NEWSFLASH BOOKLET

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OVERSEAS BOOKLET

Non resident with Australian investments

It is a lot easier to become a non resident for taxation purposes than it is for immigration purposes. If a non resident has a rental property in Australia they are still subject to Australian tax at non resident rates on it. If the property makes a loss these losses can be carried forward and offset against future Australian income. In order to carry these losses forward an Australian income tax return must be lodged for each year.

The carried forward losses described above are reduced by any exempt income received (section 36-10) but section 36-20 states that this does not include income made exempt by Section 128B - refer next paragraph.

If a non resident has interest, dividend or royalty income with an Australian source it will only be subject to Australian withholding tax and as a result will be excluded from an Australian income tax return. Note dividend withholding tax rates are 30% for residents of countries with no double tax agreement and 15% for countries with a double tax agreement but if the dividend is franked the withholding tax rate is effectively zero. Section 128B.

Note if you are a non resident there is no point in negatively gearing any interest, dividends or royalties (other than considerations unique to your country of residence) as the withholding tax is calculated on your income before deductions and these deductions would not be claimable in your Australian tax returns as the corresponding income is excluded under 128B so there would be no link of cost of earning income under section 8(1) of the 1997 Act.

A non-resident may also be liable for tax on a capital gain arising from a CGT event that occurs in relation to an asset that is "connected with Australia", even if the gain does not have an Australian source. But shares in an Australian public company or units in an Australian public trust where your controlling interest is less than 10%, are not subject to CGT in Australia as they are not included in the definition of "connected with Australia".

Becoming a non resident of Australia for tax purposes

IT 2650 examines the relevant factors in depth. Generally if a person leaves Australia for more than two years and sets up a home in another country they will be considered not to be a resident of Australia for tax purposes right from the time they leave Australia. Note it is possible to become a resident of more than one country at the same time.

Upon becoming a non resident of Australia ITAA97 section 104-160 deems a capital gains tax event to have occurred. This is that you are considered to have disposed of all your assets, that are **not** "connected with Australia" and acquired after 19th September, 1985, at their market value. Accordingly, you will be subject to capital gains tax on any increase in value over their cost base. The following is a list of assets "connected with Australia":

1) Land, buildings and structures in Australia
2) An interest or right in land in Australia
3) A strata title flat or home unit
4) A share in a company that owns 1, 2 or 3 above and gives the shareholder the right to occupy.
5) An asset that has been used by its owner at any time to carry on business through a permanent establishment in Australia.
6) A share in a private company that was a resident of Australia when the share was sold.
7) An interest in a trust that was a resident of Australia when the interest was sold.
8) A share in public company that was a resident of Australia when the share was sold and the non resident and associates had control over more than 10% of the shares at any time during the last 5 years.
9) An unit in a unit trust that was a resident of Australia when the unit was sold and the non resident and associates had control over more than 10% of the units at any time during the last 5 years.
10) An option or right to acquire any of the above.
11) Various provisions associated with rollover relief.

But Section 104-165(2) gives you the option of ignoring the capital gain accrued when you leave the country but this will effectively mean you are taxed on any gain while you are a non resident. The options offered by Section 104-165(2) are:

a) Defer the CGT and pay it when the asset is sold but the tax will be on the gain over the whole period up to the sale including when a non resident.

or

b) Defer the CGT on the basis you will be returning to Australian Residency before you sell it but when you do sell there will be no exemption for the gain made while you were a non resident.

So the choice is pay the tax when you leave and be free of Australian tax on any gain you make while a non resident or defer the tax but widen the period of time you are exposed to Australian capital gains tax.

