

NOTICE OF FILING AND HEARING

This document was lodged electronically in the FEDERAL COURT OF AUSTRALIA (FCA) on 10/08/2021 6:34:34 PM AEST and has been accepted for filing under the Court's Rules. Filing and hearing details follow and important additional information about these are set out below.

Filing and Hearing Details

Document Lodged:	Originating Application - Form 15 - Rule 8.01(1)
File Number:	NSD616/2021
File Title:	WESTPAC BANKING CORPORATION ABN 33 007 457 141 v FORUM FINANCE PTY LIMITED & ORS
Registry:	NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA
Reason for Listing:	To Be Advised
Time and date for hearing:	To Be Advised
Place:	To Be Advised



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

Dated: 11/08/2021 9:49:14 AM 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 Reason for Listing shown above is descriptive and does not limit the issues that might be dealt with, or the orders that might be made, at the hearing.

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.



Second Further Amended Originating application

No. NSD616 of 2021

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

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

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

To the Respondents

The Applicants ~~applies~~ apply for the relief set out in this application.

The Court will hear this application, or make orders for the conduct of the proceeding, at the time and place stated below. If you or your lawyer do not attend, then the Court may make orders in your absence.

You must file a notice of address for service (Form 10) in the Registry before attending Court or taking any other steps in the proceeding.

Time and date for hearing:

Place: Federal Court of Australia
Law Courts Building
Queens Square
SYDNEY NSW 2000

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 4279	Fax	(02) 9921 8123
Email	caitlin.murray@minterellison.com		
Address for service (include state and postcode)	Level 40, Governor Macquarie Tower, 1 Farrer Place, Sydney NSW 2000 Our reference: 1353397		

[Version 2 form approved 09/05/2013]



Date: August 2021

Signed by an officer acting with the authority
of the District Registrar



Details of claim

The Applicants claims:

As against the First Respondent

1. A declaration that the First Respondent holds on trust for the [First](#) Applicant all funds received from the [First](#) Applicant (whether directly or from Eqwe Pty Limited ACN 630 535 554 (formerly named BHO Funding Pty Limited) (**Eqwe**) as agent for the Applicant) in connection with the Purported Contracts and also the traceable property acquired using those funds.
- 1A. An order that the First Respondent disclose to the [First](#) Applicant the amount of funds paid by the [First](#) Applicant (whether directly or from Eqwe as agent for the [First](#) Applicant) in connection with the Purported Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.
- 1B. An order that the First Respondent account to the [First](#) Applicant for all funds that it has received or controls through related entities that were paid by the [First](#) Applicant (whether directly or from Eqwe as agent for the [First](#) Applicant) in connection with the Purported Contracts.
2. Judgment for the [First](#) Applicant against the First Respondent in the amount of \$253,766,555.76.
3. An order that the First Respondent pay damages in deceit or the tort of unlawful means conspiracy.
4. An order that the First Respondent pay damages for breach of contract.
- [4A. An order that the First Respondent pay equitable compensation.](#)
5. An order that the First Respondent pay damages pursuant to section 236 of the Australian Consumer Law set out in Schedule 2 of the *Competition and Consumer Act 2010* (Cth) (**Australian Consumer Law**).
6. An order that the First Respondent pay damages pursuant to section 12GF of the *Australian Securities and Investments Commission Act 2001* (Cth) (**ASIC Act**), further or alternatively pursuant to section 1041I of the *Corporations Act 2001* (Cth) (**Corporations Act**).
7. An order that the First Defendant be wound up under the provisions of the Corporations Act.



8. An order that Jason Preston and Jason Ireland of Level 12, 20 Martin Place, Sydney NSW 2000 jointly and severally, or some other fit and proper person, be appointed liquidator of the First Respondent, Forum Finance Pty Ltd.

