

Our Ref: CG:MD:127



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3 September 2018

Attention: Ms Elizabeth Brown
Australian Competition & Consumer Commission
GPO Box 3131
CANBERRA ACT 2601

By email only: adjudication@accc.gov.au

Dear Sir/Madam,

Collective Bargaining Notification

Our client: Victorian Off-Course Agents Association Inc.

We act on behalf of the Victorian Off-Course Agents Association Inc. (the **Association**), the Notifying Party in relation to this collective bargaining notification.

Notifying party

1. The details of the Notifying Party are as follows:

1.1. Victorian Off-Course Agents Association Inc., care of Mill Park TAB, 502A Plenty Road, Mill Park, Victoria, 3082.

1.2. Contact Person – John Haberman, mobile: [REDACTED] email: [REDACTED]

1.3. The Association represents the interests of TAB agents (**Agents**) who have been appointed by Tabcorp Wagering (Vic) Pty Ltd (**Tabcorp**) to supply a betting service to the public at various premises throughout Victoria (excluding licensed premises) as Agents of Tabcorp (**Wagering Services**).

1.4. The address for service of documents in Australia for the Notifying Party is care of Cameron Groppi, JAG Lawyers, cgroppi@jaglawyers.com.au

Details of the notified conduct

2. The notified conduct is for collective bargaining, but does not include a collective boycott.

3. Details of the notified conduct are as follows:

3.1. The Association represents approximately 70 Agents who operate approximately 91 Agencies at various locations throughout Victoria.

- 3.2. The Association represents the operators of stand alone off-course TAB Agencies, throughout Victoria, but not wagering operations which are located in licensed venues.
- 3.3. The Tabcorp Group has interests in wagering, gaming and media. The ultimate parent company, Tabcorp Holdings Limited (**TAH**) is listed on the ASX.
- 3.4. Tabcorp is a wholly owned subsidiary of TAH and is part of the Tabcorp Wagering Group's wagering division (**Wagering Division**).
- 3.5. Tabcorp holds a Victorian Wagering and Betting Licence which commenced in August 2012 for a period of 12 years (**Wagering Licence**). The Wagering Licence allows the Wagering Division to offer on-course and off-course totaliser, wagering and fixed odds betting on thoroughbred, harness and greyhound racing and approved sporting and other events. The Wagering Licence also allows for the offering of approved simulated racing games and the operation of a betting exchange.
- 3.6. The Association provides this notification on behalf of the Agents. This notification is requested to enable the Association to bargain with Tabcorp on behalf of the Agents as a collective group in relation to matters of common commercial concern to the Agents, for the purposes of entering into agreements with Tabcorp for the provision of services as agent of Tabcorp.
- 3.7. Some of the individual Agents may lack extensive commercial and negotiating experience. The Association, having represented the Agents in negotiations with Tabcorp on a regular basis in relation to numerous like agreements and commercial arrangements since the mid 1970s, provides to those Agents the necessary commercial assistance which some Agents may otherwise lack in understanding and negotiating the terms of such agreements.
- 3.8. The current Tabcorp Distribution Services Agreement for an Agent in Victoria (**Tabcorp Agreement**) expires on 30 June 2019 (or as otherwise agreed between Tabcorp and the Association).
- 3.9. The Association proposes to commence negotiating the terms of a new agreement with Tabcorp on behalf of the Agents in about late 2018/early 2019. Each Agent is required to enter into a separate Agreement with Tabcorp.
- 3.10. The Association previously lodged a Collective Bargaining Notification (CB00288) with the Australian Competition & Consumer Commission (the **ACCC**) on 15 July 2015 (**2015 Notification**). The 2015 Notification expires on 29 July 2018.
4. The documents submitted to the Executive Committee of the Association or prepared by or on behalf of the Association for the purposes of assessing or making a decision in relation to notified conduct and any minutes or record of a decision are as follows:
 - 4.1. The proposed negotiations between the Association and Tabcorp are the subject of ongoing discussions at meetings of the Executive Committee of the Association and also the subject of discussions between the Association and Tabcorp from time to time.

