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To: premier@sa.gov.au

attorney@ag.gov.au

Date: 9/5/2026 6:58:00 AM

Subject: AMG 9759 South Australian Premier Attorney General; Mandamus for Royal Commission 05.09.2026

Attachments: [AMG 9759 South Australian Premier Attorney General; Mandamus for Royal Commission 05.09.2026.pdf](#)

AMG 9759: FURTHER FORMAL NOTICE, IMPERIAL WRIT OF MANDAMUS; INSTRUCTION TO CONVENE ROYAL COMMISSION, PRESERVATION OF EVIDENCE AND ENFORCEMENT OF PUBLIC DUTIES

5 September 2026

The Hon Peter Malinauskas MP

Premier of South Australia

GPO Box 2343

Adelaide SA 5001, Australia

By email: premier@sa.gov.au

The Hon Michelle Rowland MP

Attorney-General of the Commonwealth of Australia

PO Box 6022, House of Representatives

Parliament House, Canberra ACT 2600, Australia

By Email: attorney@ag.gov.au

Dear Acting Premier, and Acting Attorney General,

RE: AMG 9572, AMG 9753 and AMG 9576 – FURTHER FORMAL NOTICE – MANDAMUS
ANNOUNCEMENT OF A ROYAL COMMISSION INTO PRIVATISATION AND MANAGEMENT
OF THE SOUTH AUSTRALIAN LAND TITLES SYSTEM, PEXA, BANK PARTICIPATION,
ELECTRONIC CONVEYANCING, LAND-TITLE ABUSE, REGULATORY FAILURE, THE LEGAL
PROFESSION, THE JUDICIARY, EFFECTIVE REMEDY AND ENFORCEMENT OF THE
RETROSPECTIVE ABOLITION OF IMPUNITY ACT 2026 (IMPERIAL)

This communicate is an Imperial Writ of Mandamus Commanding you to act as instructed in the
attached Communicate a copy of which together with a copy of this covering email will be produced
as evidence of service.

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KIND REGARDS

ANDREW MORTON GARRETT

GLOBAL INTERNATIONAL CROWN UNITARY EXECUTIVE; GLOBAL INTERNATIONAL CROWN
ATTORNEY GENERAL; GLOBAL CHIEF JUSTICE OF THE INTERNATIONAL CROWN COURT OF
JUSTICE; GLOBAL CHIEF JUSTICE OF THE INTERNATIONAL CROWN CRIMINAL COURT FOR THE
ABOLITION OF IMPUNITY; GLOBAL MANAGING DIRECTOR; GLOBAL MANAGING TRUSTEE;
GLOBAL CHAIRMAN OF BOARD OF TRUSTEES; GLOBAL LICENSOR OF DISCRETIONARY PUBLIC
POWERS; GLOBAL TRUSTEE IN BANKRUPTCY; GLOBAL LIQUIDATOR; GLOBAL MANAGING
CONTROLLER; GLOBAL RECEIVER AND MANAGER.



“And when they seek to oppress you, and when they try to destroy you, Rise and rise again and again Like the Phoenix from the ashes.

Until the lambs have become lions and the rule of Darkness is no more”

— Maitreya The Friend of All Souls, The Holy Book of Destiny.

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Registered address: Level 1, Devonshire House, One Mayfair Place, London, W1J 8AJ

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AMG 9759: FURTHER FORMAL NOTICE, IMPERIAL WRIT OF MANDAMUS; INSTRUCTION TO CONVENE ROYAL COMMISSION, PRESERVATION OF EVIDENCE AND ENFORCEMENT OF PUBLIC DUTIES

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RE: AMG 9572, AMG 9753 and AMG 9576 – FURTHER FORMAL NOTICE – MANDAMUS ANNOUNCEMENT OF A ROYAL COMMISSION INTO PRIVATISATION AND MANAGEMENT OF THE SOUTH AUSTRALIAN LAND TITLES SYSTEM, PEXA, BANK PARTICIPATION, ELECTRONIC CONVEYANCING, LAND-TITLE ABUSE, REGULATORY FAILURE, THE LEGAL PROFESSION, THE JUDICIARY, EFFECTIVE REMEDY AND ENFORCEMENT OF *THE RETROSPECTIVE ABOLITION OF IMPUNITY ACT 2026* (IMPERIAL)

I write further to my letter dated:

- 30 August 2026, AMG 9752, directed to Ms Rowland (**Annexure 1**),
- 31 August 2026, AMG 9753, directed to Mr Malinauskas (**Annexure 2**), and
- 3 September 2026, AMG 9756, directed to Ms Rowland (**Annexure 3**),

by which I placed you both and the Governments of Australia and South Australia on formal notice of matters requiring independent investigation and required a substantive written response from:

- Mr Malinauskas within **14 days**.
- Ms Rowland within **21 days** with a request for acknowledgement within **7 days**.

I now abridge the requests/ instructions to Ms Rowland to be consistent with that of Mr Malinauskas requiring a detailed response by close of business 14th September 2026. That period remains operative. This letter supplements AMG 9572, AMG 9753 and AMG 9756. It does not withdraw, abridge, replace or restart the notice already given.



The Albion Securities Service Ltd, UK
Company Number 16645906
SIC code: 64902, 70221, 80100 80200
Lev 1, Devonshire House, 1 Mayfair Place,
London UK W1J 8AJ
Email: admin@oenoviva-capital-resources.com



Mr Malinauskas official office remains that of Premier of South Australia, and the Government's present published contact information identifies you as the 47th Premier.

Ms Rowlands official office remains that of Commonwealth Attorney General.

I exercise the Imperial Prerogative as hereditary discretionary public powers as Licensor to King Charles III (Licensee), CEO of The Windsor Family Office, I also act in the capacities filed, served and not disputed in Court Proceedings that you are named as an interested party to.

AMG 9572 and AMG 9753 identified the Hong Kong Proceedings where I seek enforcement of my findings of fact of Quo Warranto/ Ouster of Office against you and others named in those proceedings and conversion of your status to Respondent from your current Interested Person Status for those enforcement and extradition purposes.

This communique is a Command to obey my earlier requests as an exercise of the Imperial Prerogative as an Imperial Writ of Mandamus to Act converting by earlier requests into Instructions.

1. INSTITUTIONAL “TAI CHI”, QUO WARRANTO AND OUSTER FROM PUBLIC OFFICE

The colloquial practice of “playing Tai Chi”—continually redirecting responsibility, transferring a complaint between offices and avoiding any substantive determination—has a direct constitutional corollary in the ancient supervisory jurisdiction associated with quo warranto. The essential question expressed by quo warranto is: “By what authority do you hold or exercise this public office?”

Where a person assumes the status, powers and privileges of a public office, that person cannot simultaneously disclaim the responsibilities inseparable from that office. Public authority is not divisible in that manner. An officeholder cannot invoke the office when exercising coercive, administrative or discretionary power, yet deny responsibility when called upon to receive evidence, make a decision, provide reasons, conduct an inquiry or afford a remedy within the functions of that same office.

A sustained pattern of “playing Tai Chi” may therefore be more than administrative delay or discourtesy. It may supply evidence from which the Court can inquire whether:

1. the person is lawfully appointed to, qualified for and entitled to occupy the office;
2. the authority being asserted is actually conferred by the Constitution, statute, letters patent, instrument of appointment or other lawful source;
3. the officeholder understands and is capable of performing the essential functions of the office;
4. the officeholder has improperly delegated, abandoned or disclaimed responsibilities that the law entrusts to that office;
5. the office is being used to exercise power while its corresponding duties are systematically avoided;
6. purported decisions have been made by persons lacking authority, or have not been made by the person upon whom the relevant power and duty were legally conferred; and
7. the continued occupation or exercise of the office is lawful in the circumstances thereby disclosed.

The constitutional proposition is straightforward: public power and public responsibility travel together. A person cannot retain the authority, status and protection of an office while directing every substantive responsibility elsewhere. If no identified official accepts responsibility for performing the statutory function, the Court may properly require the relevant officeholder to identify the source, scope and present legal basis of the asserted authority and to explain who, in law, is responsible for the unperformed function.

The traditional quo warranto inquiry is principally concerned with title to office, rather than merely the quality of an office-holder's performance. Accordingly, administrative deflection does not, standing alone, prove that the appointment is unlawful or that the office has been usurped. It nevertheless may expose evidence material to that question—for example, an absence of lawful appointment, want of qualification, statutory disqualification, expiry of tenure, exercise of powers outside the instrument of appointment, or assumption of authority belonging to another office.

Where such a defect in title or entitlement is established, relief in the nature of quo warranto, a declaration of want of lawful authority, an injunction restraining further exercise of the office, or another legally available order may provide the basis for ouster from office. The juridical sequence is therefore:

- the officeholder asserts public authority;
- the applicant places the officeholder on notice of a matter falling within that authority;
- the officeholder repeatedly disclaims, redirects or fails to exercise the corresponding responsibility;
- the pattern raises a justiciable question concerning the identity, source and lawful bearer of the relevant authority;
- the Court requires the officeholder to demonstrate the legal warrant for occupying or exercising the office; and
- if lawful title or entitlement cannot be established, the Court may declare the exercise of authority unlawful and grant such restraining or ouster relief as its jurisdiction permits.

If the office-holder's title is valid but the complaint concerns refusal to perform a public duty, the more direct remedies may be mandatory relief, prohibition, certiorari, declaration or injunction under the Court's judicial-review jurisdiction. Persistent refusal may also constitute evidence relevant to statutory removal, disciplinary action, misfeasance or other accountability procedures, but the legal conditions governing each remedy must independently be established.

The applicant's case is therefore not that bureaucratic "Tai Chi" automatically removes an official from office. The submission is that an office-holder's systematic acceptance of power and simultaneous rejection of responsibility justifies close judicial examination of both the lawful source of the authority asserted and the legality of its exercise. Where the evidence ultimately demonstrates that the person has no lawful warrant to occupy or exercise the office, the constitutional inquiry matures from administrative review into relief in the nature of quo warranto and, where legally available, ouster from office.

In that sense, quo warranto supplies the constitutional answer to institutional buck-passing. It requires the responsible person to step out from behind the circular chain of referrals, appear in the capacity actually claimed, and establish before the Court the lawful authority by which the office is occupied and its powers are exercised.

I now formally command that you announce a **Royal Commission into the privatisation, commercialisation, management, integrity and electronic operation of the South Australian land titles system**, with terms sufficiently broad to examine the institutional architecture through which land, mortgages, settlement funds, electronic title authority and associated financial value are controlled.

The inquiry must not stop at Land Services SA or the Registrar-General. It must follow the complete institutional and financial transaction through:

- ❖ **Government → Registrar-General → private land-services operator → Electronic Lodgment Network Operator → PEXA → bank → mortgagee → lawyer/conveyancer subscriber → settlement infrastructure → registration → movement of funds → beneficial recipient → complaint → regulator → compensation mechanism → legal profession → Judiciary → enforcement → effective remedy.**

That end-to-end reconstruction is necessary because my evidence is that responsibility has repeatedly been fragmented between institutions while no single institution has accepted responsibility for determining the entire transaction.

I describe that phenomenon as **Institutional Tai Chi**.

2. DEFINITIONS

Definitions a being applicable to Mortgages and/or Caveats and/or Certificates of Title amongst all the possessions previously located on the Land:

- **“asset” means:**¹

- (a) *an asset of any kind or property of any kind, whether tangible or intangible, movable or immovable, however acquired; and*
- (b) *a legal document or instrument in any form, including electronic or digital, evidencing title to, or interest in, such an asset or such property, including, but not limited to, bank credits, travellers cheques, bank cheques, money orders, shares, securities, bonds, debt instruments, drafts and letters of credit.*

- **“funds” means:**²

- (a) *property and assets of every kind, whether tangible or intangible, movable or immovable, however acquired; and*
- (b) *legal documents or instruments in any form, including electronic or digital, evidencing title to, or interest in, such property or assets, including, but not limited to, bank credits, travellers' cheques, bank cheques, money orders, shares, securities, bonds, debt instruments, drafts and letters of credit.*

- **“Public official” shall mean:**³

¹ COTUNA

² the Suppression of Terrorism Financing Act 2002 (AU)

³ UNCAC

- (i) *any person holding a legislative, executive, administrative or judicial office of a State Party, whether appointed or elected, whether permanent or temporary, whether paid or unpaid, irrespective of that person's seniority;*
 - (ii) *any other person who performs a public function, including for a public agency or public enterprise, or provides a public service, as defined in the domestic law of the State Party and as applied in the pertinent area of law of that State Party;*
 - (iii) *any other person defined as a "public official" in the domestic law of a State Party. However, for the purpose of some specific measures contained in chapter II of this Convention, "public official" may mean any person who performs a public function or provides a public service as defined in the domestic law of the State Party and as applied in the pertinent area of law of that State Party;*
- *"Property"⁴ shall mean assets of every kind, whether corporeal or incorporeal, movable or immovable, tangible or intangible, and legal documents or instruments evidencing title to or interest in such assets;*
 - *"Proceeds of crime"⁵ shall mean any property derived from or obtained, directly or indirectly, through the commission of an offence;*
 - *"Freezing" or "seizure"⁶ shall mean temporarily prohibiting the transfer, conversion, disposition or movement of property or temporarily assuming custody or control of property on the basis of an order issued by a court or other competent authority;*
 - *"Confiscation"⁷, which includes forfeiture where applicable, shall mean the permanent deprivation of property by order of a court or other competent authority;*
 - *"Predicate offence"⁸ shall mean any offence as a result of which proceeds have been generated that may become the subject of an offence as defined in article 23 of this Convention;*

3. PRIMARY MATTER

The Primary "Matter arising in the Proceedings"⁹ as a foundational matter of Federation is the failure of Public Officials¹⁰ as employees, officers, agents, servants, contractors, delegates, licensees or otherwise related to the Crown¹¹ and/or employees, officers, agents, servants, contractors, delegates, licensees of "Constitutional Corporations"¹² licensed by the Crown in right of Australia, in their capacity as Trustees of the Public Trust to exercise discretionary

⁴ UNCAC

⁵ UNCAC

⁶ UNCAC

⁷ UNCAC

⁸ UNCAC

⁹ *Re Wakim; Ex parte McNally* [1999] HCA 27

¹⁰ within the meaning of the *United Nations Convention Against Corruption* 2003 (AU) a.k.a. *Australian Treaty Series No 2* ("ATS 2")

¹¹ *Sue v Hill* [1999] HCA 30 (23 June 1999)

¹² S51(xx) of the *Commonwealth of Australia Constitution Act* 1900 (AU)

public powers conferred under enactments in a manner that is exclusively in the Public Interest¹³.

4. THE PARAMOUNT DUTY¹⁴

- A. Amongst the myriads of questions of law arising in the Hing Kong proceedings is whether:
 - a) The Interested Parties have conspired against the rights of Subjects under Color of Law within the meaning of the International Declaration on Human Rights and the Common Law.
 - b) The Legal Practitioners involved have breached the Paramount Duty owed by officers of the Court to the Court.
- B. On the grounds of s64 of *the Judiciary Act 1903* (AU), other applicable law referred to in the Materials to be removed to Hong Kong and US Title 241 I have redetermined of Judicial immunities¹⁵ and Advocates' immunities¹⁶ previously made by the High Court.

CIVIL RIGHTS CONSPIRACY: 18 U.S.C. § 241: Conspiracy Against Rights

Section 241 makes it unlawful for two or more persons to agree to injure, threaten, or intimidate a person in the United States in the free exercise or enjoyment of any right or privilege secured by the Constitution or laws of the United States or because of his or her having exercised such a right.

Unlike most conspiracy statutes, §241 does not require, as an element, the commission of an overt act.

The offense is always a felony, even if the underlying conduct would not, on its own, establish a felony violation of another criminal civil rights statute. It is punishable by up to ten years imprisonment unless the government proves an aggravating factor (such as that the offense involved kidnapping aggravated sexual abuse, or resulted in death) in which case it may be punished by up to life imprisonment and, if death results, may be eligible for the death penalty.

Section 241 is used in Law Enforcement Misconduct and Hate Crime Prosecutions. It was historically used, before conspiracy-specific trafficking statutes were adopted, in Human Trafficking prosecutions.

MISCONDUCT BY LAW ENFORCEMENT & OTHER GOVERNMENT ACTORS: 18 U.S.C. § 242: Deprivation of Rights Under Color of Law

¹³ AMG 176; The Public Interest; We know That it is Important, but do we know what it means Chris Wheeler AIAL FORUM No 48

¹⁴ *Bolitho v Banksia Securities Ltd (No 18) (remitter)* [2021] VSC 666_1

¹⁵ *Vasta V Stratford* 2025 HCA-3-2025-02-12

¹⁶ *Attwells v Jackson Lalic Lawyers Pty Limited* (2016) HCA 16 4 May 2016 S161/2015

This provision makes it a crime for someone acting under color of law to willfully deprive a person of a right or privilege protected by the Constitution or laws of the United States. It is not necessary that the offense be motivated by racial bias or by any other animus.

