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31 August 2018

Mr. Robert Jeremenko,
Retirement Income Policy Division,
The Treasury,
Langton Crescent,
Parkes, ACT, 2600

Dear Mr. Jeremenko,

**RE: SUBMISSION IN RELATION TO THE 2018 BUDGET PROPOSAL REGARDING
THE SMSF AUDIT CYCLE**

I make reference to the preliminary submission document previously submitted to Treasury on 11 May, 2018.

I continue to head up a joint taskforce of SMSF auditors and other industry stakeholders, with the view to having a collective voice in these matters, and as a result, I speak on behalf of the individuals listed at the end of this submission.

We wish to voice our concerns regarding the budget proposal to amend the annual audit for self managed superannuation funds to a 3 yearly audit cycle and to answer the specific queries raised by Treasury in their discussion paper in relation to this proposed measure.

We are gravely concerned as to the impact this proposal will have on the integrity of the superannuation system, a system that is underpinned by the annual independent audit. We believe the annual audit should not be considered red tape, but as an essential integrity measure.

Executive Summary

The introduction of a 3-year audit cycle for a select number of SMSFs will not achieve the policy goal of reducing red tape nor will the proposal result in reduced audit fees.

The introduction of a 3-year audit cycle for a select number of SMSFs will only serve to add complexity for trustees, unnecessarily complicate the audit process, and the auditor's ability to do a quality and timely audit. The proposal will predominately see an increase in fees for the SMSF, by either an increase in audit time, or an increase in the time spent by the accountant amending financial reports, annual tax returns, or by simply taking on the role and responsibility of doing an interim compliance check for the trustee.

During our submission I make several references to a survey undertaken by Saul SMSF (“**the Survey**”), the results of which have been included with the permission of Mr. David Saul.

The Survey noted that 93% of respondents did not support the proposal, and that 84% of respondents believed the proposed measure would decrease the integrity of the SMSF sector. There were a total 260 respondents of which approximately half were SMSF auditors.

Further to this, conversations with industry participants, be they accountants, trustees or other auditors, would suggest that very few SMSFs will opt into the 3-year audit cycle. Overall these conversations circled around the importance of the audit, that our audit work serves as a double check of the accountant or trustee, and ultimately helped to protect the superannuation balances of members.

If very few SMSFs are likely to opt-in we can only conclude that these proposed measures must be seen as an idea that was well intended, but one that has fallen well short of the mark and should be abandoned.

With specific reference to each Treasury question, and on the basis that the proposal is to proceed, we summarise:

1. Audit costs are expected to increase under these proposed measures. Further to this, other compliance costs are also expected to increase. For example: there will be additional time and costs for the accountant to essentially take on the role of performing an interim compliance review to ascertain if any trigger events have occurred.
2. Clear audit reports should include a consideration of not just a Part B qualification, but should include Part A qualifications, whether an Auditor Contravention Report (“**ACR**”) has been lodged, and whether there are any other compliance issues, that are not otherwise reportable.

Further to this, we note that the communication of the relevant information regarding the fund should not come from the trustee or tax agent, but from an independent source.

3. The most appropriate definition of a timely submission of a Superannuation Annual Return (“**SAR**”) is an SMSF that has not lodged a SAR late in the last 3 years. If the measures are to be introduced as proposed, on 1 July, 2019 presumably this would equate to an SMSF that lodged their 2017, 2018 and 2019 SAR on time.
4. An assessment of key events and the proposed trigger events are detailed below.
5. Arrangements should be put in place to manage a staggered introduction of the proposed measures, and a staggered introduction over a 3-year period should be appropriate.



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6. There are numerous other issues that should be given due consideration prior to concluding on whether the proposed measures should be introduced or abandoned.

Each consultation question is addressed in detail below.

1. How are audit costs and fees expected to change for the SMSF trustees that move to a three-yearly audit cycle?

- 1.1. Whilst there may be a small number of funds that have a reduction in their audit fees, it is anticipated that audit fees will be stagnant at best or increase because of the proposed measures. The Survey reported only 5.4% of respondents thought audit fees would reduce under a bundled arrangement.

