**GITC Review Vols I-XIV**

**INDEX**

**Compiled by Paul Connor**

|  |  |  |  |
| --- | --- | --- | --- |
| **Milton Grundy** |  |  |  |
| New Trusts | Volume XV | Number 1 | April 2019 |
| Tax Planning in the Present Climate | Volume XIV | Number 2 | March 2018 |
| The Offshore Trust: A Very British Industry | Volume XIV | Number 1 | November 2016 |
| [The Opaque Partnership: A Note](http://taxbar.com/wp-content/uploads/2016/01/The_Opaque_Partnership_A_Note_Milton_Grundy.pdf) | Volume XIII | Number 1 | December 2014 |
| [Onshore: The New Offshore](http://taxbar.com/wp-content/uploads/2016/01/Onshore_The_New_Offshore_Milton_Grundy.pdf.pdf) | Volume XI | Number 2 | December 2012 |
| [The Shahs](http://taxbar.com/wp-content/uploads/2016/01/The_Shahs_Milton_Grundy.pdf.pdf) | Volume X | Number 2 | October 2011 |
| [Nigel](http://taxbar.com/wp-content/uploads/2016/01/Nigel_Milton_Grundy.pdf.pdf) | Volume X | Number 1 | March 2011 |
| [The Uses of Trusts](http://taxbar.com/wp-content/uploads/2016/01/The_Uses_of_Trusts_MG.pdf.pdf) | Volume IX | Number 3 | October 2010 |
| [Mr. Lee](http://taxbar.com/wp-content/uploads/2016/01/Mr_Lee_MG.pdf.pdf) | Volume IX | Number 2 | June 2010 |
| [The Principessa](http://taxbar.com/wp-content/uploads/2016/01/The_Principessa_MG.pdf.pdf) | Volume VIII | Number 2 | April 2009 |
| [Case Note: S*mallwood v. Revenue & Customs Commissioners*](http://taxbar.com/wp-content/uploads/2016/01/Case_Note_Smallwood_v_Revenue_Customs_Commissioners_MG.pdf.pdf) | Volume VII | Number 2 | June 2008 |
| [“Benefit”: A Note](http://taxbar.com/wp-content/uploads/2016/01/Benefit_A_Note_MG.pdf) | Volume VII | Number 1 | December 2007 |
| [The Smith Story](http://taxbar.com/wp-content/uploads/2016/01/The_Smith_Story_MG.pdf) | Volume VI | Number 2 | June 2007 |
| [Treaty-Shopping through Life Assurance](http://taxbar.com/wp-content/uploads/2016/01/treaty-shopping_mg_000.pdf) | Volume IV | Number 2 | May 2005 |
| [Home Thoughts from Abroad](http://taxbar.com/wp-content/uploads/2016/01/home_thoughts_mg_000.pdf) | Volume III | Number 1 | November 2003 |
| [The Limited Partnership: A UK vehicle for non-residents with non-UK income](http://taxbar.com/wp-content/uploads/2016/01/limited_partnership_uk_vechicle_000.pdf) | Volume II | Number 1 | November 2002 |
| The Offshore Trust in Barbados | Volume I | Number 2 | May 2002 |
| **Michael Flesch QC** |  |  |  |
| ‘No Benefit. No Tax’ True or False? | Volume XIV | Number 2 | March 2018 |
| [Not All Benefits Are Taxable](http://taxbar.com/wp-content/uploads/2016/01/Not_All_Benefits_Are_Taxable_Michael_Flesch_QC.pdf) | Volume XIII | Number 1 | December 2014 |
| [Purpose or Intendment: Spot the Difference](http://taxbar.com/wp-content/uploads/2016/01/Purpose_of_Intendment_SpottheDifference_MF.pdf.pdf) | Volume IX | Number 1 | December 2009 |
| Section 739 and Foreign Domiciliaries: Some Reflections | Volume I | Number 2 | May 2002 |
| **David Goldberg QC** |  |  |  |
| Disputes with HMRC: Why They Arise and How to Resolve Them | Volume XV | Number 1 | April 2019 |
| The Criminalisation of Tax Law | Volume XIV | Number 2 | March 2018 |
| Where Ignorant Armies Clash by Night: How  Reducing the Size of the State has increased its  Power | Volume XIV | Number 1 | November 2016 |
| [The Senior Accounting Officer](http://taxbar.com/wp-content/uploads/2016/01/The_Senior_Accounting_Officer_David_Goldberg_QC.pdf) | Volume XIII | Number 1 | December 2014 |
| [Reflections on the GAAR](http://taxbar.com/wp-content/uploads/2016/01/Reflections_on_the_GAAR_David_Goldberg_QC.pdf.pdf) | Volume XII | Number 2 | January 2014 |
