

**Haydar Tuncer**

**From:** Martin Stockfeld  
**Sent:** Thursday, 18 November 2021 4:13 PM  
**To:** Kevin Truong  
**Subject:** FW: Claim for defective administration pursuant to CDDA Scheme [SEC=OFFICIAL:Sensitive]

Hi Kevin – see the below highlighted in yellow. I have no record of an actual request being made.

**Martin Stockfeld**

Senior Specialist – Financial Advisers

**Australian Securities and Investments Commission**

Level 7, 120 Collins Street, Melbourne, Victoria, 3000

Tel: +s 22 | Mob: s 22

s 22




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**From:** Tair Tidhar <s 22>  
**Sent:** Thursday, 18 January 2018 4:13 PM  
**To:** Martin Stockfeld s 22>  
**Subject:** Fw: Claim for defective administration pursuant to CDDA Scheme [DLM=Sensitive]

This email contains content that can be viewed only in Lotus Notes. To view this content, double-click on this email within Outlook so it opens in a separate window. Then, double-click on this attachment to open it in Lotus Notes:



ActiveMail.net

A text rendering of the Active Mail content, if available, is shown below:

Hi Martin

I just checked something in the letter and made an amendment!

Please see updated version attached.

Thanks

Tair Tidhar | Graduate | Administrative Law Team | Chief Legal Office | ASIC | s 22 | s 22



20180118 Letter  
to Sparrow re:gar...

----- Forwarded by Tair Tidhar/Melbourne/VIC/ASIC on 18/01/2018 04:11 PM -----

**From:** Tair Tidhar/Melbourne/VIC/ASIC  
**To:** Martin Stockfeld/Melbourne/VIC/ASIC@ASIC,  
**Date:** 18/01/2018 03:52 PM

Subject: Re: Fw: Claim for defective administration pursuant to CDDA Scheme [DLM=Sensitive]

FOI 255-2021

Hi Martin

Please see the attached draft letter responding to Mr Spanos request regarding the CDDA Scheme.

Thanks

Tair Tidhar | Graduate | Administrative Law Team | Chief Legal Office | ASIC |  s 22 |  s 22

[attachment "20180118 Letter to Spano regarding CDDA scheme.docx" deleted by Tair Tidhar/Melbourne/VIC/ASIC]

From: Senior Manager ALT/Melbourne/VIC/ASIC  
To: Tair Tidhar/Melbourne/VIC/ASIC@ASIC,  
Date: 17/01/2018 09:38 AM  
Subject: Fw: Claim for defective administration pursuant to CDDA Scheme [DLM=Sensitive]  
Sent by: Martin Stockfeld

----- Forwarded by Martin Stockfeld/Melbourne/VIC/ASIC on 17/01/2018 09:38 AM -----

From: Michelangelo Spano <[spanom@taxology.com.au](mailto:spanom@taxology.com.au)>  
To: "senior.manager.alt@asic.gov.au" <[senior.manager.alt@asic.gov.au](mailto:senior.manager.alt@asic.gov.au)>,  
Date: 16/01/2018 01:41 PM  
Subject: Claim for defective administration pursuant to CDDA Scheme

ATTN: Senior Manager, Administrative Law Team

We refer to all prior conferences and correspondence pertaining to our complaints regarding the misconduct of AMP Financial Planning Pty Limited and the malfeasance/nonfeasance/misfeasance of the Australian Securities and Investments Commission ("ASIC") concerning the handling of our complaints. We advise that as a result of the unlawful actions of AMP Financial Planning Pty Limited, both Taxology Financial Services Pty Ltd and Taxology Pty Ltd have suffered significant detriment, resulting in substantial financial losses, loss of existing and potential clients, cancellation of licence authorisation, and significant reputational damage to myself and the registered trademark 'Taxology'.

I have invested significant financial and non-financial resources in building both Taxology Pty Ltd and Taxology Financial Services Pty Ltd ("Taxology Group") from inception, a large part of which has been directed at building the 'Taxology' trademark as a national brand and expanding the business nationally through organic growth and acquisitions. As at 30 June 2017, the arm's length value of my financial and non-financial investment in the Taxology Group is quantified at approximately \$1.35 million at historical cost. Whilst the current value of the Taxology Group is difficult to determine without an actual sale, it is expected that it would be difficult to realise a sale price of even 5-10% of the historical cost as a result of the loss of clients and reputational damage – such a valuation would result in significant financial detriment to myself in the vicinity of \$1.5-2 million after providing for the cost of capital at market rates for comparable investments.

I enclose information detailing my dealings with the ASIC and other organs of the Crown in attempt to remedy the misconduct of AMP Financial Planning Pty Limited towards myself and the Taxology Group.

I thereby request the ASIC consider my eligibility for compensation under the Compensation for Detriment caused by Defective Administration Scheme (the CDDA Scheme) as a result of the malfeasance/nonfeasance/misfeasance of the Australian Securities and Investments Commission ("ASIC") concerning the handling of our complaints.