As against the Second Respondent

- 8A. Judgment for the First Applicant against the Second Respondent in the amount of \$253,766,555.76.
- 8A1. Judgment for the Second Applicant against the Second Respondent in the amount of NZD 44,097,969.
- 8B. A declaration that the Second Respondent holds on trust for the First and Second Applicants all funds that he has received or controls that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts or the Purported NZ Contracts, or the traceable property acquired using those funds.
- 8C. An order that the Second Respondent disclose to the Applicants the amount of funds paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts or the Purported NZ Contracts that he has received or controls through related entities, when those funds were received and all facts within his knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.
- 8D. An order that the Second Respondent account to the Applicants for all funds that he has received or controls through related entities that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts or the Purported NZ Contracts.
- 8E. An order that the Second Respondent pay equitable compensation.
- 8F. An order that the Second Respondent pay damages for the tort of unlawful means conspiracy.
9. An order that the Second Respondent pay damages in deceit.
10. An order that the Second Respondent pay damages pursuant to section 236 of the Australian Consumer Law.
11. An order that the Second Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.

As against the Third Respondent

- 11A. Judgment for the First Applicant against the Third Respondent in the amount of \$253,766,555.76.



11A1. Judgment for the Second Applicant against the Third Respondent in the amount of NZD 44,097,969.

- 11B. A declaration that the Third Respondent holds on trust for the First and Second Applicants all funds that he has received or controls that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts or the Purported NZ Contracts, or the traceable property acquired using those funds.
- 11C. An order that the Third Respondent disclose to the Applicants the amount of funds paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts or the Purported NZ Contracts that he has received or controls through related entities, when those funds were received and all facts within his knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.
- 11D. An order that the Third Respondent account to the Applicants for all funds that he has received or controls through related entities that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts.
- 11E. An order that the Third Respondent pay equitable compensation.
- 11F. An order that the Third Respondent pay damages for the tort of unlawful means conspiracy.

11G. An order that the Third Respondent pay damages pursuant to section 236 of the Australian Consumer Law.

11H. An order that the Third Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.

As against each Respondent (including those identified below)

12. Interest, including interest up to judgment pursuant to section 52(2)(a) of the *Federal Court Act 1976* (Cth) (**Federal Court Act**).
13. Interest on judgment pursuant to section 52 of the *Federal Court Act* and rule 39.06 of the *Federal Court Rules 2011* (Cth).
14. Costs.
15. Such further or other orders as the Court deems fit.

As against the Fourth Respondent

16. A declaration that the Fourth Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the ~~First~~ Applicants (whether



directly or from Eqwe as agent for the First Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.

17. An order that the Fourth Respondent disclose to the First Applicants the amount of funds paid by the First Applicants (whether directly or from Eqwe as agent for the First Applicants) in connection with the Purported Contracts and/or the Purported NZ Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.
18. An order that the Fourth Respondent account to the First Applicants for all funds that it has received or controls through related entities that were paid by the First Applicants (whether directly or from Eqwe as agent for the First Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts.
19. Judgment for the First Applicant against the Fourth Respondent in the amount of \$253,766,555.76.

19A. Judgment for the Second Applicant against the Fourth Respondent in the amount of NZD 44,097,969.

20. An order that the Fourth Respondent pay equitable compensation.
21. An order that the Fourth Respondent pay damages in the tort of unlawful means conspiracy.
22. An order that the Fourth Respondent be wound up under the provisions of the Corporations Act.
23. An order that Jason Preston and Jason Ireland of Level 12, 20 Martin Place, Sydney NSW 2000 jointly and severally, or some other fit and proper person, be appointed liquidator of the Fourth Respondent.

23A. An order that the Fourth Respondent pay damages pursuant to section 236 of the Australian Consumer Law.

23B. An order that the Fourth Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.

As against the Fifth Respondent

24. A declaration that the Fifth Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the First Applicants (whether directly or from Eqwe as agent for the First Applicants) in connection with the Purported Contracts, the Purported NZ Contracts -and/or the traceable property acquired using those funds.



25. An order that the Fifth Respondent disclose to the ~~First~~ Applicants the amount of funds paid by the ~~First~~ Applicants (whether directly or from Eqwe as agent for the ~~First~~ Applicants) in connection with the Purported Contracts and/or the Purported NZ Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.
26. An order that the Fifth Respondent account to the ~~First~~ Applicants for all funds that it has received or controls through related entities that were paid by the ~~First~~ Applicants (whether directly or from Eqwe as agent for the ~~First~~ Applicants) in connection with the Purported Contracts and/or the Purported NZ Contracts.
27. Judgment for the First Applicant against the Fifth Respondent in the amount of \$253,766,555.76.

