

Form 59

Rule 29.02(1)

# **AFFIDAVIT**

No. NSD1220 of 2020

Federal Court of Australia

District Registry: NSW

Division: Commercial and Corporations

**IN THE MATTER OF MALIVER PTY LTD (ACN 164 334 918)**

**AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION**

Plaintiff

**MELISSA LOUISE CADDICK and others named in the Schedule**

Defendants

Affidavit of: Isabella Lucy Allen

Address: Level 5, 100 Market Street, Sydney, New South Wales

Occupation: Investigator

Date: 15 December 2020

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I, Isabella Lucy Allen, Investigator of Level 5, 100 Market Street Sydney New South Wales 2000 affirm:

1. This is the fifth affidavit that I have affirmed in relation to these proceedings, with previous affidavits being affirmed on 9 November 2020 (my **Main Affidavit and Suppression Affidavit**), 25 November 2020 (my **Third Affidavit**) and 7 December 2020 (**Fourth Affidavit**).
2. I am employed by the Australian Securities and Investments Commission (**ASIC**) as an investigator in ASIC's Financial Services Enforcement team as part of the Office of Enforcement.
3. I am authorised to make this affidavit on behalf of ASIC pursuant to section 102 of the *Australian Securities and Investments Commission Act 2001* (Cth) (**ASIC Act**) and have been delegated certain functions and powers, including the functions and powers under Part 3 of the ASIC Act which relate to ASIC's investigation and information gathering powers.
4. Unless otherwise stated:
  - (a) I make this affidavit from information within my own knowledge and from an examination of the records of, or otherwise in the possession of, ASIC. Where I depose to matters from information and belief, I believe those matters to be true and correct; and
  - (b) the abbreviations and acronyms used in this affidavit are the same as those referred to in my affidavits affirmed on 9 November 2020, 25 November 2020 and 7 December 2020.

**Updated company extract for Maliver Pty Ltd**




5. On 14 December 2020 I caused to be extracted from the ASCOT database the current and historical company extract for Maliver, a copy of which is annexed and marked **IA-19**.

**Notice of winding up application and application for appointment of provisional liquidators**

6. On 27 November 2020, ASIC published a media release on its website at the following URL <https://asic.gov.au/about-asic/news-centre/find-a-media-release/2020-releases/20-301mr-asic-to-seek-appointment-of-provisional-liquidator-to-maliver-pty-ltd-and-receiver-and-manager-to-property-of-melissa-caddick/> entitled '20-301MR ASIC to seek appointment of provisional liquidator to Maliver Pty Ltd and receiver and manager to property of Melissa Caddick'.
7. On 8 December 2020, ASIC updated the media release to include a new paragraph entitled 'Editor's note:'.
8. On 14 December 2020 Ms Kofman informed me that she accessed the URL mentioned in paragraph 6 above and saved the webpage as a PDF. A copy of that PDF is annexed and marked **IA-20**.

**Service of court documents on the Second Defendant**

9. Each of the following documents have been served on the Second Defendant:
  - (a) The Plaintiff's interlocutory process filed 26 November 2020;
  - (b) my four affidavits referred to in paragraph 1 above;
  - (c) the Plaintiff's submissions; and
  - (d) consent of provisional liquidators and consent of receivers.
10. The following affidavits concern, among other things, service on the Second Defendant:
  - (a) Affidavit of Thomas Conner affirmed 12 November 2020 and filed on 17 November 2020;
  - (b) Affidavit of Jarrah Nicholson affirmed 14 December 2020 and filed on 15 December 2020.
  - (c) Affidavit of Kevin Nott sworn 14 December 2020 and filed on 15 December 2020.

11. For completeness, I note that Mr Hough informed me that on 8 December 2020 he express posted the Orders of Justice Jagot of 27 November 2020 and the Orders of Justice Farrell of 8 December 2020 (**Orders**) to the Second Defendant's registered address, under cover of a letter dated 8 December 2020.
12. However, on 14 December 2020 Ms Kofman informed me that she searched the tracking number of the express post envelope on Australia Post's website and could not confirm it had been delivered. The Orders were therefore personally served at the Second Defendant's registered address, along with other documents, on 14 December 2020 as detailed in the affidavit of Kevin Nott sworn 14 December 2020.

#### **Correspondence from legal representatives of investors**

13. Since my affidavit affirmed 7 December 2020 was filed, ASIC has received correspondence from separate legal representatives who represent both individual and groups of investors.
14. On 7 December 2020, ASIC received a letter from Holding Redlich, the legal representatives of one investor. ASIC responded by email to Holding Redlich on 14 December 2020. A copy of Holding Redlich's letter and ASIC's emailed response, together with attachment, is annexed and marked **IA-21**.
15. On 11 December 2020, ASIC received an email from Bridges Lawyers, the legal representative of a group of 13 investors, which attached a letter sent from Bridges Lawyers to Hogan Lovells the previous day. On 11 December 2020, ASIC replied to the email from Bridges Lawyers. On 14 December 2020, ASIC received a letter from Bridges Lawyers. On 14 December at 9:53pm ASIC received a further letter from Bridges Lawyers. A copy of those emails, the letters and ASIC's attachment is annexed and marked **IA-22**.
16. On 4 December 2020 and 10 December 2020, ASIC received emails from DiMarco Lawyers, the legal representative of one investor family. On 14 December 2020, ASIC replied to those emails. A copy of those emails and ASIC's attachments are annexed and marked **IA-23**.

#### **Correspondence from the legal representative of Mrs [REDACTED] and Mr [REDACTED]**

17. On 14 December 2020 ASIC received a letter from William James, the legal representatives of [REDACTED] the parents of the First Defendant. A copy of that letter is annexed and marked **IA-24**.




Affirmed by the deponent

)

at Sydney

)

in New South Wales



)

on 15 December 2020

)

Before me:

)

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

JANANI LAWSON.

An Australian Legal Practitioner within the  
meaning of the Legal Profession Uniform Law (NSW)

**SCHEDULE**

Federal Court of Australia

No. NSD1220 of 2020

District Registry: NSW

Division: Commercial and Corporations

**Defendants**

Second Defendant: MALIVER PTY LTD (ACN 164 334 918)

Date: 15 December 2020

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Federal Court of Australia  
District Registry: NSW  
Division: Commercial and Corporations

**IN THE MATTER OF MALIVER PTY LTD (ACN 164 334 918)**

**AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION**

Plaintiff

**MELISSA LOUISE CADDICK and others named in the Schedule**

Defendants

This is the annexure marked "**IA-19**" referred to in the affidavit of Isabella Lucy Allen affirmed on 15 December 2020.

Before me:

  
\_\_\_\_\_  
JANANI LAWSON

An Australian Legal Practitioner within the Meaning of the Legal Profession  
Uniform Law (NSW)





**ASIC**

Australian Securities & Investments Commission

## Current & Historical Company Extract

**Name:** MALIVER PTY LIMITED

**ACN:** 164 334 918

**Date/Time:** 14 December 2020 AEST 10:33:56 AM

This extract contains information derived from the Australian Securities and Investments Commission's (ASIC) database under section 1274A of the Corporations Act 2001.

Please advise ASIC of any error or omission which you may identify.

EXTRACT

Organisation Details	Document Number
<b>Current Organisation Details</b>	
Name: MALIVER PTY LIMITED	5E3331085
ACN: 164 334 918	
ABN: 67164334918	
Registered in: New South Wales	
Registration date: 18/06/2013	
Next review date: 18/06/2021	
Name start date: 18/06/2013	
Status: Registered	
Company type: Australian Proprietary Company	
Class: Limited By Shares	
Subclass: Proprietary Company	

Address Details	Document Number
<b>Current</b>	
Registered address: C/- LSI TAXATION & BUSINESS ADVISORS PTY LTD, 22 Webster Avenue, HENDRA QLD 4011	7EAG62566
Start date: 06/12/2018	
Principal Place Of Business address: 5 Wallangra Road, DOVER HEIGHTS NSW 2030	2E0830293
Start date: 24/07/2014	
<b>Historical</b>	
Registered address: 5 Wallangra Road, DOVER HEIGHTS NSW 2030	2E0830293
Start date: 07/08/2014	
Cease date: 05/12/2018	
Registered address: 37 Chamberlain Avenue, ROSE BAY NSW 2029	1E9939897
Start date: 08/11/2013	
Cease date: 06/08/2014	
Registered address: TITAN PARTNERS, Level 3 Suite 2, 7 Macquarie Place, SYDNEY NSW 2000	1E9915933
Start date: 01/11/2013	
Cease date: 07/11/2013	
Registered address: DALCHRISTIE SERVICES, Suite 203 Level 2, 1 Alfred Street, SYDNEY NSW 2000	5E3331085
Start date: 18/06/2013	
Cease date: 31/10/2013	
Principal Place Of Business address: 37 Chamberlain Avenue, ROSE BAY NSW 2029	1E9939897
Start date: 01/11/2013	
Cease date: 23/07/2014	
Principal Place Of Business address: 2 York Place, KENSINGTON NSW 2033	5E3331085
Start date: 18/06/2013	
Cease date: 31/10/2013	

**Contact Address**

Section 146A of the Corporations Act 2001 states 'A contact address is the address to which communications and notices are sent from ASIC to the company'.

