


CR 2005/39W - Income tax: Promina Group Limited - proposed capital reduction

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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: Promina Group Limited – proposed capital reduction

Preamble

*The number, subject heading, **What this Class Ruling is about** (including **Tax laws, 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

1. This Ruling is withdrawn and ceases to have effect after 30 June 2005. However, the Ruling continues to apply after its withdrawal in respect of the tax laws ruled upon, to all persons within the specified class who entered into the specified arrangement during the term of the Ruling, subject to there being no change in the arrangement or in the person's involvement in the arrangement.

Commissioner of Taxation

25 May 2005

Previous draft:

Not previously issued as a draft

Related Rulings/Determinations:

CR 2001/1; TR 92/1; TR 92/20;
TR 97/16

Subject references:

- capital benefit
- dividend
- dividend substitution
- return of capital

Legislative references:

- ITAA 1936 6(1)
- ITAA 1936 6(4)
- ITAA 1936 6D
- ITAA 1936 45A
- ITAA 1936 45A(2)
- ITAA 1936 45A(3)

- ITAA 1936 45A(3)(b)
- ITAA 1936 45B
- ITAA 1936 45B(2)
- ITAA 1936 45B(3)
- ITAA 1936 45B(5)
- ITAA 1936 45B(8)
- ITAA 1936 45B(8)(a)
- ITAA 1936 45B(8)(b)
- ITAA 1936 45B(8)(c)
- ITAA 1936 45B(8)(d)
- ITAA 1936 45B(8)(e)
- ITAA 1936 45B(8)(f)
- ITAA 1936 45B(8)(g)
- ITAA 1936 45B(8)(h)
- ITAA 1936 45B(8)(i)
- ITAA 1936 45B(8)(j)
- ITAA 1936 45B(8)(k)
- ITAA 1936 45B(9)
- ITAA 1936 45C
- ITAA 1936 47
- ITAA 1936 177D(b)(i)
- ITAA 1936 177D(b)(ii)

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|---------------------------|------------------------|
| - ITAA 1936 177D(b)(iii) | - ITAA 1997 104-135(3) |
| - ITAA 1936 177D(b)(iv) | - ITAA 1997 104-135(4) |
| - ITAA 1936 177D(b)(v) | - ITAA 1997 136-25 |
| - ITAA 1936 177D(b)(vi) | - ITAA 1997 995-1(1) |
| - ITAA 1936 177D(b)(vii) | - TAA 1953 Pt IVAAA |
| - ITAA 1936 177D(b)(viii) | - Copyright Act 1968 |
| - ITAA 1936 318 | |
| - ITAA 1997 104-135 | |
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ATO references

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