTSILEWS at [84].

20 ZTSILEWS at [84(a)]; Transcript at p 85 lines 20–31.

will not be a "sting" if the exclusionary period runs from the date of the court's decision in the relevant admission application because that applicant would be "called in the same time as his peers".[21] In other words, the SILE contends that if the exclusionary period runs concurrently with the applicant's PTP, he or she would be "able to take the benefit of the [misconduct committed/disclosed] because [he/she would be] called together with [his/her peers]".[22]

27 Adopting the proposed approach by the SILE would also result in "even-handedness" between the new and previous admissions frameworks. Put another way, the SILE contends that adopting its position would mean that both LNP applicants (under the new admissions framework) and AAS applicants (under the previous admissions framework) are treated the same – any exclusionary period imposed would start to run only after the conclusion of the applicant's PTP.[23]

The Law Society's position

28 The Law Society, however, takes the view that any exclusionary period imposed by the court should start to run from the adjournment, withdrawal or dismissal of the relevant LNP application.[24] In support of this position, the Law Society makes the following main submissions.

29 First, the Law Society emphasises that the purpose of any exclusionary period is not to punish the applicant, but to provide time for the applicant to resolve his/her character issues, and for the stakeholders to regain confidence in

---

21 Transcript at p 85.

22 Transcript at p 85 lines 9–19.

23 ZTSILEWS at [84(b)].

24 ZTLSWS at [53].

the applicant's suitability to be admitted.[25] Considering this rationale, the Law Society argues that the process of rehabilitation can take place long before an LNP application is brought, and may certainly continue even while the applicant is undergoing his/her PTP.[26] At the hearing, counsel for the Law Society explained that s 34(*a*) of the LPA Rules in fact *imposes* a responsibility on supervising solicitors to ensure that each practice trainee under supervision receives adequate training, including matters relating to professional responsibility, etiquette, and conduct.[27] In the premises, the Law Society contends that should an applicant complete his/her PTP successfully and without incident, this would be a factor showing that he/she has rehabilitated.[28]

30 Second, in any event, the court retains discretion to decide on the appropriate exclusionary period to impose on an applicant, based on the facts of the case.[29] Any exclusionary period imposed represents only the minimum time which the court considers necessary for the applicant's rehabilitation. There is no assurance that the applicant will be admitted as an LNP at the end of the exclusionary period. If the applicant brings a fresh application to be admitted at the end of the exclusionary period, he/she would have to satisfy the court that he/she has been meaningfully rehabilitated, and that he/she is now a fit and proper person to be admitted.[30]

---

25 ZTLSWS at [54]; Transcript at p 93.

26 ZTLSWS at [55]; Transcript at p 93.

27 Transcript at p 93.

28 Transcript at p 93.

29 Transcript at p 95.

30 ZTLSWS at [56] and [62].

31 Third, running an exclusionary period from the conclusion of an LNP application would provide consistency with admission cases under the previous admissions framework.[31]

32 Fourth, LNP applicants who are subject to an exclusionary period would have more certainty if such period commences from the date of the order, as each applicant would know the minimum period of time that he/she is precluded from making a fresh application to be admitted.[32]

33 Lastly, running an exclusionary period at some other time other than at the date of the order (*eg*, at the end of the PTP) may result in the applicant sitting on his/her hands and waiting for the exclusionary period to commence before engaging in reflection and rehabilitation.[33]

The Applicants' positions

(1) Ms Tan's position

34 In her written submissions, Ms Tan declined to take a position as to the date from which any exclusionary period imposed should run, preferring to leave this issue to the court to determine.[34] However, at the hearing, counsel for Ms Tan indicated that Ms Tan is taking a similar position to that of the Law Society[35] (see [28]–[33] above).

---

31 ZTLSWS at [63].

32 ZTLSWS at [64].

33 ZTLSWS at [63].

34 The Applicant's Written Submissions for HC/LNP 138/2025 (Ms Zenn Tan Jia Wei) (undated) ("ZTAWS") at [81].

35 Transcript at p 4 lines 16 –20.

(2) Mr Zhang's position

35 Mr Zhang submits that any exclusionary period imposed should run from the end of the applicant's PTP. He contends that adopting this approach is consistent with the principle that an exclusionary period is rehabilitative and must provide a "clear timeframe" for an applicant to address the character issues disclosed by the misconduct and for the stakeholders to subsequently reassess the applicant's suitability for admission.[36]

36 In this connection, Mr Zhang contends that running an exclusionary period after the completion of the PTP would "enhance" the "rehabilitative character" of an exclusionary period. He submits that this approach would also provide "sufficient opportunity" for the stakeholders and the court to evaluate the applicant's rehabilitative progress and his/her eligibility for admission.[37]

(3) Ms Koh's position

37 Ms Koh did not address this issue in her written submissions. At the hearing, Ms Koh also declined to take a position on this issue.[38]

My decision

38 Having considered all the parties' respective positions, I am unable to accept the submissions of the AG, the SILE and Mr Zhang on this issue. In my judgment, *in general*, any exclusionary period imposed on an applicant seeking admission as an LNP under the new admissions framework should commence from the date of the court order – regardless of whether the court decides to

---

[36] Applicant's Written Submissions for HC/LNP 360/2025 (David Zhang Yichao) dated 6 November 2025 ("DZAWS") at [60]; Transcript at p 4 line 22.

[37] DZAWS at [62]–[64].

[38] Transcript at p 4 line 25.

adjourn the matter; permit the withdrawal of the application; or dismiss the application altogether. Where the court has taken time to consider the matter, the court may also consider backdating any exclusionary period to the date of the original hearing. Importantly, and in any event, any exclusionary period need not start after the PTP. These are my reasons.

Rehabilitation does not and should not commence only after an applicant completes the PTP

39 The primary argument advanced by the AG, the SILE and Mr Zhang against commencing exclusionary periods from the date of the court order is that applicants would lack adequate time, or, in SILE's words, lack a "protected time out" for rehabilitation (see [16]–[17], [25] and [35]–[36] above). With due respect, I find these submissions unpersuasive.

40 These arguments rest on the misconceived assumption that an applicant's rehabilitative journey and PTP are mutually exclusive processes which may be neatly separated. In reality, there is nothing stopping an applicant from engaging in meaningful rehabilitative activities *during* his/her PTP. In fact, an applicant *should* be strongly encouraged to do so and advised against delaying rehabilitative efforts. Even if one were to accept, *arguendo*, that exclusionary periods should commence only after an applicant completes his/her PTP, it is unrealistic to expect that applicants in such circumstances would spend the *entire* exclusionary period engaged *solely* in reflection and rehabilitation. In practice, after completion of the PTP, such applicants would likely take up work as paralegals, legal executives, or in other non-legal positions. This reality undermines the emphasis of the AG and the SILE on the need to provide a "protected time-out" for an applicant's rehabilitation, given that such a period would not, in all likelihood, be exclusively dedicated to reflection and rehabilitation.

41 Moreover, as the Law Society emphasised, r 34(*a*) of the LPA Rules imposes the obligation on supervising solicitors to ensure that practice trainees receive adequate training, including matters relating to professional responsibility, etiquette and conduct. In this connection, r 34(*a*) of the LPA Rules refers to the Practice Training Guidelines and Checklists issued by the SILE pursuant to r 49 of the LPA Rules ("Guidelines").[39] The Guidelines state that a supervising solicitor "must ensure" that each practice trainee completes, amongst others, the following training:[40]

(a) First, understanding the core values of the legal profession, namely:

(i) integrity, which incorporates the principle that a legal practitioner must always act with uncompromising honesty;

(ii) professionalism, which requires legal practitioners to maintain the highest standards in discharging the duties they owe towards the court, any tribunal, clients, other legal practitioners and the public; and

(iii) justice, which reflects the legal practitioner's commitment to serve the ends of justice, and conducting himself or herself, and all aspects of his or her work, as a member of an honourable profession.

(b) Second, ensuring that there is no misrepresentation or misleading statement made in communications with the court, and

---

39 See the letter issued by the Attorney-General's Chambers dated 20 November 2025 titled "HC/LNP 138/2025 – ZENN TAN JIA WEI" ("AGC Letter") at [2].

40 Guidelines at [10(a)] and at Section D titled "Ethics and Professional Responsibility" (AGC Letter at pp 11, 28 and 29).

understanding the duty to conduct proceedings before any court or tribunal with integrity.

(c) Third, understanding that the legal practitioners' duties to the court are paramount and override their duties to the client.

42 While the AG submits that the Guidelines do not "go towards any kind of [rehabilitation]" and is essentially a "checklist" of the "day-to-day rigour of what a [practice trainee] goes through",[41] this contention lacks merit. The mere fact that the Guidelines appear in the form of a checklist does not diminish the requirement that supervising solicitors "must ensure" that their practice trainees (*ie*, LNP applicants who elect to serve a PTP) receive adequate training on, among other things, the ethical and professional responsibilities of a legal practitioner. Indeed, as counsel for the Law Society highlighted at the hearing, practice trainees would inevitably encounter ethical issues frequently and in various contexts during his/her PTP.[42] These applicants would therefore have opportunities to reflect on and be guided through some of these ethical encounters by experienced practitioners. It is artificial and unrealistic for the AG and the SILE to suggest that an applicant's journey of rehabilitation and PTP are mutually exclusive processes. On the contrary, the PTP provides real-world exposure to ethical issues and a legal practitioner's professional responsibilities, which creates a foundation for meaningful reflection and rehabilitation.

43 The AG's related argument that applicants would lack incentive to undertake activities "above and beyond" the completion of the PTP if

---

41 Transcript at p 104 lines 22–30.

42 Transcript at p 89 lines 3–15.

exclusionary periods were to run concurrently with the PTP suffers from the same misconception that rehabilitation cannot occur during the PTP. More of concern is that the AG's position seems to signal that rehabilitation will not and should not commence until the end of an applicant's PTP, and that any steps towards rehabilitation that an applicant undertakes during the PTP should be discounted. In my view, this position is inconsistent with the court's approach thus far. Under the previous admissions framework, the court examines what has happened from the time of the applicant's disclosed transgression all the way to the date of the hearing, to determine and situate the applicant's stage of rehabilitation.

44 To illustrate, in *Re Shafee*, the applicant, Mr Shafee, was a teacher at a school in Singapore. Mr Shafee had earlier faced ten charges under the Films Act (Cap 107, 1998 Rev Ed) and the Penal Code (Cap 224, 2008 Rev Ed). These charges included making and possessing obscene films. Mr Shafee filed an application seeking admission as an AAS. The court accepted that Mr Shafee had shown objective signs of remorse, including the completion of his practice training, and his volunteerism. As Menon CJ explained (at [115]–[118]):

> … *the Applicant maintained a clean record for six years since the Offences. This cast his progress in a positive light … He enrolled himself in and graduated from law school, passed the Bar examinations, and completed his practice training. The fact that the Applicant maintained a clean record amidst the not insignificant amount of stress that comes with pursuing a course of legal study and professional training, while concurrently navigating the criminal justice process, struck me as significant and suggested that real progress was being made.* This took on particular significance because the Applicant's inability to cope with stress from his workload as a teacher and his underlying health challenges had been identified in the medical evidence as significant contributors to the Offences … The Applicant, by his conduct over four years, had demonstrated that he had developed the resilience needed to handle stress without giving in to recidivism.