There are several factors that cause this expectation:

- a) Amending the timing of the audit will have little impact on the audit procedures required to be undertaken by the auditor. Auditing standards require that an audit file be a stand-alone set of documents, and as a result, deferring audits 1 and 2 until some time in year 4 will not typically reduce the amount of work undertaken by the auditor, nor reduce the amount of audit evidence that must be collated for each audit report issued.
- b) With the passage of time, it is our experience that documentation retention becomes lax and memories fade. Audit requests will remain consistent from year to year, however, the trustee may not have retained the information required or be able to recall the scenario being reviewed by the auditor. This will inevitably result in delays – adding to audit time, and therefore audit costs. The Survey noted that 93% of respondents thought the audits would be more complex under a bundled 3-year approach. Further to this, we have collated some real-life examples in relation to fees for delayed/bundled audit clients and would be happy to supply this further information should Treasury like to review this level of detail.
- c) Errors identified in financial statements in year 4 that require amendment to year 1, year 2 and, or year 3 financial reports will clearly add time and cost to not only the audit, but to the accounting function as well. Financial reports will require updating as will the SAR. This will be a significant cost to the trustee, and cause challenges to the accountants in terms of the ability of the various software packages used to allow such historical changes. The Survey reported that 91% of respondents thought time spent by advisors, accountants and administrators would increase under the proposal.



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- d) Compliance issues identified in year 1 or year 2 which would otherwise be commented on solely in the audit management letter would now require ATO reporting via an ACR. This inevitably increases the audit time, and therefore costs to the fund, not to mention the additional ATO resources that would be required to review the additional reporting done by auditors. Further to this, trustees have a greater risk of receiving penalties because of compliance issues that remain uncorrected for an extended period of time.
 - e) The review of annual financial transactions by the accountant of the fund to determine if a trigger event has occurred will increase the time spent by the accountant, thereby negating any possible audit fee reduction.
 - f) As with most professional accountants, auditors review and amend their hourly charge out rates on an annual basis. Audits that would typically be undertaken at year 1 charge out rates would be bundled and charged at year 4 rates.
- 1.2. There will be numerous situations where trustees can not locate simple documentation such as bank statements. To obtain statements older than two years would typically incur a fee, per statement. This fee is around \$7 per statement, depending on the bank involved. If statements for year 1 have not been retained by the trustee, there will be hard costs to source these from the bank. Audits done annually do not have this issue, and any duplicate statements required are provided by the banks free of charge.
 - 1.3. The real risk of additional costs due to errors, poor record keeping and compliance issues are significant and would dwarf any potential benefit.
 - 1.4. Disbursements on-charged by auditors may be the only area costs can be saved.

Property title searches

- 1.5. Where a fund has a property investment an auditor would typically arrange for the property title to be searched. This is usually an annual check. The cost of the search ranges between \$15 and \$75 per title, depending on where the property is located geographically. If an audit were done in year 4 for years 1, 2 and 3, the title search would only be requested in year 4, and may be used for all 3 audits, depending on when the fund acquired the property, and what changes, if any, occurred to the title in that time.
- 1.6. In my practice I note disbursements account for 2% of total audit fees. Of these fees title search fees were approximately 46% for the 2018 financial year. This equates to a nominal cost over all funds that I audit personally.



