

BIBLIOGRAPHY

Parliamentary and Official Documents

Parliamentary Papers

A New Tax System (tax administration) Act (No. 2) 2000, Explanatory Memorandum.

Commonwealth of Australia (statement by the Prime Minister, the Honourable John Howard, MP) 1997, *More Time for Business*, Commonwealth of Australia, Canberra.

Commonwealth of Australia 1990, *A full self assessment system of taxation: a consultative document*, 13 December 1990, Commonwealth of Australia, Canberra.

Commonwealth of Australia 1991, *Improvements to self assessment – priority tasks*, 20 August 1991, Commonwealth of Australia, Canberra.

Commonwealth of Australia 1996, *Time for Business: Report of the small business deregulation task force*, Commonwealth of Australia, Canberra.

Commonwealth of Australia 1998, *Tax Reform: not a new tax, a new tax system*, August 1998, Commonwealth of Australia, Canberra.

Commonwealth of Australia 1999, *Review of Business Taxation: A tax system redesigned*, July 1999, Commonwealth of Australia, Canberra.

Commonwealth of Australia Commissioner of Taxation 1984, *Sixty-Third Report 1983-1984*, Commonwealth of Australia, Canberra.

Commonwealth of Australia Committee on Taxation 1952, *Report on Self Assessment*, Commonwealth of Australia, Canberra.

Commonwealth of Australia Joint Committee of Public Accounts 1993, *An Assessment of Tax, Report 326*, 1993, Commonwealth of Australia, Canberra.

Commonwealth of Australia Joint Committee of Public Accounts and Audit 2003, *Review of Auditor-General's report No 19, 2002- 2003: the ATO's management of its relationship with tax practitioners*, Commonwealth of Australia, Canberra.

Commonwealth of Australia Senate Economics Reference Committee 2001, *Inquiry into mass marketed tax effective schemes and investor protection, A Recommended Resolution and Settlement, Second Report*, Commonwealth of Australia, Canberra.

Review of Self Assessment

Commonwealth of Australia Senate Economics Reference Committee 2001, *Inquiry into mass marketed tax effective schemes and investor protection, Interim Report*, Commonwealth of Australia, Canberra.

Commonwealth of Australia Senate Economics Reference Committee 2002, *Inquiry into mass marketed tax effective schemes and investor protection, Final Report*, Commonwealth of Australia, Canberra.

Hansard 1985, House of Representatives ministerial statement, Treasurer Keating: Reform of the Taxation System, 19 September 1985.

Hansard 1992, House of Representatives, Tax Laws Amendment (self assessment) Act 1992 second reading speech.

Hansard 1999 Senate Economics Reference Committee Inquiry into mass marketed tax effective schemes and investor protection, 2 November 1999.

Hansard 2001 Senate Economics Reference Committee Inquiry into mass marketed tax effective schemes and investor protection, 23 August 2001.

Hansard 2002 Senate Questions on Notice, 21 August 2002.

Hansard 2002, House of Representatives Questions on Notice, 16 September 2002.

Keating, P (Treasurer) 1985, tax reform package announced, press release, Parliament House, Canberra, 19 September 1985.

Kerin J (Treasurer) 1991, *Improvements to Self Assessment*, Parliament House, Canberra, 20 August 1991.

Taxation Laws Amendment (self assessment) Act 1992, Explanatory Memorandum.

Taxation Laws Amendment (tax administration) Act 2000, Explanatory Memorandum.

Taxation Laws Amendment Act (No. 3) 2001, Supplementary Explanatory Memorandum.

Taxation Laws Amendment Act (No. 5) 1998, Explanatory Memorandum.

Tax Office Publications

Australian Taxation Office 1985, *Report of Assessing Review Group*, (LJ Hutchinson, chairperson), Australian Taxation Office, Canberra.

Australian Taxation Office 1986, *Report of assessing policy conference*, Commonwealth of Australia, Canberra.

Australian Taxation Office 1989, *Report of the program evaluation of self-assessment*, Commonwealth of Australia, Canberra.

Australian Taxation Office 1994, *Taxation Ruling TR 94/4*, Australian Taxation Office, Canberra.

Australian Taxation Office 1994, *Taxation Ruling TR 94/5*, Australian Taxation Office, Canberra.

Australian Taxation Office 1995, *Court decision confirms working of private rulings system*, media release, Australian Taxation Office, Canberra 17 March 1995.

