

SUPREME COURT OF QUEENSLAND

REGISTRY: BRISBANE
NUMBER: 15269/22

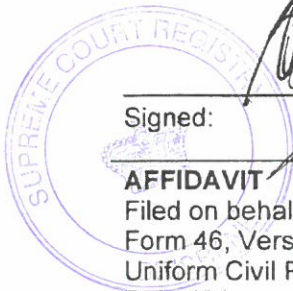
Applicant: **Geoffrey Graeme Heaton as Court
Appointed Trustee by Order dated 25
March 2022**
AND
Respondent: **Voyager Resort Ltd ACN 101 547
618, Alan Skelton & Ors**

AFFIDAVIT

I, **Bradley Vincent Hellen** of Level 10, 1 Eagle Street Brisbane in the State of Queensland, Chartered Accountant, solemnly and sincerely affirm and declare:

1. I refer to and rely upon my affidavit filed in Supreme Court proceeding 13638 of 2021, which is Court document 9 on that file (my "**Previous Affidavit**"). For the Court's convenience, exhibited hereto and marked "**BVH-1**" is a true copy of the same.
2. A current schedule of rates charged by Pilot Partners is exhibited hereto and marked "**BVH-2**".
3. Following the Orders of Justice Ryan on 25 March 2022 ("**Orders**"), the trustees for sale appointed under those Orders – Mr Geoffrey Heaton, Mr Geoffrey Walters and Ms Angela Julian-Armitage (collectively, "**Trustees**") have sought extensive accounting, taxation and professional advice from Pilot Partners.
4. Accordingly, I am familiar with the current activities of the Trustees, the status of their intentions and decisions and Voyager Resort Limited Ltd ACN 101 547 618 ("**Voyager**") generally.
5. I consent to this Honourable Court appointing me as a liquidator of Voyager.
6. If appointed, I am able, personally and by staff at Pilot Partners under my supervision, to conduct the winding up of Voyager and attend to distributing the net assets of Voyager in the manner directed by the Orders. I will progress these matters with as much expedition as the circumstances and care and diligence will reasonably allow.

- PAGE 1 -

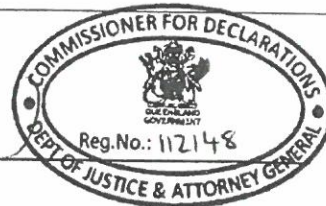


Signed:

AFFIDAVIT
Filed on behalf of the Applicant
Form 46, Version 1
Uniform Civil Procedure Rules 1999
Rule 431

Taken By:

MILLS OAKLEY
Level 23, 66 Eagle Street
BRISBANE QLD 4000
Phone No: +61 7 3228 0400
Fax No: +61 7 3012 8777
Ref: 9336914



7. If appointed as a liquidator of Voyager, I would perform my obligations with Nigel Markey, also of Pilot Partners, as a joint appointee.
8. I am informed by Mr Markey and genuinely believe that:
 - (a) He consents to this Honourable Court appointing him as liquidator of Voyager;
 - (b) He is aware of no conflict or other reason that should prevent his appointment or render his appointment inappropriate or undesirable; and
 - (c) If appointed, he is able, personally and by staff at Pilot Partners under his supervision to immediately commence work and progress that work with as much expedition as the circumstances and care and diligence will reasonably allow.
9. Both Mr Markey's and my curriculum vitae are currently identical to those exhibited to my Previous Affidavit – being exhibits BVH-1 and BVH-3.
10. All of the facts and circumstances herein deposed to are within my own knowledge save such as are deposed from information only and my means of knowledge and sources of information appear on the face of this my Affidavit.

AFFIRMED by **BRADLEY VINCENT HELLEN** on 16 March 2017 in the presence of:



Signature of **Bradley Vincent Hellen**,
Deponent

By signing this affidavit, the Deponent hereby declares that:

- (a) the contents of this affidavit are true; and
- (b) the Deponent understands that a person who provides a false matter in this affidavit commits an offence.