Should you have any questions or wish to discuss any other matter, please do not hesitate to contact us, thank you.

Regards,

**Michelangelo Spano**

DIRECTOR | MIPA AFA BAcc BBus(Fin. Plan.)

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FOI 255-2021

**From:** Michelangelo Spano  
**Sent:** Tuesday, 25 July 2017 5:03 PM  
**To:** [John.Chapman@sa.gov.au](mailto:John.Chapman@sa.gov.au)  
**Subject:** RE: Case No: 16-011227 - Taxology Financial Services Pty Ltd vs. AMP Financial Planning Pty Ltd  
**Importance:** High

Correction: contravention should read Subsection 991A(1) of the *Corporations Act 2001*

**From:** Michelangelo Spano  
**Sent:** Tuesday, 25 July 2017 4:55 PM  
**To:** [John.Chapman@sa.gov.au](mailto:John.Chapman@sa.gov.au)  
**Subject:** RE: Case No: 16-011227 - Taxology Financial Services Pty Ltd vs. AMP Financial Planning Pty Ltd  
**Importance:** High

Dear Mr Chapman

RE: YOUR REFERENCE 16-011227

We refer to all prior correspondence pertaining to our complaint regarding the misconduct of AMP Financial Planning Pty Limited, in particular my fax correspondence dated 25 May 2017, enclosed below for your reference.

We have received a reply from the Australian Securities and Investments Commission ("ASIC") in reply to your referral and our complaint concerning the conduct of AMP Financial Planning Pty Limited ("AMP") with respect to Taxology Financial Services Pty Ltd. In a letter from ASIC dated 22 June 2017 (enclosed) Mr Warren Day makes reference to my complaint, indicating that in his opinion, my complaint concerned unconscionable conduct with respect to denying an application for vendor finance. This is a grossly inaccurate statement and indicates that Mr Day has not investigated the matter in sufficient detail or has not been provided with the information I have provided to both your office and the ASIC in my email correspondence with Ms Ellen Chapman of ASIC dated 10 April 2017 (also included in my fax to you dated 25 May 2017). I thereby request your assistance in bringing this matter to the attention of Mr Warren Day, in particular the fact that AMP's misleading and deceptive conduct with respect to the misrepresentation of the PSO Offer constitutes a contravention of subsection 91A(1) the *Corporations Act 2001*. Should ASIC refuse to acknowledge this fact, I request you refer the matter to the Attorney General's office as an act of malfeasance/nonfeasance.

Should you have any questions or wish to discuss any other matter, please do not hesitate to contact us, thank you.

Regards,

**Michelangelo Spano** | MIPA AFA BAcc BBus (Fin. Plan.) | Director  
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PO Box 305, WELLAND SA 5007 AUSTRALIA | T +61 8 8127 9655 | F +61 8 8127 9677 | M 0411 711 790  
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**Michelangelo Spano**  
MIPA AFA BAcc BBus (Fin. Plan.)  
DIRECTOR  
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**From:** Jenna Koochew [s 22]  
**Sent:** Thursday, 22 June 2017 5:25 PM  
**To:** Michelangelo Spano  
**Cc:** [John.Chapman@sa.gov.au](mailto:John.Chapman@sa.gov.au); Lauren Roy  
**Subject:** ASIC's response to letter - CCU 17\0361 [SEC=UNCLASSIFIED]

Dear Mr Spano

Please find attached a copy of ASIC's response to your request.

Kind regards

**Jenna Koochew** | Executive Assistant to Warren Day, Senior Executive Leader – Assessment & Intelligence and Regional Commissioner - Victoria | **ASIC**

| s 22 | s 22 | s 22

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**From:** Michelangelo Spano  
**Sent:** Thursday, 25 May 2017 9:14 AM  
**To:** [John.Chapman@sa.gov.au](mailto:John.Chapman@sa.gov.au)  
**Subject:** RE: Case No: 16-011227 - Taxology Financial Services Pty Ltd vs. AMP Financial Planning Pty Ltd  
**Importance:** High

Dear Mr Chapman

RE: Case No: 16-011227 - Taxology Financial Services Pty Ltd vs. AMP Financial Planning Pty Ltd

We refer to all prior conferences, meetings and correspondence with your office concerning the dispute between Taxology Financial Services Pty Ltd ("TFS") and AMP Financial Planning Pty Limited ("AMP"). We note that we have not received any confirmation from the Australian Competition and Consumer Commission ("ACCC") with respect to your referral of our complaint to the ACCC. May you please provide an update as to the status of your referral of our complaint?

We advise that we have also raised a complaint with the Australian Securities and Investments Commission ("ASIC") concerning AMP's contravention of s991A(1) of the *Corporations Act 2001* with respect to the bundle of financial products integral to TFS's contractual arrangements with AMP. ASIC have refused to assist with enforcement action despite the matter constituting a clear contravention of the provisions of the Corporations Law over which ASIC is charged with governance. In my opinion, the refusal to investigate my complaint is an act of malfeasance and a breach of ASIC's obligations to uphold and enforce the law. We enclose a copy of our correspondence with ASIC concerning the matter below for your reference.