Australian Taxation Office 1997, *Taxation Ruling TR 97/24*, Australian Taxation Office, Canberra.

Australian Taxation Office 1999, *Tax Office clamps down on schemes*, media release, Australian Taxation Office, Canberra, 26 March 1999.

Australian Taxation Office 2001, *Facts on 'tax effective' investments*, Issue 1, Australian Taxation Office, Canberra, June 2001.

Australian Taxation Office 2001, *Practice Statement PS LA 2001/4*, Australian Taxation Office, Canberra.

Australian Taxation Office 2001, *Practice Statement PS LA 2001/8*, Australian Taxation Office, Canberra.

Australian Taxation Office 2001, *Tax office in town to help mass marketed scheme investors*, media release, Australian Taxation Office, Canberra, 5 April 2001.

Australian Taxation Office 2002, *87% of mass marketed scheme investors accept tax office settlement offer*, media release, Australian Taxation Office, Canberra, 4 July 2002.

Australian Taxation Office 2002, *Annual Report 2001- 2002*, Commonwealth of Australia, Canberra.

Australian Taxation Office 2002, *Practice Statement PS LA 2002/8*, Australian Taxation Office, Canberra.

Australian Taxation Office 2002, *Tax office announces settlement offer for mass marketed scheme investors*, media release, Australian Taxation Office, Canberra, 14 February 2002.

Review of Self Assessment

Australian Taxation Office 2003, *Australian Taxation Office Receivables Policy*, Australian Taxation Office, Canberra, viewed 25 November 2003:
<www.law.ato.gov.au/atolaw.htm>.

Australian Taxation Office 2003, *Cash economy taskforce report*, media release, Australian Taxation Office, Canberra, 23 September 2003.

Australian Taxation Office 2003, *Facts about tax effective investment newsletter – Part 2*, Australian Taxation Office, Canberra, viewed 24 November 2003:
<www.ato.gov.au/print.asp?doc=/content/12530.htm>.

Australian Taxation Office 2003, *Important information for participants in arrangements covered by existing product rulings*, Australian Taxation Office, Canberra, viewed 25 November 2003: <www.ato.gov.au/print.asp?doc=/content/prod_ruling_alerts.htm>.

Australian Taxation Office 2003, *Large Business and Tax Compliance*, Australian Taxation Office, Canberra.

Australian Taxation Office 2003, *Making it easier to comply: the easier, cheaper and more personalised program*, Australian Taxation Office, Canberra.

Australian Taxation Office 2003, *Mass marketed schemes cases*, Australian Taxation Office, Canberra, viewed 26 November 2003:
<www.ato.gov.au/print.asp?doc=/content/27144.htm>.

Australian Taxation Office 2003, *Mass marketed tax schemes and the Budplan case*, Australian Taxation Office, Canberra, viewed 28 November 2003:
<www.ato.gov.au/print.asp?doc=/content/21976.htm>.

Australian Taxation Office 2003, *Mass marketed tax schemes*, Australian Taxation Office, Canberra, viewed 25 November 2003:
<www.ato.gov.au/print.asp?doc=/content/20003.htm>.

Australian Taxation Office 2003, *Practice Statement PS LA 2003/3*, Australian Taxation Office, Canberra.

Australian Taxation Office 2003, *Progress Report on Tax Agent Initiatives June 2003 Update*, Australian Taxation Office, Canberra.

Australian Taxation Office 2003, *Self assessment – Australian Taxation Office support initiatives*, Australian Taxation Office, Canberra, viewed 28 November 2003:
<www.ato.gov.au/print.asp?doc=/content/13689.htm>.