5. The target in collective bargaining is Tabcorp. The Association has discussed its intention to file a collective bargaining notification with Tabcorp. The Association understands that while Tabcorp does not accept that it has any superior bargaining power in respect of its relationship with the Agents, it considers there may be efficiency gains for both the Agents and Tabcorp through collective bargaining. In such circumstances, the Association understands that Tabcorp does not object to the filing of this notification. The Association also understands that Tabcorp will directly contact the ACCC directly in this respect.

Market information and concentration

6. The products and/or services supplied are as follows:
 - 6.1. The Association represents the interests of the Agents who have been appointed by Tabcorp in respect of the provision of Wagering Services on behalf of Tabcorp throughout Victoria.
 - 6.2. The Association represents the operators of stand-alone off-course TAB agencies, as opposed to Tabcorp wagering operations which are located in licensed venues (i.e. PubTABs or ClubTABs).
 - 6.3. Pursuant to the Tabcorp Agreement the Agents have obligations to Tabcorp which include:
 - (a) operating TAB Agencies in accordance with the terms and conditions of the Tabcorp Agreement;
 - (b) promoting and developing the supply of Wagering Services and other services to the public at the TAB Agencies as agent of Tabcorp;
 - (c) providing an efficient betting service to the public; and
 - (d) employing trained personnel to provide these services as agent of Tabcorp including on major racing days such as Melbourne Cup Day and the Victorian Spring Racing Carnival.
 - 6.4. Under the Tabcorp Agreement, Tabcorp also have obligations to the Agents, including payment of Agency fees and commission and the supply of business premises, fit out, equipment and facilities, training, promotional material, manuals, information and assistance, licences and public liability insurance.
 - 6.5. Relevant markets include the market or markets for:
 - the supply of wagering and other services to the public by organisations who are not parties to the Tabcorp Agreement (**Betting Services**); and
 - **Wagering Services**.
 - 6.6. Suppliers of Wagering Services are service providers who operate Agencies pursuant to the Tabcorp Agreement. Tabcorp is a significant acquirer of Wagering Services.
 - 6.7. Significant suppliers of Betting Services, in addition to Tabcorp, are:
 - other totalisators;

- on-course bookmakers;
- corporate bookmakers, such as Centrebet, Sportsbet, Crownbet and the like; and
- betting exchanges.

6.8. Significant acquirers of Wagering Services and Betting Services are:

- members of the general public; and
- corporate bookmakers.

7. The relevant industry is the wagering industry. The Agents provide, as agent of Tabcorp, a service to the public in enabling customers to bet at TAB premises, watch major sporting activities, including but not limited to horse racing, harness racing and greyhound racing events, open accounts to enable customers to bet on their own devices and to deposit and withdraw funds from betting accounts managed by Tabcorp.
8. In respect of overlapping products and/or services, the Association is not in a position to provide estimates of market shares for each of the parties, however this information may be in the possession of Tabcorp.
9. In relation to the competitive constraint on the parties to the proposed conduct, including any likely change to those constraints should authorisation be granted, the Association is not in a position to provide this information for each of the parties, however this information may be in the possession of Tabcorp.

Public benefit

10. The ACCC considered, in its 2009 determination regarding the TAB Agent's Association of New South Wales (**2009 NSW Determination**), that the collective bargaining arrangements in that case were likely to generate benefits in the form of:
 - improved bargaining power for the relevant association members leading to a more efficient allocation of resources;
 - improved quality of service; and
 - efficiency gains.

Further, the ACCC considered, in its 2012 Determination relating to the Association commencing on 3 December 2012 (**2012 Determination**), that the likely benefit to the public from the collective bargaining conduct in that application would outweigh the anti-competitive detriment to the public (see Collective Bargaining Notification CB00280).