> … the Applicant disclosed that *he had since become a volunteer to guide others in similar situations. The willingness and ability to assist others also lent weight to my view that he had made significant progress in his rehabilitation.*
>
> [emphasis added]

While Menon CJ accepted that Mr Shafee had "some distance to go" in terms of his rehabilitative journey, the court held that the circumstances of Mr Shafee's case did not warrant a substantial exclusionary period (at [119]).

45 In the premises, the approach that the court applies at the time of the hearing is to review what the applicant has done from the transgression (including during the PTP) until the hearing, and to assess whether rehabilitation has commenced, or has commenced but has not been completed. Following this assessment, the court proceeds to determine whether an exclusionary period is warranted, to give the applicant more time to commence or to complete his/her journey of rehabilitation. The court does not ignore or disregard the applicant's past conduct prior to the date of the hearing. On the contrary, the court *would* give due consideration to any rehabilitative attempts by the applicant during that period. In fact, as counsel for the Law Society contends, the fact that an applicant completes his/her PTP successfully and without incident may be another factor showing that he/she has been rehabilitated[43] (see also Menon CJ's observations in *Re Shafee* at [44] above).

46 If the nature of the applicant's transgression(s) requires him/her to engage in certain kinds of activities in pursuit of rehabilitation and character development, for example (as the AG alluded to at the hearing), *pro bono* work, charity work, and/or ethical training,[44] the applicant must assess whether he/she

---

43 Transcript at p 93 lines 13–18.

44 Transcript at p 73 lines 8–17.

has adequate time to engage in and complete these activities within the PTP, or whether he/she needs to take additional time to do so before proceeding with the application (or reapplying, as the case may be) for admission as an LNP.

47 In this connection, the AG also expressed concern that the stakeholders could face practical difficulties conducting a "rigorous examination" of whether an applicant has been rehabilitated during the exclusionary period if all the applicant has done during that period is to complete the PTP (see [17]–[18] above). In my view, such a contention lacks merit. Where an applicant serves the exclusionary period concurrently with his/her PTP, *the onus remains squarely on that applicant to engage in rehabilitative activities and demonstrate how he/she has been meaningfully rehabilitated during that period*. In particular, an applicant who files a fresh application for admission as an LNP following an exclusionary period must invariably satisfy the court that the activities undertaken during that period demonstrate adequate rehabilitation. This is not a perfunctory exercise. It requires the applicant to provide concrete evidence to substantiate *how* he/she has addressed the character issues that led to the initial withdrawal or dismissal of his/her admission application. If an applicant (following an exclusionary period) files a fresh admission application and points only to the bare completion of his/her PTP without more, that applicant will, to put it simply, likely fail to persuade the stakeholders and the court that he/she has been sufficiently rehabilitated.

The imposition of an exclusionary period is not meant to be punitive

48 I turn now to the AG's and the SILE's contentions that an exclusionary period must commence after completion of the PTP to ensure: (a) that the applicant feels the "practical effect" or "sting" of the exclusionary period (see [19] and [26] above); and (b) parity with the previous admissions framework.

In my view, these submissions are fundamentally misconceived and inconsistent with the established rationale for imposing exclusionary periods.

49 As I alluded to above at [11], and as repeatedly emphasised by the court, an exclusionary period serves to provide a timeframe to "facilitate rehabilitation by affording applicants the opportunity to defer their admission, reflect on their prior misconduct and address their character issues". The imposition of an exclusionary period is "*not meant to punish applicants for their earlier mistakes*", *even if such an order may be felt or perceived to have a punitive effect* (see *Re Pulara* [61]; *Re Gabriel* at [51]; *Re Tay Jie Qi* at [4]; *Re Tay Quan Li Leon* [2022] 5 SLR 896 at [42]; *Re Wong Wai Loong Sean* [2023] 4 SLR 541 ("*Re Sean Wong*") at [27]). As Menon CJ explained in *Re Suria* (at [23]):

> … [T]he purpose of a deferment in admission applications is rehabilitative, not punitive … Where the deferment is seen, even subconsciously, through a punitive lens, there can arise a tendency to fall into the misguided notion that once a given period of deferment has run its course, the applicant should be free to pursue the admission application. That is not correct. Deferment in admission applications is not a matter of routine – the need for deferment, its appropriate duration, and where it has expired, its efficacy, must all be carefully assessed in every case. The question for the court and the Stakeholders to consider is not whether the applicant has been sufficiently punished for her misconduct, but rather, whether the applicant has sufficiently reformed her character issues and demonstrated her suitability to shoulder the weighty responsibilities that come with being an Advocate and Solicitor in Singapore.

50 Keeping in mind the rationale of an exclusionary period, I find fundamentally misguided the argument that an exclusionary period must have a certain level of "punishment",[45] "practical effect",[46] and/or "sting"[47] to provide

---

45 ZTAGWS at [32].

46 ZTAGWS at [32]–[33].

47 Transcript at p 85

impetus for rehabilitation. Such contentions are inconsistent with the established jurisprudence that an exclusionary period serves to provide a timeframe for rehabilitation, rather than to punish the applicant for his/her misconduct. The exclusionary periods under the previous admissions framework commenced after completion of the PTP purely because of the statutory provisions – applicants could *only* apply for AAS admission *after* completing the PTP, and the courts would only be able to consider the imposition of exclusionary periods when dealing with the AAS applications thereafter. The exclusionary periods were *not* intended to create punitive effects, even though such effects may have been perceived (see [11] and [49] above). In the premises, the contentions that there should be parity with the previous admissions framework (where exclusionary periods ran after the PTP) is misconceived, as they mistake a statutory requirement for a deliberate and reasoned choice. Viewed in this context, the proper inquiry should not be whether an LNP applicant would suffer any similar practical consequences from the exclusionary period as compared to the previous admissions regime (such as, as the AG and the SILE contend – delay in the applicant's admission as an AAS, and whether he/she is on the same footing as the other applicants who did not commit any misconduct),[48] but whether the exclusionary period imposed *provides adequate time and opportunity for the applicant's rehabilitation*.

51 The implicit assumption underlying the submissions of the AG and the SILE is also of some concern. To elaborate, there seems to be a suggestion that admission as an LNP is somehow lesser, or of less value/importance, than admission as an AAS. As counsel for the Law Society emphasised, being called as an LNP is not a path to something greater.[49] Being admitted as an LNP is

---

48 Transcript at p 85; ZTAGWS at [32]–[33].

49 Transcript at p 90 lines 27–32.

itself a professional qualification that carries significant responsibilities. Both LNPs and AAS are officers of the court. Indeed, as Menon CJ emphasised, LNPs serve a special duty in the administration of justice. Thus, even if one were to accept, *arguendo*, that some "practical effect" or "sting" is necessary to provide impetus for an applicant's rehabilitation, the fact that an applicant's LNP admission would be delayed by at least the length of the exclusionary period would arguably already provide the practical consequence that the AG and the SILE contend is necessary.[50]

Practical issues

52 Beyond the issues identified above, adopting the approaches of the AG and the SILE would also create practical difficulties.

53 I begin by addressing the AG's proposed approach (see [22] above). The AG's proposed framework distinguishes between two categories of applicants: those serving (or intending to serve) a PTP with a view to being admitted as AAS, and those who are not. In my view, this distinction is problematic for several reasons.

54 First, it fails to account for LNP applicants who are genuinely uncertain about their career intentions at the time of their applications. Applicants may be undecided about whether they wish to pursue the PTP, and if so, whether they eventually intend to be called as an AAS.

55 More importantly, it is unclear why an exclusionary period should commence from the completion of the PTP *only if* the applicant serves (or is intending to serve) a PTP *with a view to being admitted as an AAS*. The implicit

[50] See also Transcript at p 96 lines 12–15.

premise underlying the AG's proposed approach appears to be that an AAS is somehow held to a higher standard than that of a LNP, and which warrants a longer timeframe for rehabilitation and/or additional scrutiny regarding whether he/she is a fit and proper person to be admitted. These are contentions that I have already rejected (see [51] above).

56 Third, the AG's proposed approach does not adequately address the porosity between the two categories of applicants. It fails to recognise that an applicant's intentions may change. I provide two illustrations below:

(a) An applicant may initially commit to serving a PTP and being admitted as an AAS. Under the AG's approach, the applicant's exclusionary period would commence only after the PTP. However, if this applicant subsequently changes his/her mind about AAS admission or fails to complete the PTP, it becomes unclear when the exclusionary period should commence, and how any existing exclusionary period should be managed/adjusted so that the applicant may be called as an LNP.

(b) In contrast, an applicant may initially undertake not to serve a PTP, triggering immediate commencement of the exclusionary period under the AG's approach. If, despite the undertaking, this applicant later decides to pursue a PTP to get admitted as an AAS, the framework provides no guidance on whether the exclusionary period should be reset, extended, or continue unchanged.

57 At the hearing, the AG acknowledged the practical difficulties that may arise with the proposed approach, in light of changing circumstances.[51] It was

[51] Transcript at p 76 lines 5–27.

proposed that in such scenarios, the applicants should come back to the court to vary the court orders that were made.[52] In my view, adopting such an approach may result in additional complexity, unpredictability, and the workload of filing and dealing with applications to vary the court orders made.

58 I turn now to the SILE's proposed approach. At the hearing, the SILE confirmed its general alignment with the AG's proposed approach (see [22] above). However, the SILE sought to make certain modifications, which I highlight below in bold:

> (a) For applicants serving (or intending to serve) a PTP ~~**with a view to being admitted as AAS**~~: the exclusionary period should start to run from the conclusion of the applicant's PTP. Where the applicant's intention is unclear from the materials before the court, clarification can be sought from the applicant where it is assessed that the applicant's admission should be deferred.[53]
>
> (b) For applicants not serving or intending to serve a PTP: the exclusionary period should commence from the date of the order granting the applicant to withdraw his or her LNP application, or for exclusionary periods effected by way of an adjournment, from the date the admission hearing was fixed (on the applicant's undertaking that he/she will not [**continue or**] commence his/her PTP during that period).[54]

---

52 Transcript at p 75 lines 16–21.

53 ZTAGWS at [35(a)].

54 ZTAGWS at [35(b)].

59 The SILE's amendments were two-fold. First, the SILE sought to delete the phrase "with a view to being admitted as AAS". According to the SILE, this amendment would address the situation where an LNP applicant, who either expressed no intention, was unclear, and/or undecided about being admitted as an AAS, subsequently decides to be called as an AAS. The SILE contends that this amendment would ensure that such applicants "do not gain an unfair advantage" over their peers who had "made it clear to the [c]ourt that they intend to be called to the Bar", thus preventing "gaming from having the PTP and [exclusionary] period running concurrently".[55]

60 The second amendment pertained to the SILE's addition of the phrase "continue or" in the sentence set out above at [58(b)]. The SILE submits that this amendment will cater to LNP applicants who: (a) at the time of the hearing, have already served a certain duration of the PTP but will not, or are not intending to serve the remainder of the PTP; and (b) after the hearing and while serving the exclusionary period, the applicant changes their mind and decides to continue serving the remainder of the PTP. According to the SILE, this amendment will likewise prevent "gaming from having the PTP and [exclusionary] period running concurrently".[56]

61 The SILE's proposed amendments attempt to partially address some of the concerns I expressed earlier about the AG's proposed approach (see [52]–[57] above). However, they do not address the fundamental problems with such an approach which I have discussed (see [39]–[41] and [43]–[45] above).