Solicitor / Justice of the Peace /
Commissioner for Declarations

SUPREME COURT OF QUEENSLAND

REGISTRY: BRISBANE
NUMBER: 13638/21

Applicant: **Geoffrey Graeme Heaton as Court
Appointed Trustee by Order dated 25
March 2022**

AND

Respondent: **Voyager Resort Ltd ACN 101 547
618, Alan Skelton & Ors**

CERTIFICATE OF EXHIBIT

Bound and marked "BVH-1" and "BVH-2" are the exhibits to the Affidavit of **VINCENT HELLEN** affirmed on 16 March 2023.

.....
Deponent

.....
Solicitor / Justice of the Peace /
Commissioner for Declarations



Name:

CERTIFICATE OF EXHIBIT

Filed on Behalf of the Respondent
Form 47, Version 2
Uniform Civil Procedure Rules 1999
Rule 435

Name: Mills Oakley
Address: Central Plaza Two
66 Eagle Street
Brisbane Qld 4000
Phone No: +61 7 3228 0400
Fax: +61 7 3012 8777
Email: agreenhalgh
@millsoakley.com.au

SUPREME COURT OF QUEENSLAND

REGISTRY: BRISBANE
NUMBER: 13638/21

Applicant: **Geoffrey Graeme Heaton as Court
Appointed Trustee by Order dated 25
March 2022**

AND

Respondent: **Voyager Resort Ltd ACN 101 547
618, Alan Skelton & Ors**

CERTIFICATE OF EXHIBIT

Bound and marked "BVH-1" and "BVH-2" are the exhibits to the affidavit of **BRADLEY VINCENT HELLEN** affirmed on 16 March 2023.

.....
Deponent

.....
Solicitor / Justice of the Peace
Commissioner for Declarations



Name:

CERTIFICATE OF EXHIBIT
Filed on Behalf of the Respondent
Form 47, Version 2
Uniform Civil Procedure Rules 1999
Rule 435

Name: Mills Oakley
Address: Central Plaza Two
66 Eagle Street
Brisbane Qld 4000
Phone No: +61 7 3228 0400
Fax: +61 7 3012 8777
Email: agreenhalgh
@millsOakley.com.au

"BVH-1"
SUPREME COURT OF QUEENSLAND

REGISTRY: BRISBANE
NUMBER: BS 13638/21

Applicant: VOYAGER RESORT LTD ACN 010 547 618

AND

Respondent: ALAN SKELTON AND ORS

AFFIDAVIT

I, Bradley Vincent Hellen of Level 10, 1 Eagle Street Brisbane in the State of Queensland, Chartered Accountant, solemnly and sincerely affirm and declare:

1. I am a partner of the incorporated firm of chartered accountants trading as Pilot Partners.
2. I am a:
 - (a) chartered accountant; and
 - (b) registered liquidator.
3. A true copy of my curriculum vitae is exhibited hereto and marked BVH-1. The contents of my curriculum vitae are true and correct, and complete in every particular.
4. I consent to this Honourable Court appointing me being appointed as statutory trustee for sale pursuant to the orders sought in the application. I know of no conflict or other reason that should prevent my appointment or render my appointment inappropriate or undesirable. If appointed, I am able, personally and by staff at Pilot Partners under my supervision, to immediately commence work and progress that work with as much expedition as the circumstances and care and diligence, will reasonably allow.
5. A schedule of rates charged by Pilot Partners is exhibited hereto and marked BVH-2. If appointed as statutory trustee for sale:
 - (a) work done by me and staff under my supervision would be charged at those hourly rates; and



Deponent

Page 1

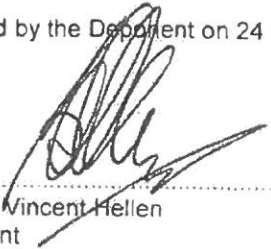
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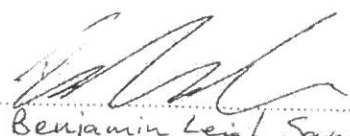
AFFIDAVIT
Filed on behalf of the Applicant
Form 46, Version 1
Uniform Civil Procedure Rules 1999
Rule 431

