



# ***PR 2004/6W - Income tax: Film Investment - 'Hating Alison Ashley'***

 This cover sheet is provided for information only. It does not form part of *PR 2004/6W - Income tax: Film Investment - 'Hating Alison Ashley'*

 This document has changed over time. This is a consolidated version of the ruling which was published on *30 June 2006*

## Product Ruling

### Income tax: Film Investment – ‘Hating Alison Ashley’

#### *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 ruling’ 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 This Product Ruling is withdrawn on 30 June 2006 and ceases to have effect on and from that date.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 persons, 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**

21 January 2004

*Previous draft:* - tax administration

Not previously released in draft form

#### *Related Rulings/Determinations:*

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

#### *Legislative references:*

- ITAA 1936 26AG
- ITAA 1936 26AG(9)
- ITAA 1936 Div 5 of Part III
- ITAA 1936 Div 10BA
- ITAA 1936 124ZAA(6)
- ITAA 1936 124ZAB
- ITAA 1936 124ZAB(10)
- ITAA 1936 124ZAC
- ITAA 1936 124ZADA(1)
- ITAA 1936 124ZADA(2)
- ITAA 1936 124ZAFA
- ITAA 1936 124ZAFA(1)(a)
- ITAA 1936 124ZAFA(1)(b)(i)
- ITAA 1936 124ZAFA(1)(c)(i)

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|--------------------------------|-----------------------------------|
| - ITAA 1936 124ZAFA(1)(c)(ii)  | - ITAA 1997 995-1                 |
| - ITAA 1936 124ZAFA(1)(d)(iii) | - Corporations Act 2001 708(1)    |
| - ITAA 1936 124ZAFA(1)(d)(iv)  | - Corporations Act 2001 708(2)    |
| - ITAA 1936 124ZAFA(2)         | - Corporations Act 2001 708(3)    |
| - ITAA 1936 124ZAG             | - Corporations Act 2001 708(4)    |
| - ITAA 1936 124ZAJ             | - Corporations Act 2001 708(5)    |
| - ITAA 1936 124ZAJ(1)          | - Corporations Act 2001 708(6)    |
| - ITAA 1936 124ZAM             | - Corporations Act 2001 708(7)    |
| - ITAA 1936 124ZAM(1)          | - Corporations Act 2001 708(8)    |
| - ITAA 1936 124ZAM(2)          | - Corporations Act 2001 708(9)    |
| - ITAA 1936 124ZAM(3)          | - Corporations Act 2001 708(10)   |
| - ITAA 1936 124ZAO(2)          | - Corporations Act 2001 708(11)   |
| - ITAA 1936 124ZAO(3)          | - TAA 1953 Pt IVAAA               |
| - ITAA 1936 Part IVA           | - TAA 1953 8AAG                   |
| - ITAA 1936 177A               | - A New Tax System (GST) Act 1999 |
| - ITAA 1936 177C               | - ANTS (GST)A 1999 11             |
| - ITAA 1936 177D               | - Copyright Act 1968              |
| - ITAA 1936 204                |                                   |
| - ITAA 1997 8-1                |                                   |
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## ATO references:

NO 2003/004383

ISSN: 1441 1172