We request your assistance with enforcing our statutory rights – may you please refer our complaint to the senior management of ASIC for investigation and enforcement action?

Thank you.

FOI 255-2021

Regards,

**Michelangelo Spano** | MIPA AFA BAcc BBus (Fin. Plan.) | Director  
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## Michelangelo Spano

MIPA AFA BAcc BBus (Fin. Plan.)

DIRECTOR

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**From:** Lauren Roy [REDACTED]  
**Sent:** Thursday, 11 May 2017 4:40 PM  
**To:** Michelangelo Spano  
**Subject:** Your complaints about ASIC [SEC=UNCLASSIFIED]

Dear Mr Spano

I refer to the complaints about ASIC you lodged through our website on 20 April 2017 and 21 April 2017. I apologise for the delay in responding to you.

As you have requested that your concerns regarding AMP Financial Planning be reassessed by another officer, we have decided to review our original decision to take no further action in relation to your report of misconduct.

In addition, in light of the concerns you raised regarding CMC Markets and the Financial Ombudsman Service, we have also commenced a separate review of our decision to take no further action in relation to that report of misconduct.

We will contact you in the next few weeks to advise you of the outcome of these reviews.

If you have any questions in the meantime, please contact me using the details below.

Regards

Lauren

**Lauren Roy** | Escalated Matters & Government - Misconduct & Breach Reporting | Assessment & Intelligence | ASIC | [REDACTED] | Fax: [REDACTED] | [REDACTED]

*I am not in the office on Fridays*

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**From:** Michelangelo Spano  
**Sent:** Wednesday, 10 May 2017 12:24 PM  
**To:** [professional.standards.unit@asic.gov.au](mailto:professional.standards.unit@asic.gov.au)  
**Subject:** FW: Conduct complaint  
**Importance:** High

ATTN: PROFESSIONAL STANDARDS UNIT – AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

RE: YOUR REFERENCE 10179/17

We refer to our correspondence dated 20 April 2017 and advise that we have not received a response to-date – may you please acknowledge the receipt of our complaint, thank you.

Regards,

**Michelangelo Spano**

MIPA AFA BAcc BBus (Fin. Plan.)  
 DIRECTOR

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**From:** Michelangelo Spano  
**Sent:** Thursday, 20 April 2017 6:53 PM  
**To:** [professional.standards.unit@asic.gov.au](mailto:professional.standards.unit@asic.gov.au)  
**Subject:** Conduct complaint  
**Importance:** High

ATTN: PROFESSIONAL STANDARDS UNIT – AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

RE: YOUR REFERENCE 10179/17

We refer to all prior correspondence pertaining to our complaint regarding the misconduct of AMP Financial Planning Pty Limited, in particular Ms Chapman's letter dated 19 April 2017 and email correspondence dated 20 April 2017, enclosed below for your reference.

FOI 235-2021

We formally issue a complaint regarding the conduct of Ms Chapman with respect to her decision to dismiss our complaint against AMP Financial Planning Pty Limited without adequate cause. We enclose our email correspondence with Ms Chapman dated 10 April 2017 which clearly details a number of serious contraventions of the Corporations Act 2001 by AMP Financial Planning Pty Limited that the Australian Securities and Investments Commission is charged with governance over. In light of such contraventions, Ms Chapman's dismissal of our complaint without adequate justification may be construed as an act of malfeasance and should be referred to the Attorney General's office for investigation.

We request that our complaint regarding the conduct of AMP Financial Planning Pty Limited (your reference 10179/17) be actioned by another officer of the Australian Securities and Investments Commission with urgency.

Should you have any questions or wish to discuss any other matter, please do not hesitate to contact me, thank you.

Regards,

**Michelangelo Spano**

MIPA AFA BAcc BBus(Fin. Plan.)

DIRECTOR

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**Michelangelo Spano** | MIPA AFA BAcc BBus (Fin. Plan.) | Director

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**From:** Ellen Chapman [s 22]

**Sent:** Thursday, 20 April 2017 5:16 PM

**To:** Michelangelo Spano

**Subject:** AMP Financial Planning Pty Limited (Treat as In Confidence) [DLM=Sensitive]

Our reference: 10179/17

Dear Mr Spano

Please find attached our letter regarding the outcome of your report of misconduct.

Should you have any queries in relation to this letter please contact me on s 22.

Yours sincerely

**Ellen Chapman** | Analyst | Misconduct & Breach Reporting | Australian Securities & Investments Commission | Ext s 22 |  
Ph: s 22 | Fax: s 22 | email: s 22 | Level 1, 11 Mounts Bay Road, Perth WA 6000

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**From:** Michelangelo Spano  
**Sent:** Monday, 10 April 2017 4:26 PM  
**To:** [REDACTED]  
**Subject:** RE: AMP Financial Planning Pty Limited (Treat as In Confidence) [DLM=Sensitive]  
**Importance:** High

Dear Ms Chapman

RE: YOUR REFERENCE 10179/17

We refer to all prior correspondence pertaining to our complaint regarding the misconduct of AMP Financial Planning Pty Limited, in particular your email correspondence dated 7 April 2017, enclosed below for your reference.