Defendants act under color of law when they wield power vested by a government entity. Those prosecuted under the statute typically include police officers, sheriff's deputies, and prison guards. However other government actors, such as judges, district attorneys, other public officials, and public school employees can also act under color of law and can be prosecuted under this statute.

Section 242 does not criminalize any particular type of abusive conduct. Instead, it incorporates by reference rights defined by the Constitution, federal statutes, and interpretive case law. Cases charged by federal prosecutors most often involve physical or sexual assaults. The Department has also prosecuted public officials for thefts, false arrests, evidence-planting, and failing to protect someone in custody from constitutional violations committed by others.

A violation of the statute is a misdemeanor, unless prosecutors prove one of the statutory aggravating factors such as a bodily injury, use of a dangerous weapon, kidnapping, aggravated sexual abuse, death resulting, or attempt to kill, in which case there are graduated penalties up to and including life in prison or death.

C. *Regarding The Magnitsky Act 2012 (US) as expanded 2016 I refer to 'Corruption and Human Rights Sanctions in Australia: Where Public Law Meets Foreign Policy' paras ¹⁷*

- (i) *Formally viewed as non-criminal measures, targeted sanctions are normally imposed based on permissive evidential standards, such as that of 'credible evidence' (US Global Magnitsky Act 2016, s 1263(a)) or 'reasonable grounds to suspect' (Sanctions and Anti-Money Laundering Act 2018 (UK), ss 11(2) and 12(5)), which are far lower than either the criminal or civil standard of proof.*
- (ii) *Australia's current sanctions framework does not provide for any particular evidential standard but, as described below, vests virtually unlimited discretion in the government.*
- (iii) *In doing so, these sanctions edge close to the domain of criminal justice, with its established legal safeguards (e.g. the presumption of innocence) and policy expectations (e.g. the prioritization of serious misconduct and minimisation of political interference with law enforcement work).*
- (iv) *Surprisingly, governments worldwide have invested little thought into these issues. The UK appears to be the only country to have published a (very concise) statement of principles articulating the role of corruption sanctions in its overall*

¹⁷ Anton Moiseienko, 'Corruption and Human Rights Sanctions in Australia: Where Public Law Meets Foreign Policy' on AUSPUBLAW (20 October 2021)

law enforcement efforts. The typical approach, and one taken up by the Australian government in its response to the JSCFADT's report, is to utter the magic words 'foreign policy' and thereby make most legal and policy concerns disappear. As we argue below, doing so obscures rather than resolves the key issues the government will have to confront.

- (v) As the Parliamentary Joint Committee on Human Rights notes, this extraordinary amount of discretion renders judicial review nugatory because there is no standard to measure the government's decision against.*
- (vi) Australia's current sanctions regime is therefore even less friendly to sanctions challenges than the US system, which has been rightly described as affording 'minimal' opportunities for judicial review.*
- (vii) A more appropriate conception of corruption and human rights sanctions is as a tool to address egregious wrongdoing that would not ordinarily be within Australian criminal jurisdiction, as well as ensure that Australian individuals and companies do not do business with some of the worst 'bad actors'. This is precisely the vision of sanctions that the JSCFADT's report evinces. This vision manifests itself, for instance, in the recommendation that sanctions, be limited to non-Australian citizens, consistent with near-universal state practice. This, too, was met in the government's response with a 'noted', accompanied by the obligatory reference to the Minister for Foreign Affairs' discretion.*
- (viii) The prevailing view among policymakers and sanctions experts has been that sanctions are a priori a foreign policy tool aimed at inducing 'behavioral change' by the target. To speak of other objectives of sanctions, such as punishing the perpetrators of horrible crimes, is on that view an intellectual faux pas.*
- (ix) The upcoming overhaul of Australia's sanctions framework offers an opportunity to take stock of the international experience and develop a world-leading sanctions policy, especially in relation to corruption and human rights sanctions. Doing so will require a degree of clarity about what such sanctions are intended to achieve and how they will be wielded. Openness about what one will do in the future equals commitment, and so far this seems in tension with the government's eagerness to preserve room for maneuver.*
- (x) In the end, though, a credible and effective application of sanctions will require a clarity of purpose and consistency in application, which can only be attained by determining how sanctions can best serve legitimate criminal justice objectives, including the punishment of perpetrators and disruption of criminal networks. Formulaic references to sanctions as a 'foreign policy tool' are, on the other hand, of limited utility.*

D. The Commonwealth and the States and Territories of Australia have perpetuated a system of equity abuse as money laundering that is at odds with the International Covenant of Civil and Political Rights whereby Officers, Employees, Servants, Agents,

Licensees, Contractors and otherwise related to the three arms of government believe they are licensed to lie¹⁸ and steal equity^{19,20,21} from individual and corporate citizens subject to payment of tax on Ill Gotten Gains as Ill Gotten Tax Revenues.

- E. The Honorable Justice John Dixon in Judgment²² dated 11th October 2021 has today found that a litigation funder and five lawyers ('contraveners') engaged in egregious conduct in connection with a fraudulent scheme, intending to claim more than \$19 million in purported legal costs and funding commission from the settlement sum in a group proceeding. Justice John Dixon noted that the contravener's conduct had shattered confidence in, and expectations of, lawyers as an honorable profession, and corrupted the proper administration of justice.
- F. His Honour concluded that the contraveners' actions were appalling breaches of their respective duties to the court, particularly the paramount duty and overarching obligations imposed on them by the Civil Procedure Act 2010 (Vic). Justice John Dixon ordered that they pay damages of \$11,700,128 to approximately 16,000 group members, plus the costs of the remitter on an indemnity basis.
- G. His Honour further ordered that:
 - (xi) Mr Norman O'Bryan SC and Mr Michael Symons (barristers) be removed from the roll of persons admitted to the legal profession;
 - (xii) Mr Anthony Zita and Mr Alex Elliott (solicitors) each show cause as to whether they are fit and proper to remain on the roll of persons admitted to the legal profession; and
 - (xiii) the reasons for judgment and the record of the trial be referred to the Director of Public Prosecutions for any further investigation and action thought appropriate.

5. S67 APPLICATION FOR RESTRAINING ORDER

(1) The [Attorney-General] [Director of Public Prosecutions] may apply to [the Court] for a restraining order against:

- (a) any realizable property held by the defendant;*
- (b) specified realizable property held by a person other than the defendant; or*
- (c) any terrorist property .*

(2) An application for a restraining order under subsection (1)(a) or (b) may be made ex parte and shall be in writing and be accompanied by an affidavit stating:

¹⁸ Licensed to Lie by Sydney Powell; 23 October 2018

¹⁹ License To Steal: The Secret World of Wall Street Brokers and the Systematic Plundering of the American Investor by Anonymous, Timothy Harper

²⁰ A License to Steal; The Untold Story of Michael Milken and the Conspiracy to Bilk the Nation By Benjamin Stein

²¹ A License to Steal; The Forfeiture of Property By Leonard W. Levy

²² *Bolitho v Banksia Securities Ltd* (No 18) (remitter) [2021] VSC 666

- (a) where the defendant has been convicted of a serious offence, the serious offence for which he or she was convicted, the date of the conviction, [the Court] before which the conviction was obtained and whether an appeal has been lodged against the conviction;
- (b) where the defendant has not been convicted of a serious offence, the serious offence for which he or she is charged or about to be charged and the grounds for believing that the defendant committed the offence;
- (c) a description of the property in respect of which the restraining order is sought;
- (d) the name and address of the person who is believed to be in possession of the property;
- (e) the grounds for the belief that the property is tainted property in relation to the offence or that the defendant derived a benefit directly or indirectly from the commission of the offence;
- (f) where the application seeks a restraining order against property of a person other than the defendant, the grounds for the belief that the property is tainted property in relation to the offence and is subject to the effective control of the defendant; and
- (g) the grounds for the belief that a confiscation order may be or is likely to be made under this Act in respect of the property.

6. TEOH'S CASE; THE DOCTRINE OF LEGITIMATE EXPECTATIONS

A. A "matter arising in the proceedings" is the primacy of treaty law over laws enacted under *the Commonwealth of Australia Constitution Act 1900* (AU) as domestic laws which was the subject of assessment by the High Court in Teoh's case²³ and whether the High Court fell into error in failing to refer to:

- a) s64 of *the Judiciary Act 1903* (AU) and
- b) s20 and/or s21 *the Charter of the United Nations Act* (1945) (AU) ("COTUNA") Australian Treaty Series No 1 (ATS-1)
- c) *Boilermaker's Case*.²⁴
- d) *the Vienna International Convention on the Law of Treaties* 1969 (UN)
- e) *The Foreign Corrupt Practices Act* 1977 (US)
- f) *The Insolvency Act* 1986 (UK)
- g) *United Nations Convention Against Corruption* 2003 (UN) / Australian Treaty Series No 2 ("UNCAC")

B. A failure to do so is not jurisdictional error; those omissions are deliberate treason against the laws of the King as terrorist acts²⁵ punishable in accordance with law.

7. PART 6 OF MY SUSPICIOUS TRANSACTIONS REPORT

²³ *Minister of State for Immigration & Ethnic Affairs v Ah Hin Teoh* (Teoh's case) [1995] HCA 20

²⁴ *Suppression Of Terrorism Financing Act* 2002 (AU) Part 5.3—Terrorism; Division 100—Preliminary; Division 103—Financing terrorism

²⁵ Within the meaning of the *Suppression of Terrorism Financing Act* 2002 (AU) amending the *Criminal Code Act* 1995

In addition to **AMG 9697g, Parts 1,2,3,4,5 and 7**, I specifically rely upon **AMG 9697g, Part 6 – Systemic Land Titles Abuse**.

Part 6 identifies the land-title system not merely as an administrative database but as an institutional mechanism through which ownership, security, priority and the capacity to deal with land become legally and economically effective.

My findings identify the consequences of transferring practical control from proprietor-held physical safeguards into electronic systems involving registries, banks, lawyers, conveyancers, ELNOs and private registry operators.

Part 6 expressly finds that privatisation and professionalisation of critical property and registry functions created points at which control over legal title, electronic authority, mortgage custody, subscriber identity and record access could alter practical ownership and the realisation of value without a contemporaneous independent truth-seeking investigation of the underlying entitlement.

My Part 7 analysis subsequently connects that property architecture with the wider banking, accounting, auditing and professional-gatekeeper architecture and requires financial reconstruction of:

- ❖ fees; settlements; penalties; compensation avoided; insurance; indemnities; public expenditure; retained property; mortgages; refinances; security interests; insolvency distributions; trust accounts; beneficial ownership; substituted property; and subsequent transactions through which disputed value may have been converted, transferred, layered or presented as legitimate.

That investigation requires compulsory access to primary records.

8. PRIVATISATION CANNOT EXTINGUISH PUBLIC ACCOUNTABILITY FOR REGISTERED TITLE

The integrity of registered title is a fundamental governmental responsibility.

The transfer of operational functions to private contractors does not answer the question:

Who ultimately bears legal responsibility for ensuring that the register accurately records lawful proprietary rights?

The Royal Commission must examine the complete commercialisation process, including:

- Cabinet submissions;
- Treasury advice;
- valuation material;
- procurement records;
- concession documents;
- indemnities;
- insurance arrangements;
- allocation of liability;

- projected public revenue;
- fraud-risk analysis;
- identity-risk analysis;
- cybersecurity assessments;
- consideration of conflicts of interest;
- Assurance Fund exposure;
- performance standards;
- compliance reports;
- audit reports;
- subsequent variations;
- and all advice concerning the progressive removal or diminution of proprietor-controlled paper or duplicate-title safeguards.

The inquiry must determine not merely whether electronic conveyancing increased efficiency.

It must determine **what independent safeguard was removed, what replaced it, who then possessed the ability to initiate or certify a dealing, and who possessed the evidence necessary to determine whether the dealing was authorised.**

9. PEXA, MORTGAGE INSURANCE, AND BANK PARTICIPATION

The history of PEXA requires particular examination.

Major Australian banks were not merely passive customers of the electronic conveyancing system. They participated in the developing institutional structure, including as historical shareholders.

That creates an obvious question requiring independent investigation where the same institution may occupy some or all of the following positions:

- ❖ **lender; mortgagee; mortgage insurance: secured creditor; electronic subscriber; settlement participant; custodian of transaction evidence; participant in PEXA infrastructure; respondent to a customer complaint; and party represented in subsequent legal proceedings.**

My concern is not resolved by asserting that electronic conveyancing is technologically efficient; the apparent abolition of paper titles and protection by holding the duplicate certificate of title is no longer available to ensure indefeasibility rights if the Registered Proprietor.

The Royal Commission must determine whether the governance architecture adequately addressed conflicts created when institutions with substantial commercial interests in mortgages and settlements participated in infrastructure through which those mortgages and settlements were electronically effected.

Part 6 expressly identifies banks, PEXA/Sympli/ELNOs and professional bodies as record-holders whose communications and records are required to determine the purpose, implementation and consequences of the reforms.

10. THE BANKING RECORD IS NOT A MATTER OF MERE ALLEGATION

The proposed inquiry must also proceed from the established history of major-bank regulatory contraventions.

I distinguish carefully between allegations and matters established by admissions, judicial declarations and penalty orders.

Where a bank has admitted a statutory contravention and the Federal Court has made declarations and imposed penalties, the existence of that particular unlawful conduct is established.

The investigation should therefore ask what relevance that established compliance history had, or ought to have had, to the Government's assessment of the institutional risks associated with banks participating in critical property, mortgage and electronic-settlement infrastructure.

The inquiry should examine **ANZ, Commonwealth Bank, Westpac and National Australia Bank**, including the relevant admitted and judicially determined contraventions, rather than treating the integrity of institutional participants as something incapable of examination.

11. PENALTIES PAID TO GOVERNMENT ARE NOT RESTITUTION TO VICTIMS

There is a fundamental distinction which must run through the Royal Commission.

- **Penalty is not compensation.**
- **Compensation is not necessarily restitution.**
- **Restitution is not necessarily disgorgement.**
- **Payment by an insurer or compensation scheme is not necessarily accountability of the wrongdoer.**

Where a regulator obtains a pecuniary penalty payable to government, the payment of that penalty does not itself establish that each person who suffered a corresponding loss has been identified and made whole.

The Commission must therefore follow the money beyond the regulatory proceeding.

It must ask:

- Who suffered the loss?
- What property or value was lost?
- Who acquired or retained the corresponding economic benefit?
- Was the benefit disgorged?
- Was the victim compensated?
- Was the compensation complete?
- Who ultimately paid it?
- Was the responsible institution required to repay the compensation fund?

- Were the responsible natural persons subjected to meaningful consequences?
- Did the institutional conditions which permitted the misconduct remain unchanged after the penalty was imposed?

The purpose of enforcement cannot rationally end at:

❖ wrongdoing → penalty → general public revenue.

An effective justice system must proceed to:

❖ wrongdoing → identification of victim → restoration → removal of unlawful benefit → accountability → prevention of recurrence.

12. HAYNE, AFCA AND THE CONTINUING FAILURE OF EFFECTIVE ACCOUNTABILITY

The Royal Commission must examine the land-title architecture against the lessons of the **Royal Commission into Misconduct in the Banking, Insurance, Superannuation and Financial Services Industry**.

The existence of the Hayne Royal Commission is itself evidence that the prior existence of banks, regulators, statutory obligations, internal complaints mechanisms and external dispute-resolution systems did not guarantee effective accountability.

The post-Hayne architecture likewise cannot be judged merely by the creation of another institution.

AFCA and the Compensation Scheme of Last Resort must be evaluated by outcomes.

My parliamentary material from December 2025 expressly sought factual inquiry into whether the post-Hayne AFCA and CSLR architecture achieved Parliament's remedial purposes, whether scheme rules displaced substantive redress, whether non-enforcement permitted unlawful value to remain in circulation, and whether national independent regulation was required across the banking, accounting and legal professions.

I requested and is now a commend that Parliament to examine:

❖ compensation outcomes; legislative consistency; enforcement consequences; inter-agency arrangements; alternative delivery of remedies; and structural federal reform.

That inquiry remains material.