27A. Judgment for the Second Applicant against the Fifth Respondent in the amount of NZD 44,097,969.

28. An order that the Fifth Respondent pay equitable compensation.
29. An order that the Fifth Respondent pay damages in the tort of unlawful means conspiracy.
30. An order that the Fifth Respondent be wound up under the provisions of the Corporations Act.
31. An order that Jason Preston and Jason Ireland of Level 12, 20 Martin Place, Sydney NSW 2000 jointly and severally, or some other fit and proper person, be appointed liquidator of the Fifth Respondent.

31A. An order that the Fifth Respondent pay damages pursuant to section 236 of the Australian Consumer Law.

31B. An order that the Fifth Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.

As against the Sixth Respondent

32. A declaration that the Sixth Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the ~~First~~ Applicants (whether directly or from Eqwe as agent for the ~~First~~ Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.
33. An order that the Sixth Respondent disclose to the ~~First~~ Applicants the amount of funds paid by the ~~First~~ Applicants (whether directly or from Eqwe as agent for the ~~First~~ Applicants) in connection with the Purported Contracts and/or the Purported NZ



Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.

34. An order that the Sixth Respondent account to the ~~First~~ Applicants for all funds that it has received or controls through related entities that were paid by the ~~First~~ Applicants (whether directly or from Eqwe as agent for the ~~First~~ Applicants) in connection with the Purported Contracts and/or the Purported NZ Contracts.
35. Judgment for the First Applicant against the Sixth Respondent in the amount of \$253,766,555.76.

35A. Judgment for the Second Applicant against the Sixth Respondent in the amount of NZD 44,097,969.

36. An order that the Sixth Respondent pay equitable compensation.
37. An order that the Sixth Respondent pay damages in the tort of unlawful means conspiracy.
38. An order that the Sixth Respondent be wound up under the provisions of the Corporations Act.
39. An order that Jason Preston and Jason Ireland of Level 12, 20 Martin Place, Sydney NSW 2000 jointly and severally, or some other fit and proper person, be appointed liquidator of the Sixth Respondent.

39A. An order that the Sixth Respondent pay damages pursuant to section 236 of the Australian Consumer Law.

39B. An order that the Sixth Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.

As against the Seventh Respondent

40. A declaration that the Seventh Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the ~~First~~ Applicants (whether directly or from Eqwe as agent for the ~~First~~ Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.
41. An order that the Seventh Respondent disclose to the ~~First~~ Applicants the amount of funds paid by the ~~First~~ Applicants (whether directly or from Eqwe as agent for the ~~First~~ Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.



42. An order that the Seventh Respondent account to the ~~First Applicants~~ for all funds that it has received or controls through related entities that were paid by the ~~First Applicants~~ (whether directly or from Eqwe as agent for the ~~First Applicants~~) in connection with the Purported Contracts and/or Purported NZ Contracts.
43. Judgment for the First Applicant against the Seventh Respondent in the amount of \$253,766,555.76.

43A. Judgment for the Second Applicant against the Seventh Respondent in the amount of NZD 44,097,969.

44. An order that the Seventh Respondent pay equitable compensation.
45. An order that the Seventh Respondent pay damages in the tort of unlawful means conspiracy.
46. An order that the Seventh Respondent be wound up under the provisions of the Corporations Act.
47. An order that Jason Preston and Jason Ireland of Level 12, 20 Martin Place, Sydney NSW 2000 jointly and severally, or some other fit and proper person, be appointed liquidator of the Seventh Respondent.
48. An order that the Seventh Respondent pay damages pursuant to section 236 of the Australian Consumer Law.
49. An order that the Seventh Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act

As against the Eighth Respondent

50. A declaration that the Eighth Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.
51. An order that the Eighth Respondent disclose to the Applicants the amount of funds paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.
52. An order that the Eighth Respondent account to the Applicants for all funds that it has received or controls through related entities that were paid by the Applicants (whether



directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts.