| [How Clear, Transparent, Accessible & Foreseeable Is Tax Law & Practice](http://taxbar.com/wp-content/uploads/2016/01/How_Clear_Transparent_Accessible_And_Foreseeable_Is_Tax_Law_And_Practice_David_Goldberg.pdf) | Volume XII | Number 1 | June 2013 |
| [The Current Focus on Tax Avoidance](http://taxbar.com/wp-content/uploads/2016/01/The_Current_Focus_on_Tax_Avoidance_David_Goldberg_QC.pdf.pdf) | Volume XI | Number 2 | December 2012 |
| [Some Reflections on *Tower MCashback*](http://taxbar.com/wp-content/uploads/2016/01/Some_Reflections_on_Tower_MCashback_DG.pdf.pdf) | Volume X | Number 2 | October 2011 |
| [Recent Tax Cases](http://taxbar.com/wp-content/uploads/2016/01/Recent_Tax_Cases_David_Goldberg_QC.pdf.pdf) | Volume X | Number 1 | March 2011 |
| [On the Nature of Reality](http://taxbar.com/wp-content/uploads/2016/01/On_the_Nature_in_Law_of_Reality_DG.pdf.pdf) | Volume IX | Number 1 | December 2009 |
| [Thoughts on Corporate Residence](http://taxbar.com/wp-content/uploads/2016/01/Thoughts_on_Corporate_Residence_DG.pdf.pdf) | Volume VIII | Number 3 | June 2009 |
| [Tax Avoidance in Practice](http://taxbar.com/wp-content/uploads/2016/01/Tax_Avoidance_in_Practice_DG.pdf.pdf) | Volume VIII | Number 1 | November 2008 |
| [*Mars* and *Secan:* There Illusion and Here Truth; the Computation of Profit](http://taxbar.com/wp-content/uploads/2016/01/Mars_and_Secan_There_Illusion_and_here_Truth_DG.pdf.pdf) | Volume VII | Number 2 | June 2008 |
| [The Ordinary and Extraordinary Power of the European Court of Justice](http://taxbar.com/wp-content/uploads/2016/01/The_Ordinary_and_Extraordinary_Power_of_the_European_Court_of_Justice_DG.pdf) | Volume VI | Number 2 | June 2007 |
| [The Problem is Perception](http://taxbar.com/wp-content/uploads/2016/01/problem_perception_000.pdf) | Volume IV | Number 2 | May 2005 |
| [Words From The Heart: Tax Avoidance of the Third Kind; the Lessons of Schrodinger’s Cat](http://taxbar.com/wp-content/uploads/2016/01/words_from_the_heart_dg_000.pdf) | Volume IV | Number 1 | November 2004 |
| [The Legal Adviser’s Responsibility](http://taxbar.com/wp-content/uploads/2016/01/legal_advisers_responsiblity_dg_000.pdf) | Volume II | Number 1 | November 2002 |
| Anti-Avoidance | Volume I | Number 1 | November 2001 |
| **David Goy QC** |  |  |  |
| Does Interest Arise in the UK? | Volume XIV | Number 1 | November 2016 |
| [SPV’s and Control](http://taxbar.com/wp-content/uploads/2016/01/SPVs_And_Control_David_Goy_QC.pdf) | Volume XIII | Number 1 | December 2014 |
| [Miscellaneous Points on VAT and Property](http://taxbar.com/wp-content/uploads/2016/01/Miscellaneous_Points_on_VAT_and_Property_DGY.pdf.pdf) | Volume VIII | Number 1 | November 2008 |
| [Double Tax Treaties and ss.739 and 740 ICTA 1988](http://taxbar.com/wp-content/uploads/2016/01/Double_Tax_Treaties_DGY_000.pdf) | Volume V | Number 2 | May 2006 |
| [Disposals Companies With Substantial Shareholdings](http://taxbar.com/wp-content/uploads/2016/01/disposals_companies_dgy_000.pdf) | Volume II | Number 1 | November 2002 |
|  |  |  |  |
| **Laura K. Inglis** |  |  |  |
| Tax Considerations in Matrimonial Finance Cases | Volume XV | Number 1 | April 2019 |
| **John Walters QC** |  |  |  |
| [The View From The Bench](http://taxbar.com/wp-content/uploads/2016/01/The_View_From_The_Bench_John_Walters_QC.pdf) | Volume XIII | Number 1 | December 2014 |
| [The 2009 Reforms of the Tax Appeals Tribunals](http://taxbar.com/wp-content/uploads/2016/01/The_2009_Reforms_of_the_Tax_Appeals_Tribunals_JW.pdf.pdf) | Volume VIII | Number 2 | April 2009 |