As your home will be an asset "connected with Australia" you will not be deemed to have disposed of your home by 104-160 if you decide to keep a home in Australia to return to and go overseas for longer than 2 years and lose your residency for tax purposes. This is assuming you have actually lived in the home as your main residence before you go overseas. You will have to elect for it to be your main residence otherwise section 118-192 deems there to be a disposal anyway, if it is first rented out after 20th August 1996. If you elect for it to be your main residence but rent it out during you absence the exemption will only last 6 years unless you move back in again. You will qualify for another 6 years each time you move back in. If it is not rented out the exemption from CGT is unlimited. Section 118-145. Note the disposal deemed by section 118-192 does not trigger a capital gain if the house had always been your main resident during the time you owned it.

You may also have trouble if you are the trustee of your self managed superannuation fund as the trustee needs to be a resident.

Working overseas

If you work overseas for less than two years you could still be considered a resident of Australia for taxation purposes. But section 23AG exempts from Australian taxation employment income earned overseas providing the following conditions are met:

1) The employment is for a continuous period of 91 days. Note continuity is not broken by absences due to accidents or illness or recreation leave, which is part of the terms of your employment contract. Weekends, public holidays, compassionate leave etc do not break continuity nor do business trips for the foreign employer. But continuity is broken by long service leave or leave on reduced or no pay. More detail can be found in TR96/15 which also addresses the absentee credit system.

and

2) You are taxed on this income in the foreign country. Note Australia has different double tax agreements with each country so you will need to know exactly what applies to your country.

But note while section 23AG exempts the income earned overseas it does not exempt from Australian tax your other income such as interest, royalties, dividends, rent etc., if you are still considered to be an Australian Resident for tax purposes. That is you intend to return to Australia within less than 2 years. This 2 year rule is not hard and fast it boils down to a question of fact. You will be taxed on any interest, royalty, dividend and rent income as if you were a resident but your net overseas income (calculated in accordance with Australian Tax Law) will be taken into account in determining your tax bracket.

Interest, dividends and rent when overseas

This all revolves around whether you are a resident of Australia for tax purposes. Note you can be working overseas and being taxed on the wages you earn in that country by that country. But if you are still a resident of Australia for tax purposes Australia gets to tax your Interest, Royalties, Dividends and Rent from anywhere in the world. It is only your wages earned overseas and that meet the requirements of 23AG i.e. 91 days work, that are exempt in Australia. The interest on the overseas bank account, that your overseas wage is paid into, is taxable in Australia even if the wage isn't. Whether you are a resident of Australia for tax purpose is a question of fact but a big deciding factor is whether you have gone overseas for a period of less than 2 years.

If you are not considered a resident of Australia for tax purposes then you are not taxed by Australia (other than withholding tax) on your interest, royalty or dividend income that has a source in Australia but you are still taxed in Australia on your rental income if the property is in Australia.

Note if you make a capital gain on an asset "connected with Australia" you are subject to tax on that gain in Australia whether you are a resident or not.

Becoming a resident of Australia for tax purposes

While the ATO likes to hang onto its residents for tax purposes if they are overseas for up to 2 years. On the other side of the coin they will start trying to assess a person from overseas as a resident of Australia once they have been here 6 months and it does not have to be a continuous period of 6 months. But it cannot apply if you have no intention of setting up a residence (normal abode) here. More information is available in TR 98/17.

Immigrants are considered to be an Australian resident from the time they arrive.

For capital gains tax purposes all assets (other than those acquired before 19th September, 1985) owned by a new resident are deemed to be purchased at the date of residency for their market value. So it would be wise to collect as much information as possible to calculate this cost base. Note this does not apply if the assets are "connected with Australia", in that case the cost base is the original cost.

From the 1st July, 2002 expatriates resident in Australia for less than 4 years will not be subject to capital gains tax on their non Australian assets.

For a quick test on whether you are a resident go to:
http://calculators.ato.gov.au/scripts/axos/axos.asp?CONTEXT=&KBS=resident.xr4&go=ok

Rates of tax

Non Residents:

If you are a non resident for tax purposes you are not charged the Medicare levy. Australian Tax Rates will change between the 2006 and 2007 financial year.