Mahoneys
Level 18, 167 Eagle Street
Brisbane Qld 4000
Tel: 07 3007 3777
Fax: 07 3007 3778
Ref: 25203

- (b) outlays would be charged at cost.
6. If appointed as statutory trustee for sale I would perform my obligations with Nigel Markey, also of Pilot Partners as my co-trustee.
7. Nigel Markey is a chartered accountant and registered liquidator.
8. I am informed by Mr Markey and honestly believe that:
- (a) he consents to this Honourable Court appointing him as statutory trustee for sale pursuant to the orders sought in the application;
 - (b) he is aware of no conflict or other reason that should prevent his appointment or render his appointment inappropriate or undesirable;
 - (c) if appointed, he is able, personally and by staff at Pilot Partners under his supervision to immediately commence work and progress that work with as much expedition as the circumstances and care and diligence will reasonably allow; and
 - (d) a copy of his curriculum vitae, which is true and correct, and complete in every particular, appears at exhibit BVH-3 to this affidavit.
9. All the facts and circumstances herein deposed to are within my own knowledge, save such as are deposed to from information only, and my means of knowledge and sources of information appear in this my affidavit.

Affirmed by the Deponent on 24 November 2021 at Brisbane in the presence of:


.....
Bradley Vincent Hellen
Deponent


.....
Name: Benjamin Leigh Sandford
Lawyer/Commissioner for Declarations/JP

SUPREME COURT OF QUEENSLAND

REGISTRY: BRISBANE
NUMBER: BS 13638/21

Applicant: VOYAGER RESORT LTD ACN 010 547 618


AND

Respondent: ALAN SKELTON AND ORS

CERTIFICATE OF EXHIBIT

Exhibit "BVH-1" to the affidavit of Bradley Vincent Hellen affirmed on 24 November 2021.


Bradley Vincent Hellen
Deponent


Name: Benjamin Leigh Sandford
Lawyer/Commissioner for Declarations/JP

CERTIFICATE OF EXHIBIT
Filed on behalf of the Applicant
Form 47, Version 2
Uniform Civil Procedure Rules 1999
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Level 18, 167 Eagle Street
Brisbane Qld 4000
Tel: 07 3007 3777
Fax: 07 3007 3778
Ref: 25203



CURRICULUM
VITAE

BRADLEY VINCENT HELLEN

Date of Birth | 19 March 1962

Business Address | Level 10, Waterfront Place
1 Eagle Street
BRISBANE QLD 4000

T | 61 7 3023 1300

F | 61 7 3229 7779

Professional Qualifications | Chartered Accountant (1986)
Registered Liquidator (1994)
Accredited Mediator (2016)

Membership of Professional Institutions and Positions Used | Fellow, Chartered Accountants Australia and New Zealand (1996)
Member of the Australian Restructuring Insolvency & Turnaround Association ("ARITA")

Past National Chairman and Queensland Representative on Public Practice Advisory Committee for Chartered Accountants Australia and New Zealand

Former co-presenter of the Public Practice Course for Chartered Accountants Australia and New Zealand for 10 years

Professional Academic Qualifications | Bachelor of Commerce (B.Comm) University of Queensland (1982)



Chartered Accountants Australia and New Zealand
Professional Year (1985)
Advanced Insolvency Course - Insolvency Practitioners
Association of Australia (1992)

Graduate Certificate in Financial Planning (2006)

Occupational Profile |
Jul 1995 to Present

Director

Pilot Partners Chartered Accountants
(formerly Calabro Partners)

Jul 1993 to Jul 1995

Partner

Duesburys, Chartered Accountants, Brisbane
Deloitte, Brisbane
(Practices merged in January 1994)