Similarly, it is submitted that by collectively negotiating on behalf of the Agents the Association will:

- provide the Agents with greater competitive parity in their negotiations with Tabcorp and greater input into contract terms to achieve more efficient commercial outcomes; and

- enable the Agents to pass on at least some of the benefits of any more favourable terms negotiated by the Association, in the form of improvements in service levels provided by the Agents, to consumers, and to do so more quickly than would be the case in the absence of the collective bargaining notification.

Public detriment

11. The ACCC found, in its 2009 NSW Determination, that any reduced economic efficiency which may have resulted from the collective bargaining arrangements was likely to be mitigated because:

- the arrangements were entirely voluntary;
- the size and composition of the bargaining group was limited to 169 TAB agents in New South Wales; and
- the proposed conduct did not involve any boycott activity.

Further, the ACCC found, in its 2012 Determination, that the likely benefit to the public from the collective bargaining conduct in that application would outweigh the anti-competitive detriment to the public.

In addition, in the 2012 Determination the ACCC accepted submissions on behalf of the Association that the arrangements:

- would not affect the price of wagering services provided to the public given that prices were already regulated by government legislation; and
- would not reduce competition between agents on service levels as they did not restrict agents' ability to compete on service levels to any greater extent than the standard form contract which was used between the relevant Tabcorp entity in New South Wales and agents at the time.

For similar reasons, it is submitted that the proposed arrangements would not result in public detriment given that:

- the arrangements are voluntary;
- the size of the group is limited to approximately 70 Agents;
- the proposed conduct does not involve boycott activity; and
- the arrangements are unlikely to result in higher prices for Wagering Services, or reduced competition between agents on service levels.

Contact details of relevant market participants

12. The contact details for Tabcorp are as follows:

Marcus Welch, Head of Key Partnerships – Vic/Tas/SA/NT, c/- Tabcorp Holdings Ltd,
Tower 2, Level 18, 727 Collins St, Docklands VIC 3008, mobile: [REDACTED] email:

[REDACTED]

Other information

13. The ACCC has previously considered the public benefits and detriments associated with collective bargaining in the context of granting authorisation to similar bodies in New South Wales (TAB Agents' Association of New South Wales) and Western Australia (WA TAB Agents' Association Inc) to collectively negotiate with the relevant licensees in those States (i.e. TAB Limited in New South Wales and Racing and Wagering Western Australian in Western Australia) on behalf of their members.

The ACCC has also previously provided immunity to the Association in 2012 (see Collective Bargaining Notification CB00280) and 2015 (see CB00288).

In granting these previous authorisations, the ACCC was satisfied that those collective bargaining arrangements outweighed any public detriment.

The Association submits that in this case the benefit to the public likely to result from the proposed arrangements would outweigh any detriment to the public likely to result from the conduct.

Additional information for collective bargaining

14. We confirm that the Notifying Party is not a trade union, an officer of a trade union or acting at the direction of a trade union.
15. Details of the persons who are current members of the group are as follows:
- 15.1 We have **attached**, as Annexure "A", a list of the persons who are current members of the Association and on whose behalf this notification is lodged. The members of the Association change from time to time, based on the natural turnover of Agents (for example where existing Agents are replaced by new Agents). Accordingly, the Association seeks to include future members of the collective bargaining group under this notification.
- 15.2 As set out in paragraph 3.7 above, the Association has represented the Agents in negotiations with Tabcorp on a regular basis since the mid 1970's. Historically, the normal term of agreements between Agents and Tabcorp have ranged between two to four years in duration. The terms of the agreement generally remain very similar from agreement to agreement, save for some variation in the commercial terms, for example as to rates of commissions payable to the Agents etc, or where additional provisions may be required, for example where a change in the wagering products introduced by Tabcorp may give rise to an additional type of commission payment to the Agents.
- 15.3 In light of this fact, and bearing in mind the fact that the Association is operated by a committee comprising unpaid volunteers, it would be of benefit to the Association if a longer period of immunity were to be granted. Given that the Wagering Licence will be in operation until at least 2024, the Association seeks a period of at least six years. This would enable the Association to enter into negotiations with Tabcorp for the remaining period of Tabcorp's Wagering Licence without having to seek further notifications.
- 15.4 By way of further background, it is not envisaged that there will be significant changes in the negotiating positions of the respective parties or the commercial relationship between those parties during that period of immunity.