1-7-05 to 30-6-06		1-7-06 to 30-6-07	
$0 to $21,600	29%	$0 to $25,000	29%
$21,601 to $63,000	30%	$25,000 to $75,000	30%
$63,001 to $95,000	42%	$75,001 to $150,000	40%
Over $95,000	47%	Over $150,000	45%

The tax rate is 29% on the first $25,000 then 30% on the next $50,000 and 40% on the next $75,000. If your Australian taxable income is over $150,000 it is then taxed at 45% on every dollar over.

Residents:

Most residents are subject to a 1.5% Medicare levy plus an extra 1% surcharge if you have no private health insurance are single with no dependant children and your income exceeds $50,000. If you are a family the combined threshold is $100,000. New residents to the country who do not qualify for a Medicare card do not have to pay the levy. There are a few other exemptions such as members of the defence force, low income earners etc. Excluding the Medicare levy the resident rates of tax are:

1-7-05 to 30-6-06		1-7-06 to 30-6-07	
$0 to $6,000	0%	$0 to $6,000	0%
$6,001 to $21,600	15%	$6,001 to $25,000	15%
$21,601 to $63,000	30%	$25,000 to $75,000	30%
$63,001 to $95,000	42%	$75,001 to $150,000	40%
Over $95,000	47%	Over $150,000	45%

Note some rebates may apply to reduce the tax amount i.e. low income rebate of $235 for 2006 and $600 for 2007, zone rebates, dependant rebates, medical expenses rebates etc.

If you have earned exempt employment income overseas but are still a resident for tax purposes in Australia the exempt income is taken into account to determine which percentage is applied to your other Australian income. So it is important that you keep a record of how much you earned overseas and the dates. Note that how much you earned overseas is after allowing for deductions against that income that would have been deductible according to Australian law.

Non residents and Capital Gains Tax

Non residents are subject to tax on capital gains made on assets that are "connected" with Australia ITAA97 Section 136-10 if the assets were acquired after 19th September, 1985. But if the Australian assets are actually owned by a non resident company the capital gains tax will not apply. Note the Ralph Review suggested closing this loophole. To be "connected with Australia" (section 136-25) the asset must be:

1) Land, buildings and structures in Australia
2) An interest or right in land in Australia
3) A strata title flat or home unit
4) A share in a company that owns 1, 2 or 3 above and gives the shareholder the right to occupy.
5) An asset that has been used by its owner at any time to carry on business through a permanent establishment in Australia.
6) A share in a private company that was a resident of Australia when the share was sold.
7) An interest in a trust that was a resident of Australia when the interest was sold.
8) A share in public company that was a resident of Australia when the share was sold and the non resident and associates had control over more than 10% of the shares at any time during the last 5 years.
9) An unit in an unit trust that was a resident of Australia when the unit was sold and the non resident and associates had control over more than 10% of the units at any time during the last 5 years.
10) An option or right to acquire any of the above.
11) Various provisions associated with rollover relief.

Accordingly, a non resident will not be subject to capital gains made on shares in Australian public companies or trust if they control less than 10%. But will be subject to CGT on the sale of a house or home unit unless the are utilising the exemption available under section 118- 145 because they have lived in it.

Note some double tax agreements can contradict the above and if so the double tax agreement has authority over Australian tax law.

A non resident is entitled to the 50% capital gains tax discount if they have held the asset for more than 12 months.

Note the above has been changed in the 2006 budget, refer the end of this booklet.

Residents of Australia with overseas investments

Note this also covers Australian Residents for tax purposes that are overseas at the time, even if they are working temporarily overseas and even if their wages income is exempt under section 23AG.

Dividend Royalty and Interest Income from Investments Overseas – Under our double tax agreements this should be subject to withholding tax in the country it is earned. Nevertheless, the full amount you have earned before the withholding tax was deducted should be included in your Australian tax return as foreign income with the withholding tax shown as foreign tax credits.