Bank Audit Certificate Fees

- 1.7. We have yet to decide which way the audit industry will go in relation to bank audit certificate requests if the audits are bundled into a 3-yearly cycle. Auditors may conclude that with the lack of regular review in the intervening years that a bank audit certificate is crucial and request more certificates than are currently being arranged – that is, a certificate for years 1, 2 and 3. Or, auditors may choose to only request a bank audit certificate for the bank balances as 30 June of year 3.
 - 1.8. If bank audit certificate fee requests reduce this would result in a cost saving to the SMSF trustee. Alternatively, these fees may increase.
 - 1.9. Of the disbursements charged by my practice, bank audit certificate fees charged by the bank directly to me accounted for approximately 20% of total disbursements charged for the 2018 financial year. I note this is in addition to the fee many banks also charge the fund. Again, this is a nominal cost over all funds that I audit personally.
 - 1.10. The Survey asked the direct question regarding the expected impact on the level of audit fees under this proposed measure. The Survey noted that 5.4% of respondents thought audit fees would be expected to decrease. 23.3% anticipated no change in audit fees, whilst 71.3% expected fees to increase.
- 2. Do you consider an alternative definition of “clear audit reports” should be adopted? Why?**
- 2.1. Good record keeping is currently based on the information reported in the SAR for the fund. The SAR only requires the fund to report if Part B of the audit report has been qualified, and if qualified, if the compliance matter has been resolved. No other information is provided to the ATO. As a result, there is insufficient information reported to the ATO to enable an assessment as to whether the fund has a clear audit report.
 - 2.2. In our opinion, good compliance is more than having three consecutive clear Part B audit opinion issued.
 - 2.3. We further note that the SAR is lodged by the trustee directly or the tax agent of the SMSF.
 - 2.4. The SAR is not subject to review by the auditor, nor is the SAR required to be included in the audit process. The SAR quite literally falls outside the scope of the audit. Notwithstanding this, most competent auditors review the SAR as part of the audit process to add value to their client service offering. However, any suggestions or amendments requested by the auditor may simply be ignored by the trustee or the tax agent for the fund.



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- 2.5. Further to this, it is not uncommon to hear that a SAR has been lodged prior to the audit being finalised to ensure the fund has met lodgement deadlines and can maintain their 15 May annual return lodgement date, and to avoid late lodgement penalties.
 - 2.6. Given this, it would be most imprudent for government to rely on the information reported in the SAR to establish eligibility criteria for this proposed measure.
 - 2.7. We would propose that if the measure is to be implemented that all SMSF auditors be required to notify the ATO when an audit has been completed. The mechanism for this reporting already exists in the eSat tool offered by the ATO.
 - 2.8. The eSat tool could be extended to ask the following additional questions for each fund audited:
 - a) Was Part A of the audit opinion qualified?
 - b) Was Part B of the audit opinion qualified?
 - c) Was an ACR lodged?
 - d) Were any other compliance matters, not otherwise reportable in an ACR, identified by the auditor?
 - 2.9. We make this recommendation noting that this will naturally add time to each audit, and therefore add costs for the SMSF trustee. Notwithstanding this, we strongly believe that if the measure is to be introduced then eligibility needs to be appropriately assessed by the ATO, based on independent information.
 - 2.10. The introduction of notifying audit completion information with the ATO by the auditor would also assist the ATO in identifying tax agents or trustees incorrectly lodging the fund SAR prior to an audit being finalised, and would assist the ATO in identifying funds that go unaudited each financial year.

3. What is the most appropriate definition of timely submission of a SAR? Why?

- 3.1. To be eligible for the 3-year audit cycle based on the timely submission of a SAR Treasury has noted three options:
 - a) An SMSF that has never lodged a late SAR;
 - b) An SMSF that has not submitted a late SAR in the last 3 years; or
 - c) An SMSF without any outstanding SAR's.



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- 3.2. We believe the most appropriate definition of a timely submission of a SAR is option b) where an SMSF has lodged on time for the three years prior to opting into the 3-year audit cycle.
 - 3.3. We believe option b) is appropriate on the basis that restricting eligibility to funds that have never lodged late is unreasonable, and too strict – any number of reasons might result in the late lodgement of a SAR, not all of which may be in the control of the trustee of the fund.
 - 3.4. We further believe option b) is more suitable than making eligibility dependant on having no outstanding SAR's – if a fund simply ensures all their return obligations are up to date, there is no consideration to the reasons why one or multiple years were outstanding, or for how long the returns were outstanding for. If the motivation is to reward trustees, a reward can not be issued for funds that lodge late.

4. What should be considered a key event for a SMSF that would trigger the need for an audit report in that year? Which events present the most significant compliance risks?