53. Judgment for the First Applicant against the Eighth Respondent in the amount of \$253,766,555.76.

54. Judgment for the Second Applicant against the Eighth Respondent in the amount of NZD 44,097,969.

55. An order that the Eighth Respondent pay equitable compensation.

56. An order that the Eighth Respondent pay damages in the tort of unlawful means conspiracy.

57. An order that the Eighth Respondent pay damages pursuant to section 236 of the Australian Consumer Law.

58. An order that the Eighth Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.

As against the Ninth Respondent

59. A declaration that the Ninth Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.

60. An order that the Ninth Respondent disclose to the Applicants the amount of funds paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.

61. An order that the Ninth Respondent account to the Applicants for all funds that it has received or controls through related entities that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts.

62. Judgment for the First Applicant against the Ninth Respondent in the amount of \$253,766,555.76.

63. Judgment for the Second Applicant against the Ninth Respondent in the amount of NZD 44,097,969.

64. An order that the Ninth Respondent pay equitable compensation.



65. An order that the Ninth Respondent pay damages in the tort of unlawful means conspiracy.
66. An order that the Ninth Respondent pay damages pursuant to section 236 of the Australian Consumer Law.
67. An order that the Ninth Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.

As against the Tenth Respondent

68. A declaration that the Tenth Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.
69. An order that the Tenth Respondent disclose to the Applicants the amount of funds paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.
70. An order that the Tenth Respondent account to the Applicants for all funds that it has received or controls through related entities that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts.
71. Judgment for the First Applicant against the Tenth Respondent in the amount of \$253,766,555.76.
72. Judgment for the Second Applicant against the Tenth Respondent in the amount of NZD 44,097,969.
73. An order that the Tenth Respondent pay equitable compensation.
74. An order that the Tenth Respondent pay damages in the tort of unlawful means conspiracy.
75. An order that the Tenth Respondent pay damages pursuant to section 236 of the Australian Consumer Law.
76. An order that the Tenth Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.



As against the Eleventh Respondent

77. A declaration that the Eleventh Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.
78. An order that the Eleventh Respondent disclose to the Applicants the amount of funds paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.
79. An order that the Eleventh Respondent account to the Applicants for all funds that it has received or controls through related entities that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts.
80. Judgment for the First Applicant against the Eleventh Respondent in the amount of \$253,766,555.76.
81. Judgment for the Second Applicant against the Eleventh Respondent in the amount of NZD 44,097,969.
82. An order that the Eleventh Respondent pay equitable compensation.
83. An order that the Eleventh Respondent pay damages in the tort of unlawful means conspiracy.
84. An order that the Eleventh Respondent pay damages pursuant to section 236 of the Australian Consumer Law.
85. An order that the Eleventh Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.

As against the Twelfth Respondent

86. A declaration that the Twelfth Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.
87. An order that the Twelfth Respondent disclose to the Applicants the amount of funds paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in



connection with the Purported Contracts and/or Purported NZ Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.

88. An order that the Twelfth Respondent account to the Applicants for all funds that it has received or controls through related entities that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts.

89. Judgment for the First Applicant against the Twelfth Respondent in the amount of \$253,766,555.76.

90. Judgment for the Second Applicant against the Twelfth Respondent in the amount of NZD 44,097,969.

91. An order that the Twelfth Respondent pay equitable compensation.

92. An order that the Twelfth Respondent pay damages in the tort of unlawful means conspiracy.

93. An order that the Twelfth Respondent pay damages pursuant to section 236 of the Australian Consumer Law.

94. An order that the Twelfth Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.

As against the Thirteenth Respondent

95. A declaration that the Thirteenth Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.

96. An order that the Thirteenth Respondent disclose to the Applicants the amount of funds paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.

97. An order that the Thirteenth Respondent account to the Applicants for all funds that it has received or controls through related entities that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts.



98. Judgment for the First Applicant against the Thirteenth Respondent in the amount of \$253,766,555.76.
99. Judgment for the Second Applicant against the Thirteenth Respondent in the amount of NZD 44,097,969.
100. An order that the Thirteenth Respondent pay equitable compensation.
101. An order that the Thirteenth Respondent pay damages in the tort of unlawful means conspiracy.
102. An order that the Thirteenth Respondent pay damages pursuant to section 236 of the Australian Consumer Law.
103. An order that the Thirteenth Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.

