

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

Westpac Banking Corporation ABN 33 007 457 141

Applicant

Forum Finance Pty Limited (In Liquidation) (Receivers Appointed) ACN 153 301 172
and others

Respondents

Affidavit of: **Jason Ireland**

Address: Level 12, 20 Martin Place, Sydney NSW 2000

Occupation: Registered Liquidator

Date: 13 July 2021

CERTIFICATE IDENTIFYING EXHIBIT

This is the exhibit marked "**JI-1**" produced and shown to Jason Ireland at the time of affirming his affidavit this 13 July 2021.

Before me:

Kirsty Prinsloo

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Signature of witness

Account Forum Finance Westlawn
 BSB 082-080
 Account number 848483695

Sources and uses summary

	Total	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	
Balance at start of period	3,458	3,458	79,758	4,705,047	49,493	21,033	7,056	11,184	60,275	9,099	26,714	3,969,798	21,531	38,858	18,779	20,396	82,625	17,368	27,838	21,668	29,789	5,034	48,465	86,082	46,788	28,086	22,657	61,735	86,734	7,586	34,951	62,133	80,860	19,630	35,908	
Credits	367,516,281	21,776,939	22,633,506	8,180,905	9,500,894	731,346	8,115,392	7,989,357	13,033,769	9,883,549	22,398,112	19,954,292	6,862,726	6,585,151	12,859,019	10,544,570	12,366,438	8,788,864	12,419,868	9,035,498	15,144,189	11,897,282	13,205,652	8,903,202	6,727,049	6,755,029	9,228,801	9,809,633	11,266,288	4,385,524	10,305,490	12,010,261	6,130,212	15,312,881	2,774,593	
Debits	(367,459,525)	(21,700,639)	(18,008,217)	(12,836,459)	(9,529,354)	(745,324)	(8,111,263)	(7,940,266)	(13,084,945)	(9,865,933)	(18,455,028)	(23,902,559)	(6,845,399)	(6,605,230)	(12,857,401)	(10,482,342)	(12,431,695)	(8,778,394)	(12,426,037)	(9,027,377)	(15,168,944)	(11,853,851)	(13,168,036)	(8,942,496)	(6,745,751)	(6,760,458)	(9,189,723)	(9,784,634)	(11,345,436)	(4,358,159)	(10,278,308)	(11,991,534)	(6,191,442)	(15,296,603)	(2,750,287)	
Movement during period	56,756	76,301	4,625,289	(4,655,554)	(28,460)	(13,977)	4,129	49,091	(51,176)	17,616	3,943,084	(3,948,267)	17,327	(20,080)	1,618	62,228	(65,257)	10,470	(6,169)	8,121	(24,755)	43,431	37,617	(39,294)	(18,702)	(5,429)	39,078	24,999	(79,148)	27,365	27,182	18,727	(61,230)	16,278	24,306	
Balance at end of period	60,214	79,758	4,705,047	49,493	21,033	7,056	11,184	60,275	9,099	26,714	3,969,798	21,531	38,858	18,779	20,396	82,625	17,368	27,838	21,668	29,789	5,034	48,465	86,082	46,788	28,086	22,657	61,735	86,734	7,586	34,951	62,133	80,860	19,630	35,908	60,214	
Check value	60,214																																			
Check	-																																			
Sources																																				
Westpac	340,386,713	21,718,876	22,594,670	7,204,456	8,812,359	-	7,366,226	7,207,547	12,342,438	8,958,429	22,361,735	19,217,167	6,070,155	5,842,898	12,088,773	9,713,294	11,641,553	7,999,548	11,617,397	8,257,298	14,418,922	11,099,575	12,421,019	8,166,357	5,984,448	5,984,908	9,189,713	9,784,624	11,235,426	4,358,149	9,566,125	7,862,767	6,111,432	10,438,152	2,750,277	
CBA	8,987,198	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Other credits (mainly loans from Forum Group for Westlawn rent)	18,142,370	58,063	38,836	976,449	688,535	731,346	749,166	781,810	691,331	925,120	36,377	737,125	792,571	742,253	770,246	831,276	724,885	789,316	802,471	778,200	725,267	797,707	784,633	736,845	742,601	770,121	39,088	25,009	30,862	27,375	739,365	18,737	18,780	16,288	24,316	
Total sources	367,516,281	21,776,939	22,633,506	8,180,905	9,500,894	731,346	8,115,392	7,989,357	13,033,769	9,883,549	22,398,112	19,954,292	6,862,726	6,585,151	12,859,019	10,544,570	12,366,438	8,788,864	12,419,868	9,035,498	15,144,189	11,897,282	13,205,652	8,903,202	6,727,049	6,755,029	9,228,801	9,809,633	11,266,288	4,385,524	10,305,490	12,010,261	6,130,212	15,312,881	2,774,593	
Uses																																				
FGFS	(289,043,550)	-	-	-	-	-	(7,366,226)	(7,207,547)	(12,342,438)	(8,958,429)	(18,455,018)	(23,123,884)	(6,070,155)	(5,842,898)	(12,088,773)	(9,713,294)	(11,641,553)	(7,999,548)	(11,617,397)	(8,257,298)	(14,418,922)	(11,099,575)	(12,421,019)	(8,166,357)	(5,984,448)	(5,984,908)	(9,189,713)	(9,784,624)	(11,235,426)	(4,358,149)	(9,566,125)	(11,991,524)	(6,111,432)	(15,296,593)	(2,750,277)	
Veolia	(5,246,792)	-	-	(5,246,792)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
HWL Ebaworth	(4,177,994)	(4,177,994)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Westlawn	(1,278,549)	(635,600)	(642,949)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Forum Group	(16,120,000)	(7,400,000)	(8,720,000)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Enviro loan	(6,516,723)	(1,150,000)	(5,366,723)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Enviro settlements	(13,719,829)	(1,918,935)	(2,988,535)	-	(8,812,359)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Enviro deal	(1,957,664)	-	-	(1,957,664)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Unidentified	(11,000,000)	(6,300,000)	-	(4,700,000)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Loan to Direct	(100,000)	-	(100,000)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Loan to Fleet	(100,000)	-	(100,000)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Other debits (mainly Westlawn rent)	(18,198,424)	(118,110)	(90,010)	(932,003)	(716,995)	(745,324)	(745,037)	(732,719)	(742,507)	(907,504)	(10)	(778,675)	(775,244)	(762,332)	(768,628)	(769,048)	(790,142)	(778,846)	(808,640)	(770,079)	(750,022)	(754,276)	(747,017)	(776,139)	(761,303)	(775,550)	(10)	(10)	(110,010)	(10)	(712,183)	(10)	(80,010)	(10)		
Total uses	(367,459,525)	(21,700,639)	(18,008,217)	(12,836,459)	(9,529,354)	(745,324)	(8,111,263)	(7,940,266)	(13,084,945)	(9,865,933)	(18,455,028)	(23,902,559)	(6,845,399)	(6,605,230)	(12,857,401)	(10,482,342)	(12,431,695)	(8,778,394)	(12,426,037)	(9,027,377)	(15,168,944)	(11,853,851)	(13,168,036)	(8,942,496)	(6,745,751)	(6,760,458)	(9,189,723)	(9,784,634)	(11,345,436)	(4,358,159)	(10,278,308)	(11,991,534)	(6,191,442)	(15,296,603)	(2,750,287)	
Difference	56,756	76,301	4,625,289	(4,655,554)	(28,460)	(13,977)	4,129	49,091	(51,176)	17,616	3,943,084	(3,948,267)	17,327	(20,080)	1,618	62,228	(65,257)	10,470	(6,169)	8,121	(24,755)	43,431	37,617	(39,294)	(18,702)	(5,429)	39,078	24,999	(79,148)	27,365	27,182	18,727	(61,230)	16,278	24,306	