---

55 See document tendered by the SILE at the hearing.

56 See document tendered by the SILE at the hearing.

Commencement date and calibrating the length of an exclusionary order

62 For all the reasons above, I do not accept the common position of the AG, the SILE and Mr Zhang that any exclusionary period imposed on an LNP applicant should commence only after his/her PTP. I agree with the Law Society that in general, any such exclusionary period should start to run from the date of the court order. That said, as set out at [38] above, the court may also consider commencing any exclusionary period, especially short periods, from the date of the original hearing.

63 For completeness, I should also address how existing admissions-related case law should guide the determination of lengths of exclusionary periods under the new admissions framework. Under the previous admissions framework, any exclusionary period imposed on an AAS applicant would, by statutory design, invariably have commenced after the conclusion of that applicant's PTP. Given my decision that an exclusionary period under the new admissions framework will commence from the date of the court order (and may therefore run before or during an LNP applicant's PTP depending on when the applicant applies for admission), the question which arises is whether the courts may still draw guidance from existing case law in relation to the lengths of the exclusionary periods imposed in AAS cases.

64 In my judgment, the court may continue to take broad guidance from existing precedents, particularly to compare the facts and assess the relative seriousness of the disclosed misconduct. However, I emphasise that determining the length of any exclusionary period must ultimately turn on the specific facts of each case, taking into account the time the court deems necessary for that particular applicant to complete his/her rehabilitation.

The applicable principles for the Applications

65 Based on the above, for the Applications, I reiterate that the applicable principles are to be drawn from those set out for AAS admission cases. The broad framework is set out from [9]–[10] above, together with my decision on the commencement date of any exclusionary period to be generally from the date of its imposition. Guidance may also be drawn from past cases to calibrate the appropriate length of any exclusionary period.

66 Before turning to the facts, as alluded to at [9] above, I should elaborate on the Character Principle and the Protective Principle. To restate the former, where there is no question as to an applicant's competence or qualifications, the central inquiry is whether the applicant is suitable for admission in terms of his/her character (*Re Shafee* at [64] citing *Re Gabriel* at [34] and *Re Sean Wong* at [3]). Where incidents of misconduct have been disclosed which are material to the fitness of the applicant to be admitted, the court will consider all relevant circumstances, including (*Re Shafee* at [64]):

(a) the nature of the applicant's misconduct;

(b) his/her conduct in the course of any investigations into the misconduct;

(c) the nature and extent of subsequent disclosures made in his or her application for admission;

(d) any evidence of remorse; and

(e) any evidence of rehabilitation.

67 These factors, which were previously formulated in the context of instances of academic misconduct, are of general application to all matters which have a material bearing on the applicant's suitability for admission to the Bar, including criminal misconduct (*Re Shafee* at [64]). Where a significant time has passed since the wrongdoing, factors (c) to (e) assume particular importance in the court's assessment of the applicant's progress in his/her reform and rehabilitation in the intervening period (*Re Shafee* at [64] citing *Re Lee Jun Ming Chester* [2024] 3 SLR 1443 ("*Re Chester*") at [3] and *Re Gabriel* at [36]). In this regard, if a substantial period of time had already elapsed between the misconduct in question and the time of the admission application, and where an applicant maintained a clean record during that intervening period, the court may dispense with a further exclusionary period if the circumstances show that the applicant has already been satisfactorily rehabilitated (*Re Ariffin* at [23] citing *Re Pulara* at [61]; *Re Tay Jie Qi* at [4] and [33]; *Re Ong Pei Qi Stasia* [2024] 4 SLR 392 at [21]–[22]; and *Re Chester* at [9]).

68 Turning to the Protective Principle, it arises where, even though there is nothing before the court to suggest that an applicant continues to face unresolved character issues at the time of the application for admission, the court may conclude, having regard to the nature of his or her misconduct (typically consisting of an offence), "that to admit the applicant would risk undermining public trust and confidence in the legal profession and the administration of justice" (*Re Ariffin* at [24] citing *Re Shafee* at [63(b)] and [120]). The Protective Principle is particularly concerned with how the public may perceive the standing, integrity and reputation of the profession if the applicant were admitted and is not linked to the rehabilitation of the applicant (*Re Ariffin* at [24] citing *Re Shafee* at [130]).

69 The factors relevant to the Protective Principle are (*Re Ariffin* at [25]):

(a) the nature of the offence;

(b) the penalty already served by the applicant;

(c) the duration since the completion of the penalty;

(d) efforts of the applicant directed at demonstrating his or her ability to function as a member of the legal profession; and

(e) whether the court is satisfied, in the round, that the applicant is capable of being entrusted to aid the administration of justice as an officer of the court without any risk of undermining public confidence.

70 The Protective Principle only engages in exceptional circumstances, where the underlying misconduct is sufficiently grave. This principle ought to be balanced against the redemptive element that every individual ought to be given a second chance, provided that he/she has attained complete rehabilitation and his/her admission to the Bar would not undermine public confidence in the administration of justice (*Re Ariffin* at [26]).

Ms Zenn Tan Jia Wei

71 The AG and the SILE object to Ms Tan's application in view of, among other things, the nature of her instances of misconduct, and her subsequent non-disclosure about such misconduct.[57] The Law Society does not object to the application.[58]

72 Having considered the parties' submissions, I find that Ms Tan is presently not a fit and proper person to be admitted on account of her character

[57] ZTAGWS at [1]; ZTSILEWS at [1] and [41].

[58] ZTLSWS at [2].

issues. I grant her leave to withdraw LNP 138, subject to an exclusionary period of 12 months from the date of the order. These are my reasons.

Facts

73 Ms Tan disclosed these instances of misconduct in her two affidavits. I will summarise the material facts below.

The first academic misconduct

74 In April 2022, Ms Tan submitted a a joint assignment for one of the modules, Mergers & Acquisitions ("LL4074V") she took during her third year at the National University of Singapore ("NUS").[59] For this module, Ms Tan had to submit an essay. The students in this course had the option to work individually or in pairs. Ms Tan elected to work on the essay as a pair.[60]

75 On 18 April 2022, Ms Tan received an email from the Law Office of Academic Affairs informing her that she was suspected of a possible plagiarism offence for her assignment. She was directed to attend an inquiry. An Academic Offence Report was also provided to her. The report stated that a substantial part of Ms Tan's essay (*ie*, 48%) was similar to another paper authored by one Emma Armson ("Armson Paper"). Chunks of Ms Tan's submitted essay (including footnotes) were copied *verbatim* from the Armson Paper.[61]

76 During the plagiarism inquiry, Ms Tan apologised and admitted that she had referred to the Armson Paper. She claimed that she had been unaware that

---

59 First affidavit of Ms Tan dated 30 March 2025 ("Ms Tan's 1st Affidavit") at p 3; ZTAWS at [9].

60 Ms Tan's 1st Affidavit at p 3.

61 Ms Tan's 1st Affidavit at p 4.

she had to cite the Armson Paper because she had already cited the primary sources referred to in the Armson Paper. Ms Tan was advised how proper citations were supposed to be done. She was informed of the need to cite both the primary and secondary sources.[62] Further, she was told that her essay would likely be reduced to a zero mark. Ms Tan claims that she accepted the consequences and apologised for her mistake.[63]

77 Subsequently, NUS informed Ms Tan that the penalty for her academic offence was revised to a "Fail" grade for the LL4074V module. According to Ms Tan, she felt "confused and distressed about the sudden change in penalty". Thus, together with her classmate, she decided to appeal the revised penalty. On 15 July 2022, NUS informed Ms Tan that her academic offence was of "moderate" severity, and that her appeal was unsuccessful.[64]

The second academic misconduct

78 In November 2022, and in her fourth year at NUS, Ms Tan took another module, International Projects Law and Practice ("LL4164V"). For this module, Ms Tan sat for a final two-hour-long take-home examination on 18 November 2022. While the exam ended at 11.00am, Ms Tan submitted her paper only at 11.04am, purportedly due to time constraints. After submitting her paper, the Turnitin report revealed a similarity index of 84%. Ms Tan claims that she was "shocked by the high index" and she was "unsure" of the cause of it. As she understood that resubmissions were allowed (albeit being accompanied with a penalty), Ms Tan decided to make amendments to her first submission as she

---

62 Ms Tan's 1st Affidavit at p 4.

63 Ms Tan's 1st Affidavit at pp 4 to 5.

64 Ms Tan's 1st Affidavit at pp 62 to 63.

was "aware of the severity of plagiarism".[65] She submitted her second script at around 12.00pm. In so doing, she explained the circumstances of her second submission in an email to NUS as follows:[66]

> … I apologise for the late submission as my computer crashed towards the end of the examination and when I restarted it I submitted a different copy from the one I had intended. I had submitted a draft of my exam which I mistook to be my final version when I uploaded it onto Luminus as my computer had not saved my final version. As such, attached is my final version of the script I intended to submit. I am aware of the consequences of the late submission, which is a deduction of 5 marks. So sorry for the inconvenience caused and thank you for understanding …

79 On 2 December 2022, Ms Tan was notified that she was suspected of having committed a plagiarism offence for LL4164V. An Academic Offence Report provided on 23 December 2022 stated that the Turnitin report for her first script revealed a similarity index of 84%, while her second script had a similarity index of 71%. Ms Tan was directed to attend a plagiarism inquiry. At this inquiry, Ms Tan explained that she intended her second submission to be her final answer, and to be marked and graded. She was informed that the first script she submitted was approximately on time, and that that submission should be marked instead. She was further informed that her case would be referred to the Board of Discipline ("BOD") given that this was her second offence. Ms Tan apologised and agreed to have her case referred accordingly.[67]

80 In Ms Tan's letter of explanation to the BOD, she explained that her notetaking methods included referring to, amongst others, books, online

---

65 Ms Tan's 1st Affidavit at p 8.

66 Ms Tan's 1st Affidavit at p 87.

67 Ms Tan's 1st Affidavit at pp 8 to 9.

websites, and notes shared by her seniors.[68] She claimed that she had "forgotten to mark the areas that [she] needed to further work on after compiling [her] notes, and thus overlooked … paraphrasing those sections".[69] She asserted that it was not her intention to commit academic dishonesty, and apologised for her "oversight" and "negligence".[70]

81 On 23 March 2023, Ms Tan was notified of the BOD's decision. The BOD found that Ms Tan committed plagiarism for LL4164V and imposed, amongst others, the following sanctions: (a) a "Fail grade" for that module; (b) a suspension of her candidature at NUS Law from 7 May 2023 till the end of Semester 1 of Academic Year 2023/2024; (c) attend rehabilitation and reconciliation sessions with a social worker/facilitator; and (d) 30 hours of community service.[71]

Misrepresentation to the law firm

82 In addition to the two academic offences disclosed by Ms Tan, she also disclosed a third incident involving an untruth she had communicated to TSMP Law Corporation ("TSMP"). Originally, Ms Tan was due to commence her PTP with TSMP. However, following the suspension of her NUS candidature (see [81] above), Ms Tan requested that her PTP with TSMP be deferred by one year.