- Australian Taxation Office 2003, *Tax office reduces interest applying to some mass marketed 'tax effective' schemes debts*, media release, Australian Taxation Office, April 2001.
- Australian Taxation Office 2003, *Taxpayer's Charter*, Australian Taxation Office, Canberra.
- Australian Taxation Office 2003, *The facts about product rulings*, Australian Taxation Office, Canberra, viewed 25 November 2003:
<www.ato.gov.au/print.asp?doc=/content/prod_ruling_facts.htm>.
- Australian Taxation Office 2003, *What is a class ruling?*, Australian Taxation Office, Canberra, viewed 25 November 2003:
<www.ato.gov.au/print.asp?doc=/content/34038.htm>.
- Australian Taxation Office 2003, *What is a private ruling?* Australian Taxation Office, Canberra, viewed 2 December 2003:
<www.ato.gov.au/print.asp?doc=/content/34060.htm>.
- Australian Taxation Office 2004, *Balancing Individual interests and community needs – a focus on legal professional privilege*, Australian Taxation Office, Canberra, viewed on 17 January 2004: <www.ato.gov.au/corporate/content.asp?doc=/content/37818.htm>.
- Australian Taxation Office 2004, *Draft Taxation Determination TD 2004/D2*, Australian Taxation Office, Canberra.
- Boucher, T 1986, Opening address by the Commissioner to the 1986 assessing conference, 12 April 1986.
- Boucher, T 1986, Self Assessment – the practicalities, address by the Commissioner of Taxation to the Accounting Professional Development Conference, Toowoomba, 1 February 1986.
- Boucher, T 1987, Taxation audits – facing the reality, address by the Commissioner of Taxation to the Labor Business Forum, Adelaide, 2 September 1987.
- Carmody, M (Commissioner of Taxation) 2000, *The integrity of the private binding rulings system*, media release, Australian Taxation Office, 15 November 2000.
- Carmody, M 1993, Initial response to the JCPA report – an assessment of tax, address by the Commissioner of Taxation, 17 November 1993.
- Carmody, M 1996, A market-based approach to tax administration, address by the Commissioner of Taxation to the Corporate Tax Association 1996 Convention, 21 May 1996.

Review of Self Assessment

Carmody, M 1997, Where to with self assessment?, CEDA address by the Commissioner of Taxation, Brisbane, 3 July 1997.

Carmody, M 1998, 'Taxing times' or 'Beware of the magic pudding', address by the Commissioner of Taxation to the Third International Conference on Accounting at the TOP 98 Conference Australian Society of CPAs, Darwin, 12 June 1998.

Carmody, M 1998, Administering Australia's tax system or 'walking the tightrope', address by the Commissioner of Taxation to Monash University Law School Foundation Lecture, Melbourne, 30 July 1998.

Carmody, M 1999, A question of balance, address by the Commissioner of Taxation to the American Club, Sydney, 17 September 1999.

Carmody, M 1999, The changing landscape for financial planning, address by the Commissioner of Taxation to the Financial Planning Association of Australia, Melbourne, 27 April 1999.

Carmody, M 2001, Taxation ... Current issues and future directions, address by the Commissioner of Taxation to the Australian Institute of Company Directors, Perth, 1 May 2001.

Carmody, M 2002, The art of tax administration, address by the Commissioner of Taxation to the 5th international conference on tax administration, April 2002.

D'Ascenzo, M 2001, In defence of the rule of law, Second Commissioner address to Law Council of Australia Taxation Law workshop, Victoria, 26- 28 October 2001.

D'Ascenzo, M 2002, Provision of advice in the ideal world, Speaking notes for the Second Commissioner and Chief Tax Counsel of Taxation to the OCTC SES conference, Canberra, September 2002.

Sherman, T 2000, *Report of an internal review of the systems and procedures relating to private binding rulings and advance opinions in the Australian Taxation Office*, Commonwealth of Australia, Canberra, 2000.

Other Official Papers

Auditor-General (Australian National Audit Office) 1984, *Controls over Processing Income Tax Returns, in Reports of the Auditor-General on Efficiency Audits*, Commonwealth of Australia, Canberra.

Auditor-General (Australian National Audit Office) 2000, *Risk management of individual taxpayer refunds*, Audit Report Number 27 of 1999/2000, Commonwealth of Australia, Canberra.

Auditor-General (Australian National Audit Office) 2001, *The use of audit compliance management of individual taxpayers*, Audit Report Number 37 of 2000/01, Commonwealth of Australia, Canberra.

Auditor-General (Australian National Audit Office) 2002, *The Australian Taxation Office's administration of taxation rulings*, Audit Report Number 3 of 2001/02, Commonwealth of Australia, Canberra.

Auditor-General (Australian National Audit Office) 2003, *The Australian Taxation Office's management of its relationship with tax practitioners*, Audit Report Number 19 of 2002/03, Commonwealth of Australia, Canberra.

Auditor-General (Australian National Audit Office) 2004, *The Australian Taxation Office's Management of aggressive tax planning*, Audit Report Number 23 of 2003/2004, Commonwealth of Australia, Canberra.

Commonwealth of Australia Ombudsman 1999, *The ATO and Budplan: An investigation into the Australian Taxation Office's handling of claims for tax deductions by investors in a mass marketed tax effective scheme known as Budplan*, Commonwealth of Australia, Canberra.

