

# ***CR 2005/66W - Income tax: HHG PLC: return of capital***



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This document has changed over time. This is a consolidated version of the ruling which was published on *1 July 2005*



## Class Ruling

### Income tax: HHG PLC: return of capital

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#### **Preamble**

*The number, subject heading, **What this Class Ruling is about** (including **Tax law(s)**, **Class of persons** and **Qualifications** sections), **Date of effect**, **Withdrawal**, **Arrangement** and **Ruling** parts of this document are a 'public ruling' in terms of Part IVAAA of the **Taxation Administration Act 1953**. CR 2001/1 explains Class Rulings and Taxation Rulings TR 92/1 and TR 97/16 together explain when a Ruling is a 'public ruling' and how it is binding on the Commissioner.*

#### **Withdrawal**

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1. This Class Ruling is withdrawn and ceases to have effect after 30 June 2005. The Ruling continues to apply, in respect of the tax laws ruled upon, to all persons within the specified class who enter into the specified arrangement during the term of the Ruling. Thus, the Ruling continues to apply to those persons, even following its withdrawal, for arrangements entered into prior to withdrawal of the Ruling. This is subject to there being no change in the arrangement or in the persons' involvement in the arrangement.

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#### **Commissioner of Taxation**

13 July 2005

<i>Previous draft:</i>	- ITAA 1936 6(4)
Not previously issued as a draft	- ITAA 1936 44(1)
	- ITAA 1936 45A
<i>Related Rulings/Determinations:</i>	- ITAA 1936 45B
CR 2001/1; TR 92/1; TR 97/16	- ITAA 1936 45B(2)
	- ITAA 1936 45B(3)
<i>Subject references:</i>	- ITAA 1936 45C
- capital reduction	- ITAA 1997 104-25
- CGT event	- ITAA 1997 104-25(3)
- demerger	- ITAA 1997 106-50
- dividend	- ITAA 1997 112-25(2)
- return of capital on shares	- ITAA 1997 112-25(3)
	- ITAA 1997 112-25(4)
<i>Legislative references:</i>	- ITAA 1997 116-20
- Copyright Act 1968	- ITAA 1997 116-30
- TAA 1953 Pt IVAAA	- ITAA 1997 995-1(1)
- ITAA 1936 6(1)	

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#### ATO references

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FOI status: **may be released**

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ATOlaw topic: Income Tax ~~ Capital Gains Tax ~~ CGT events C1 to  
C3 - end of a CGT asset