As against the Fourteenth Respondent

104. A declaration that the Fourteenth Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.
105. An order that the Fourteenth Respondent disclose to the Applicants the amount of funds paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.
106. An order that the Fourteenth Respondent account to the Applicants for all funds that it has received or controls through related entities that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts.
107. Judgment for the First Applicant against the Fourteenth Respondent in the amount of \$253,766,555.76.
108. Judgment for the Second Applicant against the Fourteenth Respondent in the amount of NZD 44,097,969.
109. An order that the Fourteenth Respondent pay equitable compensation.
110. An order that the Fourteenth Respondent pay damages in the tort of unlawful means conspiracy.



111. An order that the Fourteenth Respondent pay damages pursuant to section 236 of the Australian Consumer Law.
112. An order that the Fourteenth Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.

As against the Fifteenth Respondent

113. A declaration that the Fifteenth Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.
114. An order that the Fifteenth Respondent disclose to the Applicants the amount of funds paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.
115. An order that the Fifteenth Respondent account to the Applicants for all funds that it has received or controls through related entities that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts.
116. Judgment for the First Applicant against the Fifteenth Respondent in the amount of \$253,766,555.76.
117. Judgment for the Second Applicant against the Fifteenth Respondent in the amount of NZD 44,097,969.
118. An order that the Fifteenth Respondent pay equitable compensation.
119. An order that the Fifteenth Respondent pay damages in the tort of unlawful means conspiracy.
120. An order that the Fifteenth Respondent pay damages pursuant to section 236 of the Australian Consumer Law.
121. An order that the Fifteenth Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.

As against the Seventeenth Respondent

122. A declaration that the Seventeenth Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the Applicants (whether



directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.

123. An order that the Seventeenth Respondent disclose to the Applicants the amount of funds paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.
124. An order that the Seventeenth Respondent account to the Applicants for all funds that it has received or controls through related entities that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts.
125. Judgment for the First Applicant against the Seventeenth Respondent in the amount of \$253,766,555.76.
126. Judgment for the Second Applicant against the Seventeenth Respondent in the amount of NZD 44,097,969.
127. An order that the Seventeenth Respondent pay equitable compensation.
128. An order that the Seventeenth Respondent pay damages in the tort of unlawful means conspiracy.
129. An order that the Seventeenth Respondent pay damages pursuant to section 236 of the Australian Consumer Law.
130. An order that the Seventeenth Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.

As against the Eighteenth Respondent

131. A declaration that the Eighteenth Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.
132. An order that the Eighteenth Respondent disclose to the Applicants the amount of funds paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts that it has received or controls through related entities and all facts within its knowledge as to the



present whereabouts of those funds or the traceable property acquired using those funds.

133. An order that the Eighteenth Respondent account to the Applicants for all funds that it has received or controls through related entities that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts.
134. Judgment for the First Applicant against the Eighteenth Respondent in the amount of \$253,766,555.76.
135. Judgment for the Second Applicant against the Eighteenth Respondent in the amount of NZD 44,097,969.
136. An order that the Eighteenth Respondent pay equitable compensation.
137. An order that the Eighteenth Respondent pay damages in the tort of unlawful means conspiracy.
138. An order that the Eighteenth Respondent pay damages pursuant to section 236 of the Australian Consumer Law.
139. An order that the Eighteenth Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.

As against the Nineteenth Respondent

140. A declaration that the Nineteenth Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.
141. An order that the Nineteenth Respondent disclose to the Applicants the amount of funds paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.
142. An order that the Nineteenth Respondent account to the Applicants for all funds that it has received or controls through related entities that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts.
143. Judgment for the First Applicant against the Nineteenth Respondent in the amount of \$253,766,555.76.



144. Judgment for the Second Applicant against the Nineteenth Respondent in the amount of NZD 44,097,969.
145. An order that the Nineteenth Respondent pay equitable compensation.
146. An order that the Nineteenth Respondent pay damages in the tort of unlawful means conspiracy.
147. An order that the Nineteenth Respondent pay damages pursuant to section 236 of the Australian Consumer Law.
148. An order that the Nineteenth Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.