We note that ASIC is charged with the general administration of the Corporations Act 2001 ("the Act") pursuant to subsection 5B of the Act. Subsection 991A(1) of the Act prohibits a financial services licensee from engaging in unconscionable conduct "in or in relation to the provision of a financial service". Subsection 766A(1)(b) of the Act prescribes that a person provides a 'financial service' if they inter alia "deal in a financial product". Subsection 764A(c) of the Act prescribes that "a derivative" meets the criteria for recognition as a 'financial product' under the Act.

In early 2013, I met with David Dunncliff, an officer of AMP Financial Planning Pty Limited, who made certain representations on behalf of AMP Financial Planning Pty Limited with respect to an offer to transact for a package described by Mr Dunncliff as a 'PSO Offer', which included the acquisition of a derivative investment tied to the underlying asset values of the superannuation accounts of a package of 'clients' to be acquired from AMP Financial Planning Pty Limited (clearly meeting the definition of a derivative product pursuant to subsection 761D of the Act). Please note that the derivative portion of the PSO Offer package is a critical element of the vendor financing arrangement, provides for a substantial proportion of the capital value of the investment by way of an included put option tied to the derivative product, and is not merely incidental to the PSO Offer as the payments tied to the derivative product formed a critical component of the forecast cashflows utilised in the vendor financing documentation. At my initial meeting with Mr Dunncliff at his office in Dulwich (South Australia), I enquired as to whether there were any financial qualification prerequisites to be eligible for the vendor financing, to which Mr Dunncliff responded that there were no qualification criteria. I made a point of verifying this statement with Mr Dunncliff, explaining that my current Accountancy practice had little turnover for the prior year, detailing that the business was only trading at approximately 5% volume capacity due to starting from a zero client base and had only generated a small amount revenue for the prior year because the practice had adopted an aggressive discount pricing marketing strategy in order to attract new clients from roadside signage. Mr Dunncliff enquired as to the estimated revenue that potentially could be generated under existing circumstances if the practice had sufficient clientele to work at full capacity, which Mr Dunncliff made note of on his interview sheet at the time. I made it clear to Mr Dunncliff that the Accountancy practice intended to offer discounted tax return services to the list of 1000 (approximate) AMP Financial Planning clients to be acquired via a cross-selling marketing plan, which may explain Mr Dunncliff's reasoning for noting the potential revenue of my Accountancy practice rather than that of the historical revenue on his file notes. Given that AMP Financial Planning Pty Limited's PSO Offer package was self-financing and cashflow positive from commencement, it is obvious to an independent observer that the majority of the arms-length value of the consideration for the package was to be in the form of an in-specie contribution of future services by way of the contractual obligations imposed on the requirement to act as an authorised representative of AMP Financial Planning Pty Limited for a minimum period of time in order to qualify for the self-financing PSO Offer package. Failure to meet the associated minimum timeframes by terminating the authorised representative relationship was to result in significant financial penalties including the repayment of certain allowances and other amounts by way of provisions to the licensee's authorisation agreements.

In early 2013, subsequent meetings were held with Mr Dunncliff in which Mr Dunncliff reviewed my personal educational qualifications and advised that I met the criteria to proceed with the acquisition of the self-financing PSO Offer subject to my undertaking of the prerequisite training. I undertook the required training and completed all required documentation, establishing a special purpose entity to acquire the assets and act as the owner/operator of the PSO Offer in accordance with directions from AMP Financial Planning to create a legal separation between the Accountancy practice and the proposed Financial Services business. Once I had executed all contracts committing Taxology Financial Services Pty Ltd to be bound as an authorised representative of AMP Financial Planning Pty Limited for a minimum time period, and had expected a significant amount of financial and temporal resources towards meeting the initial requirements of the PSO Offer, AMP declined the vendor finance and refused to deliver the clients and derivative income stream portion of the PSO Offer. It is at this point that the officers of AMP Financial Planning Pty Limited acted unconscionably in mandating that I sign an alteration to the terms of the contract (under financial duress), promising to find an alternative solution by way of a temporary lease or other alternative. Despite my attempts to resolve this dispute with AMP Financial Planning over the 2013-2016 period, no solution was offered and Taxology Financial Services Pty Ltd was forced to fulfil the ongoing obligations imposed by AMP Financial Planning despite AMP's non-compliance with the terms of the PSO offer contract, amounting to a significant financial expenditure on items such as insurances, software, office accommodation, signage, advertising expenditure, employee remuneration, and other expenses associated with meeting the standards and requirements by which Taxology Financial Services Pty Ltd was bound under the contractual relations with AMP Financial Planning Pty Limited. The fact that AMP Financial Planning Pty Limited required Taxology Financial Services Pty Ltd to provide the consideration for the PSO Offer despite withholding the income, capital growth and client access benefits that should have been associated with the PSO Offer clearly meets the common law definition of what constitutes unconscionable conduct. Furthermore, shortly after indicating to AMP Financial Planning Pty Limited that Taxology Financial Services Pty Ltd intended to seek a financial remedy to the dispute (as described above), AMP Financial Planning Pty Limited terminated the authorisation of Taxology Financial Services Pty Ltd in June 2017, rendering the entity unable to generate income, thus impeding Taxology Financial Service Pty Ltd's ability to retain legal counsel, in-turn impeding Taxology Financial Service Pty Ltd's ability to seek remedy – a further act of unconscionable conduct and a violation of the terms of the authorisation contracts.