- 4.1. We believe the following identified trigger events should be included in the eligibility assessment:

- a) The commencement of an income stream:

The commencement of an income stream presents a number of compliance risks for the fund, which are not purely limited to the payment standards or early access risks. There are income tax consequences where income streams are not operated appropriately and claims for exempt pension deductions are erroneously claimed. Members may be exposed to adverse personal taxation consequences where SMSF benefit payments are not done correctly.

- b) The death of a member:

The death of member doesn't necessarily equate to an increased audit risk, however, there are significant considerations that the trustee must address, and if left unaudited for an extended period of time would exacerbate any issues.

- c) The addition or removal of a member:

Regular issues arise where a member is added or removed with respect to fund compliance with the definition of an SMSF. Leaving these transactions unaudited for an extended period of time creates unnecessary compliance matters.



d) The commencement or maintenance of an LRBA:

There are significant risks associated with the commencement of an LRBA, and it would be remiss of government not to have LRBAs as a trigger event. If not reviewed in a timely manner, an LRBA may continue for a period of some 4 years before the auditor checks the debt is compliant, and the other assets of the fund are safeguarded from the debt exposure.

The maintenance of an LRBA should also be a trigger event, given the fund may draw down on available lines of credit. Further to this, we note regular issues on the repayment of the debt where the mortgage is still listed over the property. To delay the audit for these funds would see significant compliance issues maintained by the trustee inadvertently.

e) An acquisition of an asset from a related party:

There are numerous compliance considerations where a fund has acquired an asset from a related party, and as a result there are considerable compliance risks where a fund acquires assets from related parties. These should be reviewed in an annual audit to ensure the fund complies with the requirements.

f) Investments, loans or leases with related parties:

There are again numerous compliance considerations where a fund has investments in, loans to or leases with related parties, and as a result there are considerable compliance risks where a fund has these arrangements in place. All these types of transactions should be reviewed in an annual audit to ensure the fund complies with the numerous requirements.

4.2. We believe the following additional transactions should also be considered as trigger events:

a) Investments in cryptocurrency:

Where a fund invests in this type of unique investment class there are risks the auditor must consider, and the timely consideration of these risks would be pertinent and relevant to the trustee of the fund.



b) A payment split on the divorce of a member:

There are risks associated with any payment split between a couple on divorce and allowing a fund that has a payment split to have their audit deferred for a 3 year period will exacerbate any issues that may exist. Errors in the processing of payment splits may significantly disadvantage one party in the divorce and would be extremely difficult to rectify years after the event.

c) Investments in personal use assets:

From a personal practice point of view, we have close to zero compliance where a fund has personal use assets, and whilst many personal use assets are immaterial, they regularly result in an ACR being lodged. Given this, any poor compliance area should be a trigger event.

d) Contribution splitting:

We believe consideration should be given by Treasury as to how contribution splits might be manipulated by trustees to avoid contribution caps and pension cap balances. Whilst the split would be reviewed as part of the bundled audit in year 4, any rectification would be time consuming and problematic.

e) Investments in derivatives:

Where a fund has investments in derivatives a charge can be placed on the assets of the fund. To ensure the derivative charges are permitted and reviewed in a timely manner, this investment class should be a trigger event.

4.3. We have assumed that new SMSFs are not eligible to opt into a 3-year audit cycle until they have lodged three SAR's on time, and have no other compliance issues or trigger events.

4.4. We do not believe the following suggested transactions should be a trigger event:

a) The receipt of non-arm's length income:

Our thoughts on why this event should be excluded is twofold.

Firstly, this is not a compliance matter - the existence of non-arm's length income is a financial statement consideration only and has no bearing on fund compliance.



Secondly, SMSFs do not volunteer any income streams as non-arm's length. All trustees simply operate on the basis that the fund income is ordinary. Non-arm's length income is a matter only ever identified by the auditor. To have as a trigger event something that no trustee is aware of would be an unreasonable and unworkable imposition on the SMSF trustee.

b) In-specie lump sum payments to a member:

This is a rare occurrence, and would therefore be an obscure trigger event, effecting a minimal number of SMSFs.