Commonwealth of Australia Ombudsman 2001, *The ATO and Main Camp: Report of the investigation into the Australian Taxation Office's handling of claims for tax deductions by investors in a mass marketed tax effective scheme known as Main Camp*, Commonwealth of Australia, Canberra.

Inspector-General of Taxation 2003, *Issues Paper Number 3: Self-Assessment*, viewed on 8 December 2003: <<http://www.igt.gov.au/content/submissions.asp?NavID=7>>.

Inspector-General of Taxation 2003, *Issues Paper Number 5: ATO/Client Interface Systems*, viewed on 8 December 2003: <<http://www.igt.gov.au/content/submissions.asp?NavID=7>>.

Inspector-General of Taxation 2003, *Issues Paper Number 4: ATO law enforcement and governance*, viewed on 8 December 2003: <<http://www.igt.gov.au/content/submissions.asp?NavID=7>>.

Articles and other publications

Allen, R 1990, 'The difficulties of keeping it simple', *Business Review Weekly*, 14 September 1990.

Australian Council of Social Service 2003, *Taxation, fairness and public opinion*, October 2003, ACOSS.

Australian Tax Practice 2003, 'No grounds for remission of penalties for failure to lodge BAS', *Australian Tax Practice Latest Tax News*, issue 201, 2003.

Baldry, J and McKinstry, K 1995, *Explaining the growth in usage of Tax agents by Australian personal income tax payers*, University of New England, NSW.

Barbone, L, Das- Gupta, A, De Wulf, L and Hansson, A, *Reforming tax systems; the world-bank record in the 1990's*, The World Bank.

Baroczky, S and Nethercott, L 1999, 'The nature of income tax assessment', *Journal of Australian Taxation*, vol 2, 1999, pp.36-47.

Barton, G 1993, 'Twilight Zone of Tax Law', *Taxation in Australia*, vol 1, 1993, p.284.

Bentley, D 1997, 'A proposal for reform of the Australian rulings system', *Australian Tax Review*, vol 27, 1997.

Bernhardt, S 1998, 'The Bellinz Case and the Ruling System', *Australian Tax Review*, Vol. 27, 1998.

Boreham, T 1990, 'Self-assessment leaves room for doubt', *Business Review Weekly*, 11 May 1990.

Boreham, T 1991, 'Assessment changes ease the burden of compliance', *Business Review Weekly*, 30 August 1991.

Boucher, T 1986, 'Self assessment of income tax', *Australian Tax Forum*, Volume 3, 1986, pp.45-53.

Boucher, T and the Australian Taxation Office 1991, *Melbourne case study services*, The University of Melbourne, Melbourne.

Braithwaite, J 2003, 'Making tax law more certain: A theory', *Centre for Tax System Integrity*, Australian National University, Canberra.

British Tax Review 1999, 'Self assessment issue', *British Tax Review*, Number 4, pp.205-320.

British Tax Review 2001, 'Improving self assessment through working together on collaborative research', *British Tax Review*, Number 6, 2001, pp.401-08.

CCH Australia Limited 2002, *International Master Tax Guide 2002*, CCH Australia limited, Sydney.

Centre for Fiscal Studies University of Bath 1998, *The tax compliance costs for employers to PAYE and National Insurance in 1995-96*, Inland Revenue, United Kingdom.

Centre for Tax System Integrity, *Justice Survey: November 2002- March 2003*, Centre for Tax System Integrity, Australian National University, Canberra.

Cooper G, 'Incentives and strategic choices facing taxpayers under the self assessment system', *Australian Tax Forum*, vol 12, 1995, pp.99-124.

Cooper, GS 1998, *Improving the Operation of the Income Tax Rulings System*, discussion paper prepared for the Australian Society of Certified Practising Accountants.

CPA Australia 2003, *Submission to Inspector General of Taxation on Systematic issues for consideration*, CPA Australia, viewed 27 November 2003: <www.cpaaustralia.com.au/03_publications/>.

CPA, NTAA, TIA, ICAA, NIA, ATMA 2003, *Joint submission to the Minister for Revenue and Assistant Treasurer on taxpayer burden and legislative issues*, CPA Australia, viewed on 27 November 2003: <www.cpaaustralia.com.au/03_publications/>.

D'Ascenzo, M and Poulakis, T 2002, 'Self-assessment: quo vadis?', *Taxation in Australia*, vol 36, 2002, pp.412-416.