As against the Twentieth Respondent

149. A declaration that the Twentieth Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.
150. An order that the Twentieth Respondent disclose to the Applicants the amount of funds paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.
151. An order that the Twentieth Respondent account to the Applicants for all funds that it has received or controls through related entities that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts.
152. Judgment for the First Applicant against the Twentieth Respondent in the amount of \$253,766,555.76.
153. Judgment for the Second Applicant against the Twentieth Respondent in the amount of NZD 44,097,969.
154. An order that the Twentieth Respondent pay equitable compensation.
155. An order that the Twentieth Respondent pay damages in the tort of unlawful means conspiracy.
156. An order that the Twentieth Respondent pay damages pursuant to section 236 of the Australian Consumer Law.



157. An order that the Twentieth Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.

As against the Twenty-First Respondent

158. A declaration that the Twenty-First Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.

159. An order that the Twenty-First Respondent disclose to the Applicants the amount of funds paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.

160. An order that the Twenty-First Respondent account to the Applicants for all funds that it has received or controls through related entities that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts.

161. Judgment for the First Applicant against the Twenty-First Respondent in the amount of \$253,766,555.76.

162. Judgment for the Second Applicant against the Twenty-First Respondent in the amount of NZD 44,097,969.

163. An order that the Twenty-First Respondent pay equitable compensation.

164. An order that the Twenty-First Respondent pay damages in the tort of unlawful means conspiracy.

165. An order that the Twenty-First Respondent pay damages pursuant to section 236 of the Australian Consumer Law.

166. An order that the Twenty-First Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.

As against the Twenty-Second Respondent

167. A declaration that the Twenty-Second Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.



168. An order that the Twenty-Second Respondent disclose to the Applicants the amount of funds paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.
169. An order that the Twenty-Second Respondent account to the Applicants for all funds that it has received or controls through related entities that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts.
170. Judgment for the First Applicant against the Twenty-Second Respondent in the amount of \$253,766,555.76.
171. Judgment for the Second Applicant against the Twenty-Second Respondent in the amount of NZD 44,097,969.
172. An order that the Twenty-Second Respondent pay equitable compensation.
173. An order that the Twenty-Second Respondent pay damages in the tort of unlawful means conspiracy.
174. An order that the Twenty-Second Respondent pay damages pursuant to section 236 of the Australian Consumer Law.
175. An order that the Twenty-Second Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.

As against the Twenty-Third Respondent

176. A declaration that the Twenty-Third Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.
177. An order that the Twenty-Third Respondent disclose to the Applicants the amount of funds paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.
178. An order that the Twenty-Third Respondent account to the Applicants for all funds that it has received or controls through related entities that were paid by the Applicants



(whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts.

179. Judgment for the First Applicant against the Twenty-Third Respondent in the amount of \$253,766,555.76.
180. Judgment for the Second Applicant against the Twenty-Third Respondent in the amount of NZD 44,097,969.
181. An order that the Twenty-Third Respondent pay equitable compensation.
182. An order that the Twenty-Third Respondent pay damages in the tort of unlawful means conspiracy.
183. An order that the Twenty-Third Respondent pay damages pursuant to section 236 of the Australian Consumer Law.
184. An order that the Twenty-Third Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.

As against the Twenty-Fourth Respondent

185. A declaration that the Twenty-Fourth Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.
186. An order that the Twenty-Fourth Respondent disclose to the Applicants the amount of funds paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.
187. An order that the Twenty-Fourth Respondent account to the Applicants for all funds that it has received or controls through related entities that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts.
188. Judgment for the First Applicant against the Twenty-Fourth Respondent in the amount of \$253,766,555.76.
189. Judgment for the Second Applicant against the Twenty-Fourth Respondent in the amount of NZD 44,097,969.
190. An order that the Twenty-Fourth Respondent pay equitable compensation.



191. An order that the Twenty-Fourth Respondent pay damages in the tort of unlawful means conspiracy.
192. An order that the Twenty-Fourth Respondent pay damages pursuant to section 236 of the Australian Consumer Law.
193. An order that the Twenty-Fourth Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.