83 In making this request for deferment of her PTP, Ms Tan originally informed TSMP that she was on a leave of absence from school "due to personal

---

68 Ms Tan's 1st Affidavit at [34(c)].

69 Ms Tan's 1st Affidavit at [34(d)].

70 Ms Tan's 1st Affidavit at pp 11 to 12.

71 Ms Tan's 1st Affidavit at p 14.

reasons at home"[72] ("Misrepresentation"). On 25 March 2025, Ms Tan reached out to a partner at TSMP to disclose the "full particulars of the incidents" after she finished preparing her first affidavit in support of LNP 138. The partner was upset that Ms Tan failed to disclose these incidents much earlier. Accordingly, on 27 March 2025, TSMP terminated Ms Tan's training contract with immediate effect.[73]

84 Ms Tan admits that what she had initially told TSMP was inaccurate (see [83] above). She further concedes that in failing to disclose her academic offences and the sanctions imposed, she was "not fully transparent" with TSMP.[74] According to her, she was "extremely scared" and "embarrassed" about the situation and was worried that disclosing the academic offences would "jeopardise [her] training contract [with TSMP]".[75] Ms Tan claims that she eventually disclosed her academic offences to TSMP because it was the right thing to do, and because she wanted to be transparent and accountable.[76]

The parties' cases

The stakeholders' positions

85 I begin with the AG's case. The AG accepts that Ms Tan's first academic offence suggested a lack of academic diligence rather than character issues.[77] However, the second academic offence and subsequent Misrepresentation

---

72 Ms Tan's Supplementary Affidavit dated 22 April 2025 ("Ms Tan's 2nd Affidavit") at [12].

73 Ms Tan's 1st Affidavit at [60].

74 Ms Tan's 2nd Affidavit at [12]–[13].

75 Ms Tan's 2nd Affidavit at [12]–[13].

76 Ms Tan's 2nd Affidavit at [16].

77 ZTAGWS at [43].

reveal Ms Tan's willingness to lie or mislead under pressure. In particular, Ms Tan's second academic offence reveals her "extremely poor insight" into the ethical implications of her actions.[78] Furthermore, Ms Tan chose to actively lie to TSMP about the true reason behind her request for the deferment of her PTP.[79] For these reasons, the AG submits that a minimum exclusionary period of 12 months is required for Ms Tan to reflect on her prior misconduct and address her character issues.[80]

86 The SILE adopts a position similar to that of the AG. The SILE contends that Ms Tan persistently attempted to downplay her culpability and present her academic offences more positively.[81] The SILE also argues that Ms Tan has not been forthcoming in her disclosures to the court and to TSMP, suggesting that Ms Tan might not have fully appreciated the gravity of her actions, or taken full personal responsibility for the same.[82] That said, the SILE recognises that Ms Tan has demonstrated some remorse and rehabilitation following her actions, and submits that this court should allow Ms Tan to withdraw her application, subject to an exclusionary period of at least 12 months.[83]

87 As for the Law Society, it does not object to LNP 138.[84] The Law Society contends, among other things, that her academic offences do not disclose any dishonesty, nor do they evince a pattern of misconduct.[85] She admitted to her

---

78 ZTAGWS at [42].

79 ZTAGWS at [59].

80 ZTAGWS at [64]–[65].

81 ZTSILEWS at [42]–[51].

82 ZTSILEWS at [52].

83 ZTSILEWS at [70] and [83].

84 ZTLSWS at [43].

85 ZTLSWS at [22]–[23].

wrongdoing at an early stage of NUS' investigations.[86] In so far as the Misrepresentation is concerned, the Law Society's view is that Ms Tan's voluntary disclosure of the same suggests that she has gained ethical insight into her conduct and is undergoing rehabilitation.[87] While the Law Society has no objections to LNP 138, they submit that it may be appropriate to impose an exclusionary period of three to six months for Ms Tan to fully resolve her character issues.[88]

Ms Tan's case

88 Ms Tan submits that both of her academic offences do not reveal any dishonesty. These offences involved either a lack of diligence and/or "unintentional conduct". There was no evidence suggesting that she intended to cheat or pass of the work of others as her own.[89] Ms Tan also readily accepted the sanctions imposed on her without attempting to downplay her culpability. She has been forthright in her disclosures to the court, been truthful at all material times, and has also expressed remorse for her mistakes.[90]

89 Ms Tan also submits that around three years has passed since her last academic offence. She has completed her studies and the Bar examinations without further incident and is now serving her PTP with a law firm since April 2025. These are positive developments which demonstrate that she is on a path of rehabilitation.[91]

---

86 ZTLSWS at [33].

87 ZTLSWS at [47]–[49].

88 ZTLSWS at [52].

89 ZTAWS at [55]–[61].

90 ZTAWS at [61]–[70].

91 ZTAWS at [71]–[75].

90 As for the Misrepresentation, while Ms Tan admits that she was not fully transparent with TSMP, she argues that whether she made disclosures to TSMP about her academic transgressions is "entirely irrelevant" since the duty of candour is owed to the court – not to TSMP.[92] Furthermore, Ms Tan contends that she has already corrected her mistake and has been honest in all her other applications for a training contract that she submitted to other law firms.[93] For all the reasons above, Ms Tan contends that she should be allowed to withdraw her application in LNP 138.[94] At the hearing, counsel for Ms Tan expressed his alignment with the Law Society's position and sought an exclusionary period of around three to six months for Ms Tan.[95]

My decision

91 Having regard to the Character Principle and the relevant factors set out at [66] above, I find that Ms Tan is not presently a fit and proper person to be admitted as an LNP. I explain.

Whether Ms Tan is a fit and proper person to be admitted

92 I begin with Ms Tan's first academic offence. This instance of academic misconduct involved her failure to cite the Armson Paper (the secondary source), having only cited the primary sources in her essay. I agree with the AG that this offence does not reveal dishonesty. Given her attempts at attributing the primary sources, there is no reason to believe that she intended to pass the

---

92 ZTAWS at [76]–[77].

93 ZTAWS at [77]–[80].

94 ZTAWS at [81].

95 Transcript at p 5.

plagiarised materials off as her own work. This first academic offence suggests a lack of academic diligence (see also *Re Suria* at [25]).

93 Furthermore, Ms Tan was forthcoming during NUS Law's investigations into her first academic offence. She apologised and admitted to referring to the Armson Paper without delay. Ms Tan also made full disclosure of this academic offence in her first affidavit to the court. While Ms Tan appealed against the "Fail" grade she received for LL4074V, this does not suggest a lack of remorse. Having been initially advised that her essay would likely be reduced to a zero mark, I accept her account that she felt confused and distressed about the more severe penalty imposed and which prompted her appeal.

94 I turn to the second academic offence. In my view, the nature and circumstances of this offence demonstrate dishonesty and concerning character issues for several reasons.

95 By the time she committed her second academic transgression, Ms Tan had been sanctioned and counselled for her earlier instance of plagiarism. This should have put her on notice of the importance of ensuring proper attribution in her work. Against this backdrop, her second academic offence was more serious than she suggests. Furthermore, contrary to Ms Tan's submissions, this offence did not involve a mere lack of academic diligence. In Ms Tan's first script, she was found to have "copied substantial amounts of text from *illegitimate* sources and passed it off as their [*sic*] own work" [emphasis in original].[96] These illegitimate sources included work submitted by students in

[96] Ms Tan's 1st Affidavit at p 129.

previous years for the same module – sources which NUS students are prohibited from relying upon for their own assignments.[97]

96 As Menon CJ emphasised, the starting point is that a student who submits work that is to be graded does so on the basis that it is the student's own work (*Re Suria* at [31]). When Ms Tan copied substantial amounts of material from illegitimate sources (including the work/notes of senior students) and relied on them in scripts she submitted for grading, she must have appreciated that she would be passing off the plagiarised material as her own (see also *Re Suria* at [25] and [31]). There is no room for her to argue that this offence was "unintentional" or involved a mere lack of academic diligence.

97 What causes more concern is the dishonesty that followed. It will be recalled that Ms Tan's own case is that she was shocked by the high Turnitin similarity index of her first script and submitted a second script after making certain amendments, given her awareness of the severity of plagiarism. Despite this being her professed reason, she provided NUS with an entirely different explanation in the email she sent enclosing her second script. She informed NUS that her "computer crashed towards the end of the examination" and that she mistakenly submitted a different copy from the one she had intended (see [78] above). This explanation was clearly untrue. It represented a calculated attempt to persuade NUS to accept her second submission and to avoid being caught for plagiarism.

98 Finally, I turn to Ms Tan's Misrepresentation. First, I reject her submission that the Misrepresentation is "entirely irrelevant" (see [90] above). While it is true that any non-disclosure of an applicant's previous misconduct

---

97 Ms Tan's 1st Affidavit at p 129.

to third parties should have no bearing on the applicant's duty of candour to the court (see *Re Shafee* at [103]), this principle has little application in the present case. Ms Tan's conduct went far beyond a mere failure to disclose. She actively communicated an untruth to TSMP by asserting that she was on a "leave of absence from school due to personal reasons at home", when she had, in reality, been suspended from NUS for her second academic offence.[98] The nature of Ms Tan's deception is troubling. Ms Tan admitted that she intentionally communicated this untruth after consulting with her family because she was "embarrassed" about the situation and was "scared" that revealing her history of academic offences would "jeopardise" her training contract.[99]

99 At the time Ms Tan made the Misrepresentation, she had been sanctioned for two earlier instances of academic plagiarism. She had also undergone mandatory counselling and community service work designed to help her understand the gravity of her actions. Seen against this context. Ms Tan's decision to avoid disclosing the truth to TSMP, coupled with her decision to mislead them instead, suggests that despite all the measures, she had failed to gain meaningful ethical insight into the importance of honesty.

100 Moreover, and contrary to her submissions, Ms Tan was initially not fully forthcoming in her disclosures to the court. In her first affidavit, Ms Tan did not voluntarily reveal the extent and nature of her Misrepresentation. She alluded only to her failure to disclose her academic offences to TSMP, but she made no mention whatsoever of the untruth she had communicated. The Misrepresentation was only revealed when the Attorney-General's Chambers directed Ms Tan to file a supplementary affidavit to provide further clarification

---

98 Ms Tan's 2nd Affidavit at [12].

99 Ms Tan's 2nd Affidavit at [13].

on the matter. Similarly, Ms Tan's eventual disclosure of her academic offences to TSMP should be seen in its proper context. While she claims that she revealed her academic misconduct to TSMP because she wanted to be transparent and accountable, this contention is unconvincing. As the AG highlights, it is likely that TSMP would have discovered the Misrepresentation independently once Ms Tan filed the relevant admission papers and/or if her LNP admission was delayed.[100] In other words, Ms Tan had no choice but to disclose the same to TSMP at that time. Viewed in this context, Ms Tan's disclosures do not carry much weight in demonstrating genuine rehabilitation and a willingness to take responsibility for her mistakes.

