

*Special Rules Relating to Value.*Income
taxes.

52. For the purposes of this Act, in determining the value of any property no allowance or deduction shall be made for or on account of income tax.

Listed
securities.

53. (1) For the purposes of this Act, except as otherwise provided in another section, the value of any security that is listed on a stock exchange, or, in the case of any security not so listed, on which a price or quotation is obtainable from a recognized financial journal or financial report or from a registered broker, shall be deemed to be the closing price or quotation of that security on the day as of which such value is required to be computed, or, if there was no closing price or quotation on that day, on the last preceding day on which there was a closing price or quotation. 5

Application
of section.

(2) This section does not apply in determining the value of any security on which no closing price or quotation is obtainable as provided in subsection (1), or in determining the value of 15

(a) any share in, or in the capital stock of, or

(b) any other security in the nature of an interest in or right to any of the proceeds, profits, capital assets or other assets of, 20

any corporation, association, partnership or syndicate that, immediately prior to the death of the deceased, was controlled, whether through holding a majority of the shares thereof or other voting interest therein or in any other manner whatsoever, by the deceased, by the deceased and one or more persons connected with him by blood relationship, marriage or adoption within the definition of that expression contained in subsection (7) of section 4, or by any other person on his or their behalf. 25

"Security"
defined.

(3) In this section, "security" includes a bond, debenture, guaranteed investment, share, stock, debenture stock, syndicate unit, right to subscribe for or purchase shares or stocks and right to royalties, but does not include a mortgage or hypothec. 30 35

Shares of
minority
shareholder
in controlled
corporation.

54. (1) Where, immediately prior to the death of any deceased, there belonged to the deceased and one or more persons connected with him by blood relationship, marriage or adoption within the definition of that expression contained in subsection (7) of section 4, shares in the capital stock of a corporation sufficient in number to control the corporation, under circumstances such that the shares in the capital stock of the corporation that belonged to the deceased alone were not sufficient in number to control the corporation, the value of each of the shares in the capital stock of the corporation that belonged at 40 45