I have provided the Small Business Commissioner of South Australia with a compilation of the documents to support the statements made above and have requested that you enquire with the Small Business Commission of South Australia to obtain the documentation as a means of reducing the administrative burden on Taxology Financial Services Pty Ltd. I would be pleased to provide any additional documentation that may be required, but as I have necessarily taken on additional employment to replace the loss of income earning capability/loss of financial resources resulting from the dispute with AMP Financial Planning Pty Limited, it may take me a few weeks to compile the required documents – please advise any specific documents that may be required urgently.

Should you have any questions or wish to discuss any other matter, please do not hesitate to contact us, thank you.

Regards,

**Michelangelo Spano** | MIPA AFA BAcc BBus (Fin. Plan.) | Director  
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**From:** Ellen Chapman [s 22]  
**Sent:** Friday, 7 April 2017 4:11 PM  
**To:** Michelangelo Spano  
**Subject:** RE: AMP Financial Planning Pty Limited (Treat as In Confidence) [DLM=Sensitive]

Our reference: 10179/17

Dear Mr Spano

Thank you for your email. ASIC is conducting a preliminary assessment of your concerns. You have stated that the AMP has engaged in unconscionable conduct over a period of time but you have not provided specific details about the financial services that were provided to you or Taxology Financial Services Pty Ltd, or the specific actions by AMP that may constitute unconscionable conduct.

We understand the Small Business Commissioner of South Australia (Small Business Commissioner) has referred your concerns to the Australian Competition and Consumer Commission (ACCC); rather than ASIC. It appears that this matter may more appropriately be considered by the ACCC. It is likely that the majority of the documentation would be relevant to the alleged anti-competitive activities and contractual dispute which falls within the legislation administered by the ACCC. Any unconscionable conduct that is alleged to have occurred by AMP Financial Planning Pty Limited in their dealings with you in relation to your contractual arrangements is more appropriately reviewed by the ACCC. Should the ACCC upon reviewing the documentation identify a concern for ASIC they can refer this to ASIC for consideration.

At this time, ASIC will not be contacting the ACCC to obtain access to the documentation as you suggest.

We would appreciate you providing further information about your concerns and addressing the following:

- the circumstances that led to your dispute with AMP
- approximate dates and the actions that you consider constitute unconscionable conduct
- whether you have utilised the internal and external dispute resolution services of AMP and if so, the outcome.

Please provide the summary by 13 April 2017.

The following link to ASIC Information Sheet 151 [ASIC's approach to enforcement](#) provides information about how ASIC assesses matters received and how we direct our resources. When determining whether to take further action we consider a number of factors including: the quality of the evidence provided, the seriousness of the misconduct, whether the misconduct is systemic, the number of consumers affected, whether the matter is more appropriately handled by another agency or whether the person reporting the misconduct can pursue their own private legal action.

As a regulator, ASIC does not intervene in private disputes for the benefit of one or the other parties and we are unable to provide legal advice. You may wish to seek independent legal advice as to whether you can pursue any civil remedies against AMP Financial Planning Pty Limited. ASIC's [moneysmart.gov.au](http://moneysmart.gov.au) website can provide you with some free legal advice options.

Should you have any queries please contact me on s 22 or by email at s 22.

Yours sincerely

**Ellen Chapman** | Analyst | Misconduct & Breach Reporting | Australian Securities & Investments Commission | Ext: s 22 |  
 Ph: s 22 | Fax: s 22 | email s 22 | Level 1, 11 Mounts Bay Road, Perth WA 6000

From: Michelangelo Spano <[spanom@taxology.com.au](mailto:spanom@taxology.com.au)>  
 To: s 22

Dear Ms Chapman

RE: YOUR REFERENCE 10179/17

We refer to all prior correspondence pertaining to our complaint regarding the misconduct of AMP Financial Planning Pty Limited, in particular your email correspondence dated 6 April 2017, enclosed below for your reference.

We advise that our complaint dated 21 March 2017 concerns the conduct of AMP Financial Planning Pty Limited with respect to their dealings with Taxology Financial Services Pty Ltd (as trustee) over the period 2013 to 2016 which includes what we proffer to be 'unconscionable conduct' concerning the provision of financial services covered by s991A of the *Corporations Act 2001*. We have provided significant documents to the Small Business Commissioner of South Australia who has sought our permission (granted) to onforward the documentation to the Australian Competition and Consumer Commission – you may be able to obtain access to the aforementioned documentation – please advise the relevant parties to contact us should authorisation be required. I will also be pleased to provide any further information/documentation if required.