As against the Twenty-Fifth Respondent

194. A declaration that the Twenty-Fifth Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.
195. An order that the Twenty-Fifth Respondent disclose to the Applicants the amount of funds paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.
196. An order that the Twenty-Fifth Respondent account to the Applicants for all funds that it has received or controls through related entities that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts.
197. Judgment for the First Applicant against the Twenty-Fifth Respondent in the amount of \$253,766,555.76.
198. Judgment for the Second Applicant against the Twenty-Fifth Respondent in the amount of NZD 44,097,969.
199. An order that the Twenty-Fifth Respondent pay equitable compensation.
200. An order that the Twenty-Fifth Respondent pay damages in the tort of unlawful means conspiracy.
201. An order that the Twenty-Fifth Respondent pay damages pursuant to section 236 of the Australian Consumer Law.
202. An order that the Twenty-Fifth Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.



As against the Twenty-Sixth Respondent

203. A declaration that the Twenty-Sixth Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.
204. An order that the Twenty-Sixth Respondent disclose to the Applicants the amount of funds paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.
205. An order that the Twenty-Sixth Respondent account to the Applicants for all funds that it has received or controls through related entities that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts.
206. Judgment for the First Applicant against the Twenty-Sixth Respondent in the amount of \$253,766,555.76.
207. Judgment for the Second Applicant against the Twenty-Sixth Respondent in the amount of NZD 44,097,969.
208. An order that the Twenty-Sixth Respondent pay equitable compensation.
209. An order that the Twenty-Sixth Respondent pay damages in the tort of unlawful means conspiracy.
210. An order that the Twenty-Sixth Respondent pay damages pursuant to section 236 of the Australian Consumer Law.
211. An order that the Twenty-Sixth Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.

As against the Twenty-Seventh Respondent

212. A declaration that the Twenty-Seventh Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.
213. An order that the Twenty-Seventh Respondent disclose to the Applicants the amount of funds paid by the Applicants (whether directly or from Eqwe as agent for the Applicants)



in connection with the Purported Contracts and/or Purported NZ Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.

214. An order that the Twenty-Seventh Respondent account to the Applicants for all funds that it has received or controls through related entities that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts.

215. Judgment for the First Applicant against the Twenty-Seventh Respondent in the amount of \$253,766,555.76.

216. Judgment for the Second Applicant against the Twenty-Seventh Respondent in the amount of NZD 44,097,969.

217. An order that the Twenty-Seventh Respondent pay equitable compensation.

218. An order that the Twenty-Seventh Respondent pay damages in the tort of unlawful means conspiracy.

219. An order that the Twenty-Seventh Respondent pay damages pursuant to section 236 of the Australian Consumer Law.

220. An order that the Twenty-Seventh Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.

As against the Twenty-Eighth Respondent

221. A declaration that the Twenty-Eighth Respondent holds on trust for the First and Second Applicants all funds that it has received that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.

222. An order that the Twenty-Eighth Respondent disclose to the Applicants the amount of funds paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts that it has received or controls through related entities and all facts within its knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.

223. An order that the Twenty-Eighth Respondent account to the Applicants for all funds that it has received or controls through related entities that were paid by the Applicants



(whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts.

224. Judgment for the First Applicant against the Twenty-Eighth Respondent in the amount of \$253,766,555.76.

225. Judgment for the Second Applicant against the Twenty-Eighth Respondent in the amount of NZD 44,097,969.

226. An order that the Twenty-Eighth Respondent pay equitable compensation.

227. An order that the Twenty-Eighth Respondent pay damages in the tort of unlawful means conspiracy.

228. An order that the Twenty-Eighth Respondent pay damages pursuant to section 236 of the Australian Consumer Law.

229. An order that the Twenty-Eighth Respondent pay damages pursuant to section 12GF of the ASIC Act, further or alternatively pursuant to section 1041I of the Corporations Act.

As against the Twenty-Ninth Respondent, Mr Giamouridis

230. A declaration that the Twenty-Ninth Respondent holds on trust for the First and Second Applicants all funds that he has received that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts, the Purported NZ Contracts and/or the traceable property acquired using those funds.

231. An order that the Twenty-Ninth Respondent disclose to the Applicants the amount of funds paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts that he has received or controls through related entities and all facts within his knowledge as to the present whereabouts of those funds or the traceable property acquired using those funds.

