


PR 2001/95W - Income tax: "The Pact" Film Investment

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 This document has changed over time. This is a consolidated version of the ruling which was published on *30 June 2004*



Product Ruling

Income tax: “The Pact” Film Investment

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 This Product Ruling is withdrawn on 30 June 2004 and ceases to have effect on and from that date.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

27 June 2001

Previous draft:

Not previously issued 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; MT 2000/1; GSTD 2000/8

Subject references:

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

Legislative references:

- ITAA 1936 Div 10BA
- ITAA 1936 26AG
- ITAA 1936 82KL
- ITAA 1936 124ZAA(6)
- ITAA 1936 124ZAB
- ITAA 1936 124ZAB(10)
- ITAA 1936 124ZAC
- ITAA 1936 124ZADA(1)
- ITAA 1936 124ZADA(2)
- ITAA 1936 124ZAF A
- ITAA 1936 124ZAF A(1)(a)
- ITAA 1936 124ZAF A(1)(b)(i)
- ITAA 1936 124ZAF A(1)(c)(i)
- ITAA 1936 124ZAF A(1)(c)(ii)
- ITAA 1936 124ZAF A(1)(d)(iii)
- ITAA 1936 124ZAF A(1)(d)(iv)

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|------------------------|----------------------------|
| - ITAA 1936 124ZAFA(2) | - ITAA 1936 177C |
| - ITAA 1936 124ZAG | - ITAA 1936 177D |
| - ITAA 1936 124ZAJ | - ITAA 1936 204 |
| - ITAA 1936 124ZAJ(1) | - ITAA 1997 8-1 |
| - ITAA 1936 124ZAM | - ITAA 1997 17-5 |
| - ITAA 1936 124ZAM(1) | - ITAA 1997 Div 27 |
| - ITAA 1936 124ZAM(2) | - TAA 1953 8AAG |
| - ITAA 1936 124ZAM(3) | - ANTS(GST)A 99 38-190(1) |
| - ITAA 1936 124ZAO(2) | - Corporations Law 708(8) |
| - ITAA 1936 124ZAO(3) | - Corporations Law 708(9) |
| - ITAA 1936 Part IVA | - Corporations Law 708(10) |
| - ITAA 1936 177A | |
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ATO references:

NO T2001/008754

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