Jun 1987 to Jun 1993

Supervisor/Manager

Duesburys, Chartered Accountants, Brisbane
Corporate Reconstruction & Insolvency, Investigations,
Litigation Support/Forensic Accounting

Feb 1986 to May 1987

Accountant

Spicer & Pegler, Chartered Accountants, London
Audit, Corporate Reconstruction & Insolvency

Jan 1983 to Jan 1986

Accountant

Duesburys Chartered Accountants, Brisbane
Audit, General Accounting and Corporate Reconstruction &
Insolvency

Professional Profile |

During my career over 30+ years, I have gained experience in most areas of Accounting, predominantly in Audit, Corporate Restructuring and Insolvency and Forensic Accounting. I have provided advice based on instructions from lawyers, directors, companies, financiers, creditors, secured creditors, insurers, insolvency practitioners, the Chartered Accountants Australia and New Zealand, the Court and shareholders.

Formal corporate appointments

Formal corporate appointments that I have accepted include:

- Corporate Receiverships
- Court Appointed Receiverships
- Agent for the Mortgagee Appointments
- Voluntary Liquidations
- Voluntary Administrations
- Court Liquidations
- Provisional Liquidations
- Deeds of Company Arrangement
- Investigations

- Personal appointments** I have also accepted or worked extensively on **personal appointments** including:
- Bankruptcy
 - Part X Arrangements
 - Trustee Appointments by the Court:
 - Statutory Trustee Appointments
 - Court Appointed Administrator of Deceased Estates
 - Court Appointed Trustee of Trusts

Notable Statutory Trustee appointments I have been appointed **Statutory Trustee** for the purpose of sale of property on numerous occasions. Notable **Statutory Trustee appointments** include:

Nobby's Outlook Appointed by District Court of Queensland on 23 September 2015 jointly and severally as Statutory Trustee for the sale of property (Lot 122 On SP284713, known as "Nobby's Outlook") pursuant to s.38 of the Property Law Act 1974.

Nobby's Outlook was a 46 unit hotel located at Nobbys Beach on the Gold Coast. The appointment resulted from the Body Corporate seeking a court order to dissolve the Community Title Scheme, the only know appointment of its type in Queensland. The order also amalgamated all 46 titles into one.

My appointment involved the following tasks amongst others:

- Compliance with orders in relation to numerous aspects of the appointment;
- Consideration as to proposed marketing methods and timing;
- Appointing and liaising with marketing agents;
- Attending to the care and preservation of the property (80m frontage to beach - Over 7284m2 area), including control of body corporate administration and sinking funds;
- Communication with 59 owners and 16 different financiers on a range of issues arising (including negotiating with all financiers to consent and effectively release all mortgages/security interests prior to sale);
- Communicating with all tenants (including long term tenants and holiday rentals) to ensure we were able to offer vacant possession of the property;
- Distribution of 17 progress reports to stakeholders to ensure open and transparent sale and funds distribution process;
- Obtaining and liaising with property valuers to determine the market value of the property prior to sale;
- Realising the property by public auction as stipulated by the Court Order (achieved the highest price ever

achieved at auction in Queensland by Colliers International);

- Attending to the realisation and payment of Body Corporate assets and liabilities;
- Determination as to status and value of property;
- Applying to the Australian Tax Office to vary the Foreign Resident Capital Gains Withhold tax obligations, due to a number of owners being non-residents of Australia;
- Distribution of funds to all stakeholders after assessment of all claims against the body corporate (owners, financiers, creditors).

Club Esplanade

Appointed by the Supreme Court of Queensland on 4 February 2003 jointly and severally as Statutory Trustee for the sale of property (situated at 116 The Esplanade, Surfers Paradise Queensland, known as "Club Esplanade") pursuant to Section 38. of the Property Law Act 1974.

Club Esplanade was a 10 Lot, time share resort/property located at Surfers Paradise on the Gold Coast. Each time share entitlement had a separate certificate of title reference, in all there were 367 separate title references.

A contract of sale had been negotiated on behalf of a number of owners and the trustees were requested to execute the contract.