**Current**

Address: PO BOX 123, NUNDAH QLD 4012  
Start date: 13/05/2020

**Historical**

Address: 22 Webster Avenue, HENDRA QLD 4011  
Start date: 10/07/2018  
Cease date: 13/05/2020

Address: PO BOX 191, CLAYFIELD QLD 4011  
Start date: 19/06/2017  
Cease date: 19/06/2018

Address: PO BOX 20247, WORLD SQUARE NSW 2002  
Start date: 18/06/2013  
Cease date: 29/06/2016

**Officeholders and Other Roles****Document Number****Director**

Name: MELISSA CADDICK 2E0830293  
Address: 5 Wallangra Road, DOVER HEIGHTS NSW 2030  
Born: 21/04/1971, SYDNEY, NSW  
Appointment date: 18/06/2013

**Secretary**

Name: MELISSA CADDICK 2E0830293  
Address: 5 Wallangra Road, DOVER HEIGHTS NSW 2030  
Born: 21/04/1971, SYDNEY, NSW  
Appointment date: 18/06/2013

**Share Information****Share Structure**

Class	Description	Number issued	Total amount paid	Total amount unpaid	Document number
ORD	ORDINARY	10	10.00	0.00	5E3331085

**Members**

Note: For each class of shares issued by a proprietary company, ASIC records the details of the top twenty members of the class (based on shareholdings). The details of any other members holding the same number of shares as the twentieth ranked member will also be recorded by ASIC on the database. Where available, historical records show that a member has ceased to be ranked amongst the top twenty members. This may, but does not necessarily mean, that they have ceased to be a member of the company.

Name: MELISSA CADDICK  
Address: 5 Wallangra Road, DOVER HEIGHTS NSW 2030

Class	Number held	Beneficially held	Paid	Document number
ORD	10	yes	FULLY	2E0830293

**Documents**

Note: Where no Date Processed is shown, the document in question has not been processed. In these instances care should be taken in using information that may be updated by the document when it is processed. Where the Date Processed is shown but there is a zero under No Pages, the document has been processed but a copy is not yet available.

Date received	Form type	Date processed	Number of pages	Effective date	Document number
18/06/2013	201C Application For Registration As A Proprietary Company	18/06/2013	3	18/06/2013	5E3331085
25/10/2013	484B Change To Company Details Change Of Registered Address	25/10/2013	2	25/10/2013	1E9915933
01/11/2013	484 Change To Company Details 484B Change Of Registered Address 484C Change Of Principal Place Of Business (Address) 484A1 Change Officeholder Name Or Address 484A2 Change Member Name Or Address	01/11/2013	2	01/11/2013	1E9939897
31/07/2014	484 Change To Company Details 484B Change Of Registered Address 484C Change Of Principal Place Of Business (Address) 484A1 Change Officeholder Name Or Address 484A2 Change Member Name Or Address	31/07/2014	2	24/07/2014	2E0830293
29/11/2018	484B Change To Company Details Change Of Registered Address	29/11/2018	2	29/11/2018	7EAG62566

**\*\*\*End of Extract of 4 Pages\*\*\***



Federal Court of Australia  
District Registry: NSW  
Division: Commercial and Corporations

**IN THE MATTER OF MALIVER PTY LTD (ACN 164 334 918)**

**AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION**

Plaintiff

**MELISSA LOUISE CADDICK and others named in the Schedule**

Defendants

This is the annexure marked "IA-20" referred to in the affidavit of Isabella Lucy Allen affirmed on 15 December 2020.

Before me:



JANANI LAWSON

An Australian Legal Practitioner within the Meaning of the Legal Profession  
Uniform Law (NSW)





**ASIC**  
Australian Securities &  
Investments Commission

ASIC media releases are point-in-time statements. Please note the date of issue and use the internal search function on the site to check for other media releases on the same or related matters.

Friday 27 November 2020

## 20-301MR ASIC to seek appointment of provisional liquidator to Maliver Pty Ltd and receiver and manager to property of Melissa Caddick

Following an application by ASIC, the Federal Court made interim orders on 10 November 2020 against Maliver Pty Limited (Maliver) and its sole director, Melissa Louise Caddick (the defendants). The orders included prohibitions against:

- the defendants removing assets (including funds held in bank accounts) from Australia, disposing of those assets, diminishing their value or incurring new liabilities;
- Ms Caddick leaving Australia.

ASIC's application for these orders was made to protect consumers while ASIC investigates concerns that:

- Maliver may be providing financial services without an Australian Financial Services Licence (AFSL);
- the AFSL of another company may have been used without authorisation;
- investor funds may be unlawfully dealt with.

The defendants did not appear at the first case management hearing of the matter.

On 27 November 2020, ASIC sought a date for the hearing of its applications for the appointment of a provisional liquidator to Maliver and a receiver and manager of the property of Ms Caddick. The matter is next before the court on 8 December 2020.

ASIC's investigation is ongoing.

Any person who is concerned they have invested with the defendants can contact ASIC through email at [maliver.investor@asic.gov.au](mailto:maliver.investor@asic.gov.au).

### Editor's note:

ASIC's applications for the appointment of a provisional liquidator to Maliver and a receiver and manager of the property of Ms Caddick are listed for hearing on 15 December 2020.

Last updated: 08/12/2020 03:14



Federal Court of Australia  
District Registry: NSW  
Division: Commercial and Corporations

**IN THE MATTER OF MALIVER PTY LTD (ACN 164 334 918)**

**AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION**

Plaintiff

**MELISSA LOUISE CADDICK and others named in the Schedule**

Defendants

This is the annexure marked "IA-21" referred to in the affidavit of Isabella Lucy Allen affirmed on 15 December 2020.

Before me:

  
\_\_\_\_\_  
JANANI LAWSON

An Australian Legal Practitioner within the Meaning of the Legal Profession  
Uniform Law (NSW)



**From:** [Nicolette Bearup](#)  
**To:** [paul.venus@holdingredlich.com](mailto:paul.venus@holdingredlich.com)  
**Cc:** [Isabella Allen](#); [Alec Cassidy](#); [Marina Kofman](#)  
**Subject:** ASIC v Caddick and Maliver Pty Ltd Federal Court NSD 1220/2020 [SEC=OFFICIAL:Sensitive, ACCESS=Commercial]  
**Date:** Monday, 14 December 2020 12:25:32 PM  
**Attachments:** [ASIC PROPOSED ORDERS.docx](#)

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Dear Paul

I refer to your letter to ASIC dated 7 December 2020.

ASIC's application to appoint a receiver to the property of Melissa Caddick and a provisional liquidator to Maliver Pty Ltd is now listed for hearing in the Federal Court before Justice Markovic at 10:15am tomorrow.

I enclose a copy of the orders ASIC's proposes to seek tomorrow, provided on a confidential basis.

Regards

**Nicolette Bearup**

Litigation Counsel, Chief Legal Office

**Australian Securities and Investments Commission**

Level 5, 100 Market Street, Sydney, 2000

Tel: +61 2 9911 5745 | Mob: +61 0478 325 087

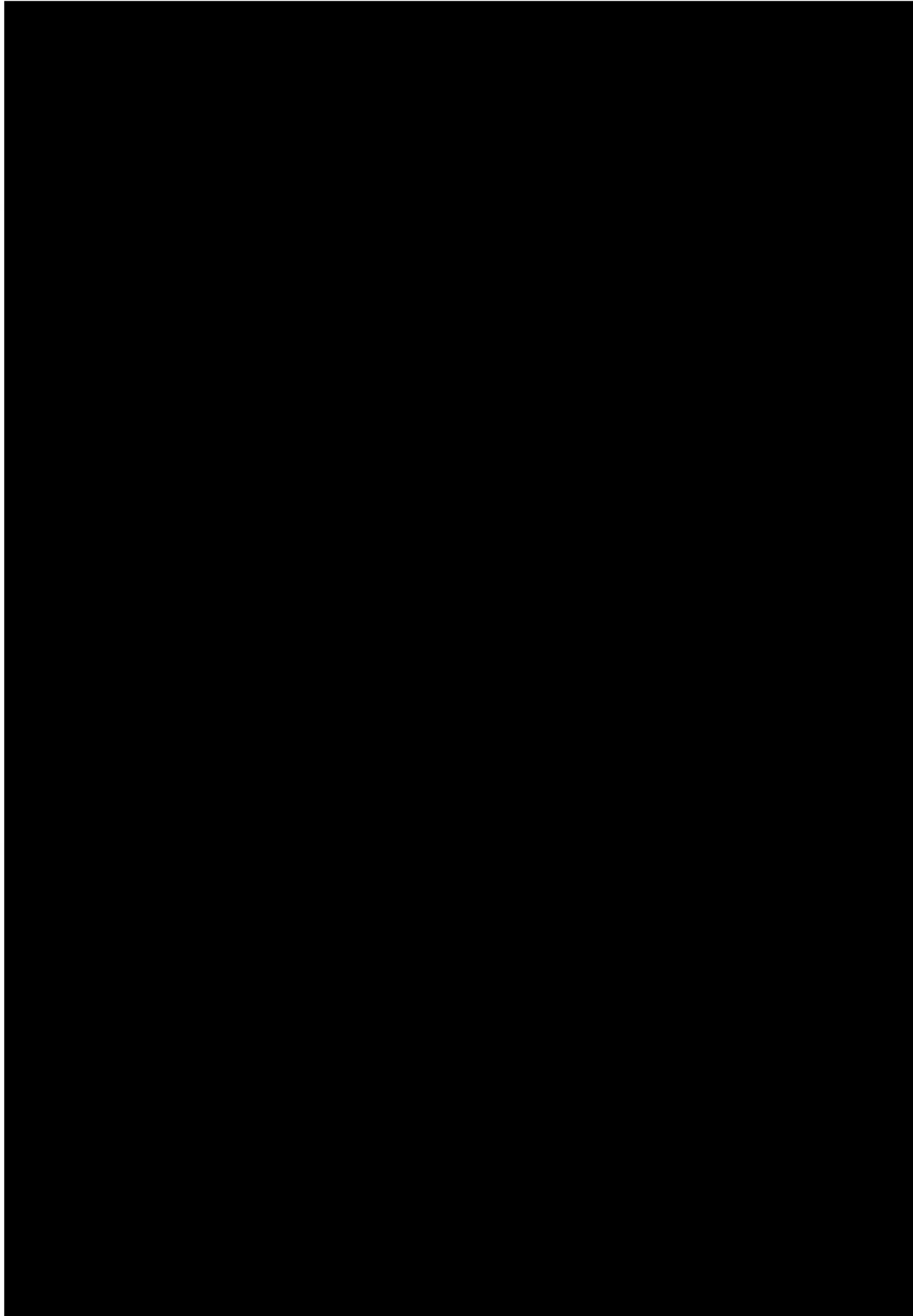
[nicolette.bearup@asic.gov.au](mailto:nicolette.bearup@asic.gov.au)



