



ASIC

Australian Securities & Investments Commission

Our reference: ENF2014/12503
Your reference: No.180

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17 June 2014



Request under the *Freedom Of Information Act 1982* for access to documents

I refer to your request under the *Freedom of Information Act 1982* (FOI Act) received by this office on 6 June 2014 in which you sought access to

Documentation of the 'in-species' transfer of unites held by Exploration Fund into Astarra Strategic Fund for the value of approximately \$50m AUD on 24th June 2009

I am the authorised decision-maker for the purposes of section 23 of the FOI Act.

I have identified a document which comes within the terms of your request. I have decided to release the document, which is attached to this letter.

This document is an internal ASIC working document entitled *Astarra Strategic Fund, Investments into underlying funds by DPA*.

I note that we have provided copies of the relevant DPAs previously.

Review Rights

I provide you with the following information as required by section 26 of the FOI Act.

In the event that you are dissatisfied with the decision:

1. You may, within 30 days after the day on which you have been notified of this decision, apply in writing to ASIC for a review of my decision by another ASIC officer under section 54B of the FOI Act. This request should be addressed to me

or to the Senior Manager, Administrative Law GPO Box 9827 SYDNEY or by email to foirequest@asic.gov.au

2. You may apply in writing to the Australian Information Commissioner for a review of my decision under section 54N of the FOI Act. Correspondence should be addressed to the Office of the Australian Information Commissioner at GPO Box 2999 Canberra ACT 2601 OR GPO Box 5218 Sydney NSW 2001.
3. You may lodge a complaint to the Australian Information Commissioner in respect to the conduct of ASIC in the handling of this request. Correspondence should be addressed to the Office of the Australian Information Commissioner - GPO Box 2999 Canberra ACT 2601 OR GPO Box 5218 Sydney NSW 2001 GPO Box 5218 Sydney NSW 2001.

Yours faithfully



Paula O'Regan
(Authorised decision-maker under subsection 23(1) of the FOI Act)
for the Australian Securities and Investments Commission

