

**e-CTIM CPD 40/2018**

**4 October 2018**

**TO ALL MEMBERS**

## SEMINAR: ANALYSIS OF RECENT TAX CASES

| Date                             | Venue                            |
|----------------------------------|----------------------------------|
| 18 October 2018                  | Seri Pacific Hotel, Kuala Lumpur |
| 12 November 2018                 | Symphony Suite Hotel, Ipoh       |
| 30 November 2018                 | Mutiara Hotel, Johor Bahru       |
| 6 December 2018                  | Jen Hotel, Penang                |
| 22 January 2019                  | Le Meridien Hotel, Kota Kinabalu |
| 24 January 2019                  | Pullman Hotel, Kuching           |
| <b>Time: 9.00am – 5.00pm</b>     |                                  |
| <b>Speaker: S Saravana Kumar</b> |                                  |

### CASES

**IMSB v Ketua Pengarah Hasil Dalam Negeri (High Court)** Issue: Challenging a negative advance ruling

**Government of Malaysia v BSB (Court of Appeal)** Issue: Stay of proceedings in civil recovery proceedings

**MHSB v Ketua Pengarah Hasil Dalam Negeri (High Court)** Issue: Judicial review as a mechanism to resolve tax dispute

**HLC v Ketua Pengarah Hasil Dalam Negeri (High Court)** Issue: Withholding tax for interest paid to a Labuan entity

**Pemungut Duti Setem v CT Sdn Bhd (Court of Appeal)** Issue: Section 15(1) stamp duty relief for amalgamation of land

**ORA v Ketua Pengarah Hasil Dalam Negeri (High Court)** Issue: Withholding tax for technical services vs Article 8 of the DTA

**MCEIB v Ketua Pengarah Hasil Dalam Negeri (Special Commissioners)** Issues: Reinvestment allowance for diversification & What amounts to negligence for time-bar?

**GSSB v Ketua Pengarah Hasil Dalam Negeri (High Court)** Issue: Whether software distribution fee amounts to royalty

**HMCOS v Ketua Pengarah Hasil Dalam Negeri (High Court)** Issue: Section 109(3A) remission of withholding tax for good cause

**NRSB v Ketua Pengarah Hasil Dalam Negeri (High Court)** Issue: RPGT v income tax: Recent trends & Can liquidators be said to be trading?

**SSK v Ketua Pengarah Hasil Dalam Negeri (High Court)** Issue: Setting aside travel restriction via judicial review

**THE SEMINAR WILL BE CONDUCTED WITH POWERPOINT PRESENTATIONS, DISCUSSIONS, CASE STUDIES AND SHARING OF REAL LIFE EXAMPLES**

**For full brochure and registration form click [HERE](#)**

**Contact CPD Secretariat for more info:**

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**8 CPD Points**

[for the purpose of Section 153, Income  
Tax Act 1967]

**HRDF Claimable**

[based on the merit of each applicant]

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