**ASIC**







The first part of the paper discusses the importance of the research and the objectives of the study. It highlights the need for a comprehensive understanding of the subject matter and the role of the researcher in this process. The second part of the paper presents the methodology used in the study, including the data collection methods and the analysis techniques. The third part of the paper discusses the results of the study and the conclusions drawn from the data. The final part of the paper provides a summary of the findings and suggests areas for further research.

The research was conducted in a systematic and rigorous manner, following the principles of scientific inquiry. The data was collected from a representative sample of the population, and the analysis was performed using advanced statistical techniques. The results of the study indicate that there is a significant relationship between the variables under investigation. The findings suggest that the proposed model is a valid representation of the phenomenon being studied. The study also identifies several limitations and areas for future research, which will be addressed in subsequent work.

In conclusion, the study has provided valuable insights into the subject matter and has contributed to the existing body of knowledge. The findings have practical implications for the field and can be used to inform policy and practice. The study also highlights the importance of continued research in this area and the need for a multidisciplinary approach to understanding complex phenomena.



**ORDERS**

Federal Court of Australia

No. NSD 1220 / 2020

District Registry: NSW

Division: Commercial and Corporations

**IN THE MATTER OF MALIVER PTY LTD (ACN 164 334 918)**

**AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION**

Plaintiff

**MELISSA LOUISE CADDICK and others named in the Schedule**

Defendants

**ORDER**

**JUDGE:**

**DATE OF ORDER:** December 2020

**WHERE MADE:** Sydney

For the purposes of these orders "**Property**" means all real or personal property, assets or interests in property of any kind, within or outside Australia including, by virtue of subsection 1323(2A) of the *Corporations Act 2001* (Cth) (**Act**), any property held otherwise than as sole beneficial owner.

**THE COURT ORDERS THAT:**

**Amended Originating Process**

1. That the Plaintiff have leave to amend the Originating Process as set out in the proposed Amended Originating Process being Annexure 1A-5 to the affidavit of Isabella Lucy Allen affirmed 25 November 2020 (**the Amended Originating Process**).

Filed on behalf of

Australian Securities and Investments Commission, Applicant

Prepared by

Nicolette Bearup

Tel (02) 9911 5745

Fax (02) 9911 2414

Email Nicolette.Bearup@asic.gov.au

**Address for service**

Email address above and Level 5, 5 Market Street, Sydney NSW 2000  
Attention: Nicolette Bearup

2. That the Plaintiff have leave to file the Amended Originating Process in Court, returnable immediately.
3. In the first instance, that service of the filed Amended Originating Process be dispensed with.
4. The costs of the amendment application be costs in the cause.

#### **Appointment of Receivers**

5. Until further order, pursuant to s 1323(1)(h)(i) of the Act, Bruce Gleeson and Daniel Robert Soire of Jones Partners of Level 13, 189 Kent St, Sydney, NSW 2000 be appointed as joint and several receivers (**Receivers**) of the Property of the First Defendant for the purpose of:
  - (a) identifying, collecting and securing the Property of the First Defendant;
  - (b) approving or making the payments from Property of the First Defendant permitted by order 11 of the orders made on 10 November 2020 as varied below;
  - (c) ascertaining the amount of money received by the First Defendant from funds paid to the Second Defendant by investors for investment (**Investor Funds**);
  - (d) identifying any Investor Funds held by the First Defendant, any Property acquired by the First Defendant with Investor Funds and any payments made by the First Defendant to third parties with Investor Funds and any other dealings by the First Defendant with Investor Funds;
  - (e) ascertaining whether any money was paid directly to the First Defendant by investors for investment and identifying the matters set out in paragraph (d) in relation to any such money.
6. For the purpose of attaining the objectives for which the Receivers are appointed, the Receivers shall have the following powers:
  - (a) the powers set out in s420(1) and 420(2)(a), (e), (f), (k), (o), (p), (q), (r) and (u) of the Act as if the references to corporation were references to the First Defendant;

- (b) the power to investigate and report on the matters set out in order 7;
  - (c) the power to apply to the Court for directions or further orders on 48 hours' notice.
7. By 15 February 2021 the Receivers shall, provide to the Court and to the Plaintiff a report regarding:
- (a) the assets and liabilities of the First Defendant;
  - (b) an opinion as to the solvency of the First Defendant;
  - (c) the amount of Investor Funds received by the First Defendant;
  - (d) any Investor Funds held by the First Defendant, any property acquired by the First Defendant with Investor Funds and any payments made by the First Defendant to third parties with Investor Funds and any other dealings by the First Defendant with Investor Funds.
  - (e) the Receivers' remuneration, costs and expenses.
8. Costs of the application to appoint the Receivers be costs in the cause.
9. The Receivers' remuneration, costs and expenses shall be capped at \$70,000 or such other amount as the Court subsequently orders, and the Receivers shall make an application to the Court for approval of their reasonable remuneration, costs and expenses and their payment out of the Property of the First Defendant, within 14 days following the provision of the report referred to in order 7.

#### **Appointment of Provisional Liquidators**

10. Pursuant to s 472(2) of the Act, Bruce Gleeson and Daniel Robert Soire of Jones Partners of Level 13, 189 Kent St, Sydney, NSW 2000 be appointed as joint and several provisional liquidators (**Provisional Liquidators**) to the Second Defendant.
11. The Provisional Liquidators have the powers set out in the Act and the power to investigate and report on the matters set out in paragraph 12.

12. By 15 February 2021 the Provisional Liquidators shall provide to the Court and to the Plaintiff a report as to the provisional liquidation of the Second Defendant, including:
  - (a) the persons who have paid money to the Second Defendant for investment, the amounts they invested, and whether, and to what extent, these amounts have been repaid;
  - (b) identifying any bank accounts in which Investor Funds are held, any Property acquired with Investor Funds or any other dealings with Investor Funds;
  - (c) the assets and liabilities of the Second Defendant, including any assets in which the Second Defendant has any legal or beneficial interest and an estimate of the value of each asset;
  - (d) an opinion as to the solvency of the Second Defendant;
  - (e) an opinion as to whether the Second Defendant has proper financial records;
  - (f) an opinion as to the claims that may be available to the Liquidators for the recovery of funds for the benefit of creditors, including claims pursuant to Part 5.7B of the Act;
  - (g) the likely return to creditors;
  - (h) any other information necessary to enable the financial position of the Second Defendant to be assessed;
  - (i) an opinion as to whether the Second Defendant has contravened any provisions of the Act and/or any other legislation; and
  - (j) any suspected contraventions of the Act by any directors or officers of the Second Defendant.
13. Within 14 days of their appointment, the Provisional Liquidators send a notice to each creditor of the Second Defendant at the last known address for each such person as shown in the books and records of the Second Defendant giving notice of:

- (a) the appointment of the Provisional Liquidators; and
  - (b) a contact address for the Provisional Liquidators.
14. The Provisional Liquidators shall be entitled to remuneration as determined by s60-16 of the Insolvency Practice Schedule (Corporations) to the Act.
  15. The Provisional Liquidators shall have liberty to apply on 48 hours' notice.
  16. The costs of the application to appoint the Provisional Liquidators be costs in the cause.

### **Provision of Information**

17. Paragraph 7 of the orders made on 10 November 2020 (**10 November Orders**) and paragraph 1 of the orders made on 10 December 2020 are amended to provide that the Plaintiff is permitted to provide the Provisional Liquidators and Receivers with unredacted copies of the affidavits filed by the Plaintiff in these proceedings, including the Main Allen Affidavit and the Suppression Allen Affidavit and Exhibits IA-1, IA-2 and IA-3 to the Main Allen Affidavit.

### **Variation of Freezing Orders**

18. Paragraph 11 of the 10 November Orders be varied as follows:
  - (a) delete paragraph 11(c) and replace with
    - 11 (c) the First Defendant from paying ordinary living expenses, but not exceeding \$800 per week, unless approved by the Receivers;
    - (ca) the Receivers dealing with or disposing of the First Defendant's Property in the discharge of obligations bona fide and properly incurred under any contract entered into by the First Defendant before these orders were made,
  - (b) delete paragraph 11 (d) and replace with
    - 11 (d) the Provisional Liquidators:
      - (i) paying trade creditors or other business expenses bona fide and properly incurred, or dealing with or disposing of the Property of the Second Defendant in the discharge of obligations bona fide and properly incurred under any

contract entered into by the Second Defendant before these orders were made.