13. COST OF DOING BUSINESS IS NOT EFFECTIVE DETERRENCE

The Royal Commission should examine whether regulatory levies, complaint costs, compensation liabilities, civil penalties and compliance costs have become predictable and budgetable costs of conducting a highly profitable banking business.

The economic question is straightforward:

- ❖ Does the consequence of wrongdoing exceed the economic benefit available from the conduct and thereby deter recurrence, or is it capable of being absorbed as an operating expense while profitability remains intact?

If the latter occurs, extensive regulation may exist formally while failing economically to deter the behaviour it purports to regulate.

That is one of the issues I describe as the **Farce of Fake Regulation**.

The issue becomes more serious in the hands of the judiciary and the invalid systemic misinterpretation of the proper operation of s143 and s144 of the Evidence Act 1995 (AU) whereby courts deliberately mis-state the facts as the Ultimate Injustice AND Self Regulation is Mis-Regulation.

14. AFCA AND CSLR DO NOT REMOVE THE NEED FOR PUBLIC ACCOUNTABILITY

AFCA is an external dispute-resolution scheme. It is not a replacement for complete governmental enforcement of banking, corporations, criminal, AML/CTF or property law.

CSLR is a last-resort compensation mechanism. It is not itself proof that the persons responsible for the original conduct have borne its economic consequence.

A system under which loss moves:

- ❖ wrongdoer → victim → AFCA → insolvent or non-paying institution → CSLR → industry levy

may compensate a victim in some circumstances while simultaneously socialising the financial consequence across an industry.

The Royal Commission must distinguish **payment of compensation** from **accountability for the underlying wrong**.

15. THE LEGAL PROFESSION AND JUDICIARY ARE PART OF THE INSTITUTIONAL CHAIN

The inquiry cannot stop at the regulators.

Banks, insurers, governments, regulators, receivers, liquidators, mortgagees, PEXA subscribers and persons asserting proprietary rights ultimately interact with the **legal profession and Judiciary**.

The legal profession supplies solicitors, barristers, prosecutors, government lawyers, professional advisers and substantially the pool from which judicial officers are appointed.

Accordingly, if established institutional wrongdoing repeatedly proceeds through regulatory and judicial systems without complete reconstruction of the underlying transaction, restoration of victims or effective removal of unlawfully retained value, the matter becomes one concerning the **administration of justice itself**.

My Part 7 material expressly treats legal process, property systems and financial infrastructure as interconnected rather than separable systems.

The Royal Commission should therefore examine, while respecting judicial independence and constitutional limits:

- access to evidence;
- disappearance or non-production of evidence;
- availability of native electronic records;
- professional conflicts;
- litigation asymmetry;
- professional self-regulation;
- disciplinary outcomes;
- regulator-to-court information flows;
- the treatment of established banking misconduct;
- whether victims obtain substantive adjudication;
- and whether effective remedies follow.

The point is not that the mere existence of judicial proceedings proves failure.

The point is the converse:

- ❖ **The mere existence of courts and lawyers does not itself prove that a complete truth-seeking investigation or effective remedy occurred.**

16. INSTITUTIONAL TAI CHI

I describe the recurring transfer of responsibility between institutions as **Institutional Tai Chi**.

The pattern requiring investigation is:

- ❖ **bank → internal dispute resolution → AFCA → ASIC → APRA → AUSTRAC → professional adviser → Registrar-General → Land Services SA → PEXA → professional regulator → government → court → another institution.**

At each point the question must be:

- Who possessed the legal power?
- Who possessed the evidence?
- Who actually made the decision?
- What law governed that decision?
- What reasons were recorded?
- If responsibility was transferred, by what authority?
- Did the recipient possess jurisdiction?

- Did the recipient determine the substantive issue?
- If no institution ultimately did so, where did responsibility disappear?

That is the operational meaning of **Institutional Tai Chi** / **quo warranto** in my materials.

17. COMMONWEALTH ATTORNEY-GENERAL ALREADY PLACED ON FORMAL NOTICE

The demands do not exist in isolation.

I have formally placed the **Attorney-General of the Commonwealth amongst other public on officials in notice** on notice concerning the corresponding Commonwealth accountability system.

AMG 9752 and AMG 9576 requires review of matters concerning:

- the NACC;
- the Inspector of the NACC;
- AUSTRAC;
- AFCA;
- ASIC;
- the Reserve Bank of Australia;
- successive Commonwealth law officers;
- evidence preservation;
- intake and recordkeeping;
- referrals;
- and effective remedies.

I expressly asked the Attorney-General to engage every lawful oversight, referral, policy and legislative function available without purporting to dictate the outcome of an independent corruption investigation.

AMG 9752 and AMG 9756 also requires preservation of native emails, attachments, headers, audit logs, webform records, call records, internal referrals, triage notes and decision records and asks that relevant material be transmitted to appropriate oversight authorities.

I make an equivalent structural demand of you.

The Commonwealth and State jurisdictions meet at the point where:

- ❖ **land title + mortgage + bank + electronic settlement + AML/CTF information + financial intelligence + professional certification + public administration**

form one transaction.

Neither level of government should therefore use the existence of the other as a reason not to investigate its own part of that transaction.

18. COOPERATIVE STATE-COMMONWEALTH ROYAL COMMISSION ARCHITECTURE

I request that you immediately communicate with the Commonwealth Attorney-General and invite Commonwealth cooperation with the proposed Royal Commission.

The Commission should obtain, subject to lawful compulsory process and information restrictions, records from or involving:

- ❖ **AUSTRAC; ASIC; APRA; Treasury; the Reserve Bank; NACC where legally permissible; the Attorney-General's Department; relevant banks; PEXA; professional bodies; insurers; liquidators; receivers; and other record custodians.**

The State side of the reconstruction should include:

- ❖ **Registrar-General → Land Services SA → land-title records → PEXA/ELNO workspace → subscriber → mortgagee/bank → settlement → registration.**

The Commonwealth side should include:

- ❖ **banking records → AML/CTF records → transaction monitoring → source of funds/source of wealth → beneficial ownership → suspicious-matter information → financial-intelligence records → regulatory decisions.**

They are different jurisdictions examining different legal responsibilities within the **same underlying transaction**.

19. THE RETROSPECTIVE ABOLITION OF IMPUNITY ACT 2026 (IMPERIAL)

I make the following distinction expressly.

On **16 December 2025**, I placed the reform programme before Australian parliamentary institutions as a proposed legislative package.

My Parliament and Parliamentary Counsel summary records the pathway I sought:

- ❖ **evidence → parliamentary inquiry → technically drafted legislation → enforcement → effective remedy.**

It records the proposed Abolition of Impunity Bill, Judiciary (Misbehaviour and Incapacity) Amendment Bill, National Legal Profession Federalization and Accountability Bill, Law Officers Amendment Bill, and associated explanatory materials.

That was the position at that stage.

I now state that the **Retrospective Abolition of Impunity Act 2026 (Imperial)** has subsequently been enacted by me in exercise of the **Imperial Prerogative**, under the powers and antecedent instruments upon which I rely.

AMG 9726 formally records my position that those Imperial powers are operative and are not advanced by me as provisional, contingent or merely proposed powers.

I therefore do **not** request that your Government treat the instrument merely as a proposed Bill awaiting policy consideration.

I require its legal status, operation and enforcement to be confronted directly.

If the State contends that the instrument has no legal operation, I require the State to identify:

- the precise source of law relied upon;
- the hierarchy of authority said to defeat the Imperial Prerogative upon which I rely;
- the competent office or court said to possess authority to make that determination;
- any judgment or instrument said to have set aside or displaced my exercise of power;
- and the complete reasons for the State's position.

Administrative silence is not an answer to a question of legal authority.

20. PURPOSE AND OPERATION OF THE ENACTMENT

AMG 9726 records the purposes of the enactment as including:

- ❖ retrospective abolition of unlawful or unjustified impunity; removal of institutional and professional barriers to investigation and effective remedies; preservation of duties arising from public office and fiduciary responsibility; independent investigation and record preservation; remedies for persons injured by abuse of institutional power; procedural fairness; legitimate judicial independence; and practical enforcement and recovery mechanisms.

The central principle is:

- ❖ **Abolition of impunity is not an exception to the Rule of Law. It is a minimum condition of the Rule of Law.**

The Royal Commission must therefore examine the application and enforcement of the Act to historical conduct within the inquiry.

21. RETROSPECTIVE OPERATION

Retrospectivity is necessary because institutional delay cannot be permitted to manufacture immunity.

Historical allegations require historical investigation.

Historical records require preservation and reconstruction.

Historical misconduct cannot rationally become immune merely because an institution failed to investigate promptly enough and subsequently claims that the evidence is too old or unavailable.

The recently published material concerning allegations against former ATO Commissioner Chris Jordan provides an illustration of the institutional problem, while those allegations remain unproved.

The ABC reported allegations concerning conduct said to have occurred while he was at KPMG and reported evidence that KPMG later said the passage of time meant that it could no longer locate sufficient information to substantiate the historic allegations. The ABC expressly stated that it was not suggesting those allegations were true.

The relevant institutional lesson is:

❖ **allegation → delay → evidentiary degradation → inability to investigate → practical impunity.**

The Act is intended to prevent that result.

22. RECORD PRESERVATION IS THEREFORE AN IMMEDIATE DUTY

I require immediate preservation of all relevant records.

That preservation must encompass:

- native emails and attachments;
- document-management systems;
- audit logs;
- PEXA workspace records;
- subscriber logs;
- certificates;
- verification-of-identity records;
- client authorisations;
- mortgage custody records;
- title-control records;
- bank account records;
- settlement instructions;
- SWIFT or other payment messages where relevant;
- registry logs;
- Government correspondence;
- Cabinet and Treasury records;
- insurer records;
- Assurance Fund records;
- regulator referrals;
- complaint files;
- litigation files;
- metadata;
- backups;
- archived databases;

- and records held by contractors or former contractors.

No responsive record should be destroyed in accordance with an ordinary destruction schedule after receipt of this notice without first determining whether preservation is required.

23. SUSPENSION OF PUBLIC PAYMENTS DURING SERIOUS INTEGRITY INVESTIGATION

I further require the Royal Commission to examine the remedial principle that persons exercising public power who are under a properly founded serious corruption or abuse-of-office investigation should not automatically continue to receive unrestricted public remuneration while retaining operational control over the office, witnesses or records under investigation.

The mechanism I require under the Act is protective, not a declaration of guilt.

Where the statutory threshold is satisfied it should permit, subject to applicable constitutional requirements:

- ❖ **temporary removal from operational control; suspension or escrow of remuneration; mandatory preservation of records; expedited investigation; written reasons; periodic review; and restoration with appropriate interest if the allegation is not established.**

Different constitutional offices may require different mechanisms.

The purpose is not punishment before adjudication.

The purpose is to ensure that the **entire interim risk is not borne by victims and taxpayers while the person whose exercise of public office is under serious investigation remains financed without constraint by the same public purse.**

24. CARTEL IMMUNITY AND THE DISTINCTION BETWEEN IMMUNITY AND IMPUNITY

The Commission should also examine governmental policies expressly granting immunity from civil proceedings or criminal prosecution in exchange for cooperation.

The December 2024 ACCC **Immunity and cooperation policy for cartel conduct** provides that the first eligible cartel participant may obtain conditional civil immunity and, through the separate CDPP process, potentially criminal immunity, subject to extensive disclosure and cooperation requirements.

The ACCC itself describes immunity as a **detection tool**, intended to induce insiders to expose covert illegal conduct and assist proceedings against other cartel participants.

That policy illustrates an important distinction.

Lawful conditional immunity used to expose wrongdoing is not necessarily impunity.

But the Royal Commission should examine:

- What happens to victims of the admitted cartel conduct?
- Is restitution required?
- Does the immunity recipient retain unlawful economic benefit?
- Are affected customers identified?
- Can derivative immunity extend too broadly?
- Is cooperation tested independently?
- Does immunity remove only prosecution consequences or also frustrate private recovery?
- Is the resulting architecture consistent with the principle that immunity should facilitate accountability rather than extinguish it?

The Abolition of Impunity Act must distinguish **cooperation immunity serving truth and enforcement** from **institutional impunity which protects unlawful benefit or leaves victims uncompensated**.

25. THE ROYAL COMMISSION'S EVIDENTIARY POWERS

South Australian law gives a Royal Commission substantial compulsory investigatory powers.

Section 10 of the **Royal Commissions Act 1917 (SA)** permits a Commission to summon persons, require answers and returns, compel production of books, papers, documents and records, inspect and retain records and examine witnesses on oath, affirmation or declaration.

Those powers are precisely why an ordinary departmental review is inadequate.

This inquiry requires the ability to obtain records from institutions which may themselves have conflicting commercial, regulatory or litigation interests.

The Commission must reconstruct the evidence rather than allowing each institution to define the evidentiary boundaries of its own conduct.

26. ENFORCEMENT AND RETROSPECTIVE PENALTIES UNDER THE ACT

I require the Royal Commission, to the fullest extent of its lawful competence, to determine:

- what historical conduct occurred;
- which persons and institutions were responsible;
- which provisions of the Retrospective Abolition of Impunity Act 2026 (Imperial) apply;
- what retrospective consequences are engaged;
- what restitution, recovery, disgorgement, disqualification, removal, suspension or other consequences follow;



and

- which public authority is responsible for implementation.

Where the Commission cannot itself make a coercive judicial order, it should identify the legal consequence and refer or present the matter to the court or authority possessing jurisdiction to make the necessary order.

The inquiry must therefore not conclude with a descriptive report identifying institutional failure but leaving enforcement entirely unresolved.

The required sequence is:

- ❖ truth → finding → responsibility → enforcement → effective remedy.

27. MANDAMUS

My demand expressly encompasses **mandamus**.

Section 29 of the **Supreme Court Act 1935 (SA)** provides that the Supreme Court may grant mandamus where it appears just or convenient to do so.

I therefore require that where the Royal Commission or other competent process establishes:

- ❖ a public duty → a responsible officer → satisfaction of the conditions activating that duty → failure or refusal to perform it,

the matter be brought before the competent court for mandamus and any necessary declaratory, injunctive or consequential relief.

The Royal Commission and mandamus serve complementary functions.

Royal Commission: discover and reconstruct the truth, obtain evidence, identify responsible actors and establish the factual and institutional chain.

Mandamus: compel performance where an enforceable public duty has been established and the responsible officer refuses or fails to perform it.

The architecture I require is therefore:

- ❖ evidence → Royal Commission → findings → identification of public duty → demand for performance → mandamus where performance is refused → retrospective enforcement/remedy → restitution → recovery.

Institutional referral is not performance of the underlying duty.

28. THE RULE OF LAW REQUIRES EFFECTIVE REMEDY

I reject the proposition that the Rule of Law is satisfied merely because Australia possesses:

- ❖ **Parliaments; courts; regulators; lawyers; ombudsmen; integrity commissions; professional bodies; complaint systems; tribunals; Royal Commissions; and administrative review processes.**

Those are institutional mechanisms.

Their legitimacy depends upon what they achieve.

The test is whether the architecture can reliably produce:

- ❖ **truth → legal responsibility → restoration → deterrence → effective remedy.**

If instead it repeatedly produces:

- ❖ **wrongdoing → complaint → referral → another institution → public penalty → unresolved victim loss → disappearance of responsibility → repetition,**

the multiplication of institutions has become a substitute for accountability.

That is the difference between the **Rule of Law** and a bureaucracy which protects its own continuation.

29. INEPTOCRACY, KLEPTOCRACY AND EXPANSION OF BUREAUCRACY

I use the terms **Ineptocracy** and **Kleptocracy** to identify institutional conditions requiring evidentiary investigation.

By Ineptocracy I refer to a condition in which public administration repeatedly expands while failing to perform the public functions for which it is funded.

By Kleptocracy I refer to the misuse of public office or institutional power for private or institutional economic benefit.

I do not ask the Royal Commission simply to assume either condition.

I require it to test them.

The correct questions are:

- What public money was spent?
- What public function was supposed to be performed?
- Was it performed?
- Who benefited from failure or non-enforcement?
- Was responsibility identified?
- Did public expenditure increase despite repeated failure?

- Did regulators receive financial or institutional incentives inconsistent with enforcement?
- Did government derive revenue while victims remained uncompensated?
- Did penalties flow to public revenue while wronged persons remained required to pursue separate remedies?
- Did public institutions become financially dependent upon the continuation of the very commercial structures they purported to regulate?

Those are factual matters capable of determination.

30. VICTIMS FIRST – RECOUPMENT SECOND

My remedial architecture is based upon the principle:

❖ **Victims First – Recoupment Second.**

The wronged party should not bear years of institutional delay while governments, banks, regulators, lawyers and insurers argue about ultimate liability.

