PR 2004/93W - Income tax: tax consequences of investing in ABN AMRO High Leverage Instalment Warrants IZM Series 2004 Product Disclosure Statement - cash applicants and secondary market purchasers

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This document has changed over time. This is a consolidated version of the ruling which was published on 29 July 2005

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# **Product Ruling**

Income tax: tax consequences of investing in ABN AMRO High Leverage Instalment Warrants IZM Series 2004 Product Disclosure Statement – cash applicants and secondary market purchasers

#### Preamble

The number, subject heading, 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 This Product Ruling is withdrawn and ceases to have effect after 28 July 2005. 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, who entered into the specified arrangement prior to withdrawal of the Ruling. This is subject to there being no material difference in the arrangement or in the persons' involvement in the arrangement.

### **Commissioner of Taxation**

22 September 2004

#### Previous draft:

Not previously issued in draft from

# Related Rulings/Determinations:

TR 92/1; TR 92/20; TR 95/33; TR 97/16; PR 1999/95; TD 93/34

#### Subject references:

- financial products
- interest expenses
- prepaid expenses
- product rulings
- public rulings

- small business taxpayer
- taxation administration
- tax avoidance

# Legislative references:

- TAA 1953 Pt IVAAA
- ITAA 1936 51AAA
- ITAA 1936 82KL
- ITAA 1936 Pt III Div 3 Subdiv H
- ITAA 1936 82KZL(1)
- ITAA 1936 82KZL(2)(a)
- ITAA 1936 82KZM
- ITAA 1936 82KZMA
- ITAA 1936 82KZMD

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- ITAA 1936 82KZME
- ITAA 1936 82KZME(4)
- ITAA 1936 82KZME(5)
- ITAA 1936 82KZMF
- ITAA 1936 82KZMF
- ITAA 1936 97
- ITAA 1936 Pt IVA
- ITAA 1937 112-35
- ITAA 1937 134-1
- ITAA 1997 8-1
- ITAA 1997 Subdiv 328-F
- ITAA 1997 25-25
- ITAA 1997 104-10
- ITAA 1997 104-10(7)

#### ATO references

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