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Australian Government
Australian Taxation Office

MR CHRISTOPHER J BATTEN
GPO BOX 512
SYDNEY NSW 2001

Reply to: PO Box 3576
ALBURY NSW 2640
Our reference:
Contact officer:
Phone:
Fax:
ABN:

11 April 2011

Authorisation Number:
Authorising Officer:

Dear MR BATTEN

On 28 July 2010, you applied for a private ruling relating to MGS Hybrid Discretionary Trust. This is our response, which contains:

- your *Notice of private ruling*
- the reasons for our decision
- a fact sheet giving information about private rulings including how to have the decision reviewed by objecting, and
- an edited version of your ruling that we will publish on our website.

You have:

- 60 days (longer in some cases) to object to the private ruling if you disagree with it and have not had an assessment for the relevant period, and
- 28 days to comment on the edited version.

Please see the *Private rulings* fact sheet for more information.

Notice of private ruling

This ruling applies to:

CHRISTOPHER BATTEN

ABN

Question

Are you entitled to a full deduction for interest expenses incurred on borrowed money used to acquire Special Income Units in the Macquarie Group Services Trust (the Trust) under section 8-1 of the *Income Tax Assessment Act 1997* (ITAA 1997)?

Answer

Yes. A full deduction is available for the interest expenses incurred in the circumstances described in this ruling.

This ruling applies for the following period:

Financial Years ended 30 June 2011 to 30 June 2015