101 That said, I acknowledge several positive developments. Around three years have passed since Ms Tan's last academic offence, and she has completed her studies at NUS without further incidents.[101] She has also voluntarily disclosed her academic offences to other law firms when she applied for practice training contracts. Her full and frank disclosure to these prospective employers suggests that she is beginning to take personal responsibility for her actions and is willing to confront her wrongdoings. However, when considered against the totality of her conduct, I find that Ms Tan still has some way to go in her journey of rehabilitation. Considering all the relevant circumstances, I find that Ms Tan is presently not a fit and proper person to be admitted as an LNP. I therefore allow her to withdraw her application in LNP 138 subject to an exclusionary period, to which I now turn.

---

100 ZTAGWS at [64].

101 ZTAWS at [71]–[73].

The appropriate length of Ms Tan's exclusionary period

102 I move on to the appropriate length of Ms Tan's exclusionary period. Having considered the relevant factors, I find a 12-month exclusionary period appropriate for the following reasons.

103 Ms Tan's pattern of misconduct was serious and escalating. While her first academic offence could be attributed to a lack of academic diligence, her subsequent academic offence represented a calculated decision that also featured elements of dishonesty (see [95]–[97] above). The Misrepresentation to TSMP compounds these concerns. Despite being sanctioned by NUS for her two academic transgressions (including being suspended from NUS and being ordered to undertake counselling and community service for her second academic offence), Ms Tan failed to gain meaningful insight into her misconduct. It demonstrates Ms Tan's continued willingness to prioritise her immediate self-interests over honesty when faced with potential consequences.

104 That said, I recognise that Ms Tan's academic offences were not as severe as those committed by Mr Foo Zhong Yu Aaron ("Mr Foo") (see *Re Ariffin*) and Mr Sean Wong Wai Loong ("Mr Wong") (see *Re Sean Wong*). In Mr Foo's case, he had, among other things, intentionally recorded and transcribed his classmate's oral arguments without the latter's knowledge, and had subsequently incorporated the transcription into his own written memorandum (*Re Ariffin* at [61]).[102] When Mr Foo filed his application for admission, he had not disclosed the fact of the audio recording in his first and second affidavits for admission. He only did so after the AG requested for further information (*Re Ariffin* at [65]). Having regard to the relevant factors,

---

102 See also ZTAGWS at [69].

the court found that Mr Foo was not a fit and proper person to be admitted at the material time. The court highlighted that Mr Foo's misconduct was serious and showed a "fundamental disregard" for doing what was right. The court also found that he had carried out a premeditated and "elaborate plan" to copy the other student's work to the fullest extent possible by recording it. Furthermore, Mr Foo was not forthcoming in his disclosures to the court. In those premises, the court decided that an 18-month exclusionary period was appropriate for Mr Foo to further reflect on and remedy his character issues (*Re Ariffin* at [74]–[88]).

105 As for Mr Wong, his misconduct involved a cheating incident while he sat for his Part B examinations. After Mr Wong completed the examination in question, he communicated with another candidate, who had also completed that examination. Mr Wong asked to see this candidate's answers, to compare them with his own. After reviewing that candidate's script, Mr Wong realised that he overlooked and failed to attempt one entire question. In his panic, he proceeded to copy that candidate's answer into his own script, before resubmitting his edited script (*Re Sean Wong* at [7]–[9]). In deciding to impose a two-year exclusionary period for Mr Wong, the court highlighted that Mr Wong's cheating incident was serious – he showed lack of respect or regard for others. The court also considered unsatisfactory the fact that Mr Wong had not disclosed this cheating incident in his first admissions affidavit at all (*Re Sean Wong* at [12]–[28]).

106 In my view, the facts and circumstances of Ms Tan's application are not as serious as those disclosed in Mr Foo's and Mr Wong's cases. While Ms Tan's second academic offence and subsequent Misrepresentation reveal elements of dishonesty, these transgressions were not as elaborate or premeditated as those in Mr Foo's case. Indeed, there are several positive factors that weigh in Ms

Tan's favour. Unlike Mr Foo and Mr Wong, Ms Tan made full disclosure of her two academic offences in her first affidavit. I also repeat my observations earlier that around three years have passed since her last academic offence. Ms Tan has also voluntarily made disclosure about her misconduct to several prospective employers. These demonstrate that Ms Tan is beginning to take personal responsibility for her actions and are positive signs that Ms Tan has commenced her journey of rehabilitation.

107 Weighing these considerations, I find that a 12-month exclusionary period will provide Ms Tan with adequate time to further reflect on and meaningfully address her existing character issues.

Conclusion

108 For all the reasons above, I find that Ms Tan is presently not a fit and proper person to be admitted as an LNP on account of her character issues. I do not consider this case serious enough to warrant dismissal of her application. Thus, I grant her leave to withdraw her application in LNP 138, subject to an exclusionary period of 12 months from the date of the court order.

Ms Evangeline Koh Yi

109 The AG and the SILE object to Ms Koh's application to be admitted as an LNP. Their objections centre on Ms Koh's dishonest appropriation of the water bottle ("Bottle") of another student ("Student"), and her continued insistence that she had taken the Bottle in error rather than dishonestly, despite

closed-circuit television ("CCTV") footage demonstrating otherwise.[103] The Law Society does not object to Ms Koh's application.[104]

110 Having considered the parties' submissions, I find that Ms Koh is presently not a fit and proper person to be admitted as an LNP on account of her character issues. In my judgment, it would be inappropriate to permit Ms Koh to withdraw her application for admission. Ms Koh has demonstrated a complete failure to appreciate or acknowledge her wrongdoing. Accordingly, I dismiss her application in LNP 172 and further impose an exclusionary period of three years from the date of the court order. These are my reasons.

Facts

111 On 11 January 2024, the Student reported to the Singapore Management University's ("SMU") Office of Safety and Security ("OSS") that she had lost the Bottle. She left it on a study desk at the student lounge ("Student Lounge") at Basement 1 of SMU's School of Social Sciences building when she went to the restroom. When she returned, it was missing.[105]

112 The OSS investigated the incident on the same day. Investigations (including CCTV footage) revealed that it was Ms Koh who had taken the

---

103 The AG's Written Submissions for LNP 172 (Evangeline Koh Yi) dated 6 November 2025 ("EKAGWS") at [1]–[2]; The SILE's Written Submissions for LNP 172 (Evangeline Koh Yi) dated 6 November 2025 ("EKSILEWS") at [5]; Ms Koh's supplementary affidavit filed in support of LNP 172 dated 14 April 2025 ("Ms Koh's Affidavit") at p 41.

104 The Law Society's Written Submissions for HC/LNP 172/2025 (Evangeline Koh Yi) dated 5 November 2025 ("EKLSWS") at [2].

105 Ms Satviender Kaur Nijer's Affidavit filed on behalf of the AG and for LNP 172 dated 9 October 2025 ("AG's Affidavit") at [7] and p 45; Ms Koh's Affidavit at p 41.

Bottle.[106] Subsequently, the OSS sent an email to Ms Koh seeking to discuss the incident. Following this email, Ms Koh met with the OSS staff on the same day and returned the Bottle. In doing so, Ms Koh claimed that she had mistakenly taken the Bottle, believing it was hers as she purportedly owned the same model of water bottle, albeit in a different colour.[107]

113 The OSS took the view that Ms Koh's explanation was inconsistent with the CCTV footage and referred the matter to SMU's Office of the Dean of Students ("ODOS"). ODOS investigated the matter and wrote to Ms Koh on 15 January 2024 to inform her that the matter would be pursued further.[108] On 18 January 2024, Ms Koh sent ODOS an email, providing ODOS with a written explanation of the incident. In this email, Ms Koh stated, amongst other things, the following:[109]

(a) She was feeling the "side effects of jet lag and fatigue" as she had "not slept well" since she returned to Singapore from Frankfurt on 5 January 2024.

(b) She fell asleep during her lecture and woke up at 11.15am in a "state of semi-stupor and lethargy and was trying to focus back to the present surroundings" and had walked around [the Student Lounge] to try to re-energise herself and focus.

(c) She was in a "confused state of mind". She picked up the Bottle from the study table thinking it was hers, and that she must have

---

106 AG's Affidavit at [7(a)] and at p 45; Ms Koh's Affidavit at p 41; Ms Koh's Written Submissions for LNP 172 dated 6 November 2025 ("EKAWS") at [3]

107 AG's Affidavit at [7(a)] and at p 45; Ms Koh's Affidavit at p 41.

108 AG's Affidavit at [7(b)] and at p 46.

109 AG's Affidavit at [7(b)] and at pp 46 to 47; Ms Koh's Affidavit at pp 22 to 23.

"carelessly" left her water bottle at the Student's study table while looking for a seat earlier.

(d) Due to "fatigue and a confused state of mind", she did not notice that she eventually came to have two bottles in her bag.

(e) She genuinely believed that the Bottle she put in her bag was hers. She did not harbour any "ill intention" when taking the Bottle. When she returned the Bottle, she did so out of a sense of responsibility and not out of guilt or fear.

114 As Ms Koh insisted that she had mistakenly taken the Bottle, SMU's University Council of Student Conduct ("UCSC") classified the matter as a suspected "Major Violation" so that this case could be subjected to a more rigorous fact-finding procedure.[110] Subsequently, a disciplinary hearing panel ("Disciplinary Panel") consisting of three faculty members was convened to investigate this incident. Ms Koh submitted her written submissions to the Disciplinary Panel on 15 February 2024 ("15 February Submissions"). In these submissions, Ms Koh stated, amongst others, the following:[111]

(a) She had not committed theft as defined under the Penal Code 1871 (2020 Rev Ed) as she had not been dishonest.

(b) She claimed that she had not been in a "good frame of mind" due to a lack of sleep and stress following her return to Singapore from her overseas exchange.

---

110 AG's Affidavit at [7(b)(iii)] and at p 47.

111 AG's Affidavit at [7(b)(v)] and at p 48; Ms Koh's Affidavit at pp 25 to 27.

(c) She averred that she had not been treated for any mental illness, such as compulsive disorder, that would have inhibited her judgment or spurred her to take the Bottle.

(d) She had no incentive to take the Bottle as her own bottle was in good condition, and she was not facing financial constraints.

(e) An ordinary person would not take someone else's bottle as that would be unhygienic.

(f) She would not steal a used water bottle and "ruin everything [she had] painstakingly worked and studied for".

115 On 20 February 2024, Ms Koh had an online meeting with the Disciplinary Panel. At this meeting, she repeated her assertion that she had no intention to steal the Bottle. When it was highlighted that the Bottle was of a "clearly different colour" from her own, Ms Koh responded by saying that she had paid more attention to the shape and size of the Bottle, and not the colour.[112] The Disciplinary Panel found Ms Koh's contentions unconvincing, incapable of being verified, and therefore disbelieved them. The Disciplinary Panel presented the CCTV footage of the incident to Ms Koh and concluded that she breached Clause 5 of the SMU Code of Student Conduct ("Code of Student Conduct"). I reproduce Clause 5 below:[113]

> To refrain from stealing, damaging, defacing, or misusing the property, facilities, or infrastructure of the [SMU], or of others. Respect the right of others to use facilities and infrastructure

---

112 AG's Affidavit at [7(b)(vii)] and at p 49.

113 Ms Koh's Affidavit at p 41; AG's Affidavit at p 23.

116 The Disciplinary Panel's recommendations were referred to the UCSC. Ms Koh submitted written submissions to the UCSC on 19 March 2024, which were substantially similar in substance as her 15 February Submissions, save for a few additional points which included, amongst others, the following:[114]

(a) When the Student asked Ms Koh if Ms Koh had seen the Bottle, Ms Koh contended that it "genuinely did not occur to [her] that the [Student] was possibly referring [to] the [Bottle Ms Koh had taken]" as it was a "quick encounter" and Ms Koh was still dazed after waking up from the nap.

