

To whom it may concern

I write to the ASIC in my own personal capacity (not as the representative of Chifley Advisory) in response to the proposed levy in respect to Registered Liquidators.

It is my view that the Graduated Levy does not comply with the stated objectives, especially the objective of "Proportionality".

Basically, the Graduated Levy does not take into account the "size" of the administration such as the amount of assets/recoveries under management and the amount of remuneration earned by the Registered Liquidator.

That is, the Graduate Levy has no component equivalent to the Realisations Charge that the Government charges for the administration of Bankruptcy matters nor does the Graduate Levy have a component that would differentiate matters on "size" such as taking into account remuneration paid on a particular administration.

It is common sense that the "larger" matters would have more public interest and would require more "surveillance" than the "smaller" matters.

It is my submission that there should be a component to the Graduate Levy that takes into consideration the "size" of matters and, by so doing, it would comply with all the stated objectives including "proportionality".

Any queries, please call me anytime on 0401 086 675.

Regards,

Gavin Moss CA

Registered and Official Liquidator

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