Rental Properties – If your net rent income is taxed in the country the property is located in you are entitled to a foreign tax credit for any tax paid. Your net rent income is determined according to Australian tax law and included as foreign income in your Australian tax return. Section 43 depreciation is available for buildings, alterations etc which began after 21st August, 1990 section 43-20(1) or 26th February, 1992 section 43-20(2).

The foreign tax credit can only be used to offset tax payable in Australia on foreign income of that particular class but unused tax credits can be carried forward and used to cover future foreign income of the same class. Interest income is in a different class to other passive incomes.

Residents of Australia will be subject to capital gains tax on any assets acquired after 19th September, 1985 unless the applicable double tax agreement specifically excludes this. The 50% discount is available if the asset is held for more than 12 months. For the purposes of the tax return this amount is recorded as capital gains not foreign income. A capital loss is not quarantined as foreign income is, a foreign capital loss can only be offset against capital gains but they can be Australian or foreign. Capital losses have special offset rules refer IT2562. In short this allows foreign capital losses to be offset against Australian capital gains first thus maximizing any other foreign capital gain and so maximising the opportunity to utilise the foreign tax credits from the foreign capital gain. If you are entitled to a credit for foreign tax on your capital gain your tax return will need to be lodged manually with a note detailing this as there is no facility within a normal tax return to record the credit.

Australian residents and foreign losses

Foreign losses that cannot be offset against foreign income in the year incurred can be carried forward and deducted against foreign income of the same class in future years. The four classes are interest income, passive income that is not interest, offshore banking income and all other assessable foreign income.

A capital loss is not quarantined as foreign income is, a foreign capital loss can only be offset against capital gains but they can be Australian or foreign. Capital losses have special offset rules refer IT2562. In short this allows foreign capital losses to be offset against Australian capital gains first thus maximizing any other foreign capital gain and so maximising the opportunity to utilise the foreign tax credits from the foreign capital gain.

Unlike other partnership losses that are automatically transferred to the individual partner, foreign losses made by a partnership are quarantined to be offset against only foreign income of the same class only earned by the partnership (TD 92/113).

If you are offsetting a foreign loss against foreign income you are only permitted a tax credit for the amount of foreign tax that would have been payable on the net amount. But this is not the case with Capital losses which have special offset rules refer IT2562.

Summary

Non Resident For Tax Purposes:

1) Subject to normal income tax at non resident rates on wages earned in Australia and investment income earned in Australia that is not subject to withholding tax or imputation credits.
2) Subject to capital gains tax on gains made on assets "connected with Australia"
3) If an Australian resident becomes a non resident they have 3 choices as to how they deal with their assets that are not "connected with Australia" and were acquired after 19th September 1985.
   a) Deemed them to have been disposed of when they leave and pay the CGT. As a result no Australian CGT will be payable on any gains while a non resident
   b) Defer the CGT and pay it when the asset is sold but the tax will be on the gain over the whole period up to the sale including when a non resident.
   c) Defer the CGT on the basis you will be returning to Australian Residency before you sell it but when you do sell there will be no exemption for the gain made while you were a non resident.

Residents For Tax Purposes That Are Overseas:

1) Under certain conditions overseas employment income exempt from tax in Australia but taken into account in determining tax bracket.
2) Subject to normal income tax at resident rates on interest, royalties, dividends and rental income no matter where in the world it was earn. But entitled to a credit for any foreign tax paid.
3) Subject to capital gains tax on any gains made on any assets anywhere in the world. But entitled to a credit for any foreign tax paid.

Note:

All of the above is written for the small investor not companies or trusts and there are more complex rules if you have a significant investment in a foreign entity.

From the desk of Raegan Durch, Financial Planner with Whittaker Macnaught

"As a financial planner, I have many clients who work overseas and are nonresidents for tax purposes. Most of these clients intend to return to Australia and have retained their Australian investments. It is important that clients understand the taxation implication of holding these investments during their stay overseas as well as the capital gains tax treatment on the sale of the investment, whether while overseas or upon their return to Australia."