(b) It would be "against all common sense" for Ms Koh to have deliberately taken the Bottle, given that the Student Lounge had been full of students at the material time.

117 The UCSC eventually affirmed the Disciplinary Panel's findings and directed that in addition to being issued a written reprimand, Ms Koh was required to attend counselling sessions. For the purposes of these proceedings, SMU also highlighted the following:

(a) Ms Koh did not, at any point, provide SMU with any documentary evidence to substantiate her claims of fatigue or jetlag.[115]

(b) Ms Koh did not appeal the decision.[116]

(c) Ms Koh attended the counselling sessions as directed.[117]

---

114 AG's Affidavit at [7(b)(ix)] and at p 49.

115 AG's Affidavit at p 50.

116 AG's Affidavit at p 50.

117 AG's Affidavit at [7(b)(x)]–[7(b)(xi)] and at p 50.

(d) Finally, there is no evidence that a police report has been lodged in respect of this incident.[118]

The parties' cases

The stakeholders' cases

118 The AG and the SILE both take a similar position. They submit that Ms Koh is presently not a fit and proper person to be admitted as an LNP because her conduct during the incident suggests a serious character defect. Both stakeholders argue that the CCTV footage supports SMU's finding that Ms Koh stole the Bottle.[119] In this regard, the two stakeholders contend that her conduct of stealing reflects dishonesty, which is almost invariably seen as suggestive of underlying character flaws that are incompatible with being admitted as an LNP.[120] Lastly, while both stakeholders acknowledge that Ms Koh had voluntarily disclosed this incident in her supporting affidavit,[121] the stakeholders emphasise that Ms Koh's insistence that she had mistakenly taken the Bottle – and refusal to admit her wrongdoing – suggests a lack of remorse and ethical insight into her misconduct.[122] The AG highlights that Ms Koh has also failed to provide any evidence to demonstrate remorse or rehabilitation.[123] In the premises, the AG and the SILE agree that Ms Koh's application in LNP 172 should be withdrawn, subject to a minimum exclusionary period of three years to allow her to reflect and reform herself.[124]

---

118 AG's Affidavit at [7(b)(xii)] and at p 50.

119 EKAGWS at [43]–[44]; EKSILEWS at [26]–[36].

120 EKAGWS at [46]; EKSILEWS at [36].

121 EKAGWS at [59]–[60]; EKSILEWS at [42].

122 EKAGWS at [43]–[44], [47], [64]; EKSILEWS at [42].

123 EKAGWS at [60]–[64].

124 EKAGWS at [3] and [70]; EKSILEWS at [2] and [45].

119 I turn now to the Law Society's position. The Law Society does not object to Ms Koh's application to be admitted as an LNP for the following main reasons.[125]

(a) First, an admission application is not the appropriate forum to explore afresh the factual issues underlying Ms Koh's disciplinary proceedings at SMU.[126] Thus, it is inappropriate for this court to consider the evidence (*eg*, the CCTV footage) to determine whether Ms Koh was in fact guilty of stealing the Bottle.[127]

(b) Second, in any event, there is no evidence of premeditation in the present case.[128]

(c) Third, Ms Koh made full disclosure of the incident voluntarily.[129]

(d) Fourth, Ms Koh's insistence that she had mistakenly taken the Bottle should not be held against her.[130]

(e) Fifth, Ms Koh cooperated fully with SMU's investigations, and attended the mandatory counselling as directed.[131] She has maintained a clean record for nearly two years since the incident.[132] She has engaged in certain *pro bono* legal work since 2024.[133]

---

125 EKLSWS at [2].

126 EKLSWS at [24]–[25].

127 EKLSWS at [26].

128 EKLSWS at [28].

129 EKLSWS at [31]–[32].

130 EKLSWS at [33].

131 EKLSWS at [29]–[30].

132 EKLSWS at [37].

133 EKLSWS at [41]–[43].

120 In any event, the Law Society submits that a three-year exclusionary period is excessive – an appropriate exclusionary period would be six months.[134]

Ms Koh's case

121 I go to Ms Koh's case. I start by recounting her version of events as described in her supporting affidavit. Ms Koh explained the incident as follows. In January 2024, she took an online class in school. She had just returned to Singapore from Germany a few days prior and was "experiencing severe jetlag". She dozed off during the above-mentioned online class due to "exhaustion", and she woke up feeling dazed. In that dazed state, Ms Koh "accidentally mistook" the Bottle at the table beside her as it was the "same brand, model, shape and size as the water bottle [she] had, albeit with a slight colour difference which [she] did not notice at that point in time".[135]

122 According to Ms Koh, while she was heading home that day, she did not have the opportunity to open her bag. It was only after the OSS emailed her that she realised that the Bottle she had taken earlier was not hers. She then "quickly rushed back" to SMU to return it. She felt "extremely embarrassed" from the "lack of alertness and attentiveness" that caused this incident, and explained to the OSS officers that she genuinely believed that the Bottle was hers, given, amongst others, the similar characteristics of the Bottle compared to her own; and the fact that she had moved seats a few times at the start of the online class.

123 In her affidavit and written submissions, Ms Koh made the following main points:

---

134 EKLSWS at [71].

135 Ms Koh's Affidavit at pp 15 to 16.

(a) She takes "full responsibility" for this incident.[136]

(b) She chose to be fully transparent about this incident from the outset. She disclosed this incident at the earliest opportunity to the law firm she was training at and disclosed the same to the court when filing LNP 172.[137]

(c) She cooperated fully with SMU's investigations. She claims, amongst other things, that "at no point did [she] seek to deflect responsibility".[138] She also chose not to appeal SMU's findings as "pursuing the matter further would have served no productive purpose" and accepted SMU's findings as a "learning experience".[139] She contends that she elected not to appeal SMU's decision not because of resignation, but from a "sincere willingness to accept the consequences and to move forward responsibly and respectfully".[140]

(d) She has taken steps towards reflection and rehabilitation. These include: (i) attending all counselling sessions mandated by SMU and private counselling thereafter; (ii) engaging in *pro bono* work at her Church's legal clinic; and (iii) she plans to understand more about professional ethics from online resources and seasoned practitioners.[141]

---

136 Ms Koh's Affidavit at [5(k)].

137 EKAWS at [6].

138 EKAWS at [9].

139 EKAWS at [10].

140 EKAWS at [11].

141 EKAWS at [12]–[13].

(e) She is prepared to accept the three-year exclusionary period sought by the AG and the SILE.[142]

124 At the hearing, Ms Koh largely stood by her written submissions.[143] However, Ms Koh took issue with certain aspects of the SILE's categorisation of the CCTV footage capturing the incident. In the interests of completeness, I will first set out the SILE's categorisation (and observations) of the said CCTV footage below:[144]

(a) The colour of Ms Koh's water bottle and the colour of the Bottle were appreciably different.

(b) Ms Koh's own water bottle was placed directly in front of her, on her study desk, at the material time. It was also well within the Ms Koh's line of sight for most, if not all, of the material time.

(c) Ms Koh's act of *sliding* the Bottle under her study desk, before placing it into her bag, was unusual [emphasis added].

(d) It would have been apparent that Ms Koh was in possession of two water bottles and not one, because: (i) shortly after taking the Bottle and placing it into her bag, Ms Koh picked up her own water bottle and drank from it; and (ii) after doing so, Ms Koh immediately placed her own water bottle into her bag, together with the Student's Bottle.

(e) When the Student returned to the Student Lounge, she asked Ms Koh if Ms Koh had seen the Bottle. This should have put Ms Koh on

142 EKAWS at [17].

143 Transcript at p 46.

144 EKSILEWS at [5(a)(ii)].

notice that she may have mistakenly taken the Bottle. However, Ms Koh did not clarify matters and only responded to the Student in the negative.

(f) Ms Koh had been seated at a different study desk from the Student for the entire duration of the CCTV footage. There was no reason for Ms Koh's own water bottle to have been found at a different study desk, such that the mistake could have arisen.

125 Coming back to Ms Koh's concerns about the SILE's categorisation of the relevant CCTV footage as set out above, Ms Koh contended at the hearing that she took issue with the SILE's use of the word "sliding" (see [124(c)] above). She argued that the word "sliding" suggests "taking [the Bottle] from one hand to the other. Because, after all, [she] was moving from the table and putting the water-bottle into the bag". She further stated that "there was really no intention [for her] to hide the [Bottle] or slide it under the table".[145] Apart from these contentions, Ms Koh confirmed that she has largely no issues with the SILE's categorisation of the CCTV footage as set out above.[146]

My decision

Whether the court may explore the factual issues surrounding Ms Koh's misconduct afresh

126 Before examining the nature and circumstances of Ms Koh's misconduct, I deal first with the Law Society's preliminary contention that this court should not explore afresh the factual issues surrounding Ms Koh's conduct. Thus, contrary to what the AG and SILE contend, the court should not consider the CCTV footage. In this regard, the Law Society relies on Menon

145 Transcript at p 46 lines 3–10.

146 Transcript at p 46 lines 3–5.

CJ's observation that an admissions hearing is not the appropriate forum to explore afresh the factual issues underlying *criminal* proceedings (*Re Shafee* at [99]). In my view, the Law Society's concerns are not quite relevant to the present case.

127 SMU and its relevant disciplinary bodies have conducted its own internal investigations and, after reviewing all the evidence and considering Ms Koh's submissions, concluded that she dishonestly misappropriated the Bottle. In fact, the SMU's UCSC classified this matter as a suspected "Major Violation" precisely to subject Ms Koh's case to a "more rigorous fact-finding procedure" (see [114] above). For these reasons, this court does not actually need to revisit the factual findings relating to Ms Koh's misconduct. SMU fully investigated the matter and found Ms Koh guilty of misappropriating the Bottle and breaching Clause 5 of the Code of Student Conduct (see [115] and [117] above). It is, however, Ms Koh who remains ambivalent about these findings, by claiming that although she took the Bottle, it was but a mistake. In my view, Ms Koh has not provided any compelling reason as to why this court should disturb the factual findings of SMU's formal disciplinary bodies. In fact, I highlight that Ms Koh largely accepts the SILE's categorisation (and observations) of the CCTV footage – a categorisation that not only supports SMU's findings, but undermines her assertions that she took the Bottle mistakenly (see [124]–[125] above). Accordingly, it is sufficient that I proceed with my decision based on SMU's findings.