The trustees made an application to Court in relation to how the net proceeds on sale were to be distributed and what proportion of the proceeds were to be distributed to the various owners given the time share rights they previously held.

My appointment involved the following tasks amongst others:

- Compliance with orders in relation to numerous aspects of the appointment;
- Consideration as to proposed marketing methods and timing;
- Communication with stakeholders;
- Distribution of progress reports to stakeholders to ensure open and transparent process;
- Obtaining and liaising with property valuers to determine the market value of the property prior to sale;
- Determination as to status and value of property;
- Calculation of entitlements;
- Distribution of funds to all stakeholders after assessment of all claims.

In addition to formal appointments, I have carried out various **instructions of a more informal nature** including:

- pre-lending reviews;
- evaluation of security position;
- compliance audits;
- investigations into financial position;
- feasibility assessments; and
- due diligence.

Forensic Accounting assignments that I have carried out include investigations, provision of expert opinions, acting as an expert witness, attending mediation conferences, provision of reports to the police and other assistance in various commercial matters such as:

- timing of insolvency;
- reconstruction of books and records, and financial statements;
- business valuations;
- assessment of value of shares or interests in entities;
- loss of profits and economic loss assessments;
- damages claims;
- appointment as independent accountant to assess claims by parties to assets;
- detection of fraudulent activities by company directors and employees;
- seizure of assets and investigation into activities associated with proceeds of crime;
- acting as trustee and receiver and manager;
- appointed by the Court in order to preserve assets and carry out investigations;
- coordinating marketing activities and negotiating with relevant parties for the purposes of selling businesses and offering remote businesses to the public for lease, by tender, public auction or private treaty;
- appointment as arbitrator;
- appointments as director;
- expert advisor to resolve disputes; and
- appointment under deed to undertake specific tasks as a result of dispute.

Forensic assignments have included provision of expert evidence in The Supreme Court, The Federal Court, The District Court, The Magistrates Court, The Retail Shop Leases Tribunal, Administrative Appeals Tribunal, Commercial and Consumer Tribunal (Buildings List and Architects List), Coroner's Enquiry and The Family Court. I have also provided reports to various Courts pursuant to Orders.

My experience includes providing risk advice; advising on acquisitions, disposals, IPOs, exit planning and business reviews; trading on the business activities; carrying out investigations, and closing down and/or sale of the assets/operations of many types of entities, from small businesses to large corporations.

My assignments have included but are not limited to **exposure to the following industries:**

- agriculture (cattle stations and dairy operations, abattoir and meat manufacturing, fruit and vegetable growing and marketing);
- banking, finance and insurance;
- body corporate and strata management;
- building and construction (residential and commercial);
- education (child care centres etc.);
- excavation, landscaping and civil contractors;
- fishing and seafood;
- health services;
- hospitality (resorts, hotels, motels, caravan parks, backpacker accommodation, nightclubs, live music venues, restaurants and cafes);
- IT industry (software development, marketing and distribution, and call centres);
- manufacturing and distribution (paint, confectionery, plumbing supplies, sheds, small goods, bottled water, electrical transformers);
- mining services (coal, gold, other, prospecting, quarrying);
- motor vehicle industry (dealership parts, machinery and tyre dealerships, importation and compliance);
- property development;
- real estate;
- retail (clothing, music, giftware, toys, bakeries, chemists, leather goods etc.);
- sports and other clubs (football, RSL, golf courses etc.);
- tourism (travel agents and wholesalers, pleasure boat manufacture and sales);
- transport;
- textiles industry (import and sales); and
- waste disposal and recycling.

SUPREME COURT OF QUEENSLAND

REGISTRY: BRISBANE
NUMBER: BS 13638/21

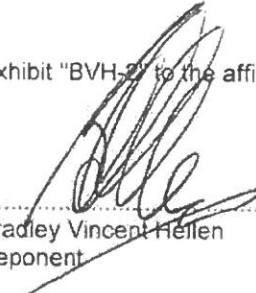
Applicant: **VOYAGER RESORT LTD ACN 010 547 618**


AND

Respondent: **ALAN SKELTON AND ORS**

CERTIFICATE OF EXHIBIT

Exhibit "BVH-2" to the affidavit of Bradley Vincent Hellen affirmed on 24 November 2021.