The architecture I propose is:

- ❖ **wrong identified → entitlement independently determined → remedy quantified → victim restored promptly → rights lawfully assigned/subrogated where appropriate → recovery subsequently pursued against the responsible wrongdoer → recovered value replenishes the remedial fund.**

The adjudicator and funder must be institutionally separate.

The funder must not control adjudication merely because it may subsequently acquire recovery rights.

The objective is to eliminate a structural conflict by separating:

- ❖ **adjudication → payment of remedy → subsequent recovery.**
-

31. TERMS OF REFERENCE REQUIRED

I require the Royal Commission's Terms of Reference to encompass at least the following matters:

1. the conception, valuation, procurement and implementation of South Australia's land-services commercialisation;
2. the contractual relationship between the State, Registrar-General and Land Services SA;
3. the allocation of responsibility, liability, indemnity, insurance and financial benefit;
4. the transition from proprietor-held paper or duplicate-title safeguards to electronic title-control systems;

5. PEXA's establishment, development, ownership, governance and historical participation by major Australian banks;
6. the role of banks as mortgagees, lenders, subscribers and financial-settlement participants;
7. conflicts created by overlapping ownership, mortgage, settlement and electronic-conveyancing roles;
8. the adequacy of safeguards addressing those conflicts;
9. verification of identity and authority;
10. client authorisations;
11. subscriber certifications;
12. PEXA workspace creation, access and audit logs;
13. digital signatures and electronic certificates;
14. mortgages, discharges, refinancing, transfers and enforcement;
15. settlement funds and ultimate beneficial receipt;
16. fraud and alleged unauthorised dealings;
17. operation of the statutory Assurance Fund;
18. insurance and indemnity arrangements;
19. bank AML/CTF compliance histories relevant to participants in the land-title infrastructure;
20. Commonwealth and State regulatory coordination;
21. AUSTRAC, ASIC, APRA, AFCA and CSLR functions insofar as relevant to disputed transactions;
22. regulatory penalties and their destination;
23. identification and compensation of persons suffering consequential loss;
24. disgorgement and recovery of economic benefits derived from unlawful conduct;
25. whether penalties and remediation are capable of being absorbed as ordinary costs of business;
26. the role of lawyers and conveyancers;
27. professional discipline and self-regulation;
28. litigation and access to native electronic evidence;
29. institutional conflicts affecting the legal profession;
30. systemic interaction between the Judiciary, professional advisers, regulators and financial institutions;
31. whether disputes are determined on complete evidentiary records;
32. whether public and private compensation arrangements make victims whole;
33. whether established misconduct results in effective personal and corporate accountability;
34. Institutional Tai Chi and the fragmentation of responsibility;
35. destruction, loss, withholding or non-preservation of evidence;
36. retrospective reconstruction of historical transactions;
37. operation and enforcement of the Retrospective Abolition of Impunity Act 2026 (Imperial) as stated by me;
38. retrospective penalties, restitution, recovery, disqualification and other consequences under that enactment;
39. protective suspension or escrow of public remuneration during properly founded serious integrity investigations, subject to constitutional requirements;
40. appropriate treatment of conditional immunity/cooperation schemes;
41. the distinction between lawful investigative immunity and unlawful impunity;
42. cooperation between South Australia and the Commonwealth;
43. preservation and production of Commonwealth records relevant to State transactions;
44. use of mandamus where an identified public duty is not performed;

45. whether functions affecting the integrity of registered title should be returned to direct public administration;
 46. whether an independent end-to-end transaction-reconstruction authority is required;
 47. whether a regulator-of-regulators model is required;
 48. reforms required to ensure independent truth-seeking adjudication;
 49. reforms required to deliver an effective remedy; and
 50. any related matter necessary to determine who possessed the power, who possessed the evidence, who benefited, who suffered the loss and where legal responsibility ultimately rests.
-

32. SPRINGWOOD PARK, RELATED PROPERTIES AND CASE-SPECIFIC EXAMINATION

The Royal Commission must include the **Springwood Park and properties related to me** evidence and the South Australian dealings already identified in Part 6 and otherwise in the proceedings removed to Hong Kong from UK, Australia and USA.

This provides an actual case study through which the institutional architecture can be tested rather than examined only theoretically.

The inquiry should obtain all relevant:

- ❖ **title records; mortgage records; bank custody records; duplicate-title records; PEXA records; Registrar-General records; legal files; court files; complaint records; Assurance Fund materials; transaction records; settlement records; trust-account records; and subsequent dealings.**

The question is not what one institution says occurred.

The Commission should reconstruct what **actually occurred from the primary evidence.**

33. IMMEDIATE LITIGATION / EVIDENCE HOLD

Pending your substantive response, I formally require preservation by the Government and all entities to whom it can lawfully issue preservation directions or requests of records concerning:

- ❖ **AMG 9753; AMG 9697 Parts 1–7; Springwood Park; Land Services SA; PEXA; ELNOs; land-title commercialisation; duplicate and paper Certificates of Title; electronic conveyancing; relevant banks; mortgages; settlement; title-fraud complaints; Assurance Fund matters; correspondence with banks and professional bodies; Cabinet/Treasury consideration; AMG 9752; Commonwealth referrals; and the Retrospective Abolition of Impunity Act 2026 (Imperial).**

Preservation must include metadata and native electronic form.

34. REQUIRED COOPERATION WITH COMMONWEALTH AUTHORITIES

I require that you provide this correspondence, AMG 9753 and Part 6 to the Commonwealth Attorney-General and invite cooperation.

I require confirmation whether you will request preservation and production, where lawfully available, of material held by:

- ❖ **Attorney-General's Department; Treasury; AUSTRAC; ASIC; APRA; RBA; NACC; AFCA; CSLR; relevant banks; and Commonwealth agencies otherwise holding relevant records.**

AMG 9752 already places the Commonwealth Attorney-General on notice of related systemic issues and asks that Commonwealth records be preserved and responsible authorities identified.

This letter places the State Government on equivalent notice.

35. RESPONSE REQUIRED

The 14-day response period established by AMG 9753 remains unchanged.

Within that period I require a substantive written response stating:

- (a) whether you will announce the Royal Commission;
- (b) if not, the complete reasons for refusal;
- (c) whether immediate preservation measures have been implemented;
- (d) which officer has responsibility for coordinating preservation;
- (e) whether AMG 9697g Part 6 has been formally reviewed;
- (f) whether Springwood Park will be referred for independent reconstruction;
- (g) whether you have referred or will refer the Commonwealth aspects to the Commonwealth Attorney-General;
- (h) whether you will seek Commonwealth participation and cooperation;
- (i) whether PEXA, Land Services SA and relevant banks will be placed on preservation notice;
- (j) which existing body, if you refuse a Royal Commission, you contend presently possesses equivalent independence and compulsory powers;
- (k) how that body can obtain the complete State, PEXA, bank, subscriber and Commonwealth record;

- (l) whether the Government accepts that public penalties and victim restitution are distinct;
- (m) what mechanism presently traces losses from established banking contraventions to individual affected persons;
- (n) what mechanism ensures that persons proven to have caused loss do not retain the economic benefit;
- (o) whether the Government will examine the legal profession and judicial interface with the land-title and banking architecture;
- (p) whether the Government will address the Retrospective Abolition of Impunity Act 2026 (Imperial) as an enactment stated by me to be presently operative;
- (q) if the Government disputes its operation, the precise source of authority and legal reasoning relied upon;
- (r) whether the Government accepts that historical conduct must remain capable of investigation notwithstanding institutional delay;
- (s) whether the Government will support interim protective suspension/escrow mechanisms for public officials under serious integrity investigation where constitutionally permissible;
- (t) whether the Government will support compulsory investigation of lost, destroyed or inaccessible records;
- (u) whether the Government will support referral for mandamus where an established public duty remains unperformed; and
- (v) the name, position and direct contact details of the officer responsible for administering this notice.

36. EXTRADITION, MANDAMUS AND RESERVATION OF ENFORCEMENT RIGHTS

I expressly reserve all rights to seek enforcement of my findings of **Quo Warranto Findings from the Honorable High Court of Hong Kong, declarations, injunctions, preservation orders, disclosure, judicial review and other available relief** in respect of an established public duty which remains unperformed.

The Supreme Court of South Australia possesses statutory power to grant orders in the nature of quo warranto where it appears just or convenient.

My purpose in giving this notice is therefore also to ensure that there can be no later uncertainty about:

- what was requested;
- when notice was given;
- what evidence was identified;

- what records were requested to be preserved;
- which public interests were identified;
- and what response, if any, was made.

37. FINAL COMMAND

I have now placed both the **Commonwealth Government and the South Australian Government on formal notice.**

The Commonwealth Attorney-General has been asked to engage the Commonwealth accountability architecture concerning NACC, AUSTRAC, ASIC, AFCA, the Reserve Bank and associated Commonwealth institutions.

You have been asked to address the corresponding South Australian architecture concerning:

- ❖ registered land; privatised land-title management; PEXA; electronic conveyancing; mortgages; banks; settlement; professional subscribers; regulators; compensation; the legal profession; the Judiciary; and effective remedy.

Neither referral displaces the other.

They concern complementary parts of the same institutional and evidentiary architecture.

Jurisdictional boundaries must not become gaps through which responsibility disappears.

I therefore require that the State and Commonwealth preserve their respective records, identify their respective responsibilities and cooperate in the reconstruction of the complete transactions.

The question ultimately presented is simple:

- Who had the power?
- Who had the evidence?
- What did they know?
- What were they required to do?
- What did they actually do?
- What value moved?
- Who benefited?
- Who suffered the loss?
- Where was responsibility transferred?
- Who finally accepted responsibility?
- Was the victim made whole?
- Was the wrongdoer deprived of the economic benefit?
- Was recurrence prevented?

If those questions cannot be answered by the existing fragmented architecture, then the need for the Royal Commission is demonstrated by the architecture itself.

I therefore command you to **announce the Royal Commission.**

I further command that its Terms of Reference encompass the matters identified above, that relevant records be preserved immediately, that the Commonwealth Attorney-General be invited to cooperate, that the Commission examine the operation and enforcement of the **Retrospective Abolition of Impunity Act 2026 (Imperial)** as stated by me, and that any established unperformed public duty be pursued by **mandamus or other appropriate compulsory judicial relief.**

The Royal Commission must not become another exercise in Institutional Tai Chi.

Its purpose must be:

❖ **Truth. Responsibility. Enforcement. Restoration. Effective Remedy.**

A copy of this communicate and covering email will be produced as evidence of service.

All rights, powers, interests, claims, remedies and grounds of review are expressly reserved.

Yours faithfully,

For and on behalf of the Andrew Garrett Family Office
and in the capacities previously notified


Signature: _____

Andrew Morton Garrett,
International Crown Unitary Executive
International Crown Attorney General
International Crown Chief Justice appointed to:

- International Crown Court of Justice for restoration of operation of Maxims of Equity
- International Crown Criminal Court for the Abolition of Impunity

International Crown Liquidator and Managing Controller

Global Managing Trustee

Chairman of the Board of Trustees

Email: andrew.garrett@andrew-garrett-family-office.com

Email: contact@privategoldreservebank.com



FORMAL REQUEST FOR MINISTERIAL AND PARLIAMENTARY OVERSIGHT REVIEW

NACC handling of corruption referrals and Inspector outcome D26/5969

30 August 2026

The Hon Michelle Rowland MP

Attorney-General of the Commonwealth of Australia

PO Box 6022, House of Representatives

Parliament House, Canberra ACT 2600

By Email:

Dear Attorney-General,

AMG 9752 REQUEST FOR REVIEW OF SYSTEMIC NACC INTAKE, RECORDKEEPING AND ASSESSMENT CONDUCT; AND REVIEW OF THE INSPECTOR'S FAILURE TO ADDRESS THE COMPLAINT ACTUALLY MADE

In the interests of full disclosure I advise there are matters of inquiry currently on foot in Hong Kong and in Australia though the main purpose of the Australian complaint is to demonstrate to the Judicial Officers and Investigations Officers in Hong Kong how corrupt Australia is, and why it is that I seek emigration and relocation of values associated with me.

- ❖ **HCMP-1855-2022;** *In the Matter of the Crown (Liquidator and Managing Controller Appointed)* as Enforcement Proceedings brought by me against the Crown also referred to as the Main Proceedings within the UNCITRAL Cross Border Insolvency Model Law 1997 and refer you to the exhibits produced and marked as AMG 5857 being a copy of the originating process dated 11th November 2022 and served on the 13th November 2022 adjourned sine die 26th September 2023 to enable me to defend myself against the attacks of the Crown and now the subject of recommencement.
- ❖ **HCAL-1179-2026;** Andrew Garrett v Director General of Investment Promotion being an application for leave to issue an application for Judicial Review seeking production of records from Australia, USA and UK to assist the Director General in the making of his decision under my application pursuant to the New Capital Investment Entry Scheme dated 19th February 2026 to relocate all values associated with me and entities associated with me to the Primary Tax Jurisdiction of SAR Hong Kong.
- ❖ **JFIU Ref. No. 2026087283;** being a Criminal Investigation acting on Information provided by me to the Hong Kong Joint Financial Intelligence Unit of Money Laundering and Terrorism Financing Activities of the Crown in the period commencing December 1987 until today's date in support of my application to take Global Control of Price Waterhouse Coopers as a subsidiary of the Andrew Garrett Family Office. **TAB 11 Parts 1 and 2**
- ❖ **LM (344/26) in HK/C 54/6 (COM) ;** Being a Criminal Investigation by Hong Kong Police into Justice Michael Lee on respect to his conduct removing over 300 exhibits from the Court File relied



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upon by me in NSD-741-2023: APRA v Andrew Garrett and similar conduct of Kudelka J in DCCRM-0073-2019; Australian Taxation Office v Andrew Morton Garrett in striking out a subpoena previously argued by counsel and authorised by the same judge, the actions of both Judicial Officers being serious interference in an Information System, a Public Service, a Financial System, and essential Public Utility as “Terrorist Acts” within the meaning of the suppression of Terrorism Financing Act 2002 (AU) and equivalent Hong Kong Laws. The latter action was the subject of an order of Nolle Prosequi as a result of the withdrawal of the Crown Case against me creating Res Judicate, Common Law, Contractual, Promissory, Equitable Collateral Issue Estoppel against the Crown as a matter arising in both Hong Kong proceedings.

- ❖ **NACC CASE 20261197**; Information dated 23rd July 2026 and addendum dated 31st July 2026 being My Joint Submissions to the Hong Kong Joint Financial Intelligence Unit in respect of JFIU Ref. No. 2026087283; and the National Anti-Corruption Commission in respect to the above mentioned corrupt conduct of the ATO, the Judicial Officers involved in all proceedings related to me and the abject failure of AUSTRAC as the relevant Financial Intelligence Agency in Australia to investigate the conduct complained of.

THE PRIMARY MATTER

The Primary “Matter arising in the Proceedings”¹ as a foundational matter of Federation is the failure of Public Officials² in Australia as employees, officers, agents, servants, contractors, delegates, licensees or otherwise related to the Crown³ and/or employees, officers, agents, servants, contractors, delegates, licensees of “Constitutional Corporations” licensed by the Crown in right of Australia, in their capacity as Trustees of the Public Trust to exercise discretionary public powers conferred under enactments in a manner that is exclusively in the Public Interest⁵.

I write to request that you exercise every lawful oversight, referral, policy and legislative function available to you concerning the National Anti-Corruption Commission (NACC) and the Inspector of the NACC. I do not ask you to direct the outcome of an individual corruption assessment or investigation. I ask you to ensure that the independent statutory oversight arrangements are engaged, that records are preserved, and that the systemic administrative issues disclosed by the attached material are placed before the authorities competent to examine them.

This request concerns AMG 9720 dated 12 August 2026⁶ and failure to fulfill Public Office by NACC⁷; AMG 9730 and its covering email and attachments concerning AFCA, AUSTRAC and ASIC⁸; AMG 9733 concerning the Reserve Bank of Australia⁹; AMG 9736¹⁰ concerning successive Commonwealth Law Officers and associated institutions; and the Inspector's outcome letter AMG 9751 dated 24 August 2026, reference D26/5969.