The nature and circumstances of Ms Koh's misconduct were serious

128 I agree with the AG and the SILE that the circumstances of Ms Koh's misconduct suggest a serious character defect on her part. The Disciplinary Panel concluded that Ms Koh had intentionally committed a violation of Clause

5 of the Code of Student Conduct by "stealing the [Bottle]".[147] The UCSC affirmed the Disciplinary Panel's findings after a careful review of the evidence.[148] As the AG highlights, Ms Koh's conduct of stealing clearly reflects dishonesty, which is almost invariably seen as suggestive of underlying character flaws that are incompatible with being admitted as a legal practitioner (*Re Tay Jie Qi* at [28]). This is because in the legal profession, clients invariably repose their trust and confidence in lawyers in various ways, including to handle their money. In such circumstances, therefore, lawyers must act with the utmost integrity and moral fortitude. This is also mandated by the nature of a lawyer's vocation, which is to aid in the administration of justice (*Re Tay Jie Qi* at [28]). While I note that the item Ms Koh stole was not high in value and was, in her words, "someone else's used water bottle", these do not detract from the fact that she had taken the Bottle *dishonestly* – a character flaw clearly inconsistent with being an LNP.

Ms Koh has not demonstrated any remorse and rehabilitation for her transgression

129 The most troubling aspect of Ms Koh's misconduct is that to date, she has shown a complete lack of remorse and rehabilitation for her transgression.

130 Up until the hearing, Ms Koh has persistently denied having taken the Bottle dishonestly. Ms Koh has not merely sought to downplay her culpability.[149] At every step, essentially, she has refused to truly admit her wrongdoing, despite SMU's findings to the contrary. Throughout this process, Ms Koh has consistently provided the same explanations for why SMU's

147 AG's Affidavit at p 49 at [12].

148 Ms Koh's Affidavit at pp 22 and 41.

149 EKAGWS at [47].

findings are to be disbelieved – that she was fatigued, jetlagged and unfocused, and that she did not intend to take the bottle dishonestly. Her persistent refusal to take personal responsibility for her actions demonstrates a complete lack of ethical insight into her wrongdoing.

131 At this juncture, it is apposite to address Ms Koh's submissions that she has shown remorse and rehabilitation for her misconduct. I find no merit in such assertions. While she claims to have taken "full responsibility" and has disclosed this incident fully and transparently from the outset (see [123] above), the substance of her disclosure tells a different story. In her affidavit, she deposed the following:[150]

> ***… I take full responsibility for this incident but would like to reiterate that I had no ill-intentions in taking someone else's used water bottle, as it does not make sense when I had the same water bottle in good condition***. I am also not financially strapped nor was I acting because of stress. Having taken my [SMU] studies seriously, such as being involved in legal competitions and teaching assistant positions, ***it was never my intention to take someone else's used water bottle for my own gain***, at the risk of jeopardising everything I had painstakingly worked for. Nonetheless, I complied throughout the investigation process and replied to all queries, panel hearings and request for information promptly. I have attended the mandatory counselling prescribed by the [SMU] as well, and have been involved in my Church's pro bono legal work since 2024. [emphasis added]

Clearly, Ms Koh did not actually take responsibility for her actions. Immediately following her purported acceptance of responsibility, she entirely qualified that acceptance – emphasising that it was "never [her] intention to take someone else's used water bottle". In these circumstances, it is difficult to see how Ms Koh can be viewed as having taken any responsibility for the incident at all.

---

150 Ms Koh's Affidavit at pp 16 to 17.

132 Ms Koh's suggestion that she demonstrated personal responsibility and rehabilitation by choosing not to appeal SMU's findings is equally unpersuasive. Looking at the substance of her statements, it becomes clear that her assertions of rehabilitation and responsibility are without basis. Ms Koh stated that she chose not to appeal because pursuing the matter "would have served no productive purpose" and that she "accept[s] the consequences". There is a clear distinction between acknowledging one's misconduct and taking personal responsibility for it versus merely accepting the consequences of one's actions. What Ms Koh is saying, in substance, is the latter. That she *accepts the consequences* of her actions. Not that she accepts that what she did was wrong.

133 As for Ms Koh's contention that she cooperated fully with SMU's investigations, this cooperation must again be seen in context of her complete denial of any wrongdoing. Any weight to be accorded to her purported cooperation is therefore attenuated.

134 Ms Koh also highlights that she has completed her mandatory counselling sessions, which demonstrates rehabilitation and reflection. I do not accept this submission. As Ms Koh highlights, these counselling sessions were *mandatory* – as part of the sanctions imposed on her by SMU for her misconduct. It is therefore unclear how her mere attendance at these compulsory counselling sessions may go to show rehabilitation. As for her purported attendance at private counselling sessions, Ms Tan has not provided any evidence of such attendance. In any event, attending counselling sessions alone, without more, does not demonstrate rehabilitation and remorse. The onus is on an applicant to substantiate *how* any counselling sessions have aided his/her rehabilitation.

135 Ultimately, regardless of what Ms Koh says she has undertaken in pursuit of rehabilitation, the fundamental issue remains. She has, up to the date of the hearing, not taken any personal responsibility for her actions. Ms Koh cannot claim to have begun her journey of rehabilitation when she does not acknowledge that what she did was wrong in the first place. For all the reasons above, I find that Ms Koh is presently not a fit and proper person to be called as an LNP on account of her character issues. As I explained above at [10(c)], permitting the withdrawal of an admission application would be inappropriate where the court finds that the applicant has not begun to appreciate the ethical consequences of his/her misconduct, and has not taken any steps towards rehabilitation. Accordingly, for the reasons discussed above, I dismiss Ms Koh's application in LNP 172. I now turn to the exclusionary period.

The appropriate duration of the exclusionary period

136 Having regard to my analysis of the relevant factors above, I consider a three-year exclusionary period appropriate for Ms Koh. I explain my reasons below.

137 First, Ms Koh's misconduct is, as explained above, serious. Her conduct of stealing clearly reflects dishonesty, which is suggestive of underlying character flaws incompatible with admission as a legal practitioner.

138 While Ms Koh claims to have made full disclosure of her misconduct and engaged in rehabilitative activities like counselling and *pro bono* work, she has consistently denied any wrongdoing, even when presented with evidence by SMU. In these circumstances, it cannot be seriously argued that Ms Koh has shown any remorse – much less rehabilitation – for her actions. On the contrary, her conduct reflects a serious lack of ethical insight into her behaviour.

139 Ms Koh's unresolved character issues may be likened to those raised in Mr Harish Rai's ("Mr Rai") application in *Re Ariffin*. In that case, the court found that Mr Rai showed "no indication of any remorse [and provided no] explanation as to why he committed the academic offence". He "baselessly maintained his innocence throughout [SMU's] entire investigation". The court found such behaviour to be indicative of, amongst others, a "fundamental lack of integrity" and "aggravated by a lack of regard for [SMU's] disciplinary process" (*Re Ariffin* at [118]). The court noted that Mr Rai still maintained in his fifth affidavit for admission that he had never referred to another student's memorandum when writing his own, despite SMU's findings (*Re Ariffin* at [121]). The court imposed a three-year exclusionary period in that case (*Re Ariffin* at [122]).

140 The present case is similar to Mr Rai's. Both applicants showed no indication of remorse and offered no explanation for their respective transgressions. They baselessly maintained their innocence throughout SMU's investigations and continued to do so during their respective admission applications. In these circumstances, I find that a similarly long exclusionary period of three years is warranted for Ms Koh. I note that Ms Koh does not contest the length of the exclusionary period.

Conclusion

141 For all the reasons above, I find that Ms Koh is presently not a fit and proper person to be admitted as an LNP on account of her unresolved character issues. I dismiss her application in LNP 172 and urge Ms Koh to use this three-year exclusionary period wisely to seriously reflect on and acknowledge her wrongdoing, before beginning on her path to rehabilitation and reformation.

Mr Zhang Yichao David

142 The AG and the SILE object to Mr Zhang's application to be admitted as an LNP. Both stakeholders argue that the nature and circumstances of Mr Zhang's academic misconduct are serious.[151] They also argue that Mr Zhang's conduct following his misconduct showed a lack of ethical insight into the seriousness of his transgression.[152] Both stakeholders are of the view that Mr Zhang is presently not suitable for admission in terms of his character and that a three-month exclusionary period should be imposed.[153] In contrast, the Law Society has no objections to the application.[154]

143 Having considered the parties' submissions, I find that Mr Zhang is a fit and proper person to be admitted. These are my reasons.

Facts

144 On 12 November 2020, during the first semester of Mr Zhang's first year in NUS Law, he cheated in his "Contract Quiz 2" ("Quiz"), which constituted 20% of the overall grade for his Law of Contract module.[155] The chronology of events is as follows.

---

151 The AG's Written Submissions for LNP 360 (David Zhang) dated 6 November 2025 ("DZAGWS") at [37] and [39]; The SILE's Written Submissions for LNP 360 (David Zhang) dated 6 November 2025 ("DZSILEWS") at [27]–[29].

152 DZAGWS at [38]; DZSILEWS at [30].

153 DZAGWS at [1]; DZSILEWS at [27] and [31].

154 The Law Society's Written Submissions for LNP 360 (David Zhang) dated 6 November 2025 ("DZLSWS") at [2].

155 Mr Zhang's Supporting Affidavit for LNP 360 dated 28 March 2025 ("Mr Zhang's 1st Affidavit") at [12].

145 Near the end of the Quiz, Mr Zhang messaged his close friend for his answers to the multiple-choice questions ("MCQ"). His friend was unaware that Mr Zhang had not yet submitted his answers for the Quiz, and so he provided Mr Zhang with his MCQ answers.[156] After realising that their answers were completely different, Mr Zhang changed his MCQ answers to match the friend's answers.[157] Mr Zhang eventually got all his answers to the MCQ in the Quiz wrong because the examination software had rearranged the order of the answers in the Quiz.[158]

146 On 4 April 2021, the then-Vice Dean of Academic Affairs ("Vice Dean") emailed Mr Zhang and said that the latter had been "engaging in conduct that constitutes serious violations of standards of academic integrity and honesty at NUS" and asked to meet with Mr Zhang.[159] Subsequently, Mr Zhang was told that the inquiry was about whether Mr Zhang had engaged in dishonest conduct in violation of NUS' guidelines.[160]

147 On 25 May 2021, Mr Zhang was interviewed by the Vice Dean. It is undisputed that at the interview, Mr Zhang immediately confessed to cheating by copying the friend's MCQ answers to the Quiz.[161] Mr Zhang explained that he was having trouble adapting to the academic rigours of law school and was unsure of his abilities. At this time, Mr Zhang apologised for his dishonesty and said that he deserved the low grade he received because he cheated.[162]

---

156 Mr Zhang's 1st Affidavit at [14]–[15].

157 Mr Zhang's 1st Affidavit at [14]–[15].

158 Mr Zhang's 1st Affidavit at [16].

159 Mr Zhang's 1st Affidavit at [18].

160 Mr Zhang's 1st Affidavit at [21].

161 Mr Zhang's 1st Affidavit at [21].

162 Mr Zhang's 1st Affidavit at [22]–[23].

148 Mr Zhang was informed that this incident would be recorded internally within NUS Law and would not be reflected in the latter's academic transcript. However, this incident would be considered if Mr Zhang committed future academic offences.[163] Eventually, Mr Zhang received zero marks for the Quiz.[164]

