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FOI request details

I am seeking access to the following documents for the purposes of Freedom of Information

The submissions summary available at <https://treasury.gov.au/consultation/protecting-the-corporate-tax-base-from-erosion-and-loopholes-preventing-dividend-washing/> refers to • "Advice from the ATO indicates that the existing law is very difficult to apply and would not necessarily apply in all circumstances". I am requesting a copy of the advice from the ATO referred to in the summary, together with any documents which refer to or relate to that advice.