If you would like further advice or assistance on managing these investments, you may contact Whittaker Macnaught. www.whittakermacnaught.com.au

Overseas rental properties

Newsflash 61

In ID2002/764 the ATO clearly states that, from 1st July, 2001 Section 160AFD allows the interest, borrowing costs etc. on an overseas rental property to be offset against Australian income to the extent that it exceeds the overseas rent received.

Note this is rental income after the deduction of other expenses such as rates, insurance and repairs. Providing they do not exceed the total amount of rent received. If the rates, insurance and repairs exceed the rent received the balance is carried forward to be offset against future foreign income and the interest is fully deductible against Australian Income.

Confusion over rollover relief because U.S. different

Newsflash 75 Article, 1st March 2004

No rollover relief is available on investment properties in Australia. The only rollover relief is available to active assets of a business and it specifically excludes assets that have been used to produce rental income section 152-40(4)(e).

CGT 50% discount trap for new residents

NewsFlash Issue: 88; By: Julia Hartman B.Bus CPA – Tax Accountant; Last Updated: 2004, 15th September

When a taxpayer first becomes a resident of Australia for tax purposes they are deemed to have acquired any assets they hold, that are not connected with Australia, at the date of becoming a resident and at the market value on that day. Accordingly, the 50% discount is not available until they have been a resident for more than 12 months. This is a real trap for people selling their assets in their country of origin to transfer their wealth to Australia, though as the capital gain is only the difference between the market value and selling price over a period of less than 12 months, it should not be too painful. For details of assets connected with Australia refer our Overseas Booklet. Reference ID 2003/628

Rebate for services to the United Nations

Taxpayers who are working for the United Nations in excess of 183 days but are actually liable for tax in Australia on their earnings are entitled to a rebate of $338 plus 50% of the notional dependant rebate amount. Reference section 23 AB (7) ITAA 1936.

Overseas fruit picking backpackers

We now have a booklet written especially for fruit pickers who come in from overseas on a working holiday visa. It covers the fine line on residency and how to avoid the 29% tax on your earnings, Visas, Medicare qualification an issues applicable to New Zealanders. This is available from the free publications section of our web site.

Working overseas

Whether the income, you earn overseas is taxable in Australia or not depends on how long you intend to go overseas, how long you work over there and whether it is taxed overseas. There are three possible outcomes.

If you work overseas for more than 91 days but do not set up a new home overseas or stay away for more than 2 years you are still a resident of Australia for tax purposes. Nevertheless you will not have to pay tax on your overseas income if it is taxed in the country in which you earned it. The amount is still included in your tax return as exempt foreign income. This means it will effect the tax bracket that your Australian income is taxed at. For example if you have earned over $70,000 in exempt foreign income you will have to pay 48.5% on any income you earn in Australia. Your passive income will still be taxed in Australia because you are still a resident for tax purposes.

If you did not work overseas for a continuous period of 91 days your overseas income will be subject to tax in Australia but with a tax credit for any tax you paid overseas. For more detail on the continuous service refer TR96/15 which also addresses the absentee credit system.

Whether you work overseas for more than 91 days or less, the amount you receive needs to be included in your tax return in Australian dollars at the exchange rate at the earliest of the time it was earned or received. Yes, this means you will need to know the exchange rate for each day you work and you will also need to know how much you earned each day. You are allowed to reduce your overseas income by costs you have incurred in earning it but only if these expenses would have been deductible if you had earned the income in Australia.

Generally if a person leaves Australia for more than two years and sets up a home in another country they will be considered not to be a resident of Australia for tax purposes right from the time they leave Australia. IT 2650 examines the relevant factors in depth. As a non resident you would not be taxed on any income you receive from an overseas source, though rental income or capital gains from a property in Australia would still be taxable here. Interest and dividend income from public companies in which you own less than 10% of the shares will not be taxed in Australia, but in most cases you will not qualify to claim back your franking credit.