Devos, K 2002, 'Penalties and Sanctions for Australian tax crimes and the implications for taxpayer compliance', *Australian Tax Forum*, vol 17, 2002.

Dirkis, M and Payne- Mulcahy, M 2002, 'Self assessment 14 years on: Time for a change', *Taxation Institute of Australia*, vol 36, 2002, pp.417-421.

Dymond, J 1992, 'Government 1, taxpayers nil', *Taxation in Australia*, vol 26, 1992, pp.429-436.

Evans C & Greenbaum, A (eds) 1998, *Tax Administration: facing the challenges of the future*, Prospect media, NSW.

Review of Self Assessment

- Evans, C and Walpole M 2001, *Tax Administration in the 21st Century*, St Leonards, NSW.
- Gill, J 2000, *A diagnostic framework for Revenue Administration*, The World Bank.
- Green, S 1996, 'Self-assessment: a new era for United Kingdom taxpayers, but what about the costs?', *British Tax Review*, Number 2, 1996, pp.107-119.
- Inglis, M 2001, 'Collapsing to laughter', *Charter*, November 2001, p.32.
- Inglis, M 2002, 'Is self assessment working? The decline and fall of the Australian Income tax system', *Australian Tax Review*, Volume 31, 2002, pp.64-78.
- Inglis, M 2002, 'Taxing times: Is self assessment working?', *Policy*, Spring 2002, pp.3-9.
- Inland Revenue Department New Zealand, *Tax and privilege: a proposed new structure*, New Zealand Department of Finance and Revenue, New Zealand, viewed on 21 January 2004: <www.taxpolicy.ird.govt.nz/publications/files/html/tax&privdd/index.html>.
- Irving, N 1993, 'The shortfalls of self-assessment', *Taxation in Australia*, vol 28, 1993.
- James, S 1994, 'Self-assessment for income tax', *British Tax Review*, Number 3, 1994, pp.204-212.
- James, S 1996, *Self assessment and the UK tax system, conference on current issues in tax administration*, University of New South Wales, Sydney.
- James, S 1997, 'Self assessment and the UK tax system', *Australian Tax Forum*, Volume 13, 1997, pp.206-227.
- Kneebone, S 1985, 'Case Commentary: estoppel as the basis of judicial review', *Australian Tax Forum*, Volume 2, 1985, pp.349-362.
- Koch, D 2004, 'Cutting to the chase', *My Business*, 2004, p.4.
- Levy, H and Mercader Prats, M 2002, 'Simplifying the personal income tax system: lessons from the 1998 Spanish reform', *Fiscal Studies*, vol 23, 2002, pp.419-443.
- McKerchar M, 'The effects of complexity on unintentional noncompliance for personal taxpayers in Australia', paper presented at the 5th international conference on tax administration, Sydney, 2002.
- McKerchar M, 'The study of income tax complexity and unintentional noncompliance: research method and preliminary findings', *ATAX discussion paper series No 6*, University of Sydney.

McManus, J and Walpole, M 2002, 'The Administration's Interpretation: The Australian GST Rulings System and More', paper presented at the 5th International Conference on Tax Administration – Current Issues and Future Developments, Sydney, 2002.

Montagu, N 1998, *Assessing self Assessment*, Inland Revenue, United Kingdom.

Mumford, A 1996, 'Self-assessment for income tax: the relevance of historical and constitutional differences', *British Tax Review*, Number 2, 1996, pp.120-131.

Murphy, K 2003 'An examination of taxpayers' attitudes towards the Australian tax system: findings from a survey of tax scheme investors', *Australian Tax Forum*, volume 18, 2003.

Organisation for Economic Co-operation and Development, 1990, *Taxpayers' rights and obligations: a survey of the legal situation in OECD countries*, OECD, Paris.

Osborn, P 2001, *Osborn's concise law dictionary*, 9th ed, Sweet & Maxwell, United Kingdom.

Phillips, I 1993, 'The Reasonable taxpayer: the reasonable taxpayer's care', *Taxation in Australia*, vol 27, 1993, pp.621-626.

Phillips, I 1993, 'The Reasonable taxpayer: the reasonably arguable position', *Taxation in Australia*, vol 27, 1993, pp.561-565.

Pilkington, C 2003, *Self-Assessment income tax returns – The filing behaviour of tax advisers and their clients*, The Chartered Institute of Taxation, Australia.