Matt Fehon AM

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Qualifications & Memberships

- Member of the Order of Australia (AM)
- Bachelor of Business (Accounting and Finance)
- Member, CA ANZ
- Graduate Member, AICD
- Member, FINSIA
- Member, Institute of Internal Auditors
- Member, Association of Certified Fraud Examiners
- Certificate IV – Government Investigation
- Certificate IV – Government Fraud Control

Matt is a highly regarded corporate advisory specialist and forensic expert and specialises in financial crime, corporate corruption and regulatory investigations, dispute advisory, enforceable undertakings and risk advisory.

A Forensic Accountant with more than 30 years of investigative and consulting experience, Matt has built a reputation for integrity and excellence together with an ability to quickly get to the source of a problem. This is best evidenced through significant investigations he has led into fraud, international corruption, foreign interference and financial markets manipulation.

Matt has many many crisis situations and used this experience to assist clients proactively with business reorganisation and improvement assignments.

The diversity of assignments extends across most industry sectors, with particular experience in the financial services, construction, resources and government sectors.

Engagement Experience

Regulatory investigations – Financial markets investigations, release of market sensitive or confidential information, insider trading, market manipulation, financial advice irregularities and collusion.

Fraud & corruption investigations – Assisting clients with high profile matters to address serious allegations. A large portfolio of matters involving financial crime, asset misappropriation, fraud, bribery, corruption, conflicts of interest, theft of IP and false representation through to legal proceedings.

Dispute advisory – Independent Expert Witness and consulting expert, involving quantification of loss, contractual disputes, accounting treatment, allocation of costs and in fraud, bribery and corruption in civil proceedings.

Contract compliance – Examining appropriateness of charges under contract to determine whether they comply with contractual agreements.

Risk management – Foreign interference, fraud, bribery and corruption prevention and compliance assignments including development of frameworks, controls and reporting procedures to mitigate risks in Australian and foreign ventures.

Enforceable undertakings – Appointed Independent Expert to Enforceable Undertakings, engaged by clients and approved by regulators to review remediation and compensation programs, continuous disclose and conduct, processes and procedures relating to financial market participants.

Business reorganisation – Major business reorganisation projects focussing on risk, asset and human capital protection, IT and regulatory risks.