4.5. Government will need to consider the implications of having specific asset classes as trigger events, and how trustees might choose to realign their asset allocations to asset classes that do not trigger an annual audit. This may see an overly conservative approach to investing which may not be beneficial for the SMSF or the sector in general.

4.6. A further consideration to grapple with is the requirement, as proposed, that if a trigger event occurs in year 2 that the fund must have the year 1 and year 2 audits undertaken before the year 2 SAR can be lodged. This will place a burden on the auditor to process two audits for a fund the auditor wasn't expecting to receive until year 4. There are obvious staffing implications along with the inevitable time pressures that will be placed on the auditor to achieve a quick turn around time to ensure the SAR is lodged on time.

5. Should arrangements be put in place to manage transition to three-yearly audits for some SMSFs? If so, what metric should be used to stagger the introduction of the measure?

5.1. Yes, arrangements should be put in place should the proposed measure be legislated.

5.2. We would recommend a metric that relies on a random basis to ensure as even an application as possible. We would recommend the use of the ABN as follows:

ABN ending	2020	2021	2023
1 to 3	x		
4 to 6		x	
7 to 0			x
No ABN			x



6. Are there any other issues that should be considered in policy development?

- 6.1. Where a fund is eligible and where the trustee decides to opt into the 3-year audit cycle trustees will need to be aware that the trust deed of the fund may need updating. This is because many trust deeds require an annual audit. Any deed update will come at a cost to the fund, so consideration will need to be given as to how government communicates these measures and the consequences. A fund looking to bundle their audits because they are hoping to reduce audit fees, only to have a fee required to update their fund deed, will be adversely impacted by the changes.
- 6.2. Depending on the trigger events, we believe there is a significant risk that contribution caps will be avoided. There are numerous ways this could be achieved, however, we have listed a few for your consideration:
- a) A member will be able to contribute investments to their SMSF for below market value to enable the contribution caps to be met;
 - b) A member will be able to deposit money into the fund and simply account for this as a movement in the market value of investments, rather than account for it as an excessive contribution; or
 - c) A member will be able to manipulate asset values to ensure their account balance stays under the various limits to permit further contributions.
- 6.3. There is a significant risk pension balances will be manipulated to ensure as many assets, and the associated income is channelled into a 0% tax bracket. There are numerous ways this could be achieved, and we have listed a few for your consideration:
- a) Asset values could be understated to ensure as many assets as possible fall under the \$1.6m pension cap; or
 - b) Earning allocations between members could be distorted to ensure account balance smoothing is achieved, so that each member can utilise as much of the \$1.6m cap (compared to one member exceeding the cap, and one member being well under the cap).
- 6.4. There are further risks that pensions will be under paid, or not paid at all to ensure as much of a member's account balance remains in a 0% tax bracket.



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- 6.5. Further to the above point, of concern will be the incentive to keep asset values low to ensure a lower minimum pension is required to be paid. Notwithstanding SIS requires assets to be reported at market value each year, if a trustee is tempted to keep asset values low to massage minimum pension obligations, there will be no timely audit check to ensure assets are reported at appropriate values until year 4. If this occurs it will be costly and problematic to reverse all prior year pension payments (as these automatically become lump sum payments), and re-state the financial report and SAR to remove any claim for exempt pension deduction.
 - 6.6. Members who transition to retirement may be tempted to withdraw greater than the permitted 10% of their pension account balance. Converse to the above point, transition pensioners who require access to greater pensions may be motivated to overstate asset values to have the appearance of not exceeding the 10% threshold.
 - 6.7. Trustees will be less inclined to obtain the necessary actuarial certificate to ensure their exempt pension figures and the resultant tax impact is fair and appropriate.
 - 6.8. As noted above, and depending on the trigger events, acquisition of assets from members will facilitate the manipulation of contribution caps, especially where these acquisitions are done by way of an in-specie contribution. Further to this, the manipulation of consideration values for these transactions will permit superannuation funds to acquire assets at below market value to shift the capital gain from personal tax rates to superannuation tax rates. If this occurs, it will be costly and problematic to correct prior year non-compliant asset acquisitions.
 - 6.9. Depending on the trigger events, by far one of the biggest risk areas is simply loans to members. The temptation to remove assets from the fund for personal reasons will be great.
 - 6.10. If having, or maintaining an LRBA is not a trigger event, there will be an increase in the number of limited recourse borrowing arrangements funded by related parties that do not comply with the arm's length requirements imposed on the fund. This will result in an understatement of non-arm's length income, the contribution caps may be exploited and total superannuation balances will be impacted.

