

Notice of Withdrawal

Is a taxpayer allowed a deduction under subsection 51(1) for management fees, in an income year, if those management fees are calculated as a percentage of the taxpayer's net profits of that same income year?

Draft Taxation Determination TD 93/D138 is withdrawn with effect from today.

The topic is not considered to be a high priority and does not justify a public ruling.

Commissioner of Taxation

2 August 1995

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