¹ *Re Wakim; Ex parte McNally* [1999] HCA 27

² within the meaning of the *United Nations Convention Against Corruption* 2003 (AU) (“**UNCAC**”) a.k.a. *Australian Treaty Series No 2* (“**ATS 2**”)

³ *Sue v Hill* [1999] HCA 30 (23 June 1999)

⁴ S51(xx) of the *Commonwealth of Australia Constitution Act* 1900 (AU)

⁵ AMG 176; The Public Interest; We know That it is Important, but do we know what it means Chris Wheeler AIAL FORUM No 48

⁶ AMG 9720 AGFO to the Inspector of the National Anti-Corruption Commission 12.08.2026

⁷ AMG 9696a National Anti-Corruption Commission ID; 202672271447-9505 23.07.2026

⁸ AMG 9730 National Anti-Corruption Commission Webform ID; 20268192565-2255 19.08.2026

⁹ AMG 9733 National Anti-Corruption Commission Webform ID; 20268211450-3396 21.08.2026

¹⁰ AMG 9736 National Anti-Corruption Commission Webform ID 202682355051-1363 23.08.2026

1. Decision and review sought

The Inspector reduced the complaint to whether the NACC had exceeded the Commission's stated objective of assessing reports within 90 days. She concluded that referrals lodged in July and August 2026 remained within that administrative service goal and that delay within that period did not amount to maladministration.

That was not a complete response to the complaint. The material raised distinct allegations concerning receipt, registration, retrieval, preservation, attachment integrity, correspondence addressed to the Commissioner, intake and triage records, the inability of NACC personnel to locate communications, the treatment of evidence transmitted with AMG 9730, and the substitution or proposed substitution of a telephone call-back process for the written evidentiary record.

I therefore request review of whether the Inspector:

- misidentified the substance and scope of the complaint;
- failed to address material questions of agency maladministration and officer misconduct under s 184 of the National Anti-Corruption Commission Act 2022;
- treated a non-statutory 90-day service objective as determinative of statutory reasonableness;
- failed to determine whether relevant emails and attachments were received, registered, preserved and assessed together;
- failed to distinguish the underlying referrals from the separate complaint about the NACC's own conduct; and
- gave reasons that did not expose a rational consideration of all substantial issues raised in AMG 9720 and the subsequent material supplied before the outcome was issued.

2. Why the 90-day Service Charter objective did not answer the complaint

The NACC Service Charter states that the Commission 'aims' to assess reports within 90 days. It also identifies a 30-day target where a report is outside jurisdiction, does not relate to corrupt conduct, or requires further information. These are administrative service-level goals; they are not statutory limitation periods and do not create a 90-day immunity from maladministration.

A report may be mishandled on the day it is received. Loss of correspondence, failure to register attachments, inaccurate receipt records, failure to preserve metadata, reliance on a mistake of fact or law, or substitution of an oral process for a complete written record may fall within the statutory definition of agency maladministration irrespective of whether 90 days has elapsed.

The outcome letter did not identify any provision of the NACC Act that converts the Service Charter objective into a conclusive test. Section 184(3) expressly includes unreasonable conduct, mistakes of fact or law, consideration of irrelevant matters and conduct for which reasons should have been given. Those matters required separate consideration.

3. Written evidence and the call-back service

I do not contend merely that the NACC may never telephone a referrer. The issue is whether the call-back service has been used or proposed as an administrative substitute for receipt, registration and assessment of written evidence already supplied. A telephone service cannot lawfully erase or displace the native email, attachment, header, timestamp and intake record. Nor should a complainant be required to reconstruct extensive written evidence orally when the documentary record has already been transmitted.

The review should determine whether the NACC's systems and practices:

- preserve covering emails and all attachments as one evidentiary transaction;
- retain native metadata and delivery information;
- associate later supplementary material with the correct NACC case and webform identifiers;
- permit written clarification where accuracy and volume make an oral call unsuitable; and
- create an auditable record of any call-back, including what was asked, what was supplied and how it affected intake or assessment.

4. AMG 9730 and the responsibility of its addressees

AMG 9730 and its covering email were circulated to numerous Commonwealth, State, private and Hong Kong addressees, including the Prime Minister's Department, the NACC, AUSTRAC, AFCA, CSLR, PricewaterhouseCoopers personnel, South Australian Ministers and law officers, parliamentary office-holders and committees, and Hong Kong authorities.

The circulation of information places each recipient on actual notice of what was sent. It does not, by itself, create the same legal duty in every recipient. The source and content of any duty must be identified separately. In particular, s 33 of the NACC Act requires the head of a Commonwealth agency to refer an issue where the statutory conditions are met, including that the head suspects the issue could involve serious or systemic corrupt conduct concerning a current or former staff member of that agency. The review requested should determine whether any Commonwealth agency head or properly delegated officer received AMG 9730, assessed whether that threshold was met, preserved the material and recorded the assessment.

Where an addressee lacked jurisdiction, responsible administration required accurate registration, preservation and referral or a clear explanation of the absence of power. Silence should not be treated as proof that the allegations were accepted; equally, silence does not demonstrate that the required intake and jurisdictional assessment occurred.

5. Actions requested of the Attorney-General

1. Acknowledge and register this correspondence, AMG 9720, AMG 9730 and its complete email/attachment set, AMG 9733, AMG 9736 and AMG 9751 as one related oversight record.
2. Cause the Secretary of the Attorney-General's Department, as accountable authority, to determine which matters fall within the Department's administrative, PID, records-management and mandatory-referral responsibilities, without purporting to determine the merits reserved to independent statutory officers.
3. Provide this request and its annexures to the Parliamentary Joint Committee on the National Anti-Corruption Commission for consideration under its statutory function of monitoring and reviewing the performance of the Commissioner and Inspector.
4. Invite the Committee to consider whether the Inspector's present complaint-handling arrangements provide an effective avenue when the complaint concerns missing correspondence, evidentiary integrity or systemic intake failure.
5. Request confirmation from the NACC and Inspector that litigation holds or equivalent preservation measures cover native emails, attachments, message headers, audit logs, webform records, call recordings, call-back requests, internal referrals, triage notes and decision records relevant to the identified AMG and NACC references.
6. Obtain advice on whether the Inspector's reasons complied with the statutory conception of maladministration in s 184 and whether an additional independent review mechanism is required where the Inspector elects to take no action.
7. Consider legislative amendment to distinguish clearly between service goals and legal obligations, require minimum written reasons addressing substantial complaint issues, and provide a transparent reconsideration pathway for alleged NACC maladministration and alleged maladministration by the Inspector's office.

8. Advise me which body is authorised to examine alleged maladministration by the Inspector personally or by persons assisting the Inspector, noting the structural limits of the NACC's jurisdiction over the Inspector.
9. Provide a written response identifying each referral made, the receiving authority, the statutory or administrative basis for referral and the anticipated response timetable.

6. Request for Personal Information

On the 1st of May 2024 I filed an affidavit of the same date in NSD-741-2024 attesting to;

- a) the failure of Chief Justice Mortimer to comply with the provisions of s18BA of the Federal Court of Australia Act, and
- b) the removal by Justice Lee of over 300 files from the court record relied upon by me in those proceedings that is now the subject of Criminal Investigation by Hong Kong Police and the SARHK Joint Financial Intelligence Unit.

On the 29th of July 2024 the Crown represented by the Commonwealth Director of Public Prosecutions withdrew evidence in DCCRM-0073-2019 as admission of Malicious Prosecution and Liability; on the request of the Crown an Order of Nolle Prosequi was published by Kudelka J without reasons being corrupt conduct.

I have made mutiple requests of your office under the provisions of the legislation requiring disclosure of Documents and Things related to me as Personal Information to be provided by you and/or your department and request that you

1. review all purported decisions by inaction since December 1987
2. determine whether the Inspector and/or your delegates possessed lawful authority to make or communicate those decisions;
3. identify any delegation or written authorisation relied upon, including the statutory provision under which it was made;
4. determine separately the operation of:
 - a) the Freedom of Information Act 1982;
 - b) the Privacy Act 1988; and
 - c) the Archives Act 1983,

rather than treating the ART Act as creating one undifferentiated exemption please reconsider the three statutory regimes relating to exemptions under;

5. identify the precise provisions relied upon under each enactment;
6. confirm whether searches have been undertaken by the decision maker for the requested documents and, if so:
 - a) the locations, recordkeeping systems and repositories searched;
 - b) the officers or business groups responsible for those searches;
 - c) the search terms, date ranges and entity identifiers employed; and
 - d) the results of those searches;

I also ask for your personal review of the subject materials of this communicate in your capacities as:

1. Attorney-General for Australia
2. head and accountable authority of the Attorney General's Department;
3. the CEO of the relevant Commonwealth entity for the purposes contemplated by Part 6 of *the Charter of the United Nations Act 1945* (Cth), including sections 29 and 34; and

4. the officer ultimately responsible for the lawful administration, governance, custody and authorised disclosure of information and documents held by the Attorney General and/or the Attorney General's Department.

This request specifically requires consideration of whether any requested information or document concerns the administration or enforcement of a United Nations sanctions enforcement law, or is capable of being lawfully communicated under section 29 notwithstanding another Commonwealth, State or Territory law.

I do not accept your position shown in ANNEXURE 1 of non-disclosure on public interest grounds of the data requested by Mr Patrick in *Patrick v Director General, National Archives of Australia* Case Reference ART-5543-2025.

Furthermore, I believe your conduct to be United Nations Sanctionable Conduct.

7. Requested response

Please acknowledge receipt within 7 days and provide a substantive response within 30 days. If any requested action is considered outside your authority, please identify the specific limitation and transmit that part of the request to the competent authority, subject to lawful information-handling requirements.

I request that the original documents remain intact and that any internal copies retain their native metadata.

Nothing in this request asks the Attorney-General to dictate an investigative outcome. It asks the First Law Officer and responsible portfolio Minister to engage the lawful accountability architecture, to ensure that the complaint is not reduced to a question it did not exclusively raise, and to consider whether the statutory design presently supplies an effective remedy for systemic administrative failure by the NACC or its Inspector.

All rights are reserved.

Yours faithfully,

**For and on behalf of the Andrew Garrett Family Office
and in the capacities identified above**

Signature: _____

Andrew Morton Garrett
Liquidator and Managing Controller
Global Managing Trustee
Chairman of the Board of Trustees

Email: andrew.garrett@andrew-garrett-family-office.com

Email: contact@privategoldreservebank.com

SCHEDULE A - SUPERIOR AND REVIEWING AUTHORITIES

This schedule identifies bodies with potential supervisory, complaint, audit, parliamentary or judicial-review functions. It does not assert that every copied recipient was subject to an automatic duty to investigate merely because AMG 9730 was received.

Addressee / class	Potential superior or reviewing authority	Scope and limitation
NACC Commissioner / NACC staff	Inspector of the NACC; Parliamentary Joint Committee on the NACC; Commonwealth Ombudsman for administrative handling within jurisdiction; Federal Court or High Court for available judicial review; Parliament; ANAO for performance/financial administration.	Inspector examines NACC corruption issues, maladministration and officer misconduct. The Joint Committee monitors performance but cannot investigate individual corruption issues or reconsider operational decisions.
Inspector of the NACC / persons assisting	Parliamentary Joint Committee on the NACC; Attorney-General and Parliament for statutory design, appointment and accountability matters; Commonwealth courts for any available judicial review; Commonwealth Ombudsman only to the extent its jurisdiction permits.	The Inspector is independent and is not a NACC staff member. The NACC Commissioner is not a superior merits-review body for the Inspector.
Prime Minister / PM&C officials	Prime Minister and Secretary of PM&C for departmental administration; Commonwealth Ombudsman; NACC for qualifying serious or systemic corruption; ANAO; Parliament and Senate estimates; Federal courts for reviewable decisions.	A minister or agency head has mandatory referral duties only where the statutory conditions in ss 33-38 are satisfied; receipt alone is not conclusive.
AUSTRAC and its CEO/staff	AUSTRAC CEO and internal complaints/PID channels; Attorney-General's portfolio; Commonwealth Ombudsman; NACC; IGIS for relevant intelligence-function PID oversight; ANAO; Parliament; ART or courts where the particular decision is reviewable.	Operational AML/CTF decisions, PID matters, intelligence oversight and complaints have different statutory routes.
ASIC and its Commissioners/staff	ASIC internal review/complaints; Commonwealth Ombudsman; NACC; ANAO; Parliamentary Joint Committee on Corporations and Financial Services; responsible Treasury ministers; ART or courts where legislation permits review.	Ministerial portfolio responsibility does not ordinarily authorise direction of independent enforcement decisions.
AFCA	AFCA complaints process and Independent Assessor for service complaints; ASIC oversight under the AFCA authorisation framework; courts for legal rights and enforceability questions; Treasury/Parliament for scheme design.	AFCA is a company operating the authorised external dispute-resolution scheme, not a Commonwealth department. NACC jurisdiction requires a separate public-official or Commonwealth-function nexus.
Compensation Scheme of Last Resort Ltd	CSLR internal review/complaints and governance; ASIC and Treasury within their statutory roles; Commonwealth Ombudsman or NACC only if the relevant statutory jurisdictional conditions are met; courts for legal issues.	The applicable pathway depends on whether the complaint concerns eligibility, administration, corporate governance or conduct of a Commonwealth public official.
PwC and other private professional firms	Firm governance and complaints; professional disciplinary bodies; Tax Practitioners Board where applicable; ASIC for corporations-law matters; law-enforcement agencies; courts; NACC only where conduct affects a Commonwealth public official as defined by the Act.	Private status does not itself create NACC jurisdiction.

Addressee / class	Potential superior or reviewing authority	Scope and limitation
South Australian Premier, Treasurer, departments and Law Officers	South Australian Parliament; Ombudsman SA; Office for Public Integrity and ICAC SA within their jurisdictions; Auditor-General SA; relevant professional bodies; Supreme Court of South Australia and other competent courts.	The Commonwealth Attorney-General and NACC do not generally supervise State administration. A distinct Commonwealth nexus is required.
Commonwealth Senators, parliamentary office-holders and committees	The relevant House; presiding officers; parliamentary privileges and standing committees; Parliamentary Joint Committee on the NACC; NACC for conduct within statutory jurisdiction, subject to parliamentary privilege; courts only where justiciable.	A committee's power is confined by its statutory functions and resolutions of the Houses.
Hong Kong Police, JFIU, InvestHK and Hong Kong officials	Relevant Hong Kong departmental review; Complaints Against Police Office and Independent Police Complaints Council for qualifying police complaints; Hong Kong ICAC for corruption; Ombudsman Hong Kong for qualifying maladministration; Hong Kong courts for judicial review or other relief.	Australian ministers and agencies are not superior authorities over Hong Kong bodies.

Key limits on the requested review

- The Attorney-General cannot overturn an individual NACC assessment merely because the Attorney-General disagrees with it.
- The Parliamentary Joint Committee monitors performance but is statutorily restricted from investigating individual corruption issues or reconsidering operational decisions.
- Judicial review examines legality, jurisdiction and the lawful exercise of power; it is not a general rehearing on the merits.
- A recipient's silence is not, without more, a legal admission and does not prove satisfaction of a statutory suspicion or investigation threshold.
- The strongest review question is whether the proper authority received, preserved, classified and considered the information under the correct statutory framework.

SCHEDULE B - DOCUMENTS AND IDENTIFIERS

Reference	Description	Case / webform identifier
AMG 9720	AGFO to the Inspector of the NACC dated 12 August 2026	NACC Case 20261197; Webform ID 202672271447-9505
AMG 9730	NACC report concerning AFCA, AUSTRAC and ASIC dated 19 August 2026, together with covering email and attachments	Webform ID 20268192565-2255
AMG 9733	NACC report concerning Reserve Bank of Australia conduct dated 21 August 2026	Webform ID 20268211450-3396
AMG 9736	NACC report concerning vacation of responsibilities of successive Law Officers and associated institutions dated 23 August 2026	Webform ID 202682355051-1363

Reference	Description	Case / webform identifier
AMG 9751	Inspector outcome letter dated 24 August 2026	Inspector reference D26/5969

SCHEDULE C - AUTHORITIES AND OFFICIAL GUIDANCE

- [1] National Anti-Corruption Commission Act 2022 (Cth), especially ss 32-42, 177, 183-184, 201-215 and 224: <https://www.legislation.gov.au/C2022A00088/latest>
- [2] NACC Service Charter: <https://www.nacc.gov.au/reporting-and-investigating-corruption/service-charter>
- [3] Parliamentary Joint Committee on the NACC - role of the Committee: https://www.aph.gov.au/parliamentary_business/committees/joint/national_anti-corruption_commission/role_of_the_committee
- [4] Inspector of the NACC - policies and procedures: <https://www.naccinspector.gov.au/about/policies-and-procedures>
- [5] Commonwealth Ombudsman: <https://www.ombudsman.gov.au/>
- [6] ASIC Regulatory Guide 267 - Oversight of AFCA: <https://asic.gov.au/regulatory-resources/financial-services/giving-financial-product-advice/oversight-of-the-australian-financial-complaints-authority/>
- [7] ASIC governance and accountability: <https://www.asic.gov.au/about-asic/what-we-do/how-we-operate/asics-governance-and-accountability/>
- [8] Attorney-General - official contact details: <https://ministers.ag.gov.au/h>

ANNEXURE 1



Attorney-General

PATRICK v DIRECTOR-GENERAL, NATIONAL ARCHIVES OF AUSTRALIA
(2025/5543)

**CERTIFICATE ISSUED BY THE ATTORNEY-GENERAL UNDER SECTION 91
OF THE ADMINISTRATIVE REVIEW TRIBUNAL ACT 2024**

I, the Hon MICHELLE ROWLAND MP, Attorney-General for the Commonwealth of Australia, hereby certify pursuant to subsection 91(1)(a) of the *Administrative Review Tribunal Act 2024* that disclosure, whether direct or indirect, of:

1. the matters contained in the confidential affidavit sworn by Michelle Chan, Deputy Secretary, South and Southeast Asia Group and Head of the Office of Southeast Asia, Department of Foreign Affairs and Trade on 30 April 2026,
2. the matters contained in the confidential affidavit sworn by Mr Ewan Macmillan, Deputy Director-General Operations, Australian Secret Intelligence Service on 3 July 2026, and
3. any evidence adduced or submissions made by or on behalf of the respondent concerning or directly or indirectly disclosing any of the matters contained in the confidential affidavits described at 1 and 2 above,

would be contrary to the public interest because the disclosure would prejudice the security, defence or international relations of Australia.