The parties' cases

The stakeholders' cases

149 I begin with the AG's and the SILE's cases. Both stakeholders take a similar position. They argue that that cheating is a serious offence. It shows a willingness to dishonestly benefit from another's work under pressure and demonstrates a lack of integrity.[165] Cheating suggests a serious character defect that requires time to address.[166] Furthermore, Mr Zhang's actions following his misconduct also reflect poor insight into the ethical implications of his actions.[167] He lamented to his peers about his failed cheating attempt and did not admit to his misconduct until his interview with the Vice Dean which was around five months after his academic transgression.[168]

150 That said, both stakeholders acknowledge that Mr Zhang has shown insight into his ethical issues. He has explained in detail the rehabilitative steps he has taken to rectify his character defects and disclosed his academic offence to his supervising solicitor on the first day of his training contract.[169] In these

---

163 Mr Zhang's 1st Affidavit at [24].

164 Mr Zhang's 1st Affidavit at [27].

165 DZAGWS at [37]–[39]; DZSILEWS at [29].

166 DZAGWS at [37].

167 DZSILEWS at [30]

168 DZAGWS at [38].

169 DZAGWS at [40]–[41]; DZSILEWS at [34]–[37].

circumstances, the AG and the SILE seek a shorter exclusionary period of at least three months for Mr Zhang.[170]

151 I turn to the Law Society's position. While the Law Society notes that Mr Zhang's misconduct was dishonest, they highlight that there was no premeditation.[171] Mr Zhang also admitted to his wrongdoing early. He was forthcoming with the Vice Dean during their interview.[172] Mr Zhang also made full disclosure of his academic offence in his supporting affidavit even though this offence was an internal disciplinary record and would not have been listed in his academic transcript.[173] There was no attempt to downplay his culpability.[174] Further, there is strong evidence of Mr Zhang's remorse and rehabilitation.[175]

Mr Zhang's case

152 Mr Zhang acknowledges that his wrongdoing entails dishonesty. He took advantage of his friend to seek a personal gain for himself.[176] He also admits that he did not come clean after the incident and had even lamented to his schoolmates about the poor scores he obtained for the Quiz.[177] However, while he only admitted to his academic cheating offence when he was confronted with the information, Mr Zhang was forthcoming with the Vice

---

170 DZAGWS at [43]; DZSILEWS at [43]–[44].

171 DZLSWS at [15].

172 DZLSWS at [16]–[17].

173 DZLSWS at [22]–[23].

174 DZLSWS at [22]–[23].

175 DZLSWS at [24]–[29].

176 Mr Zhang's Written Submissions for LNP 360 dated 6 November 2025 ("DZAWS") at [21]–[22].

177 DZAWS at [23].

Dean during the interview, and showed a willingness to take full responsibility for his mistakes.[178]

153 Mr Zhang also made full and frank disclosure about this incident in his supporting affidavits, despite his academic offence not being recorded in his academic transcript. In fact, he went beyond what was found in NUS' records by disclosing allegations that he committed misconduct in the final examination for another module (allegations which NUS later found to be unfounded).[179]

154 Mr Zhang submits that he has demonstrated genuine remorse for the following main reasons:

(a) He has maintained a clean record since his academic transgression in 2020.[180]

(b) He made full and frank disclosure about this incident to the court, the stakeholders, and to his supervising solicitor.[181]

(c) He informed his friend of his wrongdoing and apologised to the latter at the end of Mr Zhang's first year in law school.[182]

(d) He has engaged in "sustained and structured reflection" as set out in his supporting affidavit.[183]

---

178 DZAWS at [24]–[27].

179 DZAWS at [30]–[33].

180 DZAWS at [35].

181 DZAWS at [36] and [39]–[41].

182 DZAWS at [38].

183 DZAWS at [42].

(e) Mr Zhang accepted and agreed with the AG's and the SILE's position that he should withdraw his application in LNP 360 and be subjected to an exclusionary period of three months, so that he may have more time to demonstrate his rehabilitation.[184]

155 Moreover, Mr Zhang submits that he has begun on his journey of rehabilitation. He acknowledges that reflecting on his wrongdoing made him aware of three particular character flaws of his: (a) a failure to uphold honesty and integrity; (b) a disregard for others; and (c) a lack of accountability. In furtherance of addressing these character defects, Mr Zhang has engaged in the following:

(a) To address his failure to uphold honesty and integrity, Mr Zhang has committed himself to maintaining a clean record since his sole academic transgression in 2020.[185]

(b) As for his disregard for others, he has addressed this by applying himself in service of others. For example, he is committed to doing *pro-bono* work to benefit the community. He also secured a three-month attachment to the Criminal Aid Legal Scheme where he spent time shadowing a senior practitioner. This stint has taught him the meaning of being in service of others and the standards expected of being an officer of the court.[186] He also founded "Project Empower" which is aimed at educating sex workers in Singapore on their legal rights.[187] Lastly, he has also provided "substantial support" to his junior when she

184 DZAWS at [43].

185 DZAWS at [46].

186 DZAWS at [47]–[49].

187 DZAWS at [50].

was in an abusive relationship and a related incident involving the NUS Disciplinary Committee and the Police.[188]

(c) Turning to his initial lack of accountability, Mr Zhang has demonstrated a willingness to answer for his past misconduct at every stage. He made full and frank disclosure of his wrongdoing at every step.[189]

156 In the premises, Mr Zhang submits that a three-month exclusionary period is sufficient.[190]

My decision

157 I agree with all the stakeholders that Mr Zhang's academic cheating offence demonstrates dishonesty. He intentionally procured his friend's answers for the Quiz to dishonestly benefit from the latter's work. As I explained above, dishonesty is almost invariably seen as suggestive of underlying character flaws that are incompatible with being admitted as a legal practitioner (see [128] above).

158 That said, the nature and circumstances of an applicant's misconduct are not determinative of whether an applicant is a fit and proper person to be admitted. As I explained earlier, there are other relevant factors that the court must consider in determining whether an applicant is fit and proper in terms of character (see [66] above). These factors include the applicant's conduct during investigations; the nature and extent of subsequent disclosures made in the

188 DZAWS at [51].

189 DZAWS at [52]–[54].

190 DZAWS at [61]–[62].

application for admission; and whether there is any evidence of remorse and rehabilitation.

159 While Mr Zhang did not admit to his cheating offence until approximately five months after the incident, he was entirely cooperative with the Vice Dean during the investigations into his misconduct. During his first interview, Mr Zhang immediately confessed to his academic offence and opined that he deserved the low grade he received for the Quiz because he cheated. His unqualified admission and expression of remorse during the interview are positive factors in his favour.

160 I also consider Mr Zhang's full and frank disclosure about his misconduct to be demonstrative of his genuine willingness to confront his wrongdoing and take personal responsibility for the same. Mr Zhang not only disclosed the full circumstances of his academic offence in his first supporting affidavit. He also voluntarily disclosed allegations that he had committed misconduct in another final examination, even though NUS subsequently found these allegations unsubstantiated. He also disclosed his academic transgression to his supervising solicitor at an early stage. In my view, Mr Zhang's willingness to make full and frank disclosure (even regarding matters not reflected in his academic transcript) demonstrates accountability and integrity and shows both rehabilitation and remorse.

161 At this juncture, I pause to reemphasise that the main consideration behind imposing any exclusionary period must be whether the applicant requires additional time for rehabilitation, and not whether the applicant has received adequate punishment for his/her misconduct (see [11] and [49] above). Viewed in this light, the focus of the AG and the SILE on the nature of Mr Zhang's academic cheating offence, while relevant, is not entirely helpful. No

doubt the court should look at the nature and circumstances of the misconduct. But the court must equally be alive to whether rehabilitation has already been achieved. In this regard, Mr Zhang has explained in detail how he has demonstrated remorse and rehabilitation for his misconduct (see [155] above). He identified specific character flaws arising from his conduct and has engaged in multiple activities designed to address these character defects and facilitate his character development. I also find significant the fact that around five years have elapsed between Mr Zhang's academic offence and his admission application, during which he maintained a clean record. These developments are indicative of an applicant who has fully internalised his wrongdoing and successfully engaged in rehabilitation and reformation.

162 Mr Zhang's case bears similarities to another applicant, Ms Tay Jie Qi ("Ms Tay") (see *Re Tay Jie Qi*). In that case, Ms Tay committed plagiarism in one of her modules in 2019. She maintained a clean record after this act, and voluntarily disclosed the same in her admission affidavit, despite such information not otherwise being in the public domain. The court found the intervening period of time (*ie*, nearly four years) between her misconduct and admission application to be a weighty factor because it served as evidence of her genuine remorse and capacity for rehabilitation. The court also observed that Ms Tay demonstrated candour in confronting her mistakes. In the premises, the court found that no further deferment of Ms Tay's admission application was necessary and allowed her admission application (*Re Tay Jie Qi* at [16]–[19]).

163 Having considered all relevant factors, I find Mr Zhang a fit and proper person to be admitted as an LNP. The Protective Principle is also not engaged. I therefore find it unnecessary to impose any exclusionary period and allow Mr Zhang's admission application in LNP 360.

Conclusion

164 In conclusion, in LNP admission applications under the new admissions framework, an exclusionary period should, in general, start to run from the date of the court order.

165 As for the three Applications, my decisions are as follows:

(a) LNP 138 (Ms Tan): Ms Tan is presently not a fit and proper person to be admitted in terms of her character. I therefore allow her to withdraw her application in LNP 138, and impose an exclusionary period of 12 months.

(b) LNP 172 (Ms Koh): Ms Koh is presently not a fit and proper person to be admitted in terms of her character. I dismiss LNP 172, and impose an exclusionary period of three years.

(c) LNP 360 (Mr Zhang): Mr Zhang is a fit and proper person to be admitted. I allow his admission application in LNP 360.

Hoo Sheau Peng
Judge of the High Court

Divanan s/o V Narkunan (Law Chambers of Divanan Narkunan) for the applicant in LNP 138;
The applicant in LNP 172 in person;
Chia Ru Yun Megan Joan (Tan Rajah & Cheah) for the applicant in LNP 360;
Jeyendran Jeyapal, Tan Jia Qi Rachel and Tan Hui Qing Karin (Attorney-General's Chambers) for the Attorney-General in LNP 138;
Jeyendran Jeyapal and Satviender Kaur Nijer (Attorney-General's Chambers) for the Attorney-General in LNP 172;
Jeyendran Jeyapal and Abigayle Ru-el Huan (Attorney-General's Chambers) for the Attorney-General in LNP 360;
Sanjiv Kumar Rajan and Jonathan Goh Fang Yi (Allen & Gledhill LLP) for the Law Society of Singapore in LNP 138 and LNP 360;
Christopher Anand Daniel and Eileen Yeo (Advocatus Law LLP) for the Law Society of Singapore in LNP 172;
Calvin Liang and Rochelle Lim (Calvin Liang LLC - Duxton Hill Chambers) for the Singapore Institute of Legal Education in LNP 138;
Joshua Hiew (Allen & Gledhill LLP) for the Singapore Institute of Legal Education in LNP 172;
Darius Chan (Breakpoint LLC) for the Singapore Institute of Legal Education in LNP 360.