.....
Bradley Vincent Hellen
Deponent


.....
Name: Benjamin Leight Sandford
Lawyer/Commissioner for Declarations/JP

CERTIFICATE OF EXHIBIT
Filed on behalf of the Applicant
Form 47, Version 2
Uniform Civil Procedure Rules 1999
Rule 435

Mahoneys
Level 18, 167 Eagle Street
Brisbane Qld 4000
Tel: 07 3007 3777
Fax: 07 3007 3778
Ref: 25203



Pilot Partners Hourly Firm Rates

We have summarised below the rates we, our partners and staff charge:

Description of Staff Member	Description of Level of Experience	Rate \$/Hour (Excl GST) Effective 1 March 2021
Appointee / Director	Liquidator/Trustee leading the assignment with full responsibility for strategy and execution. Director of Pilot bringing his or her specialist skills to the administration.	590
Associate Director	More than 10 years of experience in insolvency or a related discipline and at least 7 years at manager level. Accountable to the Appointee but otherwise capable of controlling all aspects of an administration. May be appropriately qualified to take appointments in his/her own right.	475
Senior Manager	More than 10 years of experience in insolvency or a related discipline and at least 5 years at manager level. Accountable to the Appointee but otherwise capable of controlling all aspects of an administration. May be appropriately qualified to take appointments in his/her own right.	450
Manager 1	More than 7 years experience in insolvency or a related discipline. Generally will have completed the ARITA Insolvency Education Program. Will have conduct of small to large administrations and is experienced in managing staff and workflow.	430
Manager 2	More than 5 years experience in insolvency or a related discipline. Generally will have completed the ARITA Insolvency Education Program. Will have conduct of small to large administrations and is experienced in managing staff and workflow.	370
Supervisor	More than 4 years experience in insolvency or a related discipline. Generally will be CA qualified and will be undertaking the ARITA Insolvency Education Program. Will have conduct of minor administrations and capable of managing 1-3 staff and workflow. Assists in planning and control of medium to larger jobs.	320
Senior 1	More than 3 years experience in insolvency or a related discipline. Generally the CA program will be completed during this period. Assists planning and control of small to medium sized jobs as well as performing some of the more difficult work on larger jobs.	300
Senior 2	More than 2 years experience in insolvency or a related discipline. Generally the CA program will be undertaken during this period. Assists planning and control of small jobs as well as performing some of the more difficult work on larger jobs.	270
Intermediate	More than 1 years experience in insolvency or a related discipline. Generally the CA program will be being undertaken during this period. Assists in day-to-day work under supervision of more senior staff.	250
Accountant	Generally a Graduate with limited or no professional or insolvency experience. Generally the CA program will be commenced in this period. Assists in day-to-day work under supervision of more senior staff.	230
Undergraduate	Generally an undergraduate who plans to undertake relevant study at least on a part-time basis. Assists in day-to-day work under supervision of more senior staff.	200
Administrator	Appropriately experienced support staff undertaking functions such as IT support, secretarial support, use of computer applications, books and records management and maintaining banking and accounting records on administrations.	175
Junior	Appropriately experienced support staff undertaking functions such as secretarial support.	110

The hourly rates used by us and the partners and staff of Pilot Partners reflect our own particular cost structure, the risks associated with the work undertaken and the type of administration being carried on by us. Our scale of hourly rates recognise the nature of the work, the extent and urgency of the work, the degree of skill required and the degree of responsibility undertaken.

Our firm rates change from time to time (usually annually) to reflect increased costs of operating.