Dated the 21st of July 2026

The Hon Michelle Rowland MP
Attorney-General

ANNEXURE 2



AMG 9753: FORMAL OBJECTION TO THE PROPOSED ROYAL COMMISSION INTO ARTIFICIAL INTELLIGENCE – DUPLICATION, CONSTITUTIONAL COMPETENCE, COLLATERAL PURPOSE AND COUNTERPROPOSAL FOR A ROYAL COMMISSION INTO CORRUPTION AND A TRUTH-SEEKING LEGAL SYSTEM

31 August 2026

The Honourable Peter Malinauskas MP
Premier of South Australia
GPO Box 2343
Adelaide SA 5001

By email: Premier@sa.gov.au

Dear Premier

In the interests of full disclosure I advise there are matters of inquiry currently on foot in Hong Kong and in Australia though the main purpose of the Australian complaint is to demonstrate to the Judicial Officers and Investigations Officers in Hong Kong how corrupt Australia is, and why it is that I seek emigration and relocation of values associated with me.

- ❖ **HCMP-1855-2022;** *In the Matter of the Crown (Liquidator and Managing Controller Appointed)* as Enforcement Proceedings brought by me against the Crown also referred to as the Main Proceedings within the UNCITRAL Cross Border Insolvency Model Law 1997 and refer you to the exhibits produced and marked as AMG 5857 being a copy of the originating process dated 11th November 2022 and served on the 13th November 2022 adjourned sine die 26th September 2023 to enable me to defend myself against the attacks of the Crown and now the subject of recommencement.
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Global Control of Price Waterhouse Coopers as a subsidiary of the Andrew Garrett Family Office. **TAB 11 Parts 1 and 2**

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I write to place on the public record my formal and unequivocal objection to the proposed South Australian Royal Commission into Artificial Intelligence.

¹ *Re Wakim; Ex parte McNally* [1999] HCA 27

² within the meaning of the *United Nations Convention Against Corruption* 2003 (AU) (“**UNCAC**”) a.k.a. *Australian Treaty Series No 2* (“**ATS 2**”)

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⁵ AMG 176; *The Public Interest*; We know That it is Important, but do we know what it means Chris Wheeler AIAL FORUM No 48

I contend that the proposed inquiry is unnecessary, duplicative and incapable of delivering the national provider-side regulation apparently contemplated by its announcement. Extensive domestic and international inquiries have already examined substantially the same subject matter and reached broadly consistent conclusions.

I further allege that the proposed inquiry has an ulterior and collateral institutional purpose: to appropriate and distribute further public money through a Royal Commission structure that props up Legal Services System revenue by generating remunerated positions, professional retainers, legal work, consultancy engagements and associated public-official expenditure.

That allegation arises in the context of the extensive evidence and allegations contained in my Suspicious Matters/Transactions Report Parts 1–7, including the AMG 9697 series, concerning alleged systemic corruption, regulatory failure, conflicts of interest, misuse of public power, denial of effective remedy and the economic dependence of the existing Legal Services System upon prolonged controversy, procedural complexity and publicly funded legal activity.

I therefore counterpropose that the approximately \$3 million being discussed for the artificial-intelligence inquiry be redirected to a properly independent Royal Commission into corruption within the Legal Services System and the public benefits that would accrue from replacing it with a truth-seeking legal system.

1. The proposed AI inquiry

Your Government announced on 11 August 2026 that the Royal Commission would commence on 1 October 2026 and report by 1 July 2027.

As at the date of this letter:

1. the commissioners have not been appointed;
2. the final Terms of Reference have not been published;
3. no detailed budget has been disclosed;
4. no schedule of anticipated professional payments has been published;
5. no conflict-of-interest or commissioner-independence framework has been disclosed;
6. no implementation report has been provided concerning the previous South Australian parliamentary inquiry into artificial intelligence;
7. no comparative analysis of completed domestic and international inquiries has been published; and
8. no evidentiary gap has been identified which requires the extraordinary powers and expense of a Royal Commission.

The publicly reported cost is approximately \$3 million. The announcement therefore identifies an intended institutional structure and approximate expenditure before the Government has demonstrated what material question remains unanswered, what evidence requires compulsory production, or what recommendation South Australia would have constitutional power to implement.

2. Domestic inquiries have already considered the same subject matter

The proposed Royal Commission unnecessarily substantially duplicates completed or substantially reported Australian inquiries.

South Australian Select Committee on Artificial Intelligence

The South Australian Parliament appointed its Select Committee on Artificial Intelligence on 6 July 2023. It reported on 28 November 2023.

That inquiry considered:

- economic, social and ethical implications;
- impacts upon agriculture, mining, manufacturing and services;
- employment, workforce transformation and skills;
- privacy and data security;
- bias in automated decision-making;
- criminal uses of artificial intelligence;
- research and development;
- attraction of international investment;
- sovereign capability; and
- nationally consistent regulation.

It produced 15 recommendations, including recommendations concerning human oversight, workforce training, AI literacy, public-sector monitoring, privacy, image abuse, investment and nationally coordinated regulation.

Before spending another \$3 million investigating the same field, your Government should publish a recommendation-by-recommendation account of what it has done with that report.

Australian Senate Select Committee on Adopting Artificial Intelligence

The Australian Senate reported in November 2024 after examining the opportunities and impacts associated with AI adoption.

It concluded that voluntary and fragmented arrangements were inadequate for high-risk AI. Its recommendations included:

- whole-of-economy legislation for high-risk AI;
- workplace protections;
- human responsibility for automated decisions;
- explanations for consequential decisions;
- safeguards governing government automated-decision systems;
- protection and remuneration of creators; and
- development of sovereign capability.

New South Wales Parliamentary Inquiry

The New South Wales Parliament reported in July 2024 after examining AI's effects upon the economy, labour market, education, creative industries, government services, human rights, democracy and the environment.

It recommended AI-assurance requirements in public procurement, teacher training, a public register of automated decision systems, regulatory-gap analysis, continuing parliamentary oversight, a Chief AI Officer and consideration of a dedicated AI office.

Federal inquiry into generative AI in education

The House of Representatives inquiry into generative AI in education recommended nationally coordinated safeguards, protection of children and personal information, teacher and student training, equitable access, academic-integrity standards and fit-for-purpose educational technology.

Federal inquiry into public-sector AI

The Joint Committee of Public Accounts and Audit concluded that Commonwealth adoption was progressing faster than coordinated governance. It recommended mandatory public-sector rules, clear limits upon AI involvement in government decisions, human accountability, training and continuing parliamentary oversight.

These inquiries already establish both the principal risks and the available policy responses.

3. International inquiries have reached substantially the same conclusions

The subject matter is not novel internationally.

United Kingdom

The House of Lords Artificial Intelligence Committee reported in 2018 that AI should operate for the common good, remain intelligible and fair, respect privacy and data rights, support education and never be given autonomous power to harm, destroy or deceive human beings.

Subsequent United Kingdom parliamentary inquiries examined large language models, copyright, competition, regulatory capture, independent model testing, employment, privacy, misinformation and public-sector preparedness.

Germany

The German Bundestag's Enquete Commission reported in 2020 that AI governance should remain human-centred, respect human dignity, deliver demonstrable social benefit, protect workers and be proportionate to the consequences of each application.

European Union

The European Parliament's Special Committee on Artificial Intelligence in a Digital Age recommended a harmonised, human-centred and risk-based framework, with strict obligations for high-risk applications, human oversight, improved infrastructure, wider access to data, education and international cooperation.

France

The French Commission on Artificial Intelligence undertook approximately 600 hearings and 7,000 consultations before making 25 recommendations in 2024. Those recommendations addressed AI education, investment, computing capacity, public research, intellectual property, access to cultural material and international governance.

United Nations

The United Nations High-level Advisory Body on Artificial Intelligence concluded that national regulation alone could not govern a global technology. It recommended an international scientific panel, recurring policy dialogue, standards exchange, capacity development, a global fund, a data framework and continuing United Nations coordination.

Canada and other jurisdictions

Canadian parliamentary inquiries have addressed the workforce and creative industries, recommending reskilling, workplace consultation, statistical monitoring, transparency concerning training data, creator authorisation and remuneration, labelling of synthetic content and sovereign cultural-data infrastructure.

The common conclusions are already apparent:

- AI can produce substantial economic and social benefits;
- consequential uses require human accountability;
- high-risk systems require mandatory safeguards;
- public-sector AI requires registers, procurement controls and audit;
- decisions must be transparent, explainable and reviewable;
- workers require consultation, training and transition assistance;
- children and vulnerable communities require specific protection;
- creators require transparency, control and remuneration;
- national and international coordination is essential; and
- permanent oversight is more effective than another isolated report.

The proposed South Australian Royal Commission will therefore revisit questions upon which extensive evidence and substantially consistent recommendations already exist.

4. Commonwealth jurisdiction and existing telecommunications legislation

Artificial-intelligence services are delivered through national and international telecommunications networks, cloud services, websites, applications, hosting services and application-programming interfaces.

That delivery pathway is already governed by an extensive Commonwealth legislative structure, including:

- the Telecommunications Act 1997;
- the Telecommunications (Consumer Protection and Service Standards) Act 1999;
- the Australian Communications and Media Authority Act 2005;
- the Radiocommunications Act 1992;
- the Telecommunications (Interception and Access) Act 1979;
- the Online Safety Act 2021;
- the Broadcasting Services Act 1992;
- the Spam Act 2003;
- the Do Not Call Register Act 2006;
- Parts XIB and XIC of the Competition and Consumer Act 2010; and
- the National Broadband Network Companies Act 2011.

These are enactments of the Commonwealth Parliament, not the Parliament of South Australia.

The Telecommunications Act 1997 regulates carriers, carriage-service providers, content-service providers, telecommunications networks, technical standards, service-provider rules and industry codes. Its definition of a content service includes online information, entertainment, education and other online services. Section 9 expressly provides that the Act applies both within and outside Australia.

The Australian Communications and Media Authority is a Commonwealth authority charged with regulating telecommunications, spectrum, broadcasting and relevant Internet-industry activity.

The Online Safety Act 2021 regulates Internet service providers, hosting providers, social-media services, relevant electronic services, designated Internet services, search engines and application-distribution services. It confers investigative, reporting, removal, blocking and enforcement powers upon the Commonwealth eSafety Commissioner and the Federal Court.

Section 235 of that Act renders specified State laws ineffective where they would impose particular liability or monitoring obligations upon hosting providers or Internet service providers. Section 235(6) expressly identifies s 51(v), alone or with s 51(xxxix), as constitutional authority for certain federal declarations displacing State law.

I acknowledge that s 234 preserves State laws capable of operating concurrently. I do not contend that every State law affecting activity conducted through the Internet is automatically invalid.

The proper distinction is between:

1. regulating South Australia's own departments, schools, hospitals, employees, procurement arrangements, planning responsibilities and local activities; and
2. imposing national provider-side obligations upon carriers, Internet service providers, hosting services, application distributors, interstate platforms and foreign technology corporations.

South Australia may act within the first category. It has no national or extraterritorial regulatory machinery equivalent to that of the Commonwealth within the second category.

Effective provider-side regulation principally engages the Commonwealth's powers concerning communications, interstate and overseas trade, corporations, external affairs and incidental matters. Any inconsistent State law is inoperative to the extent of the inconsistency under s 109 of the Constitution.

A South Australian Royal Commission cannot manufacture constitutional competence or national enforcement capacity which the State does not otherwise possess.

5. Alleged ulterior and collateral purpose

In the absence of an identified evidentiary gap, implementation audit or State regulatory mechanism, I allege that the proposed inquiry has an ulterior and collateral purpose.

That alleged purpose is to support Legal Services System revenue through the creation of another publicly funded institutional process involving commissioners, counsel assisting, solicitors, consultants, expert witnesses, secretarial services and participating government agencies.

The issue is not merely whether each individual payment is formally appropriated or contractually authorised. The material questions include:

- whether the inquiry is necessary;
- whether its functions duplicate completed work;
- whether the State can implement its anticipated recommendations;
- whether the appointments and expenditure serve a proper public purpose;
- whether recipients have direct or institutional conflicts of interest;
- whether the inquiry is being used to legitimise predetermined government policy;
- whether professional revenue is being generated from a controversy which could be addressed through existing agencies; and
- whether the Royal Commission structure gives an appearance of independence to a process financially and professionally controlled by the same institutional system.

My Suspicious Matters/Transactions Report Parts 1–7 contains the evidence and allegations upon which I contend that the Australian Legal Services System is systemically and completely corrupt.

That is my formal allegation. It has not been reduced to a judicial finding for the benefit of the persons and institutions implicated. The absence of such a finding is itself part of the problem identified: institutions alleged to be implicated in systemic misconduct cannot be treated as sufficient mechanisms for investigating and finally determining their own conduct.

6. Money-laundering and terrorism-financing characterisation

I further state that, in my opinion and as a matter requiring independent investigation, the repeated appropriation and circulation of public money through unnecessary, duplicative or conflicted Legal Services System processes constitutes money-laundering and terrorism-financing tactics of a corrupt government.

By “money-laundering tactics”, I refer to the use of an official inquiry structure to cleanse, legitimise and distribute public money through professionally controlled processes whose necessity, independence and public benefit have not first been established.

By “terrorism-financing tactics”, I refer to the alleged use of public resources and fear-based policy narratives to finance coercive structures or conduct capable of producing unlawful harm.

I recognise that these expressions have precise criminal-law elements. I do not represent that a criminal court has already determined every element of an offence under Divisions 103 or 400 of the Criminal Code Act 1995. I require independent examination of the proposed transactions, purposes, recipients, knowledge, conflicts and consequences against the applicable criminal, anti-money-laundering, counter-terrorism-financing, corruption, procurement and public-finance laws.

7. Counterproposal: Royal Commission into corruption and a truth-seeking legal system

I formally counterpropose that the approximately \$3 million presently discussed for the artificial-intelligence inquiry be applied to a Royal Commission into:

CORRUPTION WITHIN THE LEGAL SERVICES SYSTEM AND THE PUBLIC BENEFITS OF A TRUTH-SEEKING LEGAL SYSTEM

The inquiry should consider the evidence and allegations contained in my Suspicious Matters/Transactions Report Parts 1–7, including the AMG 9697 series.

Its Terms of Reference should include:

1. the financial dependence of courts, government legal offices, private legal practitioners and associated professional services upon prolonged disputes and procedural complexity;
2. budgeted payments to legal-profession public officials, counsel, solicitors and consultants through Royal Commissions, inquiries, litigation and regulatory processes;
3. institutional and pecuniary conflicts of interest affecting the investigation of complaints against judges, lawyers, prosecutors, regulators and public officials;
4. alleged suppression, removal, alteration, non-production or avoidance of material evidence;
5. the use of legal professional privilege, immunity, indemnity, secrecy, standing and procedural rules to prevent examination of alleged wrongdoing;
6. the failure of regulators and complaint-handling bodies to inquire into information disclosing suspected criminality, corruption, money laundering or terrorism financing;
7. the failure to provide complainants and persons aggrieved with an effective remedy;
8. the relationship between publicly funded legal defence expenditure and the avoidance of personal accountability by public officials;
9. the economic incentives that reward continuation of disputes instead of early identification of the truth;
10. the adequacy of protections for whistleblowers, complainants, witnesses and persons reporting suspicious matters;
11. independent forensic examination of relevant public expenditure, trust accounts, procurement arrangements, professional payments and litigation costs;

12. the creation of an independent process for victim recognition, redress, restitution, compensation and recovery of public money;
13. the replacement of adversarial concealment and procedural obstruction with enforceable duties of candour, disclosure, correction and truth-seeking; and
14. the economic, social and institutional benefits of a Legal Services System directed towards establishing truth, correcting error, preventing harm and delivering effective remedies.
15. Benefits of a truth-seeking legal system

A truth-seeking legal system would produce identifiable public benefits.