(c) add

11 (e) the Receivers or the Provisional Liquidators from exercising their powers and performing their duties, pursuant to the appointments made by these orders.

### **Suppression Orders**

19. An order pursuant to s.37AF(1)(a) and (b) and 37AG(1)(a) of the *Federal Court of Australia Act 1976* (Cth), that until further order, the publication or disclosure (except to the parties and their legal representatives and the Provisional Liquidators and the Receivers) of the following is prohibited:

- (a) the affidavit of Isabella Lucy Allen affirmed 25 November 2020 in so far as it identifies the names or words set out in confidential Annexure IA-4 to the affidavit of Isabella Lucy Allen affirmed on 9 November 2020 (8 pages) **Suppression Allen Affidavit**; the entity name, ACN and AFSL number of the entity referred to in paragraph 18(b) of the affidavit of Isabella Lucy Allen affirmed on 9 November 2020 (92 pages) (**Main Allen Affidavit**), the entity name referred to in paragraph 37(e) of that affidavit and the name of the witness referred to in paragraph 26 of that affidavit; and the occupations of witnesses who have spoken with Australian Securities and Investments Commission staff;
- (b) the whole of the affidavit of Isabella Lucy Allen affirmed 7 December 2020 and Exhibit IA-18.

**SCHEDULE**

Federal Court of Australia

No. NSD 1220 / 2020

District Registry: NSW

Division: Commercial and Corporations

**Defendants**

Second Defendant: MALIVER PTY LTD (ACN 164 334 918)

Date: December 2020



Federal Court of Australia  
District Registry: NSW  
Division: Commercial and Corporations

**IN THE MATTER OF MALIVER PTY LTD (ACN 164 334 918)**

**AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION**

Plaintiff

**MELISSA LOUISE CADDICK and others named in the Schedule**

Defendants

This is the annexure marked "IA-22" referred to in the affidavit of Isabella Lucy Allen affirmed on 15 December 2020.

Before me:



JANANI LAWSON

An Australian Legal Practitioner within the Meaning of the Legal Profession  
Uniform Law (NSW)



**From:** Nicolette Bearup  
**To:** Marina Kofman; Isabella Allen; Alec Cassidy; Marita Hogan; Stephanie Fendekian  
**Subject:** Fwd: Federal Court Proceedings NSD1220/2020 - Australian Securities & Investments Commission v Melissa Louise Caddick & Anor [SEC=OFFICIAL:Sensitive]  
**Date:** Tuesday, 15 December 2020 7:09:46 AM  
**Attachments:** [image001.png](#)  
[Letter to ASIC 14.12.20 \[orders\].pdf](#)

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FYI

Nicolette Bearup  
Litigation Counsel, Chief Legal Office  
Australian Securities and Investments Commission  
Level 5, 100 Market Street, Sydney, 2000  
Tel: +61 2 9911 5745 | Mob: +61 0478 325 087  
[nicolette.bearup@asic.gov.au](mailto:nicolette.bearup@asic.gov.au)

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**From:** Lewis Jones <[LJones@bridgeslawyers.com.au](mailto:LJones@bridgeslawyers.com.au)>  
**Sent:** Monday, December 14, 2020 9:53 pm  
**To:** Nicolette Bearup; Brendan Hough  
**Cc:** Dominic Calabria  
**Subject:** Federal Court Proceedings NSD1220/2020 - Australian Securities & Investments Commission v Melissa Louise Caddick & Anor

**EXTERNAL EMAIL:** Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Colleagues,

Please see **attached** correspondence.

Kind regards,

**Lewis Jones** | Solicitor | **Bridges Lawyers**

level 2 | 50 margaret street | sydney NSW 2000  
t +61 2 8272 7144 | f +61 2 8272 7199  
[ljones@bridgeslawyers.com.au](mailto:ljones@bridgeslawyers.com.au) | [www.bridgeslawyers.com.au](http://www.bridgeslawyers.com.au)

**bridges**  
LAWYERS

Bridges Lawyers will be closed for the Christmas break from 1:00pm on Thursday, 24 December 2020 until Monday, 11 January 2021.

We wish you a Merry Christmas and a Happy New Year.



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Our Ref: DSC:LTJ:200468

14 December 2020

Australian Investments & Securities Commission  
Level 5, 100 Market Street  
SYDNEY 2000

**Attention:** Nicolette Bearup; Brendan Hough

**By Email:** Nicolette.Bearup@asic.gov.au; Brendan.Hough@asic.gov.au

T 02 8272 7100  
F 02 8272 7199

Bridges Lawyers Pty Ltd  
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PO Box R1115  
Royal Exchange  
NSW 1225

DX 10130 Sydney  
Stock Exchange

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Dear Colleagues

**Australian Securities & Investments Commission v Melissa Louise Caddick & Anor  
Federal Court of Australia Proceedings No. NSD1220/2020 ("the Proceedings")**

Thank you for the copy of your proposed orders (**the Proposed Orders**).

We particularly refer to your proposed order 18 in relation to variation of the orders made by her Honour Justice Jagot on 10 November 2020 (**the Asset Preservation Orders**). In this respect in circumstances where:

- (a) The solicitors for the First Defendant have not responded to the queries in our correspondence to the solicitors for the First Defendant dated 10 December 2020, a copy of which is **attached**. Nor have they provided any document that articulates what the First Defendant is seeking by way of variation to the Asset Preservation Orders;
- (b) the items and potential expenses set out in paragraphs 28(a) and 29 of the affidavit of Jennifer Williamson sworn on 26 November 2020 are substantial;
- (c) the total amount of money that seems to have been the subject of the alleged inappropriate conduct is extensive – and to our knowledge remains unexplained and undefended;
- (d) the volume and nature of the expenses that have been incurred throughout the period of the alleged inappropriate conduct to date is extensive;
- (e) in mortgage payments alone between now and 15 February 2021, an amount in excess of \$100,000 (which may be entirely investors' funds) will be incurred;
- (f) the entire asset position of the First and Second Defendants in the context of the total amount contributed by investors and that is the subject of alleged inappropriate conduct remains unclear and will not be expanded upon until 15 February 2021 from the reports to be prepared in contemplation in orders 7 and 12 of the Proposed Orders,

our clients:

- (a) further support the appointment of receivers and managers and provisional liquidators; and
- (b) oppose the making of any orders that would allow the payment of any material amounts out of the assets that have been preserved including in relation to continuing to fund the lifestyles of family, associates and beneficiaries of the First and Second Defendants.

 1505279

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We are instructed to consent to you providing a copy of this letter to the Court.

Yours faithfully

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the end.

Dominic Calabria  
Partner

direct 02 8272 7117  
email dcalabria@bridgeslawyers.com.au

Our Ref: DSC:LTJ:200468

t 02 8272 7100  
f 02 8272 7199

10 December 2020

Bridges Lawyers Pty Ltd  
ACN 160 506 114  
Level 2, 50 Margaret Street  
Sydney NSW 2000

Hogan Lovells  
Level 17, 20 Martin Place  
SYDNEY NSW 2000

PO Box R1115  
Royal Exchange  
NSW 1225

**Attention:** Scott Harris

DX 10130 Sydney  
Stock Exchange

**By Email:** scott.harris@hoganlovells.com

www.bridgeslawyers.com.au

Dear Sirs

**Australian Securities & Investments Commission v Melissa Louise Caddick & Anor  
Federal Court of Australia Proceedings No. NSD1220/2020 ('the Proceedings')**

We refer to the above matter.

We act on behalf of 13 former clients of Ms Caddick/Maliver Pty Ltd (**Maliver**) who represent a total investment of approximately \$5.3 million (**the Investor Group**).

We have not been instructed to identify the names and entities of the Investor Group.

Could you please advise by return whether your legal fees either have in the past or are proposed in the future to in any way be met by assets that are the subject of the asset preservation orders.

In any event we note that:

- (a) the issue as to whether there is a valid Power of Attorney to act on behalf of Ms Caddick in her personal capacity remains unresolved;
- (b) the asset preservation orders made on 10 November 2020, in particular order 11(a), only allows for the Defendants to pay or otherwise incur a liability for costs reasonably incurred in the Proceedings;
- (c) both our clients and our office consider that it is inevitable that independent persons will need to be appointed to the affairs of both Ms Caddick and Maliver. Accordingly, our clients are concerned at the use of any assets of Caddick/Maliver for the purpose of the payment of any of your legal fees, particularly to the extent they are being incurred in opposition to what the Investor Group and our office consider is an inevitable outcome;
- (d) the assets of Caddick/Maliver that are the subject the asset preservation orders may well in whole or in part have the nature of being proceeds of crime and/or have a trust character in favour of investors including the Investor Group; and
- (e) we are not aware of there being any material defence to the underlying allegations in relation to the conduct of Caddick/Maliver.

Further, we note that you have filed an Interlocutory Application in order to seek to vary the asset preservation orders. Could you please provide us, by return, with a copy of that application.

1499771

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Needless to say, we reserve all of our clients' rights, based on the above circumstances, in relation to any amount that your firm and its counsel seek to be remunerated out of the assets of Caddick/Maliver.

Should you have any queries please do not hesitate to contact our Dominic Calabria to discuss.