SUPREME COURT OF QUEENSLAND

REGISTRY: BRISBANE
NUMBER: BS 13638/21

Applicant: VOYAGER RESORT LTD ACN 010 547 618

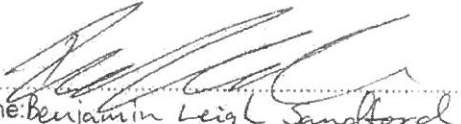
AND

Respondent: ALAN SKELTON AND ORS

CERTIFICATE OF EXHIBIT

Exhibit "BVH-3" to the affidavit of Bradley Vincent Hellen affirmed on 24 November 2021.


.....
Bradley Vincent Hellen
Deponent


.....
Name: Benjamin Leigh Sandford
Lawyer/Commissioner for Declarations/JP

CERTIFICATE OF EXHIBIT
Filed on behalf of the Applicant
Form 47, Version 2
Uniform Civil Procedure Rules 1999
Rule 435

Mahoneys
Level 18, 167 Eagle Street
Brisbane Qld 4000
Tel: 07 3007 3777
Fax: 07 3007 3778
Ref: 25203

CURRICULUM VITAE

NIGEL ROBERT MARKEY

DATE OF BIRTH 30 June 1969

BUSINESS ADDRESS Level 10, Waterfront Place
1 Eagle Street
BRISBANE QLD 4000

T (07) 3023 1300

F (07) 3229 1227

Email: nmarkey@pilotpartners.com.au

PROFESSIONAL QUALIFICATIONS

Chartered Accountant (1994)
Registered Liquidator (August 2001)
Official Liquidator (July 2005)

MEMBERSHIP OF PROFESSIONAL INSTITUTIONS

Fellow of Chartered Accountants Australia and New Zealand
Member of the Australian Restructuring Insolvency &
Turnaround Association ("ARITA")
Member of the Turnaround Management Association Australia

PROFESSIONAL ACADEMIC QUALIFICATIONS

Bachelor of Business (Queensland University of Technology)
Institute of Chartered Accountants Australia and New Zealand
- Professional Year (1994)
Advanced Insolvency Law and Practice - ARITA (formerly
Insolvency Practitioners Association of Australia) (1999)

OCCUPATIONAL PROFILE

April 2010 to Present

Director
Pilot Partners Chartered Accountants

February 1997 to March 2010

Manager
Pilot Partners Chartered Accountants
(formerly Calabro Partners)

- June 1996 to November 1996 **Financial Consultant**
JP Morgan, London
Global Equity Derivatives
- August 1995 to May 1996 **Management Accountant**
Andersen Consulting, London
- January 1990 to April 1995 **Senior Supervisor**
Deloitte Touche Tohmatsu Reconstruction and
Insolvency, Corporate Advisory

CAREER AND
PROFESSIONAL
EXPERIENCE

- February 1997 to present **PILOT PARTNERS
CHARTERED ACCOUNTANTS**
Position: Director

Group Role & Responsibilities:

Overseeing the day to day administration of the firm's Business Restructuring division as well as undertaking forensic accounting assignments.

Formal insolvency appointments that I have accepted include:

- Corporate Receivership
- Court Appointed Receivership
- Voluntary Liquidation
- Court Liquidation
- Voluntary Administration
- Deeds of Company Arrangement

In addition I have undertaken assignments in the following areas:

- Court appointment as Statutory Trustee for sale of property
- detailed pre-lending business reviews & corporate investigations on behalf of financiers & lenders
- organisation and preparation of business sales including tenders and marketing campaigns
- assisting secured creditors with security reviews and assessing businesses
- financial analysis and modeling
- preparation of reports on business interruption and loss claims
- preparation of business valuations
- investigations into the affairs of businesses, in particular:
 - review and analysis of management/financial accounts
 - loss of profit reviews
 - timing of insolvency

- voidable transactions
- Directors Loan accounts
- transactions with related entities
- reporting of statutory offences and compliance under the Corporations Act
- preparation of budgets and cashflows to determine business viability
- assessment of management and their overall strategies

June 1996 to
November 1996

JP MORGAN, London

Position: Financial Consultant
Financial Control Group,
Global Equity Derivatives

Role & Responsibilities:

The aim of the control group is to provide a quality control function for both the global swaps group and the financial division as well as training those departments on correct procedure at source.