Should you have any questions or wish to discuss any other matter, please do not hesitate to contact us, thank you.

Regards,

**Michelangelo Spano** | MIPA AFA BAcc BBus (Fin. Plan.) | Director  
TAXOLOGY FINANCIAL SERVICES PTY LTD | ABN 63 244 871 186  
PO Box 305, WELLAND SA 5007 AUSTRALIA | T +61 8 8127 9655 | F +61 8 8127 9677 | M 0411 711 790  
[spanom@taxologyfinancialservices.com.au](mailto:spanom@taxologyfinancialservices.com.au) | [www.taxologyfinancialservices.com.au](http://www.taxologyfinancialservices.com.au)

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**From:** Ellen Chapman [mailto:**s 22**]  
**Sent:** Thursday, 6 April 2017 12:26 PM  
**To:** Michelangelo Spano  
**Subject:** AMP Financial Planning Pty Limited (Treat as In Confidence) [DLM=Sensitive]

Our reference: 10179/17

Dear Mr Spano

ASIC has previously attempted to contact you by phone to discuss your report of misconduct. We understand you prefer to communicate by email.

You state that you have been in dispute with AMP Financial Planning Pty Ltd and that you sought the assistance of the Small Business Commissioner of South Australia (Small Business Commissioner). The Small Business Commissioner referred you to the Australian Competition and Consumer Commission (ACCC). You contacted the ACCC but have not had an update and you are concerned about the solvency of your business. ASIC believes that the ACCC are the body best placed to resolve your concerns in relation to the alleged anti-competitive activities and contractual disputes.

#### Request for information

We note that you have made reference to AMP Financial Planning Pty Limited breaching section 991A of the *Corporations Act 2001*. The information you have provided appears to relate to the inability to pay your indemnity insurance due to the solvency of your business resulting from this dispute, rather than documentation relating to the unconscionable conduct in the provision of financial services by AMP Financial Planning Pty Limited.

In order for us to make an assessment of your concerns please provide the following information within 7 days:

- Any documentation that shows AMP Financial Planning Pty Limited has, in relation to the provision of a financial service, engaged in unconscionable conduct.

Should you have any queries please contact me on **s 22** or by email at **s 22**.

Yours sincerely

**Ellen Chapman** | Analyst | Misconduct & Breach Reporting | Australian Securities & Investments Commission | Ext: **s 22** |  
Ph: **s 22** | Fax: **s 22** | email: **s 22** | Level 1, 11 Mounts Bay Road, Perth WA 6000

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[attachment "Michelangelo Spano.vcf" deleted by Ellen Chapman/Perth/WA/ASIC]

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[attachment "Michelangelo Spano.vcf" deleted by Tair Tidhar/Melbourne/VIC/ASIC] [attachment "20170420 Letter to Mr Spano.pdf" deleted by Tair Tidhar/Melbourne/VIC/ASIC] [attachment "Michelangelo Spano4.vcf" deleted by Tair Tidhar/Melbourne/VIC/ASIC] [attachment "Michelangelo Spano5.vcf" deleted by Tair Tidhar/Melbourne/VIC/ASIC] [attachment "ASIC's response to Mr Michelangelo Spano CCU 17-0361 \_20170622.pdf" deleted by Tair Tidhar/Melbourne/VIC/ASIC] [attachment "Fax to John Chapman.pdf" deleted by Tair Tidhar/Melbourne/VIC/ASIC] [attachment "Michelangelo Spano6.vcf" deleted by Tair Tidhar/Melbourne/VIC/ASIC]

----- Message from "Michelangelo Spano" <michelangelo.spano@gmail.com> on Mon, 4 Sep 2017 11:15:34 +1030 -----

**To:** <Contact@aclei.gov.au>

**cc:** <ags@ags.gov.au>, <crimeprevention@ag.gov.au>

**Subject:** RE: Integrity Commissioner Obligated to Recognise This Complaint  
: [SEC=UNCLASSIFIED]

Dear Integrity Commissioner,

I refer to your email correspondence dated 1 September 2017 refusing to undertake an investigation into my complaint against the Australian Securities and Investments Commission ("ASIC") and the Commonwealth Ombudsman. The information you have provided in your email as grounds for ignoring my complaint is both inaccurate and misleading, and in my opinion is a deliberate action intended to deceive the complainant with the purpose of conspiring to conceal an act of corruption. The matter that I have referred to the Australian Commission for Law Enforcement Integrity ("ACLEI") is within the jurisdiction of the ACLEI and meets the criteria mandating an investigation by the Integrity Commissioner – any party that interferes with this complaint with the intent of preventing an investigation by the Integrity Commissioner will be considered an accessory to the criminal offence of conspiring to conceal an act of corruption – a matter which I intend to pursue to ensure that all parties involved are held accountable for their contribution to my detriment. I thereby reiterate my demand that the Integrity Commissioner undertake an investigation into the conduct of ASIC and the Commonwealth Ombudsman with respect to the matter which I have referred to ASIC for enforcement action.