Yours faithfully



Dominic Calabria  
Partner

direct 02 8272 7117  
email dcalabria@bridgeslawyers.com.au

CC: Nicolette Bearup and Brendan Hough  
Australian Securities and Investments Commission  
Nicolette.Bearup@asic.gov.au; Brendan.Hough@asic.gov.au

**From:** [Nicolette Bearup](#)  
**To:** [Dominic Calabria](#)  
**Cc:** [Brendan Hough](#); [Lewis Jones](#); [Isabella Allen](#); [Marina Kofman](#); [Alec Cassidy](#)  
**Subject:** NSD1220/2020 - ASIC v Caddick & Anor [SEC=OFFICIAL:Sensitive, ACCESS=Commercial]  
**Date:** Friday, 11 December 2020 7:12:08 PM  
**Attachments:** [image004.png](#)  
[ASIC PROPOSED ORDERS.docx](#)

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Dear Dominic

I refer to our conversation earlier this week.

I now enclose on a confidential basis the orders ASIC is proposing to seek on Tuesday 15 December.

I would be grateful if you could advise what your clients' attitude is to the proposed orders.

Regards

**Nicolette Bearup**  
Litigation Counsel, Chief Legal Office  
**Australian Securities and Investments Commission**  
Level 5, 100 Market Street, Sydney, 2000  
Tel: +61 2 9911 5745 | Mob: +61 0478 325 087  
[nicolette.bearup@asic.gov.au](mailto:nicolette.bearup@asic.gov.au)



**ASIC**

**From:** Lewis Jones <[LJones@bridgeslawyers.com.au](mailto:LJones@bridgeslawyers.com.au)>  
**Sent:** Friday, 11 December 2020 10:45 AM  
**To:** Nicolette Bearup <[Nicolette.Bearup@asic.gov.au](mailto:Nicolette.Bearup@asic.gov.au)>  
**Cc:** Brendan Hough <[Brendan.Hough@asic.gov.au](mailto:Brendan.Hough@asic.gov.au)>; Dominic Calabria <[dcalabria@bridgeslawyers.com.au](mailto:dcalabria@bridgeslawyers.com.au)>  
**Subject:** Federal Court of Australia Proceedings NSD1220/2020 - ASIC v Caddick & Anor

**EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.**

Dear Nicolette,

Please see **attached** correspondence sent to Hogan Lovells yesterday.

Kind regard,

**Lewis Jones** | Solicitor | **Bridges Lawyers**

level 2 | 50 margaret street | sydney NSW 2000  
t +61 2 8272 7144 | f +61 2 8272 7199  
[ljones@bridgeslawyers.com.au](mailto:ljones@bridgeslawyers.com.au) | [www.bridgeslawyers.com.au](http://www.bridgeslawyers.com.au)



Bridges Lawyers will be closed for the Christmas break from 1:00pm  
on Thursday, 24 December 2020 until Monday, 11 January 2021.

We wish you a Merry Christmas and a Happy New Year.



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**ORDERS**

Federal Court of Australia

No. NSD 1220 / 2020

District Registry: NSW

Division: Commercial and Corporations

**IN THE MATTER OF MALIVER PTY LTD (ACN 164 334 918)**

**AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION**

Plaintiff

**MELISSA LOUISE CADDICK and others named in the Schedule**

Defendants

**ORDER**

**JUDGE:**

**DATE OF ORDER:** December 2020

**WHERE MADE:** Sydney

For the purposes of these orders "**Property**" means all real or personal property, assets or interests in property of any kind, within or outside Australia including, by virtue of subsection 1323(2A) of the *Corporations Act 2001* (Cth) (**Act**), any property held otherwise than as sole beneficial owner.

**THE COURT ORDERS THAT:**

**Amended Originating Process**

1. That the Plaintiff have leave to amend the Originating Process as set out in the proposed Amended Originating Process being Annexure 1A-5 to the affidavit of Isabella Lucy Allen affirmed 25 November 2020 (**the Amended Originating Process**).

Filed on behalf of	Australian Securities and Investments Commission, Applicant
Prepared by	Nicolette Bearup
Tel (02) 9911 5745	Fax (02) 9911 2414
Email Nicolette.Bearup@asic.gov.au	
<b>Address for service</b>	Email address above and Level 5, 5 Market Street, Sydney NSW 2000 Attention: Nicolette Bearup

2. That the Plaintiff have leave to file the Amended Originating Process in Court, returnable immediately.
3. In the first instance, that service of the filed Amended Originating Process be dispensed with.
4. The costs of the amendment application be costs in the cause.

#### **Appointment of Receivers**

5. Until further order, pursuant to s 1323(1)(h)(i) of the Act, Bruce Gleeson and Daniel Robert Soire of Jones Partners of Level 13, 189 Kent St, Sydney, NSW 2000 be appointed as joint and several receivers (**Receivers**) of the Property of the First Defendant for the purpose of:
  - (a) identifying, collecting and securing the Property of the First Defendant;
  - (b) approving or making the payments from Property of the First Defendant permitted by order 11 of the orders made on 10 November 2020 as varied below;
  - (c) ascertaining the amount of money received by the First Defendant from funds paid to the Second Defendant by investors for investment (**Investor Funds**);
  - (d) identifying any Investor Funds held by the First Defendant, any Property acquired by the First Defendant with Investor Funds and any payments made by the First Defendant to third parties with Investor Funds and any other dealings by the First Defendant with Investor Funds;
  - (e) ascertaining whether any money was paid directly to the First Defendant by investors for investment and identifying the matters set out in paragraph (d) in relation to any such money.
6. For the purpose of attaining the objectives for which the Receivers are appointed, the Receivers shall have the following powers:
  - (a) the powers set out in s420(1) and 420(2)(a), (e), (f), (k), (o), (p), (q), (r) and (u) of the Act as if the references to corporation were references to the First Defendant;

- (b) the power to investigate and report on the matters set out in order 7;
  - (c) the power to apply to the Court for directions or further orders on 48 hours' notice.
7. By 15 February 2021 the Receivers shall, provide to the Court and to the Plaintiff a report regarding:
- (a) the assets and liabilities of the First Defendant;
  - (b) an opinion as to the solvency of the First Defendant;
  - (c) the amount of Investor Funds received by the First Defendant;
  - (d) any Investor Funds held by the First Defendant, any property acquired by the First Defendant with Investor Funds and any payments made by the First Defendant to third parties with Investor Funds and any other dealings by the First Defendant with Investor Funds.
  - (e) the Receivers' remuneration, costs and expenses.
8. Costs of the application to appoint the Receivers be costs in the cause.
9. The Receivers' remuneration, costs and expenses shall be capped at \$70,000 or such other amount as the Court subsequently orders, and the Receivers shall make an application to the Court for approval of their reasonable remuneration, costs and expenses and their payment out of the Property of the First Defendant, within 14 days following the provision of the report referred to in order 7.

#### **Appointment of Provisional Liquidators**

10. Pursuant to s 472(2) of the Act, Bruce Gleeson and Daniel Robert Soire of Jones Partners of Level 13, 189 Kent St, Sydney, NSW 2000 be appointed as joint and several provisional liquidators (**Provisional Liquidators**) to the Second Defendant.
11. The Provisional Liquidators have the powers set out in the Act and the power to investigate and report on the matters set out in paragraph 12.

12. By 15 February 2021 the Provisional Liquidators shall provide to the Court and to the Plaintiff a report as to the provisional liquidation of the Second Defendant, including:
- (a) the persons who have paid money to the Second Defendant for investment, the amounts they invested, and whether, and to what extent, these amounts have been repaid;
  - (b) identifying any bank accounts in which Investor Funds are held, any Property acquired with Investor Funds or any other dealings with Investor Funds;
  - (c) the assets and liabilities of the Second Defendant, including any assets in which the Second Defendant has any legal or beneficial interest and an estimate of the value of each asset;
  - (d) an opinion as to the solvency of the Second Defendant;
  - (e) an opinion as to whether the Second Defendant has proper financial records;
  - (f) an opinion as to the claims that may be available to the Liquidators for the recovery of funds for the benefit of creditors, including claims pursuant to Part 5.7B of the Act;
  - (g) the likely return to creditors;
  - (h) any other information necessary to enable the financial position of the Second Defendant to be assessed;
  - (i) an opinion as to whether the Second Defendant has contravened any provisions of the Act and/or any other legislation; and
  - (j) any suspected contraventions of the Act by any directors or officers of the Second Defendant.
13. Within 14 days of their appointment, the Provisional Liquidators send a notice to each creditor of the Second Defendant at the last known address for each such person as shown in the books and records of the Second Defendant giving notice of:

- (a) the appointment of the Provisional Liquidators; and
  - (b) a contact address for the Provisional Liquidators.
14. The Provisional Liquidators shall be entitled to remuneration as determined by s60-16 of the Insolvency Practice Schedule (Corporations) to the Act.
  15. The Provisional Liquidators shall have liberty to apply on 48 hours' notice.
  16. The costs of the application to appoint the Provisional Liquidators be costs in the cause.

#### **Provision of Information**

17. Paragraph 7 of the orders made on 10 November 2020 (**10 November Orders**) and paragraph 1 of the orders made on 10 December 2020 are amended to provide that the Plaintiff is permitted to provide the Provisional Liquidators and Receivers with unredacted copies of the affidavits filed by the Plaintiff in these proceedings, including the Main Allen Affidavit and the Suppression Allen Affidavit and Exhibits IA-1, IA-2 and IA-3 to the Main Allen Affidavit.

