PR 2000/87W - Income tax: Yoram Gross-EM TV Pty Ltd film 'Old Tom'

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Australian Taxation Office

FOI status: may be released

Product Ruling **PR 2000/87**

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Product Ruling

Income tax: Yoram Gross-EM TV Pty Ltd film 'Old Tom'

Preamble

The number, subject heading, and the What this Product Ruling is about (including Tax law(s), Class of persons and Qualifications sections), Date of effect, Withdrawal, Arrangement and Ruling parts of this document are a 'public ruing' in terms of Part IVAAA of the Taxation Administration Act 1953. Product Ruling PR 1999/95 explains Product 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 This Product Ruling is withdrawn on 1 July 2001 and ceases to have effect on and from that date. The Ruling continues to apply, in respect of the tax laws ruled upon, to all persons within the specified class who enter into the specified arrangement during the term of the Ruling. Thus, the Ruling continues to apply to those people, even following its withdrawal, for arrangements entered into prior to withdrawal of the Ruling. This is subject to there being no change in the arrangement or the persons' involvement in the arrangement.

Commissioner of Taxation 28 June 2000

Previous draft: Not previously released in draft form

Related Rulings/Determinations: PR 98/1; PR 1999/95; TR 92/1; TR 92/20; TR 97/16; TR 98/22; TD 93/34; IT 2111;

Subject references:

- Australian films
- film income
- film industry
- interest expenses
- product Rulings
- public Rulings
- tax avoidance

tax administration

Legislative references:

- ITAA 1936 10BA
- ITAA 1936 26AG
- ITAA 1936 82KL
- ITAA 1936 124ZAA
- ITAA 1936 124ZAA(6)
- ITAA 1936 124ZABITAA 1936 124ZAB(10)
- ITAA 1936 124ZAB(10
- ITAA 1936 124ZADA
- ITAA 1936 124ZADA(1)
- ITAA 1936 124ZADA(2)
- ITAA 1936 124ZAFA
- ITAA 1936 124ZAFA(1)(a)



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ITAA 1936	124ZAFA(1)(b)(i)	-	ITAA 1936	124ZAO(3)	
ITAA 1936	124ZAFA(1)(c)(i)	-	ITAA 1936	Part IVA	
ITAA 1936	124ZAFA(1)(c)(ii)	-	ITAA 1936	Part III	
ITAA 1936	124ZAFA(1)(d)(iii)	-	ITAA 1936	170AA	
ITAA 1936	124ZAFA(1)(d)(iv)	-	ITAA 1936	170AA(11)	
ITAA 1936	124ZAFA(2)	-	ITAA 1936	177A	
ITAA 1936	124ZAJ	-	ITAA 1936	177C	
ITAA 1936	124ZAJ(1)	-	ITAA 1936	177D	
ITAA 1936	124ZAM	-	ITAA 1997	8-1	
ITAA 1936	124ZAM(1)	-	ITAA 1997	104-10	
ITAA 1936	124ZAM(2)	-	ITAA 1997	118-30	
ITAA 1936	124ZAM(3)				
ITAA 1936	124ZAO(2)				

ATO references: NO 2000/6003 BO FOI number: I 1021390

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