16. We confirm that each contracting party reasonably expects to make one or more contracts with the target for the supply of the relevant services and the value of each contract will not exceed A\$3M in any 12 month period. This expectation is based on previous years turnover.
17. It is extremely unlikely that the contracting parties would propose to engage in a collective boycott with respect to the target.

Conclusion

The ACCC has previously considered the public benefits and detriments associated with collective bargaining in the context of granting authorisation to similar bodies in New South Wales and Western Australia.

The ACCC has also previously provided immunity to the Association in 2012 and 2015.

The Association submits that:

- (a) there has been no material change in circumstances for the relative bargaining positions between the Agents and Tabcorp since the 2015 determination; and
- (b) the benefit to the public likely to result from the proposed arrangements would continue to outweigh any detriment to the public likely to result from the conduct.

We also **attach** a signed declaration, which has been completed by the President of the Association, Mr John Haberman, on behalf of the Notifying Party.

Yours faithfully,

JAG Lawyers



Cameron Groppi

Partner

cgroppi@jaglawyers.com.au

Dir: (03) 8644 6882

Encl

Wagering ID	Agent	Outlet Name	Street Address	Suburb	Postcode	State	Mobile	Primary Contact Email	Agency Phone
1	Nigel Pearson	BOWEN CRESCENT	3 Bowen Crescent	Melbourne	3004	VIC			(03) 9820 4645
5	Kate Norrish	PRESTON	597a Bell Street	Preston	3072	VIC			(03) 9416 9025
6	Raelene Grogan	MORWELL	46 Buckley Street	Morwell	3840	VIC			(03) 5133 9039
7	Melissa Yavas	HEIDELBERG WEST	Shop 3 Cnr Bell St & Oriel Road	West Heidelberg	3081	VIC			(03) 9459 8076
15	Maree Stevenson	DANDENONG	Shop 350 Dandenong Plaza Shopping Centre. 23 - 55 Mc Crae Street	Dandenong	3175	VIC			(03) 9791 6884
17	Steve Gotsis	EXHIBITION STREET	3/40 Exhibition Street	Melbourne	3000	VIC			(03) 9663 3743
20	Roger Cunningham	GREENSBOROUGH	89 Grimshaw Street	Greensborough	3088	VIC			(03) 9435 4161
21	Shane Parker	CAMBERWELL	Shop 2, 555 Riversdale Road	Camberwell	3124	VIC			(03) 9813 3576
24	Peter Arthur	NORTH MELBOURNE	1-5 Errol Street	North Melbourne	3051	VIC			(03) 9326 8898
25	Deborah Henry	SOUTH MELBOURNE	335 Clarendon Street	South Melbourne	3205	VIC			(03) 9699 8604
27	Norman Favaloro	RICHMOND	171-173 Swan Street	Richmond	3121	VIC			(03) 9429 7321
28	Ritesh Arora	ALTONA	Shop 8, 30 Pier Street	Altona	3018	VIC			(03) 9398 2878
31	Anthony Moon	PASCOE VALE	88-94 Cumberland Road	Pascoe Vale	3044	VIC			(03) 9354 8757
32	Samantha Regan	MOORABBIN	866 Nepean Highway	Moorabbin	3189	VIC			(03) 9555 4258
33	Tim Treloar	GEELONG	171 Ryrie Street	Geelong	3220	VIC			(03) 5222 6853
36	Anthony Gow	BRAYBROOK	Tenancy P8 Central West Plaza, 67 Ashley Street	Braybrook	3019	VIC			(03) 9689 1909
38	Shelley Webb	BALACLAVA	129-131 Carlisle Street	Balaclava	3183	VIC			(03) 9531 7217
39	Andrea McCully	QUEEN STREET	228 Queen (cnr Lonsdale Street) Street	Melbourne	3000	VIC			(03) 9600 3029
40	Phillip Kelly	ELIZABETH STREET NORTH	473 Elizabeth Street	Melbourne	3000	VIC			(03) 9326 5353
