



***CR 2006/36W - Income tax: capital gains: scrip for scrip roll-over: exchange of units in the Principal America Office Trust for units in the Macquarie Office Trust.***

 This cover sheet is provided for information only. It does not form part of *CR 2006/36W - Income tax: capital gains: scrip for scrip roll-over: exchange of units in the Principal America Office Trust for units in the Macquarie Office Trust*.

 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: capital gains: scrip for scrip roll-over: exchange of units in the Principal America Office Trust for units in the Macquarie Office Trust.

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**❶ This Ruling provides you with the following level of protection:**

This publication (excluding appendixes) is a public ruling for the purposes of the *Taxation Administration Act 1953*.

A public ruling is an expression of the Commissioner's opinion about the way in which a relevant provision applies, or would apply, to entities generally or to a class of entities in relation to a particular scheme or a class of schemes.

If you rely on this ruling, we must apply the law to you in the way set out in the ruling (or in a way that is more favourable for you if we are satisfied that the ruling is incorrect and disadvantages you, and we are not prevented from doing so by a time limit imposed by the law). You will be protected from having to pay any underpaid tax, penalty or interest in respect of the matters covered by this ruling if it turns out that it does not correctly state how the relevant provision applies to you.

## Withdrawal

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 This Ruling is withdrawn and ceases to have effect after 30 June 2005.

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### Commissioner of Taxation

26 April 2006

## References

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*Previous draft:*

Not previously issued as a draft

*Subject references:*

- capital gain
- capital proceeds
- CGT event
- fixed entitlement
- fixed trust
- original interest
- replacement interest
- roll-over

- scrip for scrip roll-over
- takeover
- unitholder
- unit trust

*Legislative references:*

- TAA 1953
- TAA 1953 Sch 1 335-75(1)
- TAA 1953 Sch 1 357(1)
- ITAA 1936 6(1)
- ITAA 1997 104-10
- ITAA 1997 104-10(3)

- |                              |                           |
|------------------------------|---------------------------|
| - ITAA 1997 104-10(4)        | - ITAA 1997 124-781(6)    |
| - ITAA 1997 109-10           | - ITAA 1997 124-782       |
| - ITAA 1997 116-20(1)        | - ITAA 1997 124-785(1)    |
| - ITAA 1997 Subdiv 124-M     | - ITAA 1997 124-785(2)    |
| - ITAA 1997 124-780(3)(a)    | - ITAA 1997 124-785(3)    |
| - ITAA 1997 124-780(3)(b)    | - ITAA 1997 124-785(4)    |
| - ITAA 1997 124-781(1)(a)(i) | - ITAA 1997 124-790(1)    |
| - ITAA 1997 124-781(1)(b)    | - ITAA 1997 124-790(2)    |
| - ITAA 1997 124-781(1)(c)    | - ITAA 1997 124-795(2)    |
| - ITAA 1997 124-781(1)(d)    | - ITAA 1997 124-795(2)(a) |
| - ITAA 1997 124-781(2)(a)    | - ITAA 1997 124-795(2)(b) |
| - ITAA 1997 124-781(2)(b)    | - ITAA 1997 124-810       |
| - ITAA 1997 124-781(2)(c)    | - ITAA 1997 995-1(1)      |
| - ITAA 1997 124-781(3)(a)    | - Copyright Act 1968      |
| - ITAA 1997 124-781(3)(b)    | - Corporations Act 2001 9 |
| - ITAA 1997 124-781(3)(c)    |                           |
| - ITAA 1997 124-781(4)       |                           |
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#### ATO references

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ATOlaw topic: Income Tax ~~ Capital Gains Tax ~~ roll-overs - scrip for scrip

Income Tax ~~ Capital Gains Tax ~~ CGT event A1 - disposal of a CGT asset

Income Tax ~~ Capital Gains Tax ~~ capital proceeds