#### **Variation of Freezing Orders**

18. Paragraph 11 of the 10 November Orders be varied as follows:
  - (a) delete paragraph 11(c) and replace with
    - 11 (c) the First Defendant from paying ordinary living expenses, but not exceeding \$800 per week, unless approved by the Receivers;
    - (ca) the Receivers dealing with or disposing of the First Defendant's Property in the discharge of obligations bona fide and properly incurred under any contract entered into by the First Defendant before these orders were made,
  - (b) delete paragraph 11 (d) and replace with
    - 11 (d) the Provisional Liquidators:
      - (i) paying trade creditors or other business expenses bona fide and properly incurred, or dealing with or disposing of the Property of the Second Defendant in the discharge of obligations bona fide and properly incurred under any

contract entered into by the Second Defendant before these orders were made.

(c) add

11 (e) the Receivers or the Provisional Liquidators from exercising their powers and performing their duties, pursuant to the appointments made by these orders.

### **Suppression Orders**

19. An order pursuant to s.37AF(1)(a) and (b) and 37AG(1)(a) of the *Federal Court of Australia Act 1976* (Cth), that until further order, the publication or disclosure (except to the parties and their legal representatives and the Provisional Liquidators and the Receivers) of the following is prohibited:

- (a) the affidavit of Isabella Lucy Allen affirmed 25 November 2020 in so far as it identifies the names or words set out in confidential Annexure IA-4 to the affidavit of Isabella Lucy Allen affirmed on 9 November 2020 (8 pages) **Suppression Allen Affidavit**; the entity name, ACN and AFSL number of the entity referred to in paragraph 18(b) of the affidavit of Isabella Lucy Allen affirmed on 9 November 2020 (92 pages) (**Main Allen Affidavit**), the entity name referred to in paragraph 37(e) of that affidavit and the name of the witness referred to in paragraph 26 of that affidavit; and the occupations of witnesses who have spoken with Australian Securities and Investments Commission staff;
- (b) the whole of the affidavit of Isabella Lucy Allen affirmed 7 December 2020 and Exhibit IA-18.

**SCHEDULE**

Federal Court of Australia

No. NSD 1220 / 2020

District Registry: NSW

Division: Commercial and Corporations

**Defendants**

Second Defendant: MALIVER PTY LTD (ACN 164 334 918)

Date: December 2020



Federal Court of Australia  
District Registry: NSW  
Division: Commercial and Corporations

**IN THE MATTER OF MALIVER PTY LTD (ACN 164 334 918)**

**AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION**

Plaintiff

**MELISSA LOUISE CADDICK and others named in the Schedule**

Defendants

This is the annexure marked "IA-23" referred to in the affidavit of Isabella Lucy Allen affirmed on 15 December 2020.

Before me:

  
\_\_\_\_\_  
JANANI LAWSON

An Australian Legal Practitioner within the Meaning of the Legal Profession  
Uniform Law (NSW)



**From:** Nicolette Bearup  
**To:** [scd@dimarcolawyers.com.au](mailto:scd@dimarcolawyers.com.au)  
**Cc:** [Isabella Allen](#); [Alec Cassidy](#); [Marina Kofman](#)  
**Subject:** RE: 31925 | Wilson Family Funds with Maliver Pty Ltd and Melissa Caddick [SEC=OFFICIAL:Sensitive, ACCESS=Commercial]  
**Date:** Monday, 14 December 2020 12:11:17 PM  
**Attachments:** [2020.11.10 Order.pdf](#)  
[ASIC PROPOSED ORDERS.docx](#)

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Dear Mr Dimarco

I refer to your correspondence below and conversations with my colleagues Emman Farroukh and Isabella Allen on 3 December 2020.

ASIC's application to appoint a receiver to the property of Melissa Caddick and a provisional liquidator to Maliver Pty Ltd is now listed for hearing in the Federal Court before Justice Markovic at 10:15am tomorrow.

I enclose a copy of the orders made in this matter on 10 November 2020 and a copy of the orders ASIC's proposes to seek tomorrow, provided on a confidential basis.

Have you been in contact with CommSec on behalf of your clients?

Regards

**Nicolette Bearup**

Litigation Counsel, Chief Legal Office

**Australian Securities and Investments Commission**

Level 5, 100 Market Street, Sydney, 2000

Tel: +61 2 9911 5745 | Mob: +61 0478 325 087

[nicolette.bearup@asic.gov.au](mailto:nicolette.bearup@asic.gov.au)



**ASIC**

**From:** Sebastian Dimarco <[scd@dimarcolawyers.com.au](mailto:scd@dimarcolawyers.com.au)>

**Sent:** Thursday, 10 December 2020 2:22 PM

**To:** Isabella Allen <[Isabella.Allen@asic.gov.au](mailto:Isabella.Allen@asic.gov.au)>

**Cc:** [REDACTED] Michael

Dimarco <[mjd@dimarcolawyers.com.au](mailto:mjd@dimarcolawyers.com.au)>

**Subject:** 31925 | [REDACTED] Funds with Maliver Pty Ltd and Melissa Caddick

**EXTERNAL EMAIL:** Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Isabella

I would be grateful if you could:

1. Advise your reply to the email below; and
2. Advise the outcome of the liquidation proceedings earlier this week.

Regards

Sebastian Dimarco  
**DIMARCO | LAWYERS**

Level 7  
Culwulla Chambers  
67 Castlereagh Street | SYDNEY NSW 2000  
T +61 2 9037 1000  
E [scd@dimarcolawyers.com.au](mailto:scd@dimarcolawyers.com.au)  
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**From:** Sebastian Dimarco  
**Sent:** Friday, 4 December 2020 5:46 PM  
**To:** Isabella Allen <[Isabella.Allen@asic.gov.au](mailto:Isabella.Allen@asic.gov.au)>  
**Cc:** [REDACTED]  
**Subject:** 31925 | [REDACTED] Funds with Maliver Pty Ltd and Melissa Caddick

Attn: Ms Isabella Allen

Dear Isabella

Please refer to the attached Investment Spreadsheet for our clients (prepared by me) and letters from Maliver Pty Ltd and Commsec Statements.

Further to our discussion yesterday, I request on behalf of each of our client entities identified in the Investment Spreadsheet that you liaise with Commsec and the Commonwealth Bank of Australia to determine at the earliest possible opportunity whether:

- a. Each of the Portfolio Accounts and Direct Investment Accounts indicated by the attached Statements exists;
- b. To the extent that they exist, the current balances; and
- c. What is required for the owner of each account to be able to take control of the account.

Your earliest attention would be sincerely appreciated.

Please call me if you have any questions.

Regards

Sebastian Dimarco  
**DIMARCO | LAWYERS**

Level 7  
Culwulla Chambers  
67 Castlereagh Street | SYDNEY NSW 2000  
T +61 2 9037 1000  
E [scd@dimarcolawyers.com.au](mailto:scd@dimarcolawyers.com.au)  
W [www.dimarcolawyers.com.au](http://www.dimarcolawyers.com.au)

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Federal Court of Australia

District Registry: New South Wales

Division: General

No: NSD1220/2020

**AUSTRALIAN SECURITIES & INVESTMENTS COMMISSION**  
Plaintiff

**MELISSA LOUISE CADDICK** and another named in the schedule  
First Defendant

**ORDER**

**JUDGE:** JUSTICE JAGOT

**DATE OF ORDER:** 10 November 2020

**WHERE MADE:** Sydney

**PENAL NOTICE**

**TO: MELISSA LOUISE CADDICK**

**MALIVER PTY LTD (ACN 164 334 918)**

**IF YOU:**

**(A) REFUSE OR NEGLECT TO DO ANY ACT WITHIN THE TIME SPECIFIED IN  
THIS ORDER FOR THE DOING OF THE ACT; OR**

**(B) DISOBEY THE ORDER BY DOING AN ACT WHICH THE ORDER REQUIRES  
YOU TO ABSTAIN FROM DOING,**

**YOU WILL BE LIABLE TO IMPRISONMENT, SEQUESTRATION OF PROPERTY  
OR OTHER PUNISHMENT.**

**ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING  
WHICH HELPS OR PERMITS YOU TO BREACH THE TERMS OF THIS ORDER  
MAY BE SIMILARLY PUNISHED.**



**TO: MELISSA LOUISE CADDICK**

**MALIVER PTY LTD (ACN 164 334 918)**

This is an order made against you on 10 November 2020 by Justice Jagot at a hearing without notice to you after the Court read the affidavit of Isabella Lucy Allen affirmed on 9 November 2020 (**Main Allen Affidavit**) and the affidavit of Isabella Lucy Allen affirmed on 9 November 2020 (**Suppression Allen Affidavit**).

In this order:

- (a) **"Property"** means all real or personal property, assets or interests in property of any kind, within or outside Australia including, by virtue of subsection 1323(2A) of the *Corporations Act 2001* (Cth) (**Act**), any property held otherwise than as sole beneficial owner;
- (a) **"Third Party"** means a person other than the First or Second Defendant or the Plaintiff.

**THE COURT ORDERS THAT:**

**INTRODUCTION**

1. Leave to file the Originating Process in Court.
2. In the first instance, service of the Originating Process be dispensed with, and the Originating Process be returnable immediately.
3. Time for service of the Originating Process and supporting affidavits be abridged to 5pm Wednesday 11 November 2020.
4. That the Originating Process be returnable on 13 November 2020 at 9.45am for a further hearing in respect of the orders sought by the Plaintiff.
5. Anyone served with or notified of these orders may apply to the Court to vary or discharge them or so much of them as affects the person served and notified, on the giving of reasonable notice.
6. Subject to order 7 below, an order pursuant to sections 37AF(1)(a) and (b) and 37AG(1)(a) of the *Federal Court of Australia Act 1974* (Cth) (**FCA Act**) that the publication or disclosure of these orders, the Originating Process, the Main Allen Affidavit (including the exhibits to that affidavit), the Suppression Allen Affidavit and any written submissions advanced by the Plaintiff in support of obtaining these ex-parte



orders is prohibited until 5pm Wednesday 11 November 2020, except to enable the Plaintiff to serve the Defendants or provide copies of these orders to the entities set out in paragraph 16 for the purpose of enforcing the orders.