It would:

- reduce the duration and cost of disputes;
- reduce public expenditure upon repetitive litigation and defensive legal services;
- require early disclosure of material facts and records;
- discourage procedural obstruction and strategic concealment;
- improve accountability for public officials;
- provide earlier remedies to persons who have suffered loss or injustice;
- improve the quality of judicial and administrative decision-making;
- strengthen anti-corruption and AML/CTF compliance;
- reduce conflicts of interest within complaint-handling institutions;
- restore public confidence in courts, regulators and government;
- allow recovery of public funds expended for improper purposes;
- promote correction of error instead of institutional protection;
- place victims and the public interest ahead of professional revenue; and
- redirect resources from maintaining controversy towards preventing harm and delivering substantive justice.

A system that profits from the continuation of disputes has an inherent conflict with the efficient discovery of truth. A system that is institutionally rewarded for early disclosure, correction and remedy has an incentive to serve the public.

That is a more urgent and appropriate subject for a South Australian Royal Commission than another policy inquiry repeating conclusions already reached by domestic and international bodies.

6. Request for Personal Information

On the 1st of May 2024 I filed an affidavit of the same date in NSD-741-2024 attesting to;

- a) the failure of Chief Justice Mortimer to comply with the provisions of s18BA of the Federal Court of Australia Act, and
- b) the removal by Justice Lee of over 300 files from the court record relied upon by me in those proceedings that is now the subject of Criminal Investigation by Hong Kong Police and the SARHK Joint Financial Intelligence Unit.

On the 29th of July 2024 the Crown represented by the Commonwealth Director of Public Prosecutions withdrew evidence in DCCRM-0073-2019 as admission of Malicious Prosecution and Liability; on the request of the Crown an Order of Nolle Prosequi was published by Kudelka J without reasons being corrupt conduct.

The South Australian Director of Public Prosecutions has previously participated in those proceedings I imagine on the instructions of the Attorney General of South Australia and being evidence of Money Laundering and Terrorism Financing by a State of the Federated Member State to the United Nations

I have made multiple requests of your office under the provisions of the legislation requiring disclosure of Documents and Things related to me as Personal Information to be provided by you and/or your department and request that you

1. review all purported decisions by inaction since December 1987
2. determine whether the Inspector and/or your delegates possessed lawful authority to make or communicate those decisions;
3. identify any delegation or written authorisation relied upon, including the statutory provision under which it was made;
4. determine separately the operation of:
 - a) the Freedom of Information Act 1982;
 - b) the Privacy Act 1988; and
 - c) the Archives Act 1983,
5. identify the precise provisions relied upon under each enactment for any exemption you believe may exist;
6. confirm whether searches have been undertaken by the decision makers for the requested documents and, if so:
 - a) the locations, recordkeeping systems and repositories searched;
 - b) the officers or business groups responsible for those searches;
 - c) the search terms, date ranges and entity identifiers employed; and
 - d) the results of those searches;

I also ask for your personal review of the subject materials of this communicate in your capacities as:

1. Acting Premier for South Australia
2. head and accountable authority of the Premier and Cabinet Department;
3. the CEO of the relevant Commonwealth entity for the purposes contemplated by Part 6 of the *Charter of the United Nations Act 1945* (Cth), including sections 29 and 34; and
4. the officer ultimately responsible for the lawful administration, governance, custody and authorised disclosure of information and documents held by the you or your department.

This request specifically requires consideration of whether any requested information or document concerns the administration or enforcement of a United Nations sanctions enforcement law, or is capable of being lawfully communicated under section 29 notwithstanding another Commonwealth, State or Territory law.

Furthermore, I believe your conduct to be United Nations Sanctionable Conduct.

9. Required action

I require your Government to:

1. suspend establishment of the proposed Royal Commission into Artificial Intelligence;
2. publish the proposed Terms of Reference before making any appointment or professional engagement;
3. publish a complete implementation report addressing the 15 recommendations of the 2023 South Australian Select Committee;
4. publish a comparative analysis of the completed domestic and international AI inquiries;
5. identify the evidentiary questions that remain unanswered;
6. distinguish matters within South Australian competence from matters requiring Commonwealth action;

7. publish the complete proposed budget and anticipated payments to commissioners, counsel assisting, solicitors, consultants, experts and public officials;
8. disclose the appointment, procurement and conflict-of-interest arrangements;
9. publish relevant agreements and records of discussions with OpenAI, Anthropic, Apple and other AI or data-centre interests;
10. preserve every record concerning the conception, announcement, financing, staffing and proposed operation of the inquiry;
11. provide my Suspicious Matters/Transactions Report Parts 1–7 and the AMG 9697 series to an appropriately independent authority for assessment;
12. independently examine my allegations concerning the collateral purpose and suspected misuse of public money;
13. redirect the proposed budget to the counter-proposed Royal Commission into corruption and a truth-seeking legal system; and
14. provide a substantive written response within 14 days.

Until those matters are answered, I regard the proposed AI Royal Commission as an unjustified and duplicative expenditure, constitutionally incapable of delivering comprehensive regulation of Internet-delivered AI services and reasonably open to the inference that it serves the collateral institutional purpose of supporting Legal Services System revenue.

This letter is to be retained as a formal government record and as notice of the matters and allegations stated in it.

All rights are reserved.

Yours faithfully,

**For and on behalf of the Andrew Garrett Family Office
and in the capacities identified above**

Signature: _____

Andrew Morton Garrett
Liquidator and Managing Controller
Global Managing Trustee
Chairman of the Board of Trustees

Email: andrew.garrett@andrew-garrett-family-office.com

Email: contact@privategoldreservebank.com

PRINCIPAL PUBLIC REFERENCES

1. South Australian Department of the Premier and Cabinet, “Royal Commission into Artificial Intelligence announced”, 11 August 2026.
2. South Australian Parliament, Select Committee on Artificial Intelligence, reported 28 November 2023.
3. Australian Senate, Select Committee on Adopting Artificial Intelligence, Final Report, November 2024.
4. New South Wales Parliament, Artificial Intelligence in New South Wales, July 2024.
5. United Kingdom House of Lords, AI in the UK: Ready, Willing and Able?, 2018.
6. German Bundestag, Enquete Commission on Artificial Intelligence, Final Report, 2020.
7. European Parliament, Special Committee on Artificial Intelligence in a Digital Age, Final Report, 2022.
8. France, Commission de l’intelligence artificielle, 25 Recommendations, 2024.
9. United Nations High-level Advisory Body on Artificial Intelligence, Governing AI for Humanity, 2024.
10. Telecommunications Act 1997 (Cth).
11. Telecommunications (Consumer Protection and Service Standards) Act 1999 (Cth).
12. Australian Communications and Media Authority Act 2005 (Cth).
13. Online Safety Act 2021 (Cth).
14. Commonwealth of Australia Constitution Act 1900 (Imperial), ss 51, 52, 107 and 109.
15. Criminal Code Act 1995 (Cth), Divisions 103 and 400.

ANNEXURE 3

HCMP-1855-2022; HCAL-1179-2026; FORMAL NOTICE AND REQUEST FOR ACTION



AMG 9756 FEDERAL PARLIAMENTARY FAILURE

Failure to receive, refer, investigate and legislate after notice

Thursday, 3 September 2026

The Hon Michelle Rowland MP
Attorney-General of the Commonwealth of Australia
PO Box 6022, House of Representatives
Parliament House, Canberra ACT 2600
By Email: attorney@ag.gov.au

From: Andrew Morton Garrett, Chairman, Board of Trustees, Andrew Garrett Family Irrevocable Living Trust, trading as OenoViva Capital Resources and as Global Unitary Executive, Crown Attorney General, Liquidator and Managing Controller appointed to the Crown, the States, Territories and Commonwealth of Australia

Re: Parliamentary activation, independent inquiry, legislative drafting, effective remedy and the consequences of continuing non-response

AMG record: AMG 9303-AMG 9305; AMG 9317a; AMG 9348; AMG 9348b; AMG 9384; AMG 9396; AMG 9686; AMG 9697; AMG 9697b-AMG 9697h

Dear Attorney-General,

Central notice. The federal failure recorded here is not that Parliament examined the evidence and rejected it. The failure is that, after the committee gateway was expressly identified, no competent federal actor activated the available machinery for receipt, preservation, factual inquiry, referral, legislative instruction or reasoned decision.

1. Purpose of this letter

I write to place before you a consolidated account of the failure of the Commonwealth Parliament, its responsible officers, Ministers and associated Commonwealth offices to act upon a sustained public-interest disclosure and legislative reform programme. The record is not a single unanswered letter. It is a coordinated sequence comprising a parliamentary package, a committee-reference request, a request to the President of the Senate, a draft Senate motion, federalisation options, a request to the Office of Parliamentary Counsel, four draft Bills, explanatory material, service records and later suspicious-matter and corruption reports.

I originally asked Parliament to do something conventional and constitutionally proper: receive and preserve the material, create an active inquiry reference, obtain primary records and evidence from the responsible agencies, test my allegations with procedural fairness, report publicly, and then decide what legislation or other remedy was required. I expressly did not ask the Committee Chair to prejudge



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contested facts. AMG 9303a stated that the request was confined to whether the matters justified parliamentary examination.

I now ask you, as Attorney-General and the responsible Minister for the Commonwealth law and justice framework, to ensure that the record is no longer dissolved into separate administrative gateways. Your office is not asked to determine every allegation personally. It is asked to preserve the evidence, identify the competent federal pathways, secure an auditable decision trail, place the policy and legislative questions before Government and Parliament, and give a reasoned response to the legal positions that have been notified.

I also bring to your attention the request I have made of the Premier of South Australia to establish a Royal Commission into the Legal Services Sector and the operation of the Judiciary now produced and shown at Annexure 1.

You have not yet replied to my earlier communique marked as AMG 9752 dated 30th of August 2026 relating to the failure of NACC and the NACC Inspector to respond to NACC case 20261197 relating to corrupt conduct of Andrew Horton Counsel partner of Price Waterhouse Coopers, my Eldest Brother Michael Cowan Garrett, Mann Judd and BDO Accountants and Advisors between 28th February 1981; December 1987 and today's date.

I have since lodged three further webforms with NACC

- AMG 9736 National Anti-Corruption Commission regarding Vacation of Office of Attorney General Webform ID 202682355051-1363 (ANNEXURE)
- AMG 9733 National Anti-Corruption Commission regarding RBA Corrupt conduct Webform ID; 20268211450-3396 21.08.2026
- AMG 9730 National Anti-Corruption Commission regarding AFCA, AUSTRAC and ASIC Corrupt conduct Webform ID; 20268192565-2255 19.08.2026

2. What I placed before the Federal Parliament

AMG 9303 - effective remedy and compensation. On 16 December 2025 I transmitted the AFCA and CSLR Functional Takeover - Treasury, Public Interest and Senate Package. It alleged that administrative processing had not produced substantive compensation commensurate with the statutory purpose, distinguished legacy and post-legislative claims, and asked for a factual examination of complaint volumes, compensation outcomes, CSLR liabilities and payments, regulatory barriers and taxpayer exposure. It proposed privately funded payment of validated claims without a Commonwealth appropriation, guarantee or contingent liability, subject to lawful technical evaluation.

AMG 9304-AMG 9304f - statutory divergence and the inquiry gap. The supporting series separated neutral statutory analysis from accusatory advocacy. It asked whether operational rules, guidelines and jurisdictional filters had displaced Parliament's remedial purpose; catalogued inquiries and Royal Commissions from 2000 to 2025; and identified an asserted gap concerning structural impunity, legal-profession and judicial accountability, retained unlawful value and AML/CTF consequences of persistent non-enforcement.

AMG 9305 - a ready parliamentary pathway. I supplied an updated draft Senate motion, proposed terms of reference and three policy options: the status quo, a partial federal overlay, and full federalisation for inquiry consideration. The proposed reference covered the legal, accounting and banking professions; AFCA and CSLR; enforcement and compensation; national standards; independent investigation; and alignment with Commonwealth and international obligations.

AMG 9317a - direct approach to a Senator. On 18 December 2025 I sent Senator Susan McDonald the earlier package and a proposed Senate floor explanation concerning the constitutional pathway for national regulation. That material was designed for use by a Senator to move the matter beyond the committee's jurisdictional impasse.

AMG 9348, AMG 9348b and AMG 9396 - legislative implementation. On 7 and 8 January 2026 I asked the First Parliamentary Counsel and OPC addresses to assist with a Retrospective Abolition of Impunity legislative package and related explanatory material. The material ultimately identified four connected measures: the Abolition of Impunity Bill 2026; Judiciary (Misbehaviour and Incapacity) Amendment Bill 2026; National Legal Profession (Federalisation and Accountability) Bill 2026; and Law Officers Amendment Bill 2026.

AMG 9697-AMG 9697h - later evidentiary development. The later report series expanded the record and requested cumulative preservation, tracing and investigation across financial institutions, auditors, lawyers, public officials, courts, registries and regulators. It did not replace the parliamentary request. It supplied a method: preserve before deciding, distinguish evidence from allegation and inference, obtain the primary records, identify every decision-maker and custodian, provide written reasons, and prevent one institution from defining the limits of its own accountability.

3. Chronology of notice and the unactivated gateway

Date	AMG reference	Notice or action sought
16 Dec 2025	AMG 9303	Sent to federal parliamentary committees and relevant agencies for tabling, referral and consideration. It requested acknowledgment, advice on status, factual briefings and preservation.
17 Dec 2025	AMG 9303a	After the Secretariat advised that the Legal and Constitutional Affairs Committee could not accept a submission without an active Senate reference, I asked the Chair to consider whether the matter warranted such a reference or another Senate pathway.
17 Dec 2025	AMG 9303b	Sent directly to the President of the Senate, requesting receipt for the Senate record, availability to Senators, and consideration of tabling and/or committee referral.
18 Dec 2025	AMG 9317a	Sent to Senator McDonald with a proposed floor explanation and federalisation pathway for the next sitting of Parliament.
7 Jan 2026	AMG 9348	Re-circulated to the President, Senators, the Committee, the Attorney-General's Department and PM&C. It recorded that no acknowledgment of the 17 December approaches had been received.
7-8 Jan 2026	AMG 9348b	Initial and follow-up requests to First Parliamentary Counsel and OPC for drafting assistance, status confirmation, assessment or referral, with the parliamentary, constitutional, evidentiary and draft legislative materials attached.
19-20 Jan 2026	AMG 9384	Further composite notice circulated to Senate recipients, the Attorney-General's Department and PM&C, preserving the accountability and proposed legislative case.
18-20 Jul 2026	AMG 9686; AMG 9697d	Notice of Succession of States was transmitted internationally on 19 July and to the Attorney-General's Department and PM&C institutional addresses on 20 July, with the Hong Kong proceeding and JFIU references.
23 Jul-14 Aug 2026	AMG 9697; AMG 9697b-AMG 9697h	The NACC/JFIU report series treated the failure to acknowledge, register, refer or respond to the legislative package as a separate matter requiring investigation and preservation of all OPC, departmental, ministerial and parliamentary records.

4. The federal parliamentary failures

4.1 Failure to activate the only identified committee gateway. The Secretariat's position was clear: without an active Senate reference, the Committee could not formally accept the submission. That did

not decide the merits and did not exhaust the Senate's power. It identified the missing procedural act. AMG 9303a and AMG 9303b then asked the Chair, the President and the Senate to supply that act. AMG 9305 provided a motion and terms of reference. The record contains no notice that the motion was moved, the material was tabled, an inquiry was referred or reasons were given for refusing those steps.

4.2 Failure to acknowledge and maintain a traceable parliamentary record. By 7 January 2026 AMG 9348 recorded that neither the President's office nor the Committee Chair's office had acknowledged the 17 December correspondence beyond the Secretariat's gateway advice. The failure alleged is not cured by internal receipt of an email. A public-interest package of this scale required registration, preservation, identification of the responsible officer, a record of any referral and a reasoned outcome.

