


# ***PR 2005/84W - Income tax: Film Investment - 'Jindabyne' Selldown***

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 This document has changed over time. This is a consolidated version of the ruling which was published on *1 July 2006*



## Product Ruling

### Income tax: Film Investment – 'Jindabyne' Selldown

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#### **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

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1. This Product Ruling is withdrawn and ceases to have effect after 30 June 2006. The Ruling continues to apply, in respect of the tax law(s) ruled upon, to all persons within the specified class who enter into the arrangement specified below. 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 change in the arrangement or in the persons' involvement in the arrangement.

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#### **Commissioner of Taxation**

1 June 2005

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#### *Previous draft:*

Not previously issued in draft form

#### *Related Rulings/Determinations:*

PR 1999/95; PR 2004/111;  
IT 2111; IT 2629; TR 92/1;  
TR 92/20; TR 97/16; TR 98/22;  
TD 93/34

#### *Subject references:*

- Australian films
- film income
- film industry
- interest expenses
- product rulings
- public rulings
- schemes and shams
- tax administration

- tax avoidance

#### *Legislative references:*

- ITAA 1936 26AG
- ITAA 1936 26AG(9)
- ITAA 1936 79D
- ITAA 1936 82KL
- ITAA 1936 Pt III Div 5
- ITAA 1936 Pt III Div 10BA
- ITAA 1936 124ZAA(1)
- 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 1936 124ZAFA(1)(d)(iii)
- ITAA 1936 124ZAFA(1)(d)(iv)
- ITAA 1936 124ZAFA(2)
- ITAA 1936 124ZAG
- ITAA 1936 124ZAJ
- ITAA 1936 124ZAJ(1)
- ITAA 1936 124ZAM
- ITAA 1936 124ZAM(1)
- ITAA 1936 124ZAM(2)
- ITAA 1936 124ZAM(3)
- ITAA 1936 124ZAO
- ITAA 1936 124ZAO(2)
- ITAA 1936 124ZAO(3)
- ITAA 1936 160AFD(9)
- ITAA 1936 Pt IVA
- ITAA 1936 177A
- ITAA 1936 177C
- ITAA 1936 177D
- ITAA 1936 204
- ITAA 1997 8-1
- ITAA 1997 Div 35
- ITAA 1997 35-5(2)
- ITAA 1997 995-1
- TAA 1953 Pt IVAAA
- TAA 1953 8AAG
- GST Act 1999
- GST Act 1999 Div 11
- Copyright Act 1968
- *Corporations Act 2001*
- *Corporations Act 2001* 761G
- *Corporations Act 2001* 761G(7)(a)
- *Corporations Act 2001* 761G(7)(c)
- *Corporations Act 2001* 761G(7)(d)

*Case references:*

- Commissioner of Taxation v.  
Faywin Investments Pty Ltd  
(1990) 93 ALR 241; (1990) 90  
ATC 4631; (1990) 21 ATR 256

ATO references

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