Year		Pre-6/4/08 gain/loss	post 5/4/08 gain/loss	gain if disposal of relevant assets on 6/4/08 "A"	gain(loss) on actual disposal s.2(2) amount ("B")	A/B	cap pay't to X	cap pay't	cap pay't to X unmatched at end of yr	cap pay't to Y unmatched at end of yr	accruing	gain accruing to Y	gain accruing to Y chargeable after rebasing	
2010/11		1 -	£1m											
	asset b	£1m	(£6m)											
	total relevant assets	<u>£8m</u>	(£5m)	£0	£3m	0	-	£5m	C) 2m	0	£3m	£3m*0=0	
2011/12	relevant asset	£4m	£1m	£1m	£5m	1/5	£2m	£2m	C	£1m	£2m	£3m	£3m*1/5=£600k	
	co. asset	£1m	(£2m)											
	trust asset	£2m	£1m											
	total relevant assets	£2m	£1m	£1m	£3m	1/3				£0.5m	£1.5m	£1.5m	£1.5m*1/3=£0.5m	JK computation
	total relevant assets	£2m	£1m	£2m	£3m	2/3	£2m	£2m	£0.5m	£0.5m	£1.5m	£1.5m	£1.5m*2/3=£1m	HMRC computation
James K Inn	essler QC Lincoln's London WC2 10 September 2009													