



Income Tax Act 2007

2007 CHAPTER 3

PART 13

TAX AVOIDANCE

CHAPTER 1

TRANSACTIONS IN SECURITIES

Appeals

705 Appeals against counteraction notices

- (1) A person on whom a counteraction notice has been served may appeal to the Special Commissioners on the grounds that—
 - (a) section 684 (person liable to counteraction of income tax advantage) does not apply to the person in respect of the transaction or transactions in question, or
 - (b) the adjustments directed to be made are inappropriate.
- (2) Such an appeal may be made only by giving notice to the Commissioners for Her Majesty's Revenue and Customs within 30 days of the service of the counteraction notice.
- (3) On an appeal under this section the Special Commissioners may—
 - (a) affirm, vary or cancel the counteraction notice, or
 - (b) affirm, vary or quash an assessment made in accordance with the notice.
- (4) But the bringing of an appeal under this section (or a request for its rehearing under section 706) does not affect—
 - (a) the validity of the counteraction notice, or
 - (b) the validity of any other thing done under or in accordance with section 698 (counteraction notices),

Status: *Point in time view as at 06/04/2007. This version of this provision has been superseded.*

Changes to legislation: *There are currently no known outstanding effects for the Income Tax Act 2007, Section 705. (See end of Document for details)*

pending the determination of the proceedings.

Status:

Point in time view as at 06/04/2007. This version of this provision has been superseded.

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