



CR 2004/106W - Income tax: scrip for scrip roll-over: proposed exchange of shares and options in The News Corporation Limited for shares and options in News Corporation Inc.

 This cover sheet is provided for information only. It does not form part of *CR 2004/106W - Income tax: scrip for scrip roll-over: proposed exchange of shares and options in The News Corporation Limited for shares and options in News Corporation Inc.*

 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: scrip for scrip roll-over:
proposed exchange of shares and options
in The News Corporation Limited for
shares and options in News Corporation
Inc.

Preamble

*The number, subject heading, **What this Class Ruling is about** (including **Tax law(s)**, **Class of persons** and **Qualifications** sections), **Date of effect**, **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

1. This Ruling is withdrawn and ceases to have effect after 30 June 2005.

Commissioner of Taxation

29 September 2004

Related Rulings/Determinations:
CR 2001/1; TR 92/1; TR 97/16

Subject references:

- arrangement
- capital proceeds
- CGT event
- common stakeholder
- company
- cost base
- interests
- option
- option holder
- ordinary share
- original interest

- reduced cost base
- replacement interest
- resident
- rollover
- scrip
- scrip for scrip
- significant stake
- significant stakeholder
- share
- shareholder

Legislative references:

- ITAA 1936 6(1)
- ITAA 1997 Subdiv 124-M
- ITAA 1997 124-780(1)(a)(i)

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- ITAA 1997 124-780(1)(a)(ii)
- ITAA 1997 124-780(1)(b)
- ITAA 1997 124-780(1)(c)
- ITAA 1997 124-780(2)(a)
- ITAA 1997 124-780(2)(b)
- ITAA 1997 124-780(2)(c)
- ITAA 1997 124-780(3)(a)
- ITAA 1997 124-780(3)(c)
- ITAA 1997 124-780(3)(d)
- ITAA 1997 124-780(6)
- ITAA 1997 124-783(5)
- ITAA 1997 124-785(2)
- ITAA 1997 124-785(4)
- ITAA 1997 124-795(2)(a)
- ITAA 1997 124-795(2)(b)
- ITAA 1997 124-800(1)
- Corporations Law 619(3)

ATO references

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