| [Individual Residence and s.334](http://taxbar.com/wp-content/uploads/2016/01/Individual_Residence_JW_000.pdf) | Volume V | Number 1 | November 2005 |
| [VAT and alterations to listed buildings – the Zielinski Baker appeal](http://taxbar.com/wp-content/uploads/2016/01/zielinski_baker_jw_000.pdf) | Volume III | Number 2 | April 2004 |
| [Tax and Damages](http://taxbar.com/wp-content/uploads/2016/01/tax_damages3_jw_000.pdf) | Volume II | Number 2 | April 2003 |
| Information: Compliance v Confidentiality | Volume I | Number1 | November 2001 |
| **Nicola Shaw QC** |  |  |  |
| Tax Law and the Supreme Court | Volume XIV | Number 2 | March 2018 |
| [*College of Estate Management v. Customs & Excise Commissioners* [2005] STC 1597: Case Note and Commentary](http://taxbar.com/wp-content/uploads/2016/01/College_of_Estate_Management_NS_000.pdf) | Volume V | Number 2 | May 2006 |
| [Tax and the Proceeds of Crime](http://taxbar.com/wp-content/uploads/2016/01/tax_proceeds_crime_ns_000.pdf) | Volume II | Number 2 | April 2003 |
| **Laurent Sykes QC** |  |  |  |
| A Few Points of Interest | Volume XIV | Number 1 | November 2016 |
| [Four Practical Points to Help Defend Your Client](http://taxbar.com/wp-content/uploads/2016/01/Four_Practical_Points_To_Help_Defend_Your_Client_Laurent_Sykes.pdf) | Volume XIII | Number 1 | December 2014 |
| [Why Care is Needed in Applying The *Hok* Case](http://taxbar.com/wp-content/uploads/2016/01/Why_Care_is_Needed_in_Applying_the_Hok_Case_Laurent_Sykes.pdf.pdf) | Volume XII | Number 2 | January 2014 |
| [Capital vs. Revenue: Some Points to Bear in Mind in Disputes with HMRC](http://taxbar.com/wp-content/uploads/2016/01/Capital_vs_Revenue_Some_Points_To_Bear_In_Mind_In_Disputes_With_HMRC_Laurent_Sykes.pdf.pdf) | Volume XII | Number 1 | June 2013 |
| [Loans to Participators: A Practical Point](http://taxbar.com/wp-content/uploads/2016/01/Loans_to_Participators_A_Practical_Point_Laurent_Sykes.pdf.pdf) | Volume XI | Number 1 | April 2012 |
| [Domestic Anti-avoidance Provisions: Treaty and EU Overrides](http://taxbar.com/wp-content/uploads/2016/01/Domestic_Antiavoidance_Provisions_Treaty_and_EU_Overridees_LS.pdf.pdf) | Volume IX | Number 3 | October 2010 |
| [Residence and Zero Rate of Tax Jurisdictions](http://taxbar.com/wp-content/uploads/2016/01/Residence_and_Zero_Rate_of_Tax_Jurisdictions_LS.pdf.pdf) | Volume IX | Number 2 | June 2010 |
| [Making Sense of s.809L](http://taxbar.com/wp-content/uploads/2016/01/Making_Sense_of_s.809L_LS.pdf.pdf) | Volume VIII | Number 2 | April 2009 |
| [CFC Code Removed from Statute Book by Judge](http://taxbar.com/wp-content/uploads/2016/01/CFC_Code_Removed_from_Statute_Book_by_Judge_LS.pdf.pdf) | Volume VIII | Number 1 | November 2008 |
| **Nikhil Mehta** |  |  |  |
| A Tale of Two Domiciles | Volume XV | Number 1 | April 2019 |
| The Reasonable Senior Accounting Officer | Volume XIV | Number 2 | March 2018 |
| The Importance of Being NRI | Volume XIV | Number 1 | November 2016 |
| [Foreign Collateral Damage](http://taxbar.com/wp-content/uploads/2016/01/Foreign_Collateral_Damage_Nikhil_V_Mehta.pdf) | Volume XIII | Number 1 | December 2014 |
| [There’s no Such Thing as a Sanofi Clause – Or Perhaps There Is](http://taxbar.com/wp-content/uploads/2016/01/Theres_No_Such_Thing_as_a_Sanofi_Clause_Or_Perhaps_There_Is_Nikhi_V_Mehta.pdf.pdf) | Volume XII | Number 2 | January 2014 |
| [The Bond and the Short of It](http://taxbar.com/wp-content/uploads/2016/01/The_Bond_And_The_Short_Of_It_Nikhil_Mehta.pdf.pdf) | Volume XII | Number 1 | June 2013 |
| [*Vodafone*, Hydra and Hercules’ Second Labour Revisted](http://taxbar.com/wp-content/uploads/2016/01/Vodafone_Hydra_and_Hercules_Second_Labour_Revisited_Nikhil_Mehta.pdf.pdf) | Volume XI | Number 2 | December 2012 |