Kind regards,

Michelangelo Spano.

**From:** ACLEI Contact [<mailto:Contact@aclei.gov.au>]

**Sent:** Friday, 1 September 2017 2:05 PM

**To:** Michelangelo Spano

**Cc:** ACLEI Contact

**Subject:** RE: Integrity Commissioner Obligated to Recognise This Complaint [SEC=UNCLASSIFIED]

**UNCLASSIFIED**

Dear Mr Spano

Thank you for your further email to the Australian Commission for Law Enforcement Integrity (ACLEI).

Section 23 of the *Law Enforcement Integrity Commissioner Act 2006* (the Act), provides that a person may refer to the Integrity Commissioner, an allegation or information that raises a corruption issue.

## 23 Referral of corruption issues by other people

FOI 255-2021

- (1) A person (other than the Minister) may refer to the Integrity Commissioner under this section an allegation, or information, that raises a corruption issue.

Section 7 of the Act provides the meaning of the term *corruption issue*. Section 6 of the Act provides the meaning for *engages in corrupt conduct*.

### 7 Meaning of corruption issue

- (1) For the purposes of this Act, a *corruption issue* is an issue whether a person who is, or has been, a staff member of a law enforcement agency:
  - (a) has, or may have, engaged in corrupt conduct; or
  - (b) is, or may be, engaging in corrupt conduct; or
  - (c) will, or may at any time in the future, engage in corrupt conduct.

### 6 Meaning of engages in corrupt conduct

#### *Staff members of law enforcement agencies*

- (1) For the purpose of this Act, a staff member of a law enforcement agency *engages in corrupt conduct* if the staff member, while a staff member of the agency, engages in:
  - (a) conduct that involves, or that is engaged in for the purpose of, the staff member abusing his or her office as a staff member of the agency; or
  - (b) conduct that perverts, or that is engaged in for the purpose of perverting, the course of justice; or
  - (c) conduct that, having regard to the duties and powers of the staff member as a staff member of the agency, involves, or is engaged in for the purpose of, corruption of any other kind.

Of importance to our consideration of your matter is whether the person who is involved in the alleged corrupt conduct is, or has been, a staff member of a prescribed law enforcement agency.

Section 10 of the Act identifies *staff members* of various agencies, for the purposes of the Act. Subsection 10(4) of the Act talks about *staff members of a Commonwealth government agency that is prescribed for the purposes of paragraph (d) of the definition of law enforcement agency*.

#### *Staff members of prescribed law enforcement agencies*

- (4) For the purposes of this Act, the *staff members* of a Commonwealth government agency that is prescribed for the purposes of paragraph (d) of the definition of *law enforcement agency* are the persons in the class of persons prescribed by the regulations for the purposes of this subsection.

Section 5 of the Act provides, amongst other things, the meaning of *law enforcement agency*. Paragraph (d) of that definition states:

- (d) any other Commonwealth government agency that:
  - (i) has a law enforcement function; and
  - (ii) is prescribed by the regulations for the purposes of this paragraph.

For a *Commonwealth government agency* that is not otherwise specifically named in Section 10 of the Act to fall within the Integrity Commissioner's jurisdiction, the *Commonwealth government agency* must have a *law enforcement function* and be *prescribed by the regulations* for the purposes of paragraph (d) of the meaning of *law enforcement agency* in Section 5 of the Act.

At present, the *Law Enforcement Integrity Commissioner Regulations 2017*, do not prescribe either the Australian Securities and Investments Commission or the Commonwealth Ombudsman as a *Commonwealth government agency* for the purposes of paragraph (d) of the meaning of *law enforcement agency* in Section 5 of the Act.

Accordingly, as neither the Australian Securities and Investments Commission nor the Commonwealth Ombudsman come within the Integrity Commissioner's jurisdiction, the information you have provided concerning the actions of employees of both those agencies cannot raise a corruption issue, as that term is defined by the Act.

In the absence of a corruption issue there is no legal authority for ACLEI or the Integrity Commissioner to investigate the matters you have raised.

We appreciate your concerns, your desire to obtain a satisfactory outcome to the situation you have described, and the distress that the situation must be causing, however ACLEI is unable to assist you in this instance.

We note that in the letter you received from the Commonwealth Ombudsman (dated 29 August 2017) the writer invited you to contact that office again should you wish to discuss the decision. Perhaps you may wish to consider accepting that invitation.

We thank you again for taking the time to write to ACLEI.