August 1995 to
May 1996

ANDERSEN CONSULTING, London

Position: Management Accountant
Finance Division

Role & Responsibilities:

Production of monthly accrual based management accounts including detailed analytical reporting on major client projects.

January 1990 to
April 1995

DELOITTE TOUCHE TOHMATSU, Brisbane

Position: Senior Supervisor

Role & Responsibilities:

Primarily involved in the Reconstruction and Insolvency Division undertaking trade on Receivership's however periodically seconded to the firms Corporate Advisory Division to undertake special projects such as pre-lending reviews and due-diligence assignments. Insolvency Administrations undertaken include Receivership, Liquidation, Voluntary Liquidation, Bankruptcy and Voluntary Administrations.

"BVH-2"

Pilot Partners Hourly Firm Rates

We have summarised below the rates we, our partners and staff charge:

Description of Staff Member	Description of Level of Experience	Rate \$/Hour (Excl GST) Effective 1 March 2023
Appointee / Director	Liquidator/Trustee leading the assignment with full responsibility for strategy and execution. Director of Pilot bringing his or her specialist skills to the administration.	670
Associate Director	More than 10 years of experience in insolvency or a related discipline and at least 7 years at manager level. Accountable to the Appointee but otherwise capable of controlling all aspects of an administration. May be appropriately qualified to take appointments in his/her own right.	550
Senior Manager	More than 10 years of experience in insolvency or a related discipline and at least 5 years at manager level. Accountable to the Appointee but otherwise capable of controlling all aspects of an administration. May be appropriately qualified to take appointments in his/her own right.	450
Manager 1	More than 7 years experience in insolvency or a related discipline. Generally will have completed the ARITA Insolvency Education Program. Will have conduct of small to large administrations and is experienced in managing staff and workflow.	430
Manager 2	More than 5 years experience in insolvency or a related discipline. Generally will have completed the ARITA Insolvency Education Program. Will have conduct of small to large administrations and is experienced in managing staff and workflow.	370
Supervisor	More than 4 years experience in insolvency or a related discipline. Generally will be CA qualified and will be undertaking the ARITA Insolvency Education Program. Will have conduct of minor administrations and capable of managing 1-3 staff and workflow. Assists in planning and control of medium to larger jobs.	320
Senior 1	More than 3 years experience in insolvency or a related discipline. Generally the CA program will be completed during this period. Assists planning and control of small to medium sized jobs as well as performing some of the more difficult work on larger jobs.	300
Senior 2	More than 2 years experience in insolvency or a related discipline. Generally the CA program will be undertaken during this period. Assists planning and control of small jobs as well as performing some of the more difficult work on larger jobs.	270
Intermediate	More than 1 years experience in insolvency or a related discipline. Generally the CA program will be being undertaken during this period. Assists in day-to-day work under supervision of more senior staff.	250
Accountant	Generally a Graduate with limited or no professional or insolvency experience. Generally the CA program will be commenced in this period. Assists in day-to-day work under supervision of more senior staff.	230
Undergraduate	Generally an undergraduate who plans to undertake relevant study at least on a part-time basis. Assists in day-to-day work under supervision of more senior staff.	200
Administrator	Appropriately experienced support staff undertaking functions such as IT support, secretarial support, use of computer applications, books and records management and maintaining banking and accounting records on administrations.	180
Junior	Appropriately experienced support staff undertaking functions such as secretarial support.	110

The hourly rates used by us and the partners and staff of Pilot Partners reflect our own particular cost structure, the risks associated with the work undertaken and the type of administration being carried on by us. Our scale of hourly rates recognise the nature of the work, the extent and urgency of the work, the degree of skill required and the degree of responsibility undertaken.

Our firm rates change from time to time (usually annually) to reflect increased costs of operating.