| [Vodafone’s Supreme Court Victory in India](http://taxbar.com/wp-content/uploads/2016/01/Vodafone_Supreme_Court_Victory_in_India_Nikhil_Mehta_and_Gareth_Miles.pdf.pdf) | Volume XI | Number 1 | April 2012 |
| [Debt Releases Taxing Times for a Corporate Debtor](http://taxbar.com/wp-content/uploads/2016/01/Debt_Releases_Taxing_Times_for_a_Corporate_Debtor_Nikhil_Mehta.pdf.pdf) | Volume X | Number 1 | March 2011 |
| [Growing (Capital) Pains in Indian Taxation and Other Fiscal Ailments for Foreign Investors](http://taxbar.com/wp-content/uploads/2016/01/Growing_Capital_Pains_in_Indian_NM.pdf.pdf) | Volume IX | Number 2 | June 2010 |
| **Conrad McDonnell** |  |  |  |
| [Schrödinger’s Cat](http://taxbar.com/wp-content/uploads/2016/01/Schrodingers_Cat_Conrad_McDonnell.pdf) | Volume XIII | Number 1 | December 2014 |
| [The Music Between the Notes: A review of “More Essays in International Tax Planning” Milton Grundy](http://taxbar.com/wp-content/uploads/2016/01/Music_Between_the_notes_CM.pdf) | Volume VI | Number 1 | February 2007 |
| [Tax and Damages](http://taxbar.com/wp-content/uploads/2016/01/tax_damages1_cm_000.pdf) | Volume II | Number 2 | April 2003 |
| **Michael Jones** |  |  |  |
| [A Guide to Some of the Principal Parts of the Offshore Funds Rules – Part III](http://taxbar.com/wp-content/uploads/2016/01/A_Guide_to_Some_of_the_Principal_Parts_of_the_Offshore_Fund_Rules_Part_III_MJ.pdf.pdf) | Volume X | Number 2 | October 2011 |
| [A Guide to Some of the Principal Parts of the Offshore Funds Rules – Part II](http://taxbar.com/wp-content/uploads/2016/01/A_Guide_to_Some_of_the_Principal_Parts_of_the_Offshore_Funds_Rules_Part_II_MIchael_Jone.pdf) | Volume X | Number 1 | March 2011 |
| [A Guide to Some of the Principal Parts of the Offshore Funds Rules – Part 1](http://taxbar.com/wp-content/uploads/2016/01/A_Guide_to_Some_of_the_Principal_Parts_of_the_Offshore_Funds_Rules_-_Part_1_MJ.pdf.pdf) | Volume IX | Number 3 | October 2010 |
| [Tax Planning in Pre-packaged Administrations](http://taxbar.com/wp-content/uploads/2016/01/Tax_Planning_and_Prepackaged_Administrations_MJ.pdf.pdf.pdf) | Volume VIII | Number 3 | June 2009 |
| [Every Second Counts: Limits on HMRC’s Power to Recover NICs](http://taxbar.com/wp-content/uploads/2016/01/Every_Second_Counts_Limits_on_HMRCs_Power_to_Recover_NICs_MJ.pdf.pdf) | Volume VII | Number 2 | June 2008 |
| **Michael Firth** |  |  |  |
| Delay and Alternative Remedies in Judicial Review Claims Against HMRC | Volume XV | Number 1 | April 2019 |
| Consistently Inconsistent – Appeals against Findings of Fact to the Upper Tribunal | Volume XIV | Number 2 | March 2018 |
| Why the First-Tier Tax Tribunal Definitely has Judicial Review Jurisdiction | Volume XIV | Number 1 | November 2016 |
| [The Magic Behind MTIC (Statistical Reasoning in Tax Cases)](http://taxbar.com/wp-content/uploads/2016/01/The_Magic_Behind_MTIC_Michael_Firth.pdf) | Volume XIII | Number 1 | December 2014 |
| [Tax Superpositions](http://taxbar.com/wp-content/uploads/2016/01/Tax_Superpositions_Michael_Firth.pdf.pdf) | Volume XII | Number 2 | January 2014 |
| [The Taxation of Jointly Owned Property](http://taxbar.com/wp-content/uploads/2016/01/The_Taxation_Of_Jointly_Owned_Property_Michael_Firth.pdf.pdf) | Volume XII | Number 1 | June 2013 |
| [A Trap for Remittance-Basis Taxpayers: The Situs of Choses in Action](http://taxbar.com/wp-content/uploads/2016/01/A_Trap_for_Remittance_-_Basis_Taxpayers_The_Situs_of_Choses_in_Action_Michael_Firth.pdf.pdf) | Volume XI | Number 2 | December 2012 |