Once you are a non resident any gains you make on the sale of shares you hold in Australian listed companies will not be taxable in Australia. Now the ATO isn't going to just let you leave and take your gains with you. Upon leaving Australia you are considered to have disposed of, at current market value, all your shares held in Australia and overseas if they were acquired after 19th September, 1985. There is an option under Section 104-165(2) to ignore this deemed disposal but if you do you will have to pay the CGT to Australia when you do actually dispose of the shares, even though you are a non resident. This effectively means you will be taxed by Australia on the capital gain while you were a non resident. So if you don't want to pay extra tax unnecessarily declare the gain when leaving.

There are many variations and fine lines on the above so please don't act on it without getting advice on your particular circumstances. If you want more information that is a whole booklet on the subject on our web site under free publications.

Dual resident - UK rental income

It is possible to be a resident for tax purposes of two different countries. In ID 2005/207 the ATO discuss the situation where a dual resident of the UK and Australia receives rental income on a UK property.

Australia and the UK have a double tax agreement that can override normal tax law and contains a tie breaker for dual residents. Generally the country where the rental property is situated has the right to tax the income. If you are an Australian resident for tax purposes, with a rental property in the UK, Australia will still tax the rental income even though the UK has, but Australia will give you tax credits for any tax paid in the UK.

The Tie Breaker in the Double Tax Agreement is necessary to determine the residency status of dual residents. Usually it is simply the country where a permanent home is maintained but if the taxpayer has a home of equal permanency in both countries it then looks at where his or her "personal and economic relations are closer." If neither of these test are applicable then it is determined by the country in which the taxpayer is a national.

In ID 2005/207 it was decided that the taxpayer had more personal and economic ties in the UK despite maintaining homes in both countries. As the property was located in the UK and the tie breaker made the taxpayer a UK resident, the UK was the only country that had a right to tax the rental income.

Reader's question - NZ property

A reader purchased a house in New Zealand in 1989 and used it as their main residence until 1992 when they rented it out. In 2001 they moved to Australia and sold the NZ property in 2005. They were advised that they would have to pay Australian CGT on the increase in the value of the property between 1989 and 2005 multiplied by the percentage of time it was not exempt as their main residence.

True they could not use section 118-192 which resets the cost base to the market value of the PPR when it was first rented because this only applies to properties first rented after 20th August, 1996. They were also unlucky in that they purchased the property before 20th August, 1991 so were not entitled to include holding costs such as interest, rates and maintenance while they were living there, in the cost base under section 110-25(4). As the holding costs are taken into account before apportioning for the time it was not a main residence it would have reduced the taxable gain considerably.

But their advisor had missed one vital issue. They became residents of Australia in 2001. Upon becoming residents of Australia non Australian assets are considered to have been acquired at their market value at the

time of becoming a resident. ID 2003/628 states that the 50% discount is only available if they have been an Australian resident for more than 12 months even though they have owned the property for more than 12 months. This means the ATO accepts that the purchase date is also reset when they become a resident. Accordingly, their cost base is reset to the market value of the property in 2001 and they qualify to increase their cost base by any holding costs such as interest and rates that have not been claimed as a tax deduction against the rent.

Reader's Question - CGT on Home While Overseas

Question:

A friend owned a home, lived in it for a while then worked overseas for less than 6 years and became a non resident for tax purposes. Then he returned to Australia. He has had advice that the sale is CGT exempt but one Accountant disagrees claiming the non-residency cancels the 6 year exemption rule.

Answer:

Section 118-145 is the section on the 6 year rule, at sub section (4) it gives the following example:

"You live in a house for 3 years. You are posted overseas for 5 years and you rent it out during your absence.