Yours sincerely

The ACLEI Contact Team

**From:** Michelangelo Spano [<mailto:michelangelo.spano@gmail.com>]  
**Sent:** Thursday, 31 August 2017 6:01 PM  
**To:** ACLEI Contact  
**Cc:** [ags@ags.gov.au](mailto:ags@ags.gov.au); Crime Prevention; [spanom@taxologyfinancialservices.com.au](mailto:spanom@taxologyfinancialservices.com.au)  
**Subject:** Integrity Commissioner Obligated to Recognise This Complaint  
**Importance:** High

Dear Integrity Commissioner,

I refer to your email correspondence of even date concerning my complaint regarding the conduct of the Australian Securities and Investments Commission ("ASIC") with respect to my request for ASIC to undertake enforcement action with respect to undisputable contraventions of the Corporations Act 2001 committed by a Financial Services Licensee against myself and entities under my control; and the Commonwealth Ombudsman's refusal to undertake an investigation into ASIC's nonfeasance/malfeasance concerning the matter.

In your correspondence you have indicated that the conduct referred to in my complaints concerning ASIC and the Commonwealth Ombudsman do not satisfy the jurisdictional coverage of the Australian Commission for Law Enforcement Integrity (ACLEI) of the definition of *Corruption* pursuant to s7 of the *Law Enforcement Integrity Commissioner Act 2006* ("the Act"). I refer to subsection 10(4) of the Act and note that the definition of 'law enforcement agency' pursuant to section 5 of the Act is taken to include ASIC, whom is charged with the investigation and prosecution of a range of criminal offences; and, as such, the conduct of members of the ASIC fall within the jurisdiction of the ACLEI under the Act. The matters to which I have referred in my submissions to ASIC are factually indisputable and concern a number of serious contraventions of the *Corporations Act 2001*, yet ASIC's refusal to undertake enforcement action against the Financial Services licensee can only be construed as an act of corruption in the ordinary interpretation of the term – as the term corruption is not defined in the Act, it is clear that the legislators have intended the ordinary meaning of Corruption to prevail in respect of matters concerning the Act, thus the matter that I have referred to the ACLEI clearly falls within the jurisdiction of the Integrity Commissioner, and clearly fulfils the 'corrupt conduct' requirements of the Act; therefore the Integrity Commissioner is obligated to undertake an investigation into my complaint or risk acting as an accessory in a conspiracy to conceal an act of corruption.

In light of the information presented above, I trust that the Integrity Commissioner will review the decision to ignore my complaint, thank you.

Kind regards,

Michelangelo Spano.

**From:** ACLEI Contact [<mailto:Contact@aclei.gov.au>]  
**Sent:** Thursday, 31 August 2017 4:08 PM  
**To:** Michelangelo Spano  
**Cc:** ACLEI Contact  
**Subject:** RE: Further information regarding complaint [SEC=UNCLASSIFIED]

**UNCLASSIFIED**

Dear Mr Spano

On behalf of the Australian Commission for Law Enforcement Integrity (ACLEI), we would like to acknowledge receipt of the online report you submitted on 29 August 2017 and the email and attachment you sent later the same day.

POI 255-2021

ACLEI supports the Integrity Commissioner's investigations of corrupt conduct by staff members of a number of Australian Commonwealth Government agencies. In the absence of a corruption issue, a term which is defined in section 7 of the *Law Enforcement Integrity Commissioner Act 2006* (the Act), the Integrity Commissioner cannot commence an investigation.

When ACLEI receives information such as that which you provided, it is our role to determine whether or not it raises a corruption issue. In order for information to raise a corruption issue under the Act, it must relate to a person or persons within the Integrity Commissioner's jurisdiction (sections 5 and 10 of the Act), and it must concern conduct that falls within the definition of corrupt conduct (section 6 of the Act).

It follows then, that when evaluating information we focus on two main considerations:

- whether the person or persons to whom the information relates is or are within the Integrity Commissioner's jurisdiction; and
- whether the alleged conduct might amount to corrupt conduct.

Further information about ACLEI, including the list of agencies within the Integrity Commissioner's jurisdiction and a link to the latest version of the Act, can be found at [www.aclei.gov.au](http://www.aclei.gov.au)

We have considered the information you provided. Your concerns lie with the actions of an employee of the Commonwealth Ombudsman who dealt with your complaint about the Australian Securities and Investments Commission (ASIC). As the Commonwealth Ombudsman is not an agency that is within the Integrity Commissioner's jurisdiction, neither ACLEI nor the Integrity Commissioner has any legal authority to investigate the actions of the staff member concerned.

Accordingly, ACLEI is unable to assist you in this instance. We thank you for taking the time to write to ACLEI.

Yours sincerely

The ACLEI Contact Team

**From:** Michelangelo Spano [<mailto:michelangelo.spano@gmail.com>]

**Sent:** Tuesday, 29 August 2017 4:26 PM

**To:** ACLEI Contact

**Subject:** Further information regarding complaint

**Importance:** High

Dear Australian Commission for Law Enforcement Integrity

RE: COMPLAINT LODGED VIA ONLINE FORM 29 AUGUST 2017

I enclose a copy of the documentation referred to in my complaint dated 29 August 2017, thank you.

Regards,

Michelangelo Spano.

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