Prebble, J 2002, 'Practical problems from publication of Commissioner's policy statements and interpretation guidelines', *Journal of ATAX Association*, The University of New South Wales.

Price Waterhouse Coopers 2003, *Corporate Taxes 2003- 2004 Worldwide Summaries*, John Wiley & sons, United States.

Price Waterhouse Coopers 2003, *Individual Taxes 2003- 2004 Worldwide Summaries*, John Wiley & sons, United States.

Richards, R 2003, 'Penalties for Recklessness', *CPA Technical*, September 2003.

Richards, R 1990, 'Coping with self assessment', *Australian CPA*, vol 60, 1990, pp.28-31.

Richards, R 1991, 'Living with Self-assessment', *Australian Accountant*, July 1991.

Review of Self Assessment

Rider, C 1994, 'Estoppel of the revenue: A review of recent developments', *Australian Tax Review*, vol 23, 1994, pp.135-153.

Robinson, G 2003, 'Helping your clients survive an income tax audit', *Taxation in Australia*, vol 38, 2003, pp.191-193.

Sandford, C 1994, 'Self-assessment for income tax – another view', *British Tax Review*, Number 6, 1994, pp.674-680.

Sandford, C and Wallschutzky I, 'Self-assessment of income tax: lessons from Australia', *British Tax Review*, Number 3, 1994, pp.213-220.

Sawyer, A 1997, 'Binding tax rulings: the New Zealand experience', *Australian Tax Review*, Vol 26, 1997, pp.11-27.

Sawyer, A 2000, 'What are the lessons for Australia from New Zealand's first comprehensive remedial review of its binding rulings regime?', *Australian Tax Review*, Vol. 29, 2000.

Sless, D 2003, 'The Economics of Information', *Communication Research Institute*, viewed 23 November 2003: <www.communication.org.au/html/paper_7.html>.

Talintyre B 2000, 'The relationship between taxpayer and revenue authority and its impact on tax decision- making', *Journal of ATAX Association*, Vol 2, April 2000.

Taxation in Australia 1990, 'Self assessment: the imperfect solution', *Taxation in Australia*, vol 25, 1990, pp.442-443.

Taxation in Australia 1992, 'Cross Examination: The self assessment amendments', *Taxation in Australia*, vol 27, 1992, pp.33-38.

Taxation in Australia 1992, 'Self Assessment: improvements and penalties', *Taxation in Australia*, vol 27, 1992 pp.264-268.

Taxation in Australia 1993, 'Administration: the self-assessment shunt', *Taxation in Australia*, vol 27, 1993 pp.318-319.

Taxation in Australia, 1997, 'Old game, different players – the WRE system's failure to work equitably and efficiently is nothing new', *Taxation in Australia*, vol 5, February 1997.

Taxpayers Australia Inc: Press release: *Taxpayers cheated by ATO rough justice*, 29 August 2003.

The Bulletin 2001, 'Tax Rangers', *The Bulletin with Newsweek*, 26 September 2001.

Ueng, G and Yang, C 2000, 'Taxation with little administration', *Journal of public economics*, 2000, pp.145-156.

United Kingdom House of Commons Treasury Committee 2002, *Inland Revenue: Self Assessment systems*, United Kingdom Parliament, United Kingdom.

United States Department of Treasury 2003, *1040 Forms and Instructions*, IRS, United States.

Williams, R 2003, 'Mass marketed tax schemes and self-assessment: shifting the goal posts?', *Centre for Tax System Integrity*, Australian National University, Canberra.

Woellner, R 1995, 'Private tax rulings: some practical problems', paper presented to 50th Anniversary Conference of the Australian Law Teachers' Association.

Young, S 1992, 'The determinations deluge', *Taxation in Australia*, vol 27, 1992, pp.254-255.

Court Cases

Batagol v Federal Commissioner of Taxation (1963) 109 CLR 243.

Denver Chemical Manufacturing Co v Commissioner of Taxation (NSW) (1949) CLR 296.

Federal Commissioner of Taxation v Wade (1951) 84 CLR 105.

Fenton v Federal Commissioner of Taxation [2003] AATA 137.

Vincent v Federal Commissioner of Taxation [2002] FCAFC 291.

Walstern Pty. Ltd. v Commissioner of Taxation [2003] FCA 1428.

Legislation

Freedom of Information Act 1982

Income Tax Assessment Act 1936

Income Tax Assessment Act 1997

Tax Laws Amendment (Self Assessment) Act 1992

Taxation Administration Act 1953