Alternative Cost Saving Measures

We appreciate that cost saving for the industry is a positive goal, and we have several ideas that would assist in achieving that, including:

1. Removing the need for certain minor contraventions to be reported to the ATO, thereby saving audit time and ATO resources;



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2. Removing the need for the auditor to review certain documentation, thereby saving audit time;
 3. Consultation with standard setters to design more relevant and efficient mandatory auditing standards applicable to self managed superannuation fund audits;
 4. Amending the requirements for pension funds to obtain actuarial certificates that will confirm 100% of the fund is in pension mode, and is therefore eligible for an exempt pension deduction, thereby reducing unnecessary costs for some pension members; and
 5. Implementing a mechanism whereby an SMSF could elect duplicate copies of bank statements be sent to their auditor directly from the bank. This would remove the need to request and pay for bank audit certificates. This would save audit time, and therefore reduce audit fees, along with avoiding the hard costs charged by the banks to supply the confirmation certificate to the auditor and the to fund directly.

These suggested cost saving measures would save time and therefore reduce audit fees across the board for all superannuation funds, not just a select eligible few. This would benefit the whole industry and SMSF trustees, whilst maintaining the integrity of the superannuation system.

We believe the practical difficulties of auditing 3 years at once would lead to an increase in audit report qualifications, particularly around insufficient audit evidence, which would inevitably detract from the integrity of the sector.

Please find attached a list of all individuals on whose behalf I have drafted this submission.

We would welcome any opportunity to discuss our concerns further, and I can be contacted on [REDACTED], or the office number noted above to facilitate this.

Yours faithfully,



Belinda Aisbett
Super Sphere Pty. Ltd.

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Alistair Abbott	Australian Audit
Reece Agland	Reece Agland & Associates
Robert Allan	All Super
Marueen Allan	Morrows
Gretchen Alt-Cooper	Self Fund Accounting
David Amos	MKG Partners
Sharlene Anderson	Veritas Corp
Andrew Antoniou	SMSF Auditors and Advisors
Carolyn Appleyard	Carolyn Appleyard Pty Ltd
Cherie Archibald	InFocus Audits
Sylvia Atkinson	Sylvia Atkinson Accountancy
Mark Avery	Self employed
Wali Aziz	Walker Wayland NSW
Kym Bailey	JB Were
Ian Baker	TBW Group
Judith Baker	S6 Accounting
Shelley Banton	ASF Audits
James Barlas	Bentleys Newcastle
David Baumgartner	Baumgartners
Michele Beattie	JCMB Consulting
Michael Behan	Self employed
Paul Bellas	Bellas Accountants
Greg Bentley	Opulen Accounting & Superannuation
Lyn Bettens	Arafura Accounting
Sharon Beveridge	Hartmann Cox
Rebecca Bezzina	Rebecca Bezzina & Co
Jason Bice	JSP Group
Hilton Bradford	Self employed
Errol Branson	SMSF Trustee
Liz Brooker	Absolute Audits
Sebastian Buccheri	Super Matters
Nosh Buhari	Bizzaca & Buhari
David Burrows	Baumgartner Super
David Busoli	SMSF Alliance
Ida Butera	Andresen McCarthy Partners
Simon Byers	Highview
Sally Byrne	Self employed
Jo-Anne Chaplin	Tax and Super Professionals
Angeline Chen	Goodwin Chivas
Amy Chen	Vincent's
Terrence Cheong	Strategic Integrative Accountants
Jimmy Chong	
Joe Choueifaty	RJW Associates
Elizabeth Christodoulou	Norton Christodoulou
Robert Clemente	Television Education Network
Ron Cohen	Helron Accountants
Ross Collier	Riverwood Group
Ashley Course	ARC Super