7. An order pursuant to s.37AF(1)(a) and (b) and 37AG(1)(a) of the FCA Act, that until further order, the publication or disclosure (except to the parties and their legal representatives) of:
- (a) the Main Allen Affidavit in so far as it identifies the names identified in Annexure IA-4 to the Suppression Allen Affidavit;
  - (b) the Suppression Allen Affidavit in so far as it identifies the names or words identified in Annexure IA-4 to the Suppression Allen Affidavit;
  - (c) ASIC's written submissions filed in support of its application for the orders set out in this Originating Process in so far as it identifies the names or words identified in Annexure IA-4 to the Suppression Allen Affidavit;
  - (d) the whole of Exhibit IA-1, IA-2 and IA-3 to the Main Allen Affidavit;
- be prohibited.

#### **PROVISION OF INFORMATION**

8. Subject to paragraph 9, pursuant to s 1323(1) of the Act and s 23 of the FCA Act, by 5pm on 16 November 2020, the First and Second Defendant swear and serve upon the Plaintiff an affidavit, in the case of the First Defendant deposing in detail to the matters set out in 8. (a) – (h) below, and in the case of the Second Defendant deposing in detail to the matters set out in 8. (a) – (i) below:
- (a) the name and address of any bank, building society or other financial institution at which there is an account in the name of or under the control of the relevant Defendant, together with the number of such account, the name of such account and the balance of that account;
  - (b) the name and address of any person indebted to the relevant Defendant and the amount and nature of the indebtedness;
  - (c) an itemised inventory of all Property owned or controlled by the relevant Defendant or in which that Defendant has any legal or beneficial interest giving each item's value, location and the extent of the relevant Defendant's interest in



the property;

- (d) the names and address of any person to whom the relevant Defendant is indebted and the amount and nature of the indebtedness, including amounts owed to any person who has deposited funds with the relevant Defendant for investment (**Investor**);
- (e) in respect of any of the Property of the relevant Defendant which has been given as security for any debt, the details of that Property and the nature of the security and the nature and amount of the debt;
- (f) the sources and amount of any income, wages, earnings or other payments received by the relevant Defendant in the last 12 months and expected to be received by the relevant Defendant in the next 12 months;
- (g) the name, physical address, email address and phone number of each person who currently has funds deposited with the relevant Defendant for investment at the date of these orders, or on whose behalf the Defendant holds shares or other Property, and the amount of, location and nature of those funds and/ or the Property;
- (h) for the period from 1 January 2020 to 31 October 2020, details regarding:
  - (i) each amount deposited with the relevant Defendant by an Investor, the date of each deposit and the name and address of the Relevant Investor;
  - (ii) each amount paid to an Investor and the date of the payment;
- (i) the Second Defendant's financial statements and accounts for the year ended 30 June 2020 or 31 December 2019 (as the case may be depending upon its particular financial year), whether or not audited and whether or not in the form of management accounts only.

9. If:

- (a) the First Defendant wishes to object to complying with paragraph 8 on the grounds that some or all of the information required to be disclosed may tend to prove that:
  - (i) she has committed an offence against or arising under Australian law or a law of a foreign country; or
  - (ii) is liable to a civil penalty,



- (b) all of the persons who are able to comply with paragraph 8 on behalf of the Second Defendant and with whom it has been able to communicate, wish to object to the Second Defendant complying with paragraph 8 on the grounds that some or all of the information required to be disclosed may tend to prove that they:
  - (i) have committed an offence against or arising under Australian law or a law of a foreign country; or
  - (ii) are liable to a civil penalty,

the First Defendant or Second Defendant must:

- (c) disclose so much of the information required to be disclosed to which no objection is taken; and
- (d) prepare an affidavit containing so much of the information required to be disclosed to which objection is taken, and deliver it to the Court in a sealed envelope; and
- (e) file and serve on each other party a separate affidavit setting out the basis of the objection.

#### **ASSET RESTRAINT**

- 10. Pursuant to sections 1323(1) and 1323(3) of the Act and/or section 23 of the FCA Act that until further order, the Defendants, by themselves and their servants, agents and employees or any other person on their behalf, must not:
  - (a) remove, or cause or permit to be removed from Australia any of their Property, including, but not limited to, funds in bank accounts held by the Defendants;
  - (b) sell, charge, mortgage or otherwise deal with, dispose of and/or diminish the value of any of their Property;
  - (c) without limiting the terms of sub-paragraphs (a) and (b) above, incur new liabilities, including, without limitation, liabilities incurred either directly or indirectly, through the use of a credit card, a credit facility, a drawdown facility or a re-draw facility;
  - (d) cause or permit to be sold, charged, mortgaged or otherwise dealt with, disposed of, or diminished in value, any of their Property; and



- (e) without limiting the terms of sub-paragraphs (a) to (d) above, withdraw, transfer or otherwise dispose of or deal with, any monies available in any account with any bank, building society or other financial institution in which the First or Second Defendants have any legal or equitable interest, including without limitation the bank accounts listed in **Annexure A**.

11. The order sought in paragraph 10 above, shall not prevent:

- (a) any of the Defendants from paying or otherwise incurring a liability for costs reasonably incurred in these proceedings and any criminal proceedings arising from the Plaintiff's investigation into the affairs of each of the Defendants; and
- (b) any bank, building society or financial institution from exercising any right of set-off which it may have in respect of a facility afforded by it to any of the Defendants prior to the date of this order;
- (c) the First Defendant from:
  - (i) paying ordinary living expenses not exceeding \$800 per week;
  - (ii) dealing with or disposing of her Property in the discharge of obligations bona fide and properly incurred under any contract entered into by the First Defendant before these orders were made, following a request in writing to the Plaintiff including details and documentary evidence of the obligation and receipt of the Plaintiff's approval;
- (d) the Second Defendant from:
  - (i) paying trade creditors bona fide and properly incurred not exceeding \$800 weekly;
  - (ii) paying other business expenses bona fide and properly incurred, or dealing with or disposing of its Property in the discharge of obligations bona fide and properly incurred under any contract entered into by the Second Defendant before these orders were made, following a request in writing to the Plaintiff including details and documentary evidence of the expense or obligation and receipt of the Plaintiff's approval.

## **TRAVEL RESTRICTION**

12. Pursuant to ss 1323(1)(j) and 1323(3) of the Act, the First Defendant deliver up all passports in her name which are in her possession, custody or control, and any tickets



for international travel by her, to the Sydney Registry of this Court by 4.00 pm Australian Eastern Daylight Time on 12 November 2020 to be retained by the Court until further order.

13. Pursuant to ss 1323(1)(k) and 1323(3) of the Act, the First Defendant be restrained from leaving Australia without the consent of the Court until further order.
14. Pursuant to s 23 of the FCA Act, in the event that the First Defendant cannot locate any passport within one day of the making of these orders, she file an affidavit stating that fact and exhibiting a copy of a written notification sent by her to the Department of Home Affairs or the Australian Passport Office / Information Service informing them of the same.
15. Pursuant to s 23 of the FCA Act, the First Defendant may not apply for the issue of any passport until further order.

#### **FURTHER ORDERS**

16. Pursuant to s 23 of the FCA Act, the Plaintiff have leave, to the extent necessary, to give notice of any orders made, to:
  - (a) any relevant authorities that record, control and regulate the ownership of real property, motor vehicles and maritime vessels; and
  - (b) any bank, building society or other financial institution with which, to the best of the Plaintiff's belief, any of the Defendants may operate any account; and
  - (c) any securities broking firm, foreign exchange broking or trading firm or futures broking firm with which, to the best of the Plaintiff's belief, any of the Defendants may operate any account; and
  - (d) any other person or entity, holding or controlling property, which, to the best of the Plaintiff's belief, may belong to any of the Defendants;
  - (e) the Australian Border Force or the Australian Federal Police;by giving a copy of a minute of the order to a person apparently in the employ of that entity or person.



17. Liberty to apply on 48 hours' notice.

Date that entry is stamped: 10 November 2020

*Sia Lagos*  
Registrar



# **ANNEXURE A – BANK ACCOUNTS**

Account Name	BSB	Account Number	Bank
Melissa Caddick		Card ending 44005	AMEX
Melissa L Caddick		Card ending 71008	AMEX
ML Caddick	082057	67 738 0367	NAB
Maliver Pty Ltd	082057	946084145	NAB
Maliver Pty Ltd	067167	19309571	CBA
Melissa Caddick	067167	15770731	CBA
Maliver Pty Ltd		2776566	CommSec
Maliver Pty Ltd		2776613	CommSec
Melissa Caddick		0AC-375746	CommSec
Mrs Melissa Louise Caddick		2422359	CommSec
Caddick - US Dollar Account		CADSTUDS01	NAB
Melissa Caddick & Adam Grimley - Home loan	082057	841504991	NAB
Melissa Caddick & Adam Grimley	082057	840053439	NAB
Melissa Caddick - Home loan	082057	980989888	NAB
Melissa Caddick	082057	715801266	NAB
Melissa Caddick	082057	981224254	NAB
Melissa Caddick		4303 3064 7494 4912	NAB



**Schedule**

No: NSD1220/2020

Federal Court of Australia

District Registry: New South Wales

Division: General

Second Defendant      MALIVER PTY LTD

**ORDERS**

Federal Court of Australia

No. NSD 1220 / 2020

District Registry: NSW

Division: Commercial and Corporations

**IN THE MATTER OF MALIVER PTY LTD (ACN 164 334 918)**

**AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION**

Plaintiff

**MELISSA LOUISE CADDICK and others named in the Schedule**

Defendants

**ORDER**

**JUDGE:**

**DATE OF ORDER:** December 2020

**WHERE MADE:** Sydney

For the purposes of these orders "**Property**" means all real or personal property, assets or interests in property of any kind, within or outside Australia including, by virtue of subsection 1323(2A) of the *Corporations Act 2001* (Cth) (**Act**), any property held otherwise than as sole beneficial owner.

**THE COURT ORDERS THAT:**

**Amended Originating Process**

1. That the Plaintiff have leave to amend the Originating Process as set out in the proposed Amended Originating Process being Annexure 1A-5 to the affidavit of Isabella Lucy Allen affirmed 25 November 2020 (**the Amended Originating Process**).

Filed on behalf of

Australian Securities and Investments Commission, Applicant

Prepared by

Nicolette Bearup

Tel (02) 9911 5745

Fax (02) 9911 2414

Email Nicolette.Bearup@asic.gov.au

Email address above and Level 5, 5 Market Street, Sydney NSW 2000

**Address for service**

Attention: Nicolette Bearup

2. That the Plaintiff have leave to file the Amended Originating Process in Court, returnable immediately.
3. In the first instance, that service of the filed Amended Originating Process be dispensed with.
4. The costs of the amendment application be costs in the cause.

#### **Appointment of Receivers**

5. Until further order, pursuant to s 1323(1)(h)(i) of the Act, Bruce Gleeson and Daniel Robert Soire of Jones Partners of Level 13, 189 Kent St, Sydney, NSW 2000 be appointed as joint and several receivers (**Receivers**) of the Property of the First Defendant for the purpose of:
  - (a) identifying, collecting and securing the Property of the First Defendant;
  - (b) approving or making the payments from Property of the First Defendant permitted by order 11 of the orders made on 10 November 2020 as varied below;
  - (c) ascertaining the amount of money received by the First Defendant from funds paid to the Second Defendant by investors for investment (**Investor Funds**);
  - (d) identifying any Investor Funds held by the First Defendant, any Property acquired by the First Defendant with Investor Funds and any payments made by the First Defendant to third parties with Investor Funds and any other dealings by the First Defendant with Investor Funds;
  - (e) ascertaining whether any money was paid directly to the First Defendant by investors for investment and identifying the matters set out in paragraph (d) in relation to any such money.
6. For the purpose of attaining the objectives for which the Receivers are appointed, the Receivers shall have the following powers:
  - (a) the powers set out in s420(1) and 420(2)(a), (e), (f), (k), (o), (p), (q), (r) and (u) of the Act as if the references to corporation were references to the First Defendant;

- (b) the power to investigate and report on the matters set out in order 7;
  - (c) the power to apply to the Court for directions or further orders on 48 hours' notice.
7. By 15 February 2021 the Receivers shall, provide to the Court and to the Plaintiff a report regarding:
- (a) the assets and liabilities of the First Defendant;
  - (b) an opinion as to the solvency of the First Defendant;
  - (c) the amount of Investor Funds received by the First Defendant;
  - (d) any Investor Funds held by the First Defendant, any property acquired by the First Defendant with Investor Funds and any payments made by the First Defendant to third parties with Investor Funds and any other dealings by the First Defendant with Investor Funds.
  - (e) the Receivers' remuneration, costs and expenses.
8. Costs of the application to appoint the Receivers be costs in the cause.
9. The Receivers' remuneration, costs and expenses shall be capped at \$70,000 or such other amount as the Court subsequently orders, and the Receivers shall make an application to the Court for approval of their reasonable remuneration, costs and expenses and their payment out of the Property of the First Defendant, within 14 days following the provision of the report referred to in order 7.

#### **Appointment of Provisional Liquidators**

10. Pursuant to s 472(2) of the Act, Bruce Gleeson and Daniel Robert Soire of Jones Partners of Level 13, 189 Kent St, Sydney, NSW 2000 be appointed as joint and several provisional liquidators (**Provisional Liquidators**) to the Second Defendant.
11. The Provisional Liquidators have the powers set out in the Act and the power to investigate and report on the matters set out in paragraph 12.

12. By 15 February 2021 the Provisional Liquidators shall provide to the Court and to the Plaintiff a report as to the provisional liquidation of the Second Defendant, including:
  - (a) the persons who have paid money to the Second Defendant for investment, the amounts they invested, and whether, and to what extent, these amounts have been repaid;
  - (b) identifying any bank accounts in which Investor Funds are held, any Property acquired with Investor Funds or any other dealings with Investor Funds;
  - (c) the assets and liabilities of the Second Defendant, including any assets in which the Second Defendant has any legal or beneficial interest and an estimate of the value of each asset;
  - (d) an opinion as to the solvency of the Second Defendant;
  - (e) an opinion as to whether the Second Defendant has proper financial records;
  - (f) an opinion as to the claims that may be available to the Liquidators for the recovery of funds for the benefit of creditors, including claims pursuant to Part 5.7B of the Act;
  - (g) the likely return to creditors;
  - (h) any other information necessary to enable the financial position of the Second Defendant to be assessed;
  - (i) an opinion as to whether the Second Defendant has contravened any provisions of the Act and/or any other legislation; and
  - (j) any suspected contraventions of the Act by any directors or officers of the Second Defendant.
13. Within 14 days of their appointment, the Provisional Liquidators send a notice to each creditor of the Second Defendant at the last known address for each such person as shown in the books and records of the Second Defendant giving notice of:

- (a) the appointment of the Provisional Liquidators; and
  - (b) a contact address for the Provisional Liquidators.
14. The Provisional Liquidators shall be entitled to remuneration as determined by s60-16 of the Insolvency Practice Schedule (Corporations) to the Act.
  15. The Provisional Liquidators shall have liberty to apply on 48 hours' notice.
  16. The costs of the application to appoint the Provisional Liquidators be costs in the cause.

#### **Provision of Information**

17. Paragraph 7 of the orders made on 10 November 2020 (**10 November Orders**) and paragraph 1 of the orders made on 10 December 2020 are amended to provide that the Plaintiff is permitted to provide the Provisional Liquidators and Receivers with unredacted copies of the affidavits filed by the Plaintiff in these proceedings, including the Main Allen Affidavit and the Suppression Allen Affidavit and Exhibits IA-1, IA-2 and IA-3 to the Main Allen Affidavit.

#### **Variation of Freezing Orders**

18. Paragraph 11 of the 10 November Orders be varied as follows:
  - (a) delete paragraph 11(c) and replace with
    - 11 (c) the First Defendant from paying ordinary living expenses, but not exceeding \$800 per week, unless approved by the Receivers;
    - (ca) the Receivers dealing with or disposing of the First Defendant's Property in the discharge of obligations bona fide and properly incurred under any contract entered into by the First Defendant before these orders were made,
  - (b) delete paragraph 11 (d) and replace with
    - 11 (d) the Provisional Liquidators:
      - (i) paying trade creditors or other business expenses bona fide and properly incurred, or dealing with or disposing of the Property of the Second Defendant in the discharge of obligations bona fide and properly incurred under any

contract entered into by the Second Defendant before these orders were made.

(c) add

11 (e) the Receivers or the Provisional Liquidators from exercising their powers and performing their duties, pursuant to the appointments made by these orders.

### **Suppression Orders**

19. An order pursuant to s.37AF(1)(a) and (b) and 37AG(1)(a) of the *Federal Court of Australia Act 1976* (Cth), that until further order, the publication or disclosure (except to the parties and their legal representatives and the Provisional Liquidators and the Receivers) of the following is prohibited:

- (a) the affidavit of Isabella Lucy Allen affirmed 25 November 2020 in so far as it identifies the names or words set out in confidential Annexure IA-4 to the affidavit of Isabella Lucy Allen affirmed on 9 November 2020 (8 pages) **Suppression Allen Affidavit**; the entity name, ACN and AFSL number of the entity referred to in paragraph 18(b) of the affidavit of Isabella Lucy Allen affirmed on 9 November 2020 (92 pages) (**Main Allen Affidavit**), the entity name referred to in paragraph 37(e) of that affidavit and the name of the witness referred to in paragraph 26 of that affidavit; and the occupations of witnesses who have spoken with Australian Securities and Investments Commission staff;
- (b) the whole of the affidavit of Isabella Lucy Allen affirmed 7 December 2020 and Exhibit IA-18.

**SCHEDULE**

Federal Court of Australia

No. NSD 1220 / 2020

District Registry: NSW

Division: Commercial and Corporations

**Defendants**

Second Defendant: MALIVER PTY LTD (ACN 164 334 918)

Date: December 2020



Federal Court of Australia  
District Registry: NSW  
Division: Commercial and Corporations

**IN THE MATTER OF MALIVER PTY LTD (ACN 164 334 918)**

**AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION**


Plaintiff

**MELISSA LOUISE CADDICK and others named in the Schedule**

Defendants

This is the annexure marked "IA-24" referred to in the affidavit of Isabella Lucy Allen affirmed on 15 December 2020.

Before me:



JANANI LAWSON

An Australian Legal Practitioner within the Meaning of the Legal Profession  
Uniform Law (NSW)



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