ASTARRA STRATEGIC FUND

INVESTMENTS INTO UNDERLYING FUNDS BY DPA

Underlying fund	DPA Ref No.	DPA Date	Subscription Date	Actual Subscription Date	Amount of Share	ACTUAL MONEY CONTRIBUTIONS TO UNDERLYING FUNDS				DPA INVESTMENTS INTO FLADER CONTROLLED FUNDS			
						By DPA		TOTAL		By DPA		TOTAL	
						(AUD)	(USD)	(AUD)	(USD)	(AUD)	(USD)	(AUD)	(USD)
Atlantis	4-06	1/06/2006	1/06/2006	1/06/2006	0	1,682,000	1,218,000	3,682,000	1,218,000	-	-	-	-
Atlantis	6-06	28/06/2006	1/07/2006	1/07/2006	0	2,000,000	1,508,000	-	1,508,000	4,087,998	4,087,998	1,413,700	1,413,700
Exploration A	7-1/09	30/06/2009	30/06/2009	30/06/2009	14,137	-	-	-	-	51,842,488	51,842,488	20,128,572	20,128,572
Exploration B	7-2/09	30/06/2009	30/06/2009	30/06/2009	168,863	-	-	-	-	1,961,919	1,961,919	215,771	215,771
Exploration C	1-06	28/07/2006	1/09/2006	1/04/2006	13,963	1,900,000	1,340,445	-	1,340,445	307,000	307,000	700,000	510,000
Exploration C	2-06	28/03/2006	1/04/2006	1/04/2006	0	307,000	215,771	-	215,771	700,000	700,000	6,674,627	4,178,402
Exploration C	3-06	1/06/2006	1/06/2006	1/08/2006	4,063	700,000	510,000	-	510,000	2,000,000	2,000,000	1,540,000	1,540,000
Exploration C	5-06	28/06/2006	1/07/2006	1/07/2006	40,124	5,666,494	4,178,402	-	4,178,402	10,586	10,586	37,112	37,112
Exploration C	7-06	15/10/2006	31/10/2006	1/10/2006	10,586	2,000,000	1,540,000	-	1,540,000	17,973,494	13,781,252	22,025,305	13,781,252
Exploration C (transferred from Sierra)	7-3/09	27/08/2009	31/08/2009	1/09/2009	37,112	7,400,000	5,996,634	-	5,996,634	2,000,000	2,000,000	1,544,678	1,544,678
Pacific	8-06	1/11/2006	1/11/2006	1/11/2006	18,167	2,000,000	1,544,678	-	1,544,678	1,000,000	1,000,000	856,133	856,133
Pacific	8-1/07	3/07/2007	15/07/2007	1/08/2007	8,562	1,000,000	856,133	-	856,133	1,000,000	1,000,000	855,064	855,064
Pacific	8-2/07	3/08/2007	15/08/2007	1/09/2007	8,550	1,000,000	855,064	-	855,064	800,000	800,000	755,500	755,500
Pacific	8-3/07	14/11/2007	15/11/2007	1/12/2007	6,382	750,000	668,667	-	668,667	500,000	500,000	465,500	465,500
Pacific	8-1/08	17/06/2008	18/06/2008	1/07/2008	6,786	800,000	755,500	-	755,500	600,000	600,000	401,500	401,500
Pacific	8-2/08	29/07/2008	30/07/2008	1/08/2008	4,096	500,000	465,500	-	465,500	750,000	750,000	653,827	653,827
Pacific	8-3/08	10/10/2008	15/10/2008	1/11/2008	3,107	400,000	280,000	-	280,000	1,500,000	1,500,000	1,168,230	1,168,230
Pacific	8-4/08	30/10/2008	3/11/2008	1/12/2008	4,343	600,000	401,500	-	401,500	1,400,000	1,400,000	1,172,009	1,172,009
Pacific	8-5/08	25/11/2008	26/11/2008	1/12/2008	5,230	750,000	483,500	-	483,500	1,200,000	1,200,000	967,498	967,498
Pacific	8-1/09	3/06/2009	15/06/2009	1/07/2009	5,430	800,000	653,827	-	653,827	1,500,000	1,500,000	1,287,005	1,287,005
Pacific	8-2/09	9/07/2009	15/07/2009	1/08/2009	9,446	1,500,000	1,168,230	-	1,168,230	1,500,000	1,500,000	1,172,009	1,172,009
Pacific	8-3/09	10/08/2009	17/08/2009	1/09/2009	9,354	1,400,000	1,172,009	-	1,172,009	1,200,000	1,200,000	967,498	967,498
Pacific	8-4/09	27/08/2009	30/08/2009	1/09/2009	9,762	1,500,000	1,287,005	-	1,287,005	14,200,000	14,200,000	11,560,005	11,560,005
Pacific	8-5/09	8/09/2009	30/09/2009	1/10/2009	9,960	1,500,000	1,287,005	-	1,287,005	1,500,000	1,500,000	1,345,750	1,345,750
SBS	10-1/07	8/10/2007	15/10/2007	1/11/2007	13,457	1,500,000	1,345,750	-	1,345,750	2,200,000	2,200,000	1,934,800	1,934,800
SBS	10-2/07	12/12/2007	15/12/2007	1/01/2008	18,768	2,200,000	1,934,800	-	1,934,800	1,000,000	1,000,000	872,400	872,400
SBS	10-3/07	17/12/2007	17/12/2007	1/01/2008	10,034	1,200,000	1,034,400	-	1,034,400	400,000	400,000	377,000	377,000
SBS	10-1/08	16/01/2008	17/01/2008	1/02/2008	8,470	1,000,000	872,400	-	872,400	1,000,000	1,000,000	944,500	944,500
SBS	10-2/08	26/02/2008	27/02/2008	1/03/2008	3,659	400,000	377,000	-	377,000	100,000	100,000	692,100	692,100
SBS	10-3/08	17/06/2008	18/06/2008	1/07/2008	8,961	1,000,000	896,100	-	896,100	600,000	600,000	527,228	527,228
SBS	10-4/08	15/12/2008	17/12/2008	1/01/2009	7,698	1,000,000	896,100	-	896,100	1,300,000	1,300,000	1,034,400	1,034,400
SBS	10-5/08	31/12/2008	2/01/2009	1/02/2009	5,147	600,000	514,700	-	514,700	750,000	750,000	600,000	600,000
SBS	10-1/09	3/03/2009	6/03/2009	1/04/2009	9,448	1,300,000	1,034,400	-	1,034,400	600,000	600,000	527,228	527,228
SBS	10-2/09	24/03/2009	26/03/2009	1/04/2009	6,090	750,000	609,000	-	609,000	1,000,000	1,000,000	872,400	872,400
SBS	10-3/09	21/04/2009	30/04/2009	1/05/2009	5,755	750,000	609,000	-	609,000	600,000	600,000	527,228	527,228
SBS	10-4/09	13/05/2009	15/05/2009	1/06/2009	4,550	600,000	446,945	-	446,945	1,000,000	1,000,000	793,310	793,310
SBS	10-5/09	17/06/2009	30/06/2009	1/07/2009	8,045	1,000,000	793,310	-	793,310	11,500,000	11,500,000	10,731,673	10,731,673
Sierra (transferred to Exploration C)	9-06	22/12/2006	22/12/2006	1/01/2007	6,156	-	-	-	-	-	-	-	-
Sierra (transferred to Exploration C)	9-1/07	17/01/2007	17/01/2007	1/02/2007	7,814	-	-	-	-	-	-	-	-
Sierra (transferred to Exploration C)	9-2/07	12/03/2007	15/03/2007	1/04/2007	11,412	-	-	-	-	-	-	-	-
Sierra (transferred to Exploration C)	9-3/07	8/05/2007	15/05/2007	1/06/2007	11,635	-	-	-	-	-	-	-	-
Sierra (transferred to Exploration C)	9-4/07	6/06/2007	8/06/2007	1/07/2007	3,887	-	-	-	-	-	-	-	-
Sierra (transferred to Exploration C)	9-5/07	7/08/2007	15/08/2007	1/09/2007	3,950	-	-	-	-	-	-	-	-
Sierra (transferred to Exploration C)	9-1/08	28/04/2008	28/04/2008	1/05/2008	2,466	-	-	-	-	-	-	-	-
Sierra (transferred to Exploration C)	9-2/08	26/05/2008	26/05/2008	1/06/2008	4,097	-	-	-	-	-	-	-	-
Sierra (transferred to Exploration C)	9-1/09	28/01/2009	30/01/2009	1/03/2009	4,498	-	-	-	-	-	-	-	-
Taiwind	12-1/09	3/03/2009	6/03/2009	1/04/2009	625	700,000	441,560	-	441,560	-	-	-	-
Taiwind	12-2/09	3/03/2009	9/03/2009	1/04/2009	651	750,000	527,251	-	527,251	-	-	-	-
Taiwind	12-3/09	15/06/2009	15/06/2009	1/07/2009	1,738	2,000,000	1,634,568	-	1,634,568	-	-	-	-
Taiwind Trend	11-1/09	17/02/2009	19/02/2009	n/a	n/a	-	-	-	-	-	-	-	-
Total						52,605,494	41,402,708	52,605,494	41,402,708	103,655,791	103,655,791	57,615,202	57,615,202