Graham Cox	Hartmann Cox
Brendan Curran	BPC Accounting
Ray Dadwal	Ralph Mre & Co
Andrew Dalrymple	Patison Partners
Amber Damen	Trident Business Group
Tim Davidson	Fortunity
Roger Davies	Self employed
Steven Davies	Self employed
Peter Davis	Davis Taxation Services
Belinda Davis	Superfect
Gary Day	Mill Point Accounting
Kate Denney	Self Managed Solutions
Terry Dewing	Sullivan Dewing
Poonam Di Iorio	Nexia Perth
Kevin Dixon	SMSF Trustee
Lisa Donnelly	Top Super Consulting
Adam Drabsch	Australian Independent Audit Services
Sonai Duarte	Self employed
Lana Edmonds	EDM Super
Matt Edwards	MJ Edwards
Kellie Edwards	Soak Business Services
Nathan Eid	Super Assess
John Elcheikh	Super Sphere
Madline Elcheikh	Super Sphere
Sharif Eldebs	Assured Super
Karla Eldridge	Karla Eldridge & Associates
Brad Eppingstall	RSM Australia
Lee Evans	The SMSF Audit Office
Rene Familiar	Cmact
Euan Farquhar	EDF & Associates
Voulla Flaskos	My Super Source
Katrina Fletcher	Elite Super
Rob Florence	Florence Audit & Assurance
Ian Floyd	Redmans
John Ford	2020 Business Accountants
Peter Fry	Peter Fry & Associates
Rhonda Futterleib	Essential Tax & Accounting Services
Suresh Ganeshan	Self employed
Hilliard Gar	Self employed
Eric Gardiner	Ferrari Gardner
Lina Gilmour	Absolute Accounting and Audit
James Gorey	James Gorey Chartered Accountants
Stephen Graham	SGG & Co Consulting
Rob Green	Sterling Business Accountants
Michael Green	Green Pritchard & Co
Heath Griffiths	Quay SMSF Audits
Julie Guest	Kilara Partners
Vicki Hams	Tyrrell Partners



Leigh Hancock	Opus Audit Pty Ltd
David Hansen	Guardian Partners
Richard Hardwick	Self employed
Paul Hareb	Imagine Accounting
Michael Harkin	Self employed
John Harmey	Harmeys
Glenn Hart	First Choice Super
Michael Harvey	MDH Accountants & Business Advisors
David Heffernan	DDH Strategies
Brett Herbert	Herbert Accounting
Vic Hill	Tyrell Partners
Jeanette Hoeppe	Jeanette Hoeppe Chartered Accountant
Mel Holzworth	Holzworth SMSF & Auditing Services
Jahan Hossain	Shakespear Partners
Kevin Howard	Jones Howard
Ray Itaoui	Hayes Knight (NSW)
John Ivelja	SMSF Audits Plus
Peter Jackson	Hall Jackson
Shiv Jaidka	JSP Partners
Alisten Joseph	A Joseph & Co
Naomi Kewley	Peak Super Audits
Jacob Kewley	Elite Super
Alan King	Key Audit Solutions
Allen King	Self employed
Trevor Knyvett	Adept Training Analysis
Anthony Koen	Super Know How
Maria Krnjulac	Rhodes Docherty & Co
Akrish Lal	Rhodes Docherty & Co
Ivano Laureti	Hills Audit
Adrian Law	AH Law Accounting & SMSF Auditing
Chris Levy	Aquila Super
Ian Lewis	Self employed
Elton Li	LLK Chartered Accountants
Helmut Leins	Crows Nest Accounting Services
Jennifer Lowe	Total Tax
Megan Lyons	Rankin & Young
Sandra Magann	Sea Change Accounting
Chris Malkin	Baumgartner Super
Cecilia Man	LLK Chartered Accountants
Simon Manning	Coastal View Financial Services
Saul Markunsky	In The Picture
Debbie Martin	Field Group
Clive Massingham	Hall Chadwick Queensland
Douglas McCracken	Easy Tax
Mike McFillin	McFillin Audit Services
Casey McGrath	Nest Super
Mike McHenry	Superannuation Advisors Australia
Lesley McKay	Self employed