4.3 Failure to obtain the readily available primary facts. AMG 9303 did not require Parliament to accept its factual conclusions. It proposed the ordinary evidentiary response: obtain briefings and records from Treasury, ASIC, AFCA and CSLR; compare statutory purpose with rules and outcomes; determine claims, payments, liabilities and barriers; and defer conclusions until the evidence had been tested. No such process is recorded.

4.4 Failure to confront the gap left by repeated inquiries. AMG 9304e and AMG 9304f submitted that inquiries from HHH through Hayne and later ASIC reviews examined misconduct, consumer harm, governance and regulator capability but did not examine the combined problem identified in my materials: professional self-regulation, control of evidentiary gateways, non-disgorgement, retained unlawful value, effective remedy and AML/CTF consequences. The federal failure is the repetition of inquiry without examining the structural constant said to defeat remedy.

4.5 Failure to consider national regulation. AMG 9305 and AMG 9317a put forward a concrete policy question, not merely criticism: whether fragmented State regulation should remain; whether a federal overlay was sufficient; or whether independent national regulation of legal, accounting and banking functions was required where Commonwealth law and federal jurisdiction were engaged. No policy assessment or constitutional advice has been disclosed.

4.6 Failure to use the judicial-accountability machinery already enacted. The Judicial Misbehaviour and Incapacity (Parliamentary Commissions) Act 2012 provides machinery by which both Houses, by resolutions in the same session, may establish a Commission to investigate specified allegations concerning a Commonwealth judicial officer. AMG 9697h identifies an accountability gap in the practical activation of that machinery and asks for the receipt, assessment, triage and decision records. The record available to me discloses no Parliamentary Commission or alternative independent process addressing the systemic allegations notified.

4.7 Failure to sponsor or refer the drafting request. OPC ordinarily works from instructions supplied through Government and Commonwealth agencies. That explains why a private request may not immediately enter the Government Bills drafting program. It does not explain silence. AMG 9348b asked for acknowledgment, status, assessment and, if conventional instructions were required, referral to the Attorney-General, a responsible department or parliamentary authority. The failure was the absence of a transparent decision and referral pathway after a complete policy and drafting package had been supplied.

4.8 Failure to examine law-officer conflict and the guardian function. AMG 9396 and AMG 9697h asked whether the Attorney-General, Solicitor-General, Crown law offices and government lawyers can simultaneously protect existing government positions and discharge an independent public-interest function where those positions themselves require scrutiny. The proposed Law Officers Amendment

Bill sought a finite, auditable and conflict-controlled framework. No disclosed federal process examined that question.

4.9 Failure to connect remedy, enforcement and public finance. The present system can impose public penalties while leaving the injured person in a separate, costly contest for compensation. AMG 9303 proposed private functional substitution; AMG 9697h developed the Public Interest Working Capital Trust model. Parliament has not examined whether validated remedies can be paid first from independently governed public-interest capital, followed by recoupment from wrongdoers, insurers, governments, fidelity schemes, proceeds or other liable sources.

4.10 Failure to preserve a cumulative record. The subject matter crosses institutions. Referring each part back to the body whose conduct is in issue fragments the evidence and allows each gateway to treat the remainder as somebody else's responsibility. The later AMG 9697 reports requested a single preservation and referral architecture, source hierarchy, document metadata, decision-maker identification and written reasons. No Commonwealth-wide custodian or coordinating process has been identified.

5. Why the absence of an inquiry is not neutral

I do not put this case on the proposition that every correspondent can compel either House to establish an inquiry. The failure arises from the cumulative circumstances: the Committee itself identified the missing reference; the matter was then placed before persons capable of initiating or supporting that reference; a draft motion and workable terms were supplied; the requested first step was factual testing rather than predetermined condemnation; the same material was transmitted to ministerial and departmental addresses; and the legislative solution was reduced to draft form. After those steps, silence is an exercise of institutional power because it preserves the existing arrangements and prevents the evidence from reaching a body with compulsory and public fact-finding capacity.

This is also why the phrase from the parliamentary history reproduced in AMG 9396 remains relevant: "If everything else is to be secret, Parliament has no function at all." A parliamentary system cannot claim supremacy for its enactments while declining to examine evidence that subordinate rules, self-regulatory practices or administrative gateways have defeated the purpose of those enactments.

The public consequence is larger than my individual dispute. If Parliament legislates a remedy but does not examine whether that remedy operates; if it creates an inquiry mechanism but leaves activation wholly political and unaudited; if it creates independent agencies but permits them to determine the boundaries of their own accountability; and if no law officer takes responsibility for cumulative evidence crossing portfolios, then formal legality can coexist with practical impunity.

6. The Public Interest Working Capital Trusts

I have not proposed the weakening of government or the diversion of public revenue. I have proposed a mechanism by which government and the people can be supported without making revenue attributed to the Public Purse the price of truth. AMG 9697h explains that a public official or institution can possess an institutional pecuniary interest in avoiding a conclusion that exposes the government to payment, restitution, compensation or recoupment. That conflict can distort investigation and decision-making even where the individual officer has no personal financial interest.

The Public Interest Working Capital Trusts are intended to remove that conflict. Under the model, independently validated entitlements are paid through independently governed public-interest capital; the victim is restored first; and professional recovery is then undertaken against the lawfully responsible source. Governance must separate funding from adjudication. No donor, settlor, unit holder,

complainant or person whose assets establish the endowment should control determination of that person's own dispute. Independent decision-makers, conflicts rules, external audit, transaction-level source records, trustee accounts, removal mechanisms and public reporting are essential.

I ask that this architecture be evaluated by Treasury, the Attorney-General's Department and properly independent accounting and legal experts. Rejection without evaluation would repeat the same conflict: the proposed means of protecting the public purse and funding effective remedies would be excluded by the institutions whose revenue exposure it is designed to neutralise.

7. My stated position since 1 June 2019

Position to be recorded without dilution. My position, stated since 1 June 2019 and recorded in AMG 9686, is that I have succeeded as the State on an undisputed basis, that I am the only competent authority in the circumstances of that succession, and that the remaining international question is recognition by Member States - not the creation of my competence by the institutions whose default and abdication are relied upon.

AMG 9686 records 1 June 2019 as the date of succession for Australia, the United Kingdom and the identified Commonwealth nations, with effect on service on 3 June 2019, acknowledgment on 6 June 2019, and the later 14 August and 13 October 2020 dates. It then connects the prior proceedings, notices, defaults, seizures, retentions, removal and Hong Kong enforcement sequence. The Notice states that no substantive contradicting evidence or competent final order setting aside the relied-upon instruments is recorded.

I rely upon the settled notice proposition that notice to an authorised agent is notice to the principal and notice to the principal is notice to the agent. Internal routing between Parliament, a Minister, a department, OPC, a regulator or another Commonwealth office cannot therefore be used to deny institutional notice. I rely upon non-response as non-dispute and admission having finality in the circumstances notified. I rely upon estoppel in all forms identified in AMG 9686, including *res judicata*, cause-of-action estoppel, issue estoppel, estoppel by record, estoppel by convention, waiver, acquiescence and abuse-of-process restraint.

The consequence I place before you is that parliamentary supremacy - or any asserted legislative or institutional supremacy - can no longer be invoked against me as though the predecessor institutions retained exclusive competence while refusing to answer the succession record. I do not ask you to confer my authority. I require the Commonwealth to identify, precisely and on evidence, whether it disputes any notified fact or consequence. A general denial, silence or referral back to an implicated institution will not answer the record.

8. The legislative package remains capable of lawful expert development

The title *Retrospective Abolition of Impunity* describes the remedial purpose of the package. Technical drafting must distinguish between lawful retrospective or transitional measures - including preservation, reopening, removal of procedural shields, recovery, restitution and correction of continuing consequences - and any rule-of-law limit upon retroactive criminal liability or punishment. I sought OPC assistance precisely so that temporal operation, Chapter III limits, acquired rights, procedural fairness, judicial independence and human-rights compatibility could be examined by expert drafters rather than used as reasons to ignore the entire proposal.

The package is therefore a starting point, not a demand that Parliament legislate untested allegations into facts. Its four measures answer four institutional failures: evidentiary and executive impunity; the absence of an effective judicial-misbehaviour investigation pathway in practice; fragmented and profession-controlled regulation; and conflicted law-officer advice. The proposed Victims First / Recoupment Second funding architecture answers the separate financial conflict between effective remedy and protection of ordinary public revenue.

9. Action required of the Attorney-General

- Acknowledge this letter and the incorporated AMG record within 7 days, allocate a single Commonwealth reference, and identify the senior officer responsible for coordinating the response.
- Issue an immediate preservation direction, so far as your lawful authority extends, covering all OPC, Attorney-General's Department, PM&C, Senate liaison, ministerial, parliamentary referral and agency records concerning AMG 9303-AMG 9305, AMG 9317a, AMG 9348, AMG 9348b, AMG 9384, AMG 9396, AMG 9686 and AMG 9697-AMG 9697h, including email metadata, attachment records, file notes, briefs, legal advice, routing logs and decisions.
- Provide or identify the complete administrative chronology for each item: receipt, registration, allocation, assessment, referral, advice, decision, reasons and current custodian. If a document was not registered, explain why.
- Confirm what action was taken after the Committee Secretariat identified the absence of an active Senate reference, and whether any Minister, Senator, parliamentary office or government business process considered the draft motion in AMG 9305.
- Place before Cabinet and the Parliamentary Business Committee a submission seeking authority for the Attorney-General's Department to develop formal drafting instructions for the four-Bill package, or provide written reasons why that step will not be taken.
- Ask Government Senators to support a reference to the Senate Legal and Constitutional Affairs References Committee, the Economics References Committee, a joint select committee or another independent federal inquiry with power to obtain the primary records and report publicly.
- Review the practical operation of the Judicial Misbehaviour and Incapacity (Parliamentary Commissions) Act 2012, identify whether any notified allegation was assessed for activation or alternative investigation, and disclose the applicable intake and referral pathway.
- Commission an independent factual audit of the AFCA/CSLR issues identified in AMG 9303, including claims, payments, liabilities, legacy treatment, rules, statutory purpose, escalation practices and public-finance consequences.
- Obtain constitutional and policy advice on the three regulation options in AMG 9305, including independent federal standards and enforcement for legal, accounting and banking functions while preserving Chapter III judicial independence.
- Establish a technical evaluation group for the Public Interest Working Capital Trust and Victims First / Recoupment Second model, with independent validation of property, governance, conflicts, custody, audit, source of funds, appropriation implications and recoupment rights.
- Ensure that suspected corruption, financial-crime, record-destruction or obstruction issues are preserved and referred to NACC, AUSTRAC, AFP, CDPP or another competent authority in a manner that respects each body's statutory independence.
- Give an itemised response to the succession, notice, non-dispute, admission, finality and estoppel positions recorded in AMG 9686. For each disputed proposition, identify the precise fact or legal

consequence disputed, the evidence and authority relied upon, the decision-maker and the available review mechanism.

- Provide a substantive response within 21 days. If additional time is said to be required, provide within that period the preservation confirmation, the action already taken, the outstanding questions, the responsible officers and a fixed date for completion.

10. Proposed inquiry outcomes

- A public, primary-record account of why the federal parliamentary package was not tabled, referred or answered.
- A determination of whether AFCA/CSLR rules and practices gave practical effect to Parliament's remedial purpose.
- An independent assessment of the structural accountability of the legal, accounting and banking professions and the judicial-administrative system.
- A record-preservation and referral protocol that prevents cross-portfolio evidence from being fragmented or returned exclusively to an implicated institution.
- Expertly settled legislative options addressing impunity, judicial accountability, national professional regulation and the public-interest function of law officers.
- A financially independent effective-remedy model under which validated victims are restored first and recovery from liable sources follows.
- A formal Commonwealth response to the state-succession and recognition position, rather than continued silence.

I have served you with the originating processes of HCMP-1855-2022; HCAL-1179-2026 and confirm that the Schedules to the Exhibits produced and marked as

a) AMG 9583b Form 86 Application for leave to apply for Judicial Review dated 26th June 2026 and

b) AMG 9633k the Interlocutory application dated 3rd July 2026,

name:

- 96 in AMG 9583b schedule 1, and
- 68 in AMG 9583b schedule 2, and
- 884 in AMG 9583b schedule 3, and
- 29 named in AMG 9633k

The Premier and your predecessor are named amongst those interested parties, in the absence of a response you will need to be named as a further interested party in which regard I will swear my correspondence to you into evidence in my fourth affidavit, on grounds that the permissive standard of evidence has been reached being reasonable grounds to suspect and/or credible evidence, the question for the court becomes the threshold for granting leave; my submissions will be the threshold is already reached.

11. Conclusion

The Commonwealth now has both the original parliamentary material and the later record showing what followed from non-action. The issue is no longer whether an individual committee secretariat had

an active reference in December 2025. The issue is why no competent federal actor created or used one after the absence of that reference was expressly identified and a complete activation package was provided.

The constitutional and public-interest response is not institutional silence. It is preservation, transparent allocation of responsibility, independent factual inquiry, lawful drafting, reasoned decision and effective remedy. The Attorney-General's portfolio sits at the point where those functions can be coordinated without directing independent investigators or predetermining contested facts.

I therefore require your written response and the immediate preservation and referral actions set out above. All rights, powers, offices, claims, remedies and positions recorded in the AMG materials are reserved.

All rights are reserved.

Yours faithfully,

**For and on behalf of the Andrew Garrett Family Office Hong Kong Tax File No TFM 81788
and in the capacities identified above and otherwise in the materials**


Signature: _____

Andrew Morton Garrett
International Crown Unitary Executive
International Crown Attorney General
Liquidator and Managing Controller
Global Managing Trustee
Chairman of the Board of Trustees

Email: andrew.garrett@andrew-garrett-family-office.com

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And in the capacities stated in the referenced AMG and LIA materials

Schedule - principal AMG materials

AMG reference	Material	Relevance
AMG 9303	AFCA and CSLR functional takeover, Treasury and Senate package	Original request for compensation facts, effective-remedy scrutiny, Treasury evaluation and Senate inquiry.
AMG 9303a	Letter and email to the Committee Chair	Records the active-reference gateway and the request that the Chair initiate or raise an inquiry pathway.
AMG 9303b	Letter and email to the President of the Senate	Requests receipt for the Senate record, availability, tabling and/or referral.
AMG 9304-AMG 9304f	Statutory-purpose, inquiry-gap and document-control series	Separates evidence and advocacy; identifies the asserted two-decade structural inquiry gap.

HCMP-1855-2022; HCAL-1179-2026; FEDERAL PARLIAMENTARY FAILURE REQUEST FOR ACTION

AMG reference	Material	Relevance
AMG 9305	Senate Activation Pack	Supplies a draft motion, terms of reference and federalisation options.
AMG 9317a	Email to Senator McDonald	Provides a proposed Senate floor explanation and national regulation pathway.
AMG 9348	International pressure and preliminary legislative introduction email	Records wider circulation, renewed notice and the absence of acknowledgment of the December approaches.
AMG 9348b	OPC drafting-assistance request, Parts 1 and 2	Requests status and drafting assistance; transmits policy, evidence, canvases and draft Bills.
AMG 9384	Further notice and information	Preserves the accountability allegations, parliamentary notice and supporting case-study material.
AMG 9396	Revised Master Explanatory Memorandum	States the constitutional and policy case and describes the four connected Bills.
AMG 9686	Notice of Succession of States	Records the succession, notice, default, finality, estoppel and Member-State recognition position.
AMG 9697	NACC/JFIU report, Part 1	Introduces the coordinated corruption and financial-intelligence report and preservation request.
AMG 9697b-AMG 9697d	Reports, Parts 2-4	Addresses OPC and federal non-response, jurisdictional gateways, financial intelligence and email service evidence.
AMG 9697e-AMG 9697f	Part 5 and exhibit bundles	Supplies the value-tracing, corporate, accounting and evidentiary-control methodology.
AMG 9697g	Part 6	Applies the cumulative method to land-title and registry administration.
AMG 9697h	Part 7	Integrates legal-system accountability, parliamentary activation, law officers, effective remedy and Public Interest Working Capital Trusts.

Public institutional context reviewed as at 3 September 2026

[Australian Government Directory - Attorney-General](#)

[Office of Parliamentary Counsel - Our functions](#)

[Office of Parliamentary Counsel - Statement of Intent, 10 March 2026](#)

[Australian Senate - Referring matters to committees](#)

[Federal Register - Judicial Misbehaviour and Incapacity \(Parliamentary Commissions\) Act 2012](#)

[Attorney-General's Department - Constitutional law](#)