

Illustration of Computation in the ITRs:

53. Christina, single, Filipino with 3 dependent child, received in taxable year 2019 the following professional fees as an independent consultant:

Monthly Fees	Less 5% CWT	Net Monthly Fees
P240,000	P12,000	P228,000

The monthly cost of her professional services amounted to P20,000, gross of the CWT.

The office rental expenses related to her consultancy business amounted to:

Monthly rental expense	Less 1% CWT	Monthly rental expense paid
P30,000	P300	P29,700

She is not VAT-registered and instead pays 3% OPT on her gross receipts under Section 116 of the Tax Code.

Aside from her consultancy business, she is a faculty member of CPAR University from which she received the following employment income for the same year:

Gross pay	Less CWT	Less SSS premiums and union dues	Net Pay
P850,000	P60,000	P6,000	P784,000

The amount she received from CPAR University is inclusive of 13th Month Pay and other benefits of P165,000.

Her car fuel expenses amounted to P10,000 per month. She used the car for her consultancy business 40% of the time.

She also wrote a book entitled "SINGLE LIFE IS HEAVEN" which became a bestseller in the Philippines. In 2019, she earned royalties from the book in the amount of P2,500,000, net of the 10% final tax. Using this amount, she opened a time deposit with BDO which earned interest income of P75,000, net of the 20% final tax.

She has excess tax credits from the prior year of P15,500.

- (a) Calculate her tax payable in the Quarterly and Annual ITRs if she does not avail of the 8% income tax option, and itemizes deduction.

	<u>1st Quarterly ITR</u>	<u>2nd Quarterly ITR</u>	<u>3rd Quarterly ITR</u>	<u>Annual ITR</u>
a)	P12,600	P111,740	P124,920	P309,112
b)	(P10,500)	P59,000	P28,000	P186,408
c)	P10,500	P80,000	P7,500	P 63,817
d)	None of the above			

- (b) Calculate her tax payable in the Quarterly and Annual ITRs if she does not avail of the 8% income tax option, and chooses OSD.

	<u>1st Quarterly ITR</u>	<u>2nd Quarterly ITR</u>	<u>3rd Quarterly ITR</u>	<u>Annual ITR</u>
a)	P0	P61,700	P93,600	P269,440
b)	P0	P23,595	P24,343	P34,453
c)	P10,434	P80,348	P7,534	P234,555
d)	None of the above			

- c. Calculate her tax payable in the Quarterly and Annual ITRs if she avails of the 8% income tax option.

	<u>1st Quarterly ITR</u>	<u>2nd Quarterly ITR</u>	<u>3rd Quarterly ITR</u>	<u>Annual ITR</u>
a)	P6,100	P21,600	P21,600	P80,100
b)	P0	P23,595	P24,343	P86,483
c)	P10,434	P80,348	P7,534	P234,455
d)	None of the above			

Solution To Comprehensive Problem 66 In Taxation

Tobias Bleicker



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Insight Into Income Tax 9th/ed. Kaushal Kumar Agrawal, 2007-08 The Present Book Insight Into Income Tax Based On Memory Retention Techniques Like Its Earlier Editions Has Been Designed For Both The Beginners And The Advanced Learners Of Income Tax Introducing Them To The Full Range Of Concepts Of Income Tax Structured Into Two Volumes The Book Covers The Syllabus Prescribed In All Major Indian Universities For The Courses Of B Com H P Ca Pe Ii Cs Inter IcwA Inter Bba Mba And M Com In Addition It Caters To The Academic Needs Of Students Pursuing Professional Courses In This Arena Owing To Its Simple Language And Lucid Style The Book Is Accessible Even To Average Readers It Is Undoubtedly An Asset For The Students Of The Subject While A Valuable Lasting Reference Source For The Teachers Professionals Accountants And General Readers

The Impact of Community Law on Tax Treaties: Issues and Solutions Pasquale Pistone, 2002-03-11 Study on the question of harmonization of direct taxation among European Community Member States how Member States must comply with EC Law as they apply their tax treaties how EC law regulates cross border tax issues within the Community and how EC law affects tax treaties between EU Member States and third countries The book provides expert commentary on 27 leading tax cases from the European Court of Justice and gives the proposal of EC Model Tax Convention which combines existing provisions of international tax law with the principles of Community tax law

Examining the Administration's Plan for Reducing the Tax Gap United States. Congress. Senate. Committee on Finance, 2007 *Issues in International Taxation The Application of the OECD Model Tax Convention to Partnerships* OECD, 1999-08-26 This report addresses the issue of the application of tax treaties to cases involving partnerships in detail and focuses on specific factual examples

Model Tax Convention on Income and on Capital 2017 (Full Version) OECD, 2019-04-25 This publication is the tenth edition of the full version of the OECD Model Tax Convention on Income and on Capital This full version contains the full text of the Model Tax Convention as it read on 21 November 2017 including the Articles Commentaries non member economies positions

Certificate in Management Accounting Review Grant W. Newton, 1984 **Problem Resolution Program Codes** United States. Internal Revenue Service, 1994 **Model Tax Convention on Income and on Capital 2010 (Full Version)** OECD, 2012-08-06 This publication is the eighth edition of the full version of the OECD Model Tax Convention on Income and on Capital This full version contains the full text of the Model Tax Convention on Income and on Capital as it read on 22 July 2010

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global consensus must be achieved This book offers a potential restructuring of the tax treaty dispute resolution system based on a comparative analysis of the dispute resolution mechanisms under tax treaties as prescribed in the OECD and UN models on the one hand and the UN Law of the Sea Convention LOSC on the other This comparative study is the first of its kind and is premised on certain key geopolitical similarities that underpin the international tax regime ITR and the law of the sea regime while taking into consideration the differences in the institutional context of both regimes The author proposes a new tax treaty dispute resolution system based on the LOSC system for resolving multilateral tax disputes focusing on the following mapping of the institutional arrangements that make up the dispute resolution mechanisms to understand how each system works comparative analysis of the patterns of interaction and outcomes generated across the two dispute resolution systems to identify relevant aspects of the LOSC system that may be adapted in the ITR to improve tax treaty dispute resolution and analysis of the inclusivity levels across the decision making structures under each system to identify specific consensus building techniques that may facilitate the implementation of the new proposed tax treaty dispute resolution system and also enhance international cooperation across the ITR The proposed restructuring of the tax treaty dispute resolution system expands the existing mutual agreement procedure and forms a comprehensive legal framework that aims to achieve a more effective predictable and equitable resolution of multilateral tax disputes in the 21st century ITR by striking a balance between countries right to tax sovereignty and the rule of law Just as the design of the dispute resolution system under the LOSC paved the way for universal consensus of the Convention among almost 160 countries the author s new tax treaty dispute resolution system also offers a solid foundation for consensus building towards a universal treaty in the ITR Everyone concerned with international tax dispute resolution whether policymaker in house counsel national tax authority official judge tax lawyer or academic will find the truly valuable analysis here not elsewhere

Tax Cases ,1925 *Proceedings of the Board of Supervisors of Erie County* Erie County, N.Y. County Legislature,1854
Pennsylvania School Journal ,1861

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