Marcu McLellan	McLellan Associates
Joshua McMichael	Walker Wayland NSW
Bob McNamara	SMSF Trustee
Susan McNamara	SMSF Trustee
Christine McWilliams	The SMSF Foundation
Morena Melograna	Self employed
Flavio Meoli	Meoli & Co
Phillip Miller	Vincent's
Alex Mineeff	Taxable Accounting
Rory Mitchell	Cambridge St Associates
Belinda Morris	Simply Super
Stacey Morris	Elite Super
Marjon Muizer	SF Audits
Sam Naidu	Sam Naidu & Associates
Dinesh Nanayakkara	DS Audit Services
Stephen Noble	Australian Independent Audit Services
Mitchell Noble	Australian Independent Audit Services
Carl Nunan	Self employed
Stephen Okane	LD Assurance
Danny O'Leary	Self employed
Robert Paganin	Foundation Advisory
George Pampacos	Flinders Financial
Andrew Pape	
Shiv Parihar	Manage Your Super
Geoff Parker	Nexia Melbourne
John Pascoe	Self employed
Dinesh Patel	Mobile Small Business Taxation
Viral Patel	Audit Plus
Clive Payne	Clive Payne Accounting
Susan Pearce	Self employed
Michael Pelder	Australian SMSF Auditors
Grant Plozza	GP Business Solutions
Marco Polloni	Bizally
David Pozzocco	DFP Super Fund Audit
Raj Prabhu	KBP Audit Services
Rimal Prasad	Oz Audit Services
Catherine Price	TABS
Michael Pudney	Self employed
Kim Quach	Elite Super Solutions
Aron Quach	ACQ Accounting
Karen Rainbird	Karen Rainbird
Naz Randeria	Reliance Auditing Services
Carol Rees	Rhodes Docherty & Co
Alec Reid	Self employed
Stephen Rellis	Key Audit Solutions
Ron Richardson	Self employed
Shelly Rodwell	Lithgow Taxation & Bookkeeping Services
Bernie Rohan	PBR Audit



Don Ross	Hughes O'Dea Corredig Audit
Peter Rule	Complete Business Strategies Pty Ltd
Dennis Rynne	Self employed
Jagdev Sandhu	Dhan Accountants
Umberto Santoriello	US Professional Partners
John Sarich	Self employed
David Saul	Saul SMSF
Shirley Shaefer	BDO
Terri Scott	Tax & Super Audits
Julian Sellings	BCS Accountants
Nick Shaw	Shaw Downie
Glenn Shelton	GSC Accountants
Graham Sherriff	Self employed
Peter Sheville	Vincent's
Mark Silvester	Power Tynan
Campbell Simpson	RSM Australia
Patrick Sing	Patrick Sing & Associates
Peter Singh	Christies
Nicole Small	My Work Papers
Richard Smith	ASF Audits
Stephen Smith	LA Business Services Pty Ltd
James Song	Self employed
TJ Spooner	Nexia Australia
Paul Stannard	HLV Partners
Lachlan Stephenson	Shellharbour Accounting & Business Advisors
Stepanie Stephenson	CQ Audit
Luke Stevenson	
Stephen Stewart	Graham & Scriven
Alice Stubbersfield	Adept Super
Yang Sun	Sun Accounting
Daniel Surjenko	Superannuation Audit Services
Balaji Swaminathan	DFK Crosbie
Tom Swanton	Super Fund Audits
Julie Taylor	Keep it Simple Super
Lara Taylor	Taylor Super Solutions
Darren Thamm	Jessups
Susie Thearle