42	Michael Millman	OAKLEIGH	51 Atherton Road	Oakleigh	3166	VIC			(03) 9530 9652
45	Anthony Gow	FOOTSCRAY	1 Droop Street	Footscray	3011	VIC			(03) 9687 4195
46	Nigel Pearson	CROWN CASINO LAS VEGAS ROOM	8 Whiteman Street	Southbank	3006	VIC			(03) 9696 3972
47	Norman Favaloro	MT WAVERLEY	Shop G2,g3,g4, 407 Blackburn Road	Mt Waverley	3149	VIC			(03) 9802 5487
48	George Megaloudis	WILLIAMS STREET	Lower Ground Floor, 459 Collins Street	Melbourne	3000	VIC			(03) 9614 3489
49	Barbara Uren	CARLTON NORTH	739 Nicholson Street	Carlton	3053	VIC			(03) 9388 2640
51	Robert McCully	NIDDRIE	2-481 Keilor Road	Niddrie	3042	VIC			(03) 9374 4188
54	Wayne Kendall	HEIDELBERG	Shop T22 Warringal Shopping Centre, Burgundy Street	Heidelberg	3084	VIC			(03) 9459 8986
58	Neil Francis	COLLINGWOOD	232 Smith Street	Collingwood	3066	VIC			(03) 9419 2488
59	Deborah Sherer	BERWICK	Shop 3, 4-6 Wheeler Street	Berwick	3806	VIC			(03) 9707 1893
60	Michael Mannix	NORTHCOTE	280 High Street	Northcote	3070	VIC			(03) 9481 1432
68	Alan Gerbing	CRAIGIEBURN	Shop 1 & 2 Craigieburn Plaza, Craigieburn Rd West	Craigieburn	3064	VIC			(03) 9303 8008
69	Kris Doyle	PRAHRAN	Shop 3 & 4, 191-197 Commercial Road	Prahran	3181	VIC			(03) 9824 2525
70	Con Kakkos	NOBLE PARK	Sh 11-13, 21a Douglas Street	Noble Park	3174	VIC			(03) 9546 8919
71	Andrew Minton	BALWYN	Shops 4, 310-14 Whitehorse Road	Balwyn	3103	VIC			(03) 9830 2536
74	Nathan Hansen	BENDIGO	42 Mitchell Street	Bendigo	3550	VIC			(03) 5442 4308
75	Benedict Cannamela	SOUTH YARRA	102 Toorak Road	South Yarra	3141	VIC			(03) 9820 0228
76	Kasey Davis	MIDDLE PARK	4/6 Armstrong Street	Middle Park	3206	VIC			(03) 9686 7258
82	Shane Doyle	ELIZABETH STREET SOUTH	61 Elizabeth Street	Melbourne	3000	VIC			(03) 9620 2950
84	Christopher Crofts	SPRINGHILL	Shop 5, Springhill Shopping Centre. 1370 Thomsons Road	Cranbourne	3977	VIC			(03) 5991 7598
87	Jodie Faralla	CAMPBELLFIELD	Shop 1c Campbellfield Plaza, Cnr Hume Hwy & Mahoneys Road	Campbellfield	3061	VIC			(03) 9359 5393
102	Romina Oles	MALVERN	135 Glenferrie Road	Malvern	3144	VIC			(03) 9500 2432
103	Lou Sallese	COBURG	396 Sydney Road	Coburg	3058	VIC			(03) 9350 2250
107	David Mitchell	IVANHOE	Shop 6, 120 Upper Heidelberg Road	Ivanhoe	3079	VIC			(03) 9499 6631
113	Melissa Yavas	BROADMEADOWS	Shop E005, 1099-1169 Pascoe Vale Road	Broadmeadows	3047	VIC			(03) 9309 7337
117	Con Kakkos	CLAYTON	Shop 6, 367/369 Clayton Road	Clayton	3168	VIC			(03) 9544 2671
122	Wade Clarke	THOMASTOWN	289-291 High Street	Thomastown	3074	VIC			(03) 9464 0681
123	Con Kakkos	BENTLEIGH	461 Centre Road	Bentleigh	3204	VIC			(03) 9557 0776
125	Terri Minton	BOURKE STREET	193-199 Bourke Street	Melbourne	3000	VIC			(03) 9650 1825
129	Lou Sallese	FAIRFIELD	146a Station Street	Fairfield	3078	VIC			(03) 9489 3276
131	Leslie Radford	GARDENVALE	Shop 3/170 Martin Street	Brighton	3186	VIC			(03) 9596 2020
132	John Canty	RESERVOIR	Shop 1, 327 Spring Street	Reservoir	3073	VIC			(03) 9462 3840
133	Ralph Esposito	CARLTON	243-247 Lygon Street	Carlton	3053	VIC			(03) 9347 6413
136	Peter Arthur	SOUTHERN CROSS	Tenancy Lgh-02 Ground FI Southern Cross Station Spencer Street	Melbourne	3000	VIC			(03) 9602 1811
142	Kasey Davis	CAULFIELD SOUTH	328 Hawthorn Road	Caulfield	3162	VIC			(03) 9533 0559

156	Scott Hooley	BOX HILL	587 - 589 Station Street	Box Hill	3128	VIC	(03) 9897 1785
163	Robin Fisher	KEW	331 - 333 High Street	Kew	3102	VIC	(03) 9852 9366
176	John Nicholson	LOWER TEMPLESTOWE	35-37 Macedon Road	Lower Templestowe	3107	VIC	(03) 9850 8387
180	Leslie Radford	BRIGHTON	107 Church Street	Brighton	3186	VIC	(03) 9591 0046
181	Christine Dunstan	KENSINGTON	511 Macaulay Road	Kensington	3031	VIC	(03) 9376 6828
187	Robin Fisher	BORONIA	146 Boronia Road	Boronia	3155	VIC	(03) 9762 1776
192	Judith Murphy	GLENROY	816 Pascoe Vale Road	Glenroy	3046	VIC	(03) 9306 9688
200	Steve Gotsis	ASHBURTON	203a High Street	Ashburton	3147	VIC	(03) 9885 1325
221	Lawrence Fowler	SCORESBY	Cnr Stud & Ferntree Gully Roads	Scoresby	3179	VIC	(03) 9764 0467
237	Melissa Panozzo	CAROLINE SPRINGS	Shop 4, 218-222 Caroline Springs Boulevard	Caroline Springs	3023	VIC	(03) 9360 5234
244	Tony Mitchell	ALTONA MEADOWS	Shop 20 Central Square Shopping Centre, Cnr Central Ave & Merton Street	Altona Meadows	3028	VIC	(03) 9315 8582
267	Wayne Brookes	FRANKSTON	Shop 6, 197 Karingal Drive	Frankston	3199	VIC	(03) 9775 5668
275	Mark Mitchell	DONVALE	Shop 6 & 7 Tunstall Square	Donvale	3111	VIC	(03) 9842 5161
276	Elizabeth Bolzon	ALTONA NORTH	Shop 37 Borrack Square	Altona North	3025	VIC	(03) 9391 6667
277	Ralph Esposito	BRUNSWICK WEST	Shop 10c, Union Square Shopping Centre, Grantham Street	Brunswick West	3055	VIC	(03) 9388 2572
278	Kris Doyle	POINT COOK	Shop 34, Sanctuary Lakes Shopping Cntr, Point Cook Road	Point Cook	3030	VIC	(03) 9395 5912
281	John Haberman	MILL PARK	Shop 502a Plenty Road	Mill Park	3082	VIC	(03) 9437 9891
284	Melissa Panozzo	KEILOR	Shop 1/702 Calder Highway	Keilor	3036	VIC	(03) 9336 7562
287	Jason McClure	CORIO	Sh G31c Corio Village Shppng Cntr	Corio	3214	VIC	(03) 5275 7904
288	Christopher Crofts	AIRPORT WEST	113 Matthews Avenue	Airport West	3042	VIC	(03) 9335 3890
302	Peter Sherer	HAMPTON PARK	Hampton Park Shopping Centre, Shop 66 & 67 166 Somerville Road	Hampton Park	3976	VIC	(03) 9702 8550
398	Robert Baxter	DEER PARK	Tenancy 71, Brimbank Park Shopping Centre, Cnr Neale Street & Station Road	Deer Park	3023	VIC	(03) 9449 5168
401	John Doherty	WARRNAMBOOL	124a Koroit Street	Warrnambool	3280	VIC	(03) 5562 2979
410	Matthew Fisher	CHIRNSIDE PARK	Shop P- 5a Cnr Kimberley Drive & Maroondah Highway	Chirnside Park	3116	VIC	(03) 9727 5962
418	Lauren McClure	HOPPERS CROSSING	54a Old Geelong Road	Hoppers Crossing	3029	VIC	(03) 9748 6618
425	Stuart Hodge	WERRIBEE	119/123 Watton Street	Werribee	3030	VIC	(03) 9741 6027
430	Christopher Crofts	WILLIAMSTOWN	37 Douglas Parade	Williamstown	3016	VIC	(03) 9397 7602
509	Zola Barnett	CRANBOURNE	Shop 1, 79-85 High Street	Cranbourne	3977	VIC	(03) 5995 1695
516	Anne Buckley	MT ELIZA	28 Ranelagh Drive	Mt Eliza	3930	VIC	(03) 9787 2435
533	Michelle McCann	BALLARAT	Shop 4, Bi Lo Shopping Centre 73 Victoria Street	Bakery Hill	3354	VIC	(03) 5333 7809
572	Jodie Faralla	BELMONT	Cnr High Street And Barwon Heads Road	Belmont	3216	VIC	(03) 5241 6726
777	Anna Browne	ENDEAVOUR HILLS	Shp 104 Shopping Centre, Cnr Heatherton & Matthew Flinders Ave	Endeavour Hills	3802	VIC	(03) 9708 0247
4308	Phillip Jolley	KEILOR EAST	Shop 3, Mileara Shopping Centre, 233 Mileara Road	East Keilor	3036	VIC	(03) 9325 4046
4317	Craig Henry	BURWOOD EAST	Shop G4, Burwood One Shopping Centre, Cnr Blackburn Road and Burwood Highway	Burwood East	3151	VIC	(03) 9802 5674
4381	Simon Blackie	PARKDALE	Shop 3B, 383 Nepean Highway	Parkdale	3195	VIC	(03) 9580 8680

Declaration by notifying party

Authorised persons of the notifying party must complete the following declaration.

The undersigned declare that, to the best of their knowledge and belief, the information given in response to questions in this form is true, correct and complete, that complete copies of documents required by this form have been supplied, that all estimates are identified as such and are their best estimates of the underlying facts, and that all the opinions expressed are sincere.

The undersigned are aware of the provisions of section 137.1 and 149.1 of the *Criminal Code* (Cth).



Signature of authorised person



Office held - President



Name of authorised person

This 31st day of August 2018

Note: if the Notifying Party is a corporation, state the position occupied in the corporation by the person signing. If signed by a solicitor on behalf of the Notifying Party, this fact must be stated.