On your return you move back into it for 2 years. You are then posted overseas again for 4 years (again renting it out), at the end of which you sell the house. You have not treated any other dwelling as your main residence during your absences. You may choose to continue to treat the house as your main residence during both absences because each absence is less than 6 years. You can make this choice when preparing your income tax return for the income year in which you sold the house.

Section 118-110 states the basic case for the main residence exemption and does not mention at any time that you need to be a resident for tax purposes.

Update to CGT and Foreign Residents

Foreign residents will now only be subject to capital gains tax on real (real estate) property they personally hold in Australia or any property that they use in carrying on a business that is permanently established in Australia. If more than 50% of a foreign interposed entity (and its associates) assets are Australian real property CGT will also apply. Though for this to apply to an overseas resident they must have more than a 10% interest in the entity. When this bill receives Royal Accent the above will replace the definition of assets having the necessary connection with Australia in our Overseas Booklet.

Back Issues & Booklets

To obtain free back issues of the fortnightly BAN TACS Newsflash or any of the following booklets visit our web site at www.bantacs.com.au/publications.php. You can also subscribe to our Newsflash reminder.

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Why is that most people aren't taught how to be rich or happy? We are trained to do most things in our lives, in order to do them well enough to get by. We are taught how to read and write, how to cook, how to drive. We are taught how to do incredibly complex and challenging tasks like designing and building bridges over wide spaces, how to cure diseases, to fly airplanes, yet when it comes to creating personal wealth and happiness, we're left to find out for ourselves.

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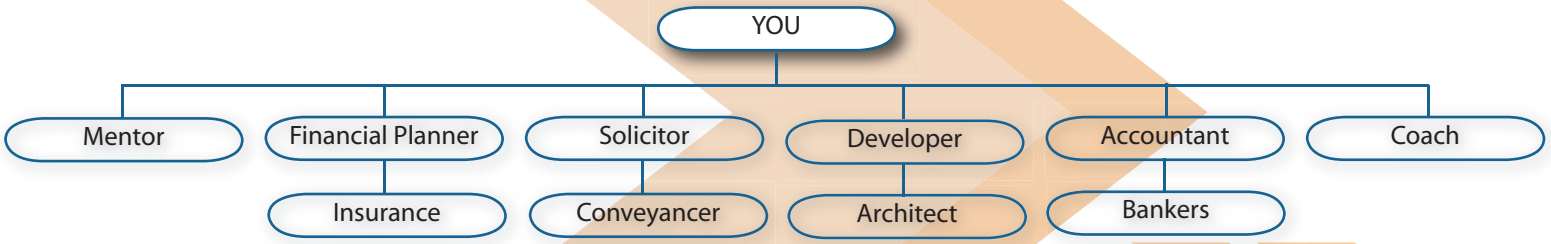
On going Support

Through APIN's Alliance Partners and Discussion Forums you can fortify your ideas and gain strength by exchanging information. Creating alliances generates business opportunities increasing your network and of course - your cashflow.

We have a mentoring service for those that are not quite ready to take those steps without guidance, extra information and some affirmation. Helping you to create a "*safe*" environment for your first steps.

Who is on your team?

When looking at people who are successful, you will notice they have a hand selected group of people to support and advise throughtout the journey to success.



Property Opportunities

Through our Australia wide network we select opportunities that "stack up". We use an independent Research company (Guardian) who are licensed financial planners and real estate agents to use our pre selection due diligence program. From investment properties, development sites, future land subdivisions, building makeovers to even golf course resort projects.

APIN also align ourselves with a select group of builders and developers where we negotiate wholesale purchasing, saving you 10% off the retail price. These opportunities are not available to the public but only members of the APIN site. We can introduce you to the key people who are experts in their fields, saving you thousands of hours of frustration and heartache. Very shortly APIN will also be offering FREE property advertising on our site through resisearch.com who are one of our alliance companies. APIN is fast becoming the most exciting site in Australia.