



ASIC

Australian Securities & Investments Commission

Our reference: ENF2014/12503
Your reference: No.183

Level 5, 100 Market Street,
Sydney NSW 2000
GPO Box 9827, Sydney NSW 2001
DX 653 Sydney

Telephone: +61 2 9911 2000
Facsimile: +61 2 9911 2414
www.asic.gov.au

17 June 2014

Mr Paul Matters
C/o 10 Dixon street
FAIRY MEADOW NSW 2519

email: johnnt@1earth.net

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 5 June 2014 in the following terms:

Three substantial redemptions (about \$500,000.00, \$1m and \$800,000.00) carried out between May 22nd 2008 and June 18th 2008. The money was transferred from ASF and ended up with the ARP Growth Fund.

....

Documentation of the destination of these amounts. We do not seek personal names or details..

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. This document is described in the Schedule to this letter.

Relevant legislation

Section 47F of the FOI Act relevantly provides

General rule

- (1) *A document is conditionally exempt if its disclosure under this Act would involve the unreasonable disclosure of personal information about any person (including a deceased person).*

- (2) *In determining whether the disclosure of the document would involve the unreasonable disclosure of personal information, an agency or Minister must have regard to the following matters:*
- (a) *the extent to which the information is well known;*
 - (b) *whether the person to whom the information relates is known to be (or to have been) associated with the matters dealt with in the document;*
 - (c) *the availability of the information from publicly accessible sources;*
 - (d) *any other matters that the agency or Minister considers relevant.*

Section 22 of the FOI Act provides that if an agency or minister decides to refuse access to a document on the ground that it is exempt, the agency or minister must consider whether it would be reasonably practicable to prepare an edited copy of the document, which has been modified by relevant deletions, for release to the applicant. If the agency or minister decides that giving access to a document would disclose information that would reasonably be regarded as irrelevant to the request, consideration should be given to preparing an edited copy for release to the applicant. The decision maker should consider the nature and extent of the modifications required, the resources available to modify the document and whether the applicant would accept an edited copy.

Decision

I have decided to release the document in the attached Schedule which has been modified to delete irrelevant material and exempt material as discussed below.

Section 47F provides that a document is conditionally exempt if its disclosure under FOI would involve the unreasonable disclosure of personal information of any person. The test of unreasonableness implies a need to balance the public interest in disclosure of information and the private interest in the privacy of individuals.

In relation to document in the schedule, I consider that release of this document in its entirety would unreasonably affect a person's privacy, and would be contrary to the public interest in that it would compromise ASIC's work. I find that information regarding the identity of the recipients of funds is exempt from release under s47F of the FOI Act.

Pursuant to s22 of the FOI Act, I have prepared an edited copy of the document, which has been modified to delete information which is exempt under s47F of the FOI Act.

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

SCHEDULE OF DOCUMENTS

No	Description of document	Date	Decision on access	Relevant section
1.	ARP Growth Fund General Ledger as at 30 June 2008 for the period 22 May 2008 to 18 June 2008		Partially exempt	47F

