PR 2001/117W - Income tax: Kimseed Robin Downs 1998 Project

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This document has changed over time. This is a consolidated version of the ruling which was published on 1 July 2002





FOI status: may be released

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Product Ruling

Income tax: Kimseed Robin Downs 1998

Project

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 This Product Ruling is withdrawn and ceases to have effect after 30 June 2002. The Ruling continues to apply, in respect of the tax law(s) ruled upon, to all persons within the specified class who entered into the specified arrangement. This is subject to there being no change in the arrangement or in the persons' involvement in the arrangement.

Commissioner of Taxation

29 June 2001

Previous draft:

Not previously issued in draft form

Related Rulings/Determinations:

PR 1999/95: TR 92/1: TR 92/20:

Legislative references:

TR 97/16; TD 93/34; TR 98/22 - ITAA 1997 Div 35
- ITAA 1997 35-10

Subject references: - ITAA 1997 35-10(2)
- carrying on a business - ITAA 1997 35-10(3)
- commencement of business - ITAA 1997 35-10(4)
- fee expenses - ITAA 1997 35-30
- interest expenses - ITAA 1997 35-35
- management fees - ITAA 1997 35-40

management fees
 producing assessable income
 product rulings
 public rulings
 taxation administration
 ITAA 1997 35-45
 ITAA 1997 35-55
 ITAA 1997 35-55(1)
 ITAA 1997 35-55(1)(a)

- tax avoidance - ITAA 1997 35-55(1)(b) - tax benefits under tax avoidance - ITAA 1936 82KL

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- ITAA 1936 Part IVA

ATO references:

NO T2001/010605

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