232. An order that the Twenty-Ninth Respondent account to the Applicants for all funds that he has received or controls through related entities that were paid by the Applicants (whether directly or from Eqwe as agent for the Applicants) in connection with the Purported Contracts and/or Purported NZ Contracts.

In this originating application, the **Purported Contracts** means any arrangement recorded by the First Respondent as a contract for the purchase of equipment between the First Respondent and a **Customer**, in respect of which the receivable for the Contract was subsequently sold by the First Respondent to Eqwe.



A Customer means any one of the following customers:

- a. Veolia Environmental Services (Australia) Pty Ltd ACN 051 316 584;
- b. WesTrac Pty Limited ACN 009 342 572;
- c. ALH Group Pty Limited ACN 098 212 134;
- d. Scentre Shopping Centre Management Pty Ltd ACN 000 712 710;
- e. Coles Supermarkets Australia Pty Limited ACN 004 189 708;
- f. Catholic Healthcare Limited ACN 064 946 318; and
- g. The Martinez HWL Practice Trust & The East HWL Practice Trust & The Warat HWL Practice Trust & The Marin HWL Practice Trust & Others trading as 'HWL Ebsworth Lawyers' ABN 37 246 549 189.

[The Purported NZ Contracts means any arrangement recorded by Iugis \(NZ\) Limited \(formerly known as ORCA Enviro Solutions NZ Limited, NZBN 9429046666581\) \(IUGIS NZ\) as a contract for the purchase of equipment between IUGIS NZ and Veolia Environmental Services \(NZ\) Limited in respect of which the receivable for the contract was subsequently sold by IUGIS NZ to Eqwe.](#)

Applicant's address

The Applicant's address for service is:

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

Attention: Caitlin Murray

Email: caitlin.murray@minterellison.com

The First Applicant's address is 275 Kent Street, Sydney NSW 2000.

[The Second Applicant's address is 16 Takutai Square Auckland 1010, New Zealand](#)



Service on the Respondents

It is intended to serve this application on all Respondents.

Date: 10 August 2021

A handwritten signature in blue ink, appearing to be "Caitlin Maria Murray".

Signed by Caitlin Maria Murray
MinterEllison
Lawyer for the Applicants



Schedule

No. NSD616 of 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 \(Administrators Appointed provisional liquidators appointed\)](#) ACN 623 033 705

Fifth Respondent: [Forum Group Pty Ltd \(Receivers Appointed\) \(Administrators Appointed in liquidation\)](#) ACN 153 336 997

Sixth Respondent: [Forum Enviro Pty Ltd \(provisional liquidators appointed Administrators Appointed\)](#)
 ACN 168 709 840

Seventh Respondent: [Forum Enviro \(Aust\) Pty Ltd \(provisional liquidators appointed Administrators Appointed\)](#) 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](#)



<u>Twentieth Respondent</u>	<u>4 Cowslip Street Violet Town Pty Ltd ACN 639 872 352</u>
<u>Twenty-First Respondent</u>	<u>55 Nolan Street Maryborough Pty Ltd ACN 641 392 912</u>
<u>Twenty-Second Respondent</u>	<u>89 Betka Road Mallacoota Pty Ltd ACN 641 393 179</u>
<u>Twenty-Third Respondent</u>	<u>9 Gregory Street Ouyen Pty Ltd ACN 641 392 707</u>
<u>Twenty-Fourth Respondent</u>	<u>9 Main Street Derrinallum Pty Ltd ACN 639 872 736</u>
<u>Twenty-Fifth Respondent</u>	<u>286 Carlisle Street Pty Limited ACN 610 042 343</u>
<u>Twenty-Sixth Respondent</u>	<u>275 High Street Golden Square Pty Ltd ACN 639 870 545</u>
<u>Twenty-Seventh Respondent</u>	<u>Mazcon Investments Hellas IKE</u>
<u>Twenty-Eighth Respondent</u>	<u>Palante Pty Ltd ACN 135 344 151</u>
<u>Twenty-Ninth Respondent</u>	<u>Anastasios Giamouridis</u>

Date: 10 August 2021