ARP Growth Fund

General Ledger

As at 30 June 2008

Account Number	Account Description		Opening \$	Closing \$
160	Current Period Surplus		0.00	80,029,686.22
190	Member Financed Benefits		0.00	70,849,282.08
270	Unit Trusts		0.00	67,775,853.90
270 0021	ARP Sub-trust No. 1		0.00	67,775,853.90
[121]	02/07/2007 C	76,724,538.10		Purchase Professional Pensions Fund X
[180]	03/07/2007 C	(3,398,921.00)		Sale Professional Pensions Fund X
[185]	31/07/2007 J	(120,223.96)		Unit Pricing - Realised Market Movement
[185]	31/07/2007 J	(2,500,903.68)		Unit Pricing - Unrealised Market Movement
[249]	31/08/2007 J	120,223.96		Unit Pricing - Realised Market Movement
[249]	31/08/2007 J	1,100,785.19		Unit Pricing - Unrealised Market Movement
[361]	03/09/2007 C	(64,187.50)		Sale Professional Pensions Fund X
[364]	30/09/2007 J	(118,240.47)		Unit Pricing - Realised Market Movement
[364]	30/09/2007 J	1,151,777.59		Unit Pricing - Unrealised Market Movement
[375]	02/10/2007 C	(64,187.50)		Sale Professional Pensions Fund X
[427]	31/10/2007 J	120,132.76		Unit Pricing - Realised Market Movement
[427]	31/10/2007 J	1,029,205.00		Unit Pricing - Unrealised Market Movement
[376]	01/11/2007 C	(64,187.50)		Sale Professional Pensions Fund X
[419]	22/11/2007 C	(1,500,000.00)		Sale Professional Pensions Fund X
[455]	30/11/2007 J	(83,774.28)		Unit Pricing - Realised Market Movement
[455]	30/11/2007 J	657,328.40		Unit Pricing - Unrealised Market Movement
[487]	31/12/2007 J	84,845.42		Unit Pricing - Realised Market Movement
[487]	31/12/2007 J	544,898.68		Unit Pricing - Unrealised Market Movement
[484]	31/12/2007 C	(65,533.81)		Sale Professional Pensions Fund X
[488]	31/01/2008 C	(149,500.00)		Sale Professional Pensions Fund X
[508]	31/01/2008 J	(83,867.07)		Unit Pricing - Realised Market Movement
[508]	31/01/2008 J	(340,962.97)		Unit Pricing - Unrealised Market Movement
[521]	29/02/2008 C	(264,500.00)		Sale Professional Pensions Fund X
[525]	29/02/2008 J	82,782.05		Unit Pricing - Realised Market Movement
[525]	29/02/2008 J	281,139.54		Unit Pricing - Unrealised Market Movement
[556]	25/03/2008 C	(249,627.46)		Sale Professional Pensions Fund X
[559]	31/03/2008 J	(97,284.12)		Unit Pricing - Realised Market Movement
[559]	31/03/2008 J	(4,597,600.73)		Unit Pricing - Unrealised Market Movement
[562]	30/04/2008 C	(296,834.40)		Sale Professional Pensions Fund X
[565]	30/04/2008 J	78,895.05		Unit Pricing - Realised Market Movement
[565]	30/04/2008 J	367,390.41		Unit Pricing - Unrealised Market Movement
[588]	30/05/2008 C	(288,179.70)		Sale Professional Pensions Fund X
[591]	31/05/2008 J	(71,665.23)		Unit Pricing - Realised Market Movement
[591]	31/05/2008 J	897,894.51		Unit Pricing - Unrealised Market Movement
[609]	30/06/2008 J	(128,736.60)		Realised market movement
[609]	30/06/2008 J	128,736.60		Unrealised market movement
[607]	30/06/2008 J	1,120,782.27		Income Professional Pensions Fund X
[599]	30/06/2008 C	(1,365,025.00)		Sale Professional Pensions Fund X
[602]	30/06/2008 J	94,279.59		Unit Pricing - Realised Market Movement
[602]	30/06/2008 J	(895,838.23)		Unit Pricing - Unrealised Market Movement
275	Foreign Investments		0.00	2,890,514.80
275 2102	Professional Pensions ARP Ltd		0.00	2,890,514.80
[245]	17/08/2007 C	3,000,000.00		Purchase Professional Pensions ARP Ltd
[249]	31/08/2007 J	(5.88)		Unit Pricing - Unrealised Market Movement
[364]	30/09/2007 J	43,499.91		Unit Pricing - Unrealised Market Movement
[427]	31/10/2007 J	50,217.65		Unit Pricing - Unrealised Market Movement
[455]	30/11/2007 J	24,749.70		Unit Pricing - Unrealised Market Movement
[487]	31/12/2007 J	24,786.48		Unit Pricing - Unrealised Market Movement

ARP Growth Fund
General Ledger

As at 30 June 2008

Account Number	Account Description		Opening \$	Closing \$
[574]	30/05/2008 C	(9,811.50)	Cash taken -	
[588]	30/05/2008 C	288,179.70	Sale Professional Pensions Fund X	
[560]	30/05/2008 C	1,088.80	Contributions for member	
[561]	30/05/2008 C	3,593.00	Contributions for member	
[589]	31/05/2008 C	410.62	Purchase Cash at Bank - ARPG	
[569]	02/06/2008 C	(6,000.00)	Schedular Auto Payment	
[569]	02/06/2008 C	(20,839.00)	Schedular Auto Payment	
[567]	02/06/2008 C	(12,000.00)	Schedular Auto Payment	
[567]	02/06/2008 C	(8,000.00)	Schedular Auto Payment	
[567]	02/06/2008 C	(1,600.00)	Schedular Auto Payment	
[567]	02/06/2008 C	(5,900.00)	Schedular Auto Payment	
[567]	02/06/2008 C	(5,834.00)	Schedular Auto Payment	
[567]	02/06/2008 C	(5,000.00)	Schedular Auto Payment	
[567]	02/06/2008 C	(12,000.00)	Schedular Auto Payment	
[567]	02/06/2008 C	(12,000.00)	Schedular Auto Payment	
[567]	02/06/2008 C	(6,500.00)	Schedular Auto Payment	
[567]	02/06/2008 C	(2,921.00)	Schedular Auto Payment	
[567]	02/06/2008 C	(6,732.66)	Schedular Auto Payment	
[567]	02/06/2008 C	(6,000.00)	Schedular Auto Payment	
[567]	02/06/2008 C	(1,591.00)	Schedular Auto Payment	
[567]	02/06/2008 C	(645.00)	Schedular Auto Payment	

ARP Growth Fund
General Ledger

As at 30 June 2008

Account Number	Account Description		Opening \$	Closing \$
[568]	02/06/2008	C	(9,000.00)	Schedular Auto Payment
[568]	02/06/2008	C	(4,500.00)	Schedular Auto Payment
[568]	02/06/2008	C	(3,000.00)	Schedular Auto Payment
[568]	02/06/2008	C	(6,000.00)	Schedular Auto Payment
[568]	02/06/2008	C	(3,279.00)	Schedular Auto Payment
[568]	02/06/2008	C	(1,334.00)	Schedular Auto Payment
[568]	02/06/2008	C	(11,183.00)	Schedular Auto Payment
[568]	02/06/2008	C	(11,710.00)	Schedular Auto Payment
[568]	02/06/2008	C	(5,500.00)	Schedular Auto Payment
[568]	02/06/2008	C	(8,290.00)	Schedular Auto Payment
[568]	02/06/2008	C	(4,382.00)	Schedular Auto Payment
[568]	02/06/2008	C	(2,223.00)	Schedular Auto Payment
[568]	02/06/2008	C	(10,000.00)	Schedular Auto Payment
[568]	02/06/2008	C	(2,500.00)	Schedular Auto Payment
[568]	02/06/2008	C	(5,467.00)	Schedular Auto Payment
[568]	02/06/2008	C	(13,926.00)	Schedular Auto Payment
[568]	02/06/2008	C	(5,000.00)	Schedular Auto Payment
[568]	02/06/2008	C	(7,000.00)	Schedular Auto Payment
[568]	02/06/2008	C	(11,000.00)	Schedular Auto Payment
[568]	02/06/2008	C	(4,015.00)	Schedular Auto Payment
[568]	02/06/2008	C	(9,905.00)	Schedular Auto Payment
[568]	02/06/2008	C	(2,139.00)	Schedular Auto Payment
[568]	02/06/2008	C	(3,000.00)	Schedular Auto Payment
[568]	02/06/2008	C	(7,000.00)	Schedular Auto Payment
[568]	02/06/2008	C	(6,385.00)	Schedular Auto Payment
[568]	02/06/2008	C	(1,500.00)	Schedular Auto Payment
[568]	02/06/2008	C	(8,350.00)	Schedular Auto Payment
[598]	02/06/2008	C	(61,755.74)	Reduce Accrued Issuer Fees - ARPG
[603]	06/06/2008	J	(465,009.98)	Inspecie Transfer
[604]	06/06/2008	J	465,009.98	Inspecie Transfer
[573]	13/06/2008	C	(32,500.00)	Cash taken -
[571]	13/06/2008	C	1,073.08	Contributions for member
[572]	13/06/2008	C	10,361.00	Contributions for member

ARP Growth Fund
General Ledger

As at 30 June 2008

Account Number	Account Description			Opening \$	Closing \$
[1]	31/07/2007	C	121.00	Purchase Withholding Tax Credit - ARPG	
[246]	31/08/2007	C	1,300.00	Purchase Withholding Tax Credit - ARPG	
310	GST Receivables Account			0.00	41,267.50
310 0021	GST Receivables Account - ARPG			0.00	41,267.50
[360]	13/09/2007	C	4,478.83	Reduce Accrued Issuer Fees - ARPG	
[372]	09/10/2007	C	4,751.26	Reduce Accrued Issuer Fees - ARPG	
[374]	02/11/2007	C	4,667.54	Reduce Accrued Issuer Fees - ARPG	
[452]	30/11/2007	C	4,706.97	Reduce Accrued Issuer Fees - ARPG	
[505]	03/01/2008	C	4,696.92	Reduce Accrued Issuer Fees - ARPG	
[523]	07/02/2008	C	4,686.05	Reduce Accrued Issuer Fees - ARPG	
[518]	07/03/2008	C	4,533.37	Reduce Accrued Issuer Fees - ARPG	
[529]	04/04/2008	C	4,535.94	Reduce Accrued Issuer Fees - ARPG	
[598]	02/06/2008	C	4,210.62	Reduce Accrued Issuer Fees - ARPG	
408	Accrued Issuer Fees			0.00	175,066.74
408 0021	Accrued Issuer Fees - ARPG			0.00	175,066.74
[184]	31/07/2007	J	62,345.32	RE/MGT Fees	
[250]	31/08/2007	J	63,799.32	RE/MGT Fees	
[360]	13/09/2007	C	(61,210.64)	Reduce Accrued Issuer Fees - ARPG	
[363]	30/09/2007	J	63,789.76	RE/MGT Fees	
[372]	09/10/2007	C	(64,934.00)	Reduce Accrued Issuer Fees - ARPG	
[428]	31/10/2007	J	64,328.56	RE/MGT Fees	
[374]	02/11/2007	C	(63,789.76)	Reduce Accrued Issuer Fees - ARPG	
[456]	30/11/2007	J	64,191.24	RE/MGT Fees	
[452]	30/11/2007	C	(64,328.56)	Reduce Accrued Issuer Fees - ARPG	
[486]	31/12/2007	J	64,042.61	RE/MGT Fees	
[505]	03/01/2008	C	(64,191.24)	Reduce Accrued Issuer Fees - ARPG	
[507]	31/01/2008	J	61,956.03	RE/MGT Fees	
[523]	07/02/2008	C	(64,042.61)	Reduce Accrued Issuer Fees - ARPG	
[524]	29/02/2008	J	61,991.10	RE/MGT Fees	
[518]	07/03/2008	C	(61,956.03)	Reduce Accrued Issuer Fees - ARPG	
[558]	31/03/2008	J	57,545.12	RE/MGT Fees	
[529]	04/04/2008	C	(61,991.09)	Reduce Accrued Issuer Fees - ARPG	
[564]	30/04/2008	J	57,702.12	RE/MGT Fees	
[590]	31/05/2008	J	58,325.89	RE/MGT Fees	
[598]	02/06/2008	C	(57,545.12)	Reduce Accrued Issuer Fees - ARPG	
[601]	30/06/2008	J	59,038.72	RE/MGT Fees	
441	Provision for Distribution			0.00	0.00
441 0021	Provision for Distribution - ARPG			0.00	0.00
[608]	30/06/2008	C	(1,483.17)	Pool Trust Distribution - ARPG	
[608]	30/06/2008	C	2,507.57	Pool Trust Distribution - ARPG	
[608]	30/06/2008	C	(2,507.57)	Pool Trust Distribution - ARPG	
[608]	30/06/2008	C	272.47	Pool Trust Distribution - ARPG	
[608]	30/06/2008	C	(272.47)	Pool Trust Distribution - ARPG	
[608]	30/06/2008	C	1,295.54	Pool Trust Distribution - ARPG	
[608]	30/06/2008	C	(1,295.54)	Pool Trust Distribution - ARPG	
[608]	30/06/2008	C	690.72	Pool Trust Distribution - ARPG	
[608]	30/06/2008	C	(690.72)	Pool Trust Distribution - ARPG	
[608]	30/06/2008	C	2,312.51	Pool Trust Distribution - ARPG	
[608]	30/06/2008	C	(2,312.51)	Pool Trust Distribution - ARPG	
[608]	30/06/2008	C	1,483.17	Pool Trust Distribution - ARPG	
[608]	30/06/2008	C	(113.70)	Pool Trust Distribution - ARPG	
[608]	30/06/2008	C	1,060.08	Pool Trust Distribution - ARPG	

ARP Growth Fund
General Ledger

As at 30 June 2008

Account Number	Account Description		Opening \$	Closing \$
[608]	30/06/2008 C	87.81		
[608]	30/06/2008 C	(87.81)		
[608]	30/06/2008 C	1,455.01		
670	Trust Distributions		0.00	1,120,782.27
670 0021	ARP Sub-trust No. 1		0.00	1,120,782.27
[607]	30/06/2008 J	1,120,782.27		
694	NAB Cash at Bank Interest		0.00	51,120.27
694 0021	NAB Cash at Bank - ARPG		0.00	51,120.27
[1]	31/07/2007 C	242.33		
[1]	31/07/2007 C	16,538.85		
[247]	31/08/2007 C	14,694.08		
[362]	30/09/2007 C	4,646.88		
[373]	31/10/2007 C	3,040.16		
[451]	30/11/2007 C	3,664.91		
[485]	31/12/2007 C	4,680.86		
[506]	31/01/2008 C	675.88		
[522]	29/02/2008 C	1,109.84		
[557]	31/03/2008 C	529.78		
[563]	30/04/2008 C	265.33		
[589]	31/05/2008 C	410.62		
[600]	30/06/2008 C	620.75		
780	Unrealised Gains		0.00	(2,285,634.89)
780 015	Unrealised Gains - Foreign Assets		0.00	(109,485.20)
[609]	30/06/2008 J	(109,485.20)		
780 060	Unrealised Gains - Unit Trusts		0.00	(2,176,149.69)
[609]	30/06/2008 J	(2,176,149.69)		
781	Unrealised Market Movement		0.00	0.00
781 0021	Pool Market Movement Un-Realised - ARPG		0.00	0.00
[185]	31/07/2007 J	(2,500,903.68)		
[249]	31/08/2007 J	(5.88)		
[249]	31/08/2007 J	1,100,785.19		
[364]	30/09/2007 J	43,499.91		
[364]	30/09/2007 J	1,151,777.59		
[427]	31/10/2007 J	1,029,205.00		
[427]	31/10/2007 J	50,217.65		
[455]	30/11/2007 J	24,749.70		
[455]	30/11/2007 J	657,328.40		
[487]	31/12/2007 J	544,898.68		
[487]	31/12/2007 J	24,786.48		
[508]	31/01/2008 J	(27,945.08)		
[508]	31/01/2008 J	(340,962.97)		
[525]	29/02/2008 J	12,461.95		
[525]	29/02/2008 J	281,139.54		
[559]	31/03/2008 J	(300,379.34)		
[559]	31/03/2008 J	(4,597,600.73)		
[565]	30/04/2008 J	14,370.19		
[565]	30/04/2008 J	367,390.41		
[591]	31/05/2008 J	38,534.19		
[591]	31/05/2008 J	897,894.51		
[609]	30/06/2008 J	109,485.20		
[609]	30/06/2008 J	2,304,886.29		

ARP Growth Fund
General Ledger

As at 30 June 2008

Account Number	Account Description		Opening \$	Closing \$
[602]	30/06/2008 J	10,225.03		Unit Pricing - Unrealised Market Movement
[602]	30/06/2008 J	(895,838.23)		Unit Pricing - Unrealised Market Movement
785	Market Movement Realised		0.00	(122,632.90)
785 060	Realised Gains Unit Trusts		0.00	(122,632.90)
[609]	30/06/2008 J	(122,632.90)		Realised market movement - Unit Trusts
786	Realised Market Movement		0.00	0.00
786 0021	Pool Market Movement Realised - ARPG		0.00	0.00
[185]	31/07/2007 J	(120,223.96)		Unit Pricing - Realised Market Movement
[249]	31/08/2007 J	120,223.96		Unit Pricing - Realised Market Movement
[364]	30/09/2007 J	(118,240.47)		Unit Pricing - Realised Market Movement
[427]	31/10/2007 J	120,132.76		Unit Pricing - Realised Market Movement
[455]	30/11/2007 J	(83,774.28)		Unit Pricing - Realised Market Movement
[487]	31/12/2007 J	84,845.42		Unit Pricing - Realised Market Movement
[508]	31/01/2008 J	(83,867.07)		Unit Pricing - Realised Market Movement
[525]	29/02/2008 J	82,782.05		Unit Pricing - Realised Market Movement
[559]	31/03/2008 J	(97,284.12)		Unit Pricing - Realised Market Movement
[565]	30/04/2008 J	78,895.05		Unit Pricing - Realised Market Movement
[591]	31/05/2008 J	(71,665.23)		Unit Pricing - Realised Market Movement
[609]	30/06/2008 J	(6,103.70)		Pool Realised market movement - Unit Trusts
[602]	30/06/2008 J	94,279.59		Unit Pricing - Realised Market Movement
790	Applications		0.00	81,935,319.88
794	Trust Distribution Re-investment		0.00	69,787.38
808	Issuer Fees		0.00	739,055.79
808 0021	Issuer Fees - ARPG		0.00	739,055.79
[184]	31/07/2007 J	62,345.32		RE/MGT Fees
[250]	31/08/2007 J	63,799.32		RE/MGT Fees
[363]	30/09/2007 J	63,789.76		RE/MGT Fees
[428]	31/10/2007 J	64,328.56		RE/MGT Fees
[456]	30/11/2007 J	64,191.24		RE/MGT Fees
[486]	31/12/2007 J	64,042.61		RE/MGT Fees
[507]	31/01/2008 J	61,956.03		RE/MGT Fees
[524]	29/02/2008 J	61,991.10		RE/MGT Fees
[558]	31/03/2008 J	57,545.12		RE/MGT Fees
[564]	30/04/2008 J	57,702.12		RE/MGT Fees
[590]	31/05/2008 J	58,325.89		RE/MGT Fees
[601]	30/06/2008 J	59,038.72		RE/MGT Fees
848	Indirect MGT Costs		0.00	783,123.68
848 0021	Indirect MGT Costs - ARPG		0.00	783,123.68
[610]	30/06/2008 J	783,123.68		Expense Indirect MGT Costs - ARPG
849	Indirect MGT Costs Contra		0.00	(783,123.68)
849 0021	Indirect MGT Costs Contra - ARPG		0.00	(783,123.68)
[610]	30/06/2008 J	(783,123.68)		Refund expense Indirect MGT Costs Contra - ARPG
956	Trust Distribution		0.00	69,787.38
990	Redemptions		0.00	9,110,616.75