

## NOTICE OF FILING

This document was lodged electronically in the FEDERAL COURT OF AUSTRALIA (FCA) on 30/09/2021 5:57:49 PM AEST and has been accepted for filing under the Court's Rules. Details of filing follow and important additional information about these are set out below.

### Details of Filing

Document Lodged: Affidavit - Form 59 - Rule 29.02(1)  
File Number: NSD616/2021  
File Title: WESTPAC BANKING CORPORATION ABN 33 007 457 141 & ANOR v  
FORUM FINANCE PTY LIMITED & ORS  
Registry: NEW SOUTH WALES REGISTRY - FEDERAL COURT OF  
AUSTRALIA



A handwritten signature in blue ink that reads 'Sia Lagos'.

Dated: 30/09/2021 5:57:50 PM AEST

Registrar

### Important Information

As required by the Court's Rules, this Notice has been inserted as the first page of the document which has been accepted for electronic filing. It is now taken to be part of that document for the purposes of the proceeding in the Court and contains important information for all parties to that proceeding. It must be included in the document served on each of those parties.

The date and time of lodgment also shown above are the date and time that the document was received by the Court. Under the Court's Rules the date of filing of the document is the day it was lodged (if that is a business day for the Registry which accepts it and the document was received by 4.30 pm local time at that Registry) or otherwise the next working day for that Registry.



Form 59  
Rule 29.02(1)

## Affidavit

No. NSD616/2021

Federal Court of Australia  
District Registry: New South Wales  
Division: General

**Westpac Banking Corporation ABN 33 007 457 141** and another named in the Schedule  
Applicants

**Forum Finance Pty Limited ACN 153 301 172** and others named in the Schedule  
Respondents

Affidavit of: Caitlin Maria Murray

Address: Level 40, Governor Macquarie Tower, 1 Farrer Place, Sydney NSW 2000

Occupation: Solicitor

Date: 30 September 2021

### Contents

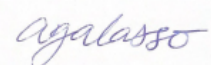
Document number	Details	Paragraph	Page
1.	Affidavit of Caitlin Maria Murray sworn on 30 September 2021	[1]	2
2.	Exhibit CMM-13 being a paginated bundle of documents	[3]	1-317

Filed on behalf of (name & role of party)	Westpac Banking Corporation and Westpac New Zealand Limited, applicants		
Prepared by (name of person/lawyer)	Caitlin Murray		
Law firm (if applicable)	MinterEllison		
Tel (02) 9921 8888	Fax	02 9921 8123	
Email	caitlin.murray@minterellison.com		
<b>Address for service</b> (include state and postcode)	Governor Macquarie Tower, 1 Farrer Place, SYDNEY NSW 2000 Our reference: CMM:AGS:1353397		

Version 3 form approved 02/05/2019

I, Caitlin Maria Murray of Level 40, Governor Macquarie Tower, 1 Farrer Place, Sydney NSW 2000, Solicitor, say on oath:

1. I am a partner of the firm of solicitors, MinterEllison and the solicitor for the first applicant, Westpac Banking Corporation (**Westpac**), and the second applicant Westpac New Zealand Limited (**WNZL**).
2. I have previously sworn affidavits in relation to these proceedings, including (but not limited to):
  - (a) my first affidavit and my second affidavits sworn 28 June 2021;
  - (b) my third affidavit and my fourth affidavit sworn 2 July 2021;
  - (c) my seventh affidavit sworn 12 July 2021;
  - (d) my eighth affidavit sworn 14 July 2021;
  - (e) my ninth affidavit sworn 15 July 2021;
  - (f) my tenth affidavit sworn 15 July 2021;
  - (g) my eleventh affidavit sworn 20 July 2021,
  - (h) my twelfth affidavit sworn 25 August 2021;
  - (i) my thirteenth affidavit sworn 16 September 2021,
  - (j) my fourteenth affidavit sworn 23 September 2021(together, my **Earlier Affidavits**).
3. Exhibited to me at the time of swearing this affidavit is a paginated bundle of documents marked 'Exhibit CMM-13' (**CMM-13**). Throughout this affidavit I make reference to documents which appear at CMM-13. In this affidavit I also make reference to documents which were exhibit to certain of my Earlier Affidavits.
4. I make this affidavit in support of an application that certain funds held by Fortis Law in their trust account be paid into Court. These orders are sought in aid of the freezing order, pursuant to section 23 of the *Federal Court Act 1976* (Cth) (**Act**) and rule 7.32 of the *Federal Court Rules 2011* (Cth) (**FCR**) made against the Third Respondent, Vincenzo Frank Tesoriero (**Mr Tesoriero**), in these proceedings on 2 July 2021 (as varied on 9 July 2021 and 27 August 2021) (**Tesoriero Freezing Order**).



## Payments made to Forum Finance by Westpac and WZNL

### *Australia*

5. As set out in paragraphs 7 and 9 of my seventh affidavit sworn 12 July 2021, I am informed by Mr Anderson and verily believe that Westpac paid to Forum Finance Pty Limited (in liquidation) (**Forum Finance**) an amount in excess of AUD \$250 million between September 2018 and June 2021 in relation to contractual arrangements which appear, at least prima facie, to be false and fictitious and which has not been recovered. I am informed by Mr Anderson and verily believe that the funds paid by Westpac to Forum Finance were paid into a National Australia Bank Limited (**NAB**) bank account with account details BSB 082-080, account number 848483695 (**FF Account**).

### *New Zealand*

6. I am informed by Mr Robert Padden, an employee of WNZL, and verily believe that WNZL paid to IUGIS (NZ) Limited (**IUGIS NZ**) approximately NZD 58 million for receivables for equipment financing pursuant to similar contractual arrangements to the Forum / Eqwe Programme with Eqwe in New Zealand, the IUGIS NZ financing programme, of which in excess of NZD 40 million has not been recovered.
7. I am informed by Mr Padden and verily believe that the amounts paid by WZNL to IUGIS NZ were paid into an ANZ account in New Zealand in the name "Orca Enviro Solutions NZ Limited with account number 01 0277-0773014-00 (**IUGIS Account**).

## Payments made by Forum Finance to FGFS

8. As set out in paragraphs 10 to 15 of my seventh affidavit sworn 12 July 2021, an analysis of the FF Account bank statements identify approximately \$277 million had been paid out of the FF Account with a description that appeared to relate to Forum Group Financial Services Pty Ltd (provisional liquidators appointed) (**FGFS**).
9. As set out in paragraphs 6 to 7 of my ninth affidavit sworn on 15 July 2021 the Applicants have obtained on subpoena the bank account statements for an account held by FGFS with details 082-080 27-105-8642 (**FGFS Account**) for the period from 1 July 2019 to 30 June 2021, which were exhibited at pages 182 to 318 of CMM-7 (the exhibit to my ninth affidavit). A further copy of these statements is at pages 1 to 137 of CMM-13.
10. A review of the FGFS Account statements shows the payments into that account from Forum Finance (often with the description including the words "Forum Fins").

11. The bank statements for the IUGIS Account have withdrawals from the account, which withdrawals record in the transaction details an Australian Dollar amount and which have the description "ORCAEN". A review of the FGFS Account statements record payments into the account, which correspond with the payments out from the IUGIS Account, often with the description "Orca Enviro Solutions New South Wales".

### **Payments by FGFS**

12. On 6 August 2021, the Provisional Liquidators of FGFS provided to the Applicants, pursuant to an information request in accordance with s 70-45 of the Insolvency Practice Schedule (Corporations) a balance sheet for FGFS as at 30 June 2019, 30 June 2020 and 30 June 2021 extracted from the Xero accounting system (**FGFS Balance Sheet**). A copy of the FGFS Balance Sheet is at pages 138 to 139 of CMM-13.
13. The FGFS Balance Sheet records as assets what is described as "loans" to various entities. The Xero records also contained a worksheet for each entity recorded in the balance sheet as a "loan" which worksheets included details of the individuals transactions recorded in that document as occurring between the entity and FGFS.
14. While Westpac and WNZL do not accept the characterisation of these transactions in the FGFS Balance Sheet (in particular, the characterisation of the transfer out of funds fraudulently obtained from them as 'loans'), except in relation to entries which are described as "manual journal" the documents appear to record payments made by FGFS to or to the benefit of various entities, and any repayments from those entities to FGFS, which correspond with payments recorded in FGFS' bank statements.

### **Correspondence regarding Freezing Orders**

15. On 2 July 2021, Westpac applied for, and obtained a freezing order against Mr Tesoriero. The freezing order applied to the Australian assets of Mr Tesoriero and was extended and varied by order of the Court on 9 July 2021. On 27 August 2021, the freezing order was varied and extended to apply over Australian and worldwide assets of Mr Tesoriero.
16. On 21 July 2021, Mr Tesoriero provided an affidavit as to his assets (**Tesoriero Assets Affidavit**). Among other matters, the Tesoriero Assets Affidavit, disclosed Mr Tesoriero's interest in shares in Natalia Ave.
17. The Tesoriero Assets Affidavit indicated the value of the shares in Natalia Ave as being "nominal".



18. As set out in my twelfth affidavit sworn 25 August 2021 MinterEllison has written to the (former) solicitors for Mr Tesoriero, Fortis Law, to express concern in relation to the adequacy of his Tesoriero Assets Affidavit, see 27 July Letter, excluding its attachments, at pages 1 to 2 of CMM-10, a further copy of which is at pages 140 to 141 of CMM-13.

**8-12 Natalia Ave Oakleigh Pty Ltd ACN 643 838 626**

19. I caused solicitors employed by MinterEllison to obtain a current and historical extract of the records of ASIC for the Forty-First Respondent, 8-12 Natalia Ave Oakleigh Pty Ltd ACN 643 838 626 (**Natalia Ave**), a copy of which is at pages 142 to 152 of CMM-13 (**Natalia Ave ASIC extract**). The Natalia Ave ASIC extract shows that Mr Tesoriero is the sole director and shareholder of Natalia Ave.
20. The FGFS Balance Sheet (as at 30 June 2021) records as a non-current asset a loan receivable with the description "Loan - 8-12 Natalia Ave Oakleigh Pty Ltd" in the amount of \$2,122,155.18. A copy of the Xero worksheet titled "Loan - 8-12 Natalia Ave Oakleigh Pty Ltd Transaction" recording a running balance of \$2,122,155.18 as at 30 June 2021 is at page 153 of CMM-13.
21. That spreadsheet, among other transactions, records two payments of \$586,000 each (on 19 December 2019 and 9 June 2020), being the amount of \$1,172,000 paid as a deposit for "12 Natalia Ave". 12 Natalia Ave is understood to be a reference to the property located at 8-12 Natalia Ave Oakleigh South, Victoria 3167 and part Common Property PS 716735J being the land now comprised in Certificate of Title Volume 12298 Folio 008 (**Oakleigh Property**).
22. Included at page 30 of CMM-13 is an extract of the FGFS Account statement showing the payment on 19.12.2019 in the amount of \$586,000 with the description "Deposit 12 Natalia". On page 59 of CMM-13 is an extract of the FGFS Account statement showing the payment on 9.06.2020 in the amount of \$586,000 with the description "Deposit 12 Natalia".
23. The Applicants have also located two deposit receipts in relation to these payments, a copy of which is at pages 154 to 155 of CMM-13.

**Correspondence about the Oakleigh Property and a transfer of the Contract for Sale**

24. On 10 August 2021, the solicitors for the Liquidators sent a letter to Fortis Law, a copy of which is at pages 227 to 229 of CMM-10, which referred to, among other things, a contract to purchase the Oakleigh Property. At that time MinterEllison was not aware of

the contract. Although Natalia Ave was referred to in the Tesoriero Assets Affidavit, Mr Tesoriero's interest in the Oakleigh Property of the contract for sale concerning the Oakleigh Property was not disclosed.

25. In the period from 17 August 2021 to 20 August, MinterEllison and the then solicitors for Mr Tesoriero exchanged correspondence in relation to the Oakleigh Property as follows:

- (a) on 17 August 2021, MinterEllison received from Fortis Law a letter in relation to the Oakleigh Property, noting that the contract for sale of the Oakleigh Property would be transferred to a nominee, by a deed styled as a Nomination Deed, to a purchaser other than Mr Tesoriero. A copy of the 17 August 2021 letter is at pages 624 to 625 of CMM-10;
- (b) further correspondence was exchanged between 17 and 19 August 2021 seeking and providing additional documents in relation to the Oakleigh Property, a copy of which is exhibited at pages 624 to 769 of CMM-10. Included with the documents provided on 19 August 2021, was a Notice of Default which indicated that the settlement date for the purchase of the Oakleigh Property had been extended by mutual agreement from 15 July 2021 to 3 August 2021;
- (c) on 20 August 2021, further correspondence was exchanged between MinterEllison and Fortis Law in relation to the Oakleigh Property as follows:
  - (i) at 11.34am, Mr Sommer (a solicitor under my supervision) sent an email to Mr Nehme which expressed concerns in relation to the disclosures by Mr Tesoriero in the Assets Affidavit and in the 19 August 2021 letter and in relation to the Oakleigh Property transaction. By this email a request was made for any funds received by Mr Tesoriero in connection with the Oakleigh Property transaction to be paid into a controlled monies account the signatories of which are MinterEllison and Fortis Law or are paid into Court;
  - (ii) at 12.20pm, Mr Sommer received an email from Mr Nehme. In this email Mr Nehme said:

*Please confirm that your client, in the interim, will consent to the funds being held in our Trust Account until such time as a joint account is established.*



*Fortis Law will undertake not to deal with those funds until such time as the appropriate account is established.*

*Our account's department will make enquiries to set up a Controlled Monies Account forthwith. I have copied in Ms Colegrove our accounts manager who can liaise with your accounts department.*

- (iii) at 1.47pm, Mr Sommer sent a further response to Mr Nehme, which indicated as follows:

*We confirm that our clients consent to the funds received by your client being held in your firm's trust account until such time as a joint account is established, on the basis of your undertaking not to deal with those funds until such time as the joint account is established.*

A copy of an email chain with the three 20 August 2021 emails is at pages 770 to 772 of CMM-10.

26. Between 26 August 2021 and 21 September 2011, MinterEllison and Fortis Law exchanged emails in relation to the establishment of the controlled monies account. A copy of these emails are at pages 156 to 164 of CMM-13.

#### **Correspondence in relation to funds held by Fortis Law**

27. From 21 September 2021, further correspondence was exchanged between MinterEllison and Fortis Law in relation to the Oakleigh Property and the proceeds held in trust by Fortis Law, being the sum of \$773,362.88 (**Trust Amount**). This correspondence includes:
- (a) at 1.18pm on 21 September 2021 Mr Sommer received an email from Mr Nehme indicating that Fortis Law no longer act for Mr Tesoriero and indicating that the Trust Amount will be held on trust by them as security for payment of legal fees or further order of Court. I note that a copy of this email was sent to Mr Sazz Nasimi, Partner of Madgwicks Lawyers, the new solicitor acting for Mr Tesoriero in the proceedings;
  - (b) at 1.50pm on 21 September 2021, I sent an email in response to Mr Nehme;
  - (c) at 12.09pm on 22 September 2021, I received an email from Mr Safi;
  - (d) at 8.18am on 23 September 2021, Mr Sommer sent a further email to Mr Safi, seeking urgent confirmation that the Trust Amount will be paid into court as requested in my email of 21 September 2021. Further, this email noted that on 20



August 2021, by email sent at 12:20pm, Mr Nehme provided an undertaking that Fortis Law would not deal with the funds until such time as a joint account had been established.

A copy of an email chain including the abovementioned emails, including its attachments, is at pages 165 to 287 of CMM-13.

28. On 27 September 2021, Mr Sommer sent an email to Mr Safi seeking an urgent response to his email of 23 September 2021. A copy of this email is at page 288 of CMM-13.
29. On 28 September 2021, further correspondence was exchanged between MinterEllison and Fortis Law in relation to the Relevant Amount as follows:
- (a) at 11.09am Mr Sommer sent an email to Mr Safi requesting an urgent response to his email of 23 September 2021;
- (b) at 11.55am, Mr Sommer received an email from Mr Safi, in which Mr Safi stated:
- "To be clear, we stand ready to facilitate any arrangement which is consistent with preserving the status of the trust money, whether it be in a controlled money account held between Fortis and Minters, whether it be in a controlled money account held between Madgwicks and Minters or whether it be deposited in Court."*
- (c) at 12.54pm, Mr Sommer sent a further response to Mr Safi.

A copy of the email chain with the three 28 September 2021 emails is at pages 289 to 291 of CMM-13.

30. On 28 September 2021, I caused Mr Sommer to send an email to Mr Nasimi attaching an email (sent 3:49pm, 20 September 2021) and letter (dated 20 September 2021) Mr Sommer sent to Justin Kang of Dentons, solicitors on the record for NAB. A copy of Mr Sommer's emails to Mr Nasimi and Mr Kang (together with the letter attached to that email) are at pages 292 to 296 of CMM-13.
31. On 29 September 2021, further correspondence was exchanged between MinterEllison and Madgwicks in relation to the Relevant Amount as follows:
- (a) at 12.46pm Mr Sommer sent an email to Mr Nasimi requesting an urgent response to his email of 28 September 2021 email to Fortis Law copied to Mr Nasimi; and




- (b) at 2.26pm, Mr Sommer received an email from Mr Nasimi, in which Mr Nasimi stated:

*"Having regard to the above, we are of the view that placing the funds held by Fortis law into either a controlled account or into Court is both counterproductive and against the interests of both parties.*

*Instead, we suggest that the funds be released to Madgwicks in order to address the fees accumulated by Fortis law, and then thereafter be held by Madgwicks in order to secure its fees and to also meet any ordinary and reasonable business expenses that may arise from time to time."*

A copy of the email chain with the 29 September 2021 emails is at pages 297 to 298 of CMM-13.

32. On 28 September 2021, Ms Alana Galasso, a solicitor working under my supervision, sent an email to Mr Nasimi of Madgwicks which included a link to an electronic file of the sealed court documents and transcripts in the proceeding to date. Mr Nasimi responded to that email on 29 September 2021. In his email in response Mr Nasimi indicated that funding was hindering him and referred to his correspondence of earlier in the day. A copy of that email is at pages 299 to 300 of CMM-13.
33. On 30 September 2021, MinterEllison received a further email from Mr Nasimi of Madgwicks in relation to the Relevant Amount, a copy of which is attached at page 301 of CMM-13.
34. As at the date of this affidavit, the Relevant Amount has not been paid into a controlled money account.

#### **Correspondence with the Oakleigh Property transaction nominee**

35. On 22 September 2021, Mr Sommer sent an email to Mr Ken Gray of Arnold Bloch Leibler (**ABL**), solicitor for Oakleigh Industrial Pty Ltd ACN 652 817 733 as bare nominee for Lasky Oakleigh Industrial Pty Ltd (as trustee for The Lasky (Oakleigh) Unit Trust) and Troon Group (Shepparton) Pty Ltd (the **Nominee**), attaching a letter to Mr Gray. The letter set out the events that have transpired in connection with Mr Tesoriero and the Oakleigh Property, and sought confirmation of funds, being in the amount of \$398,637.12, held by them and derived from deposit funds paid by or on behalf of Mr Tesoriero under the original sale contract for the Oakleigh Property. A copy of this email, including its attachment, is at pages 302 to 304 of CMM-13.




36. On 27 September 2021:

- (a) at 8.29am Mr Sommer sent a further email to Mr Gray seeking an urgent response to our letter of 22 September 2021.
- (b) at 9.51am, Mr Gray sent an email to Mr Sommer, acknowledging receipt of the letter of 22 September 2021 and indicating that a substantive response will be provided by close of business on 28 September 2021.

A copy of the email chain including the 27 September 2021 emails is at pages 305 to 306 of CMM-13.

37. On 28 September Mr Gray sent an email to Mr Sommer, attaching a letter in response to our enquiries. A copy of this email and its attachment is at pages 307 to 312 of CMM-13. This letter confirmed, among other things, that ABL are currently holding on trust the amount of \$398,637.12. The Natalia Ave worksheet which is referred to above shows that two payments were made from the FGFS Account, in the amount of \$586,000 on 19 December 2019 and 9 June 2020. Trust account receipts which have been located during the applicants' investigations reveal that these funds have been paid in relation to the deposit for the Oakleigh Property. A copy of the deposit receipts is at page 313 of CMM-13.

#### **Correspondence with Mr Papas' Solicitor**

38. On 29 September 2021, correspondence was exchanged between MinterEllison and Panetta Lawyers, (former) solicitor for Mr Papas, as follows:

- (a) at 9.10am, Mr Sommer received an email from Mr Panetta attaching a sealed copy of Notice of Ceasing to Act (the **Notice**) in relation to Mr Papas; and
- (b) at 2.08pm, Mr Sommer sent an email to Mr Panetta seeking Mr Papas' last known contact details on the basis that Mr Papas does not presently reside at the address listed in the Notice.

A copy of the email chain containing the two 29 September 2021 emails, including the Notice, is at pages 314 to 317 of CMM-13.




Sworn by the deponent  
at Sydney in New South Wales  
on 30 September 2021

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\_\_\_\_\_  
Signature of deponent

Before me:



\_\_\_\_\_  
Signature of witness  
Alana Stephanie Giuseppina Galasso  
Solicitor  
Level 40, Governor Macquarie Tower, One  
Farrer Place NSW 2000.

As a witness, I certify the following matters concerning the person who made this affidavit  
**(deponent)**:

1. This affidavit is witnessed over audio visual link in accordance with Part 2B of the *Electronic Transactions Act 2000* (NSW).
2. I saw the face of the deponent.
3. I observed the deponent signing a copy of this affidavit in real time.
4. I attest or otherwise confirm witnessing the deponent's signature by signing this affidavit.
5. I am reasonably satisfied this affidavit signed by me is a copy of the affidavit signed by the deponent.
6. I have known the deponent for over twelve months.

**Schedule of Parties**

No. NSD616/2021

Federal Court of Australia  
 District Registry: New South Wales  
 Division: General

**Applicants**

First Applicant	Westpac Banking Corporation ABN 33 007 457 141
Second Applicant	Westpac New Zealand Limited (company registration number company number 1763882)

**Respondents**

First Respondent	Forum Finance Pty Limited (in liquidation) ACN 153 301 172
Second Respondent:	Basile Papadimitriou
Third Respondent	Vincenzo Frank Tesoriero
Fourth Respondent:	Forum Group Financial Services Pty Ltd (provisional liquidators appointed) ACN 623 033 705
Fifth Respondent:	Forum Group Pty Ltd (Receivers Appointed) (in liquidation) ACN 153 336 997
Sixth Respondent:	Forum Enviro Pty Ltd (provisional liquidators appointed) ACN 168 709 840
Seventh Respondent:	Forum Enviro (Aust) Pty Ltd (provisional liquidators appointed) ACN 607 484 364
Eighth Respondent	64-66 Berkeley St Hawthorn Pty Ltd ACN 643 838 662
Ninth Respondent	14 James Street Pty Ltd (in liquidation) ACN 638 449 206
Tenth Respondent	26 Edmonstone Road Pty Ltd (in liquidation) ACN 622 944 129
Eleventh Respondent	5 Bulkara Street Pty Ltd (in liquidation) ACN 630 982 160
Twelfth Respondent	6 Bulkara Street Pty Ltd (in liquidation) ACN 639 734 473
Thirteenth Respondent	23 Margaret Street Pty Ltd ACN 623 715 373
Fourteenth Respondent	1160 Glen Huntly Road Pty Ltd ACN 639 447 984
Fifteenth Respondent	14 Kirwin Road Morwell Pty Ltd ACN 641 402 093
Sixteenth Respondent	Canner Investments Pty Ltd ACN 624 176 049
Seventeenth Respondent	123 High Street Taradale Pty Ltd ACN 639 872 512

Eighteenth Respondent	160 Murray Valley Hwy Lake Boga Pty Ltd ACN 641 392 921
Nineteenth Respondent	31 Ellerman Street Dimboola Pty Ltd ACN 641 392 887
Twentieth Respondent	4 Cowslip Street Violet Town Pty Ltd ACN 639 872 352
Twenty-First Respondent	55 Nolan Street Maryborough Pty Ltd ACN 641 392 912
Twenty-Second Respondent	89 Betka Road Mallacoota Pty Ltd ACN 641 393 179
Twenty-Third Respondent	9 Gregory Street Ouyen Pty Ltd ACN 641 392 707
Twenty-Fourth Respondent	9 Main Street Derrinallum Pty Ltd ACN 639 872 736
Twenty-Fifth Respondent	286 Carlisle Street Pty Limited ACN 610 042 343
Twenty-Sixth Respondent	275 High Street Golden Square Pty Ltd ACN 639 870 545
Twenty-Seventh Respondent	Mazcon Investments Hellas IKE
Twenty-Eighth Respondent	Palante Pty Ltd ACN 135 344 151
Twenty-Ninth Respondent	Anastasios Giamouridis
Thirtieth Respondent	The Forum Group of Companies Pty Ltd (in liquidation) ACN 151 964 626
Thirty-First Respondent	Iugis Pty Ltd (in liquidation) ACN 632 882 243
Thirty-Second Respondent	Iugis (UK) Limited
Thirty-Third Respondent	Iugis Holdings Limited
Thirty-Fourth Respondent	Iugis Global Financial Services Limited
Thirty-Fifth Respondent	Iugis Finance Limited
Thirty-Sixth Respondent	Spartan Consulting Group Pty Ltd (in liquidation) ACN 168 989 544
Thirty-Seventh Respondent	Intrashield Pty Ltd (in liquidation) ACN 133 426 534
Thirty-Eighth Respondent	Tesoriero Investment Group Pty Ltd ACN 161 088 115
Thirty-Ninth Respondent	Mangusta (Vic) Pty Ltd ACN 631 520 682
Fortieth Respondent	193 Carlisle Street Enterprises Pty Ltd ACN 612 615 237
Forty-First Respondent	8-12 Natalia Ave Oakleigh Pty Ltd ACN 643 838 626
Forty-Second Respondent	Iugis Hellas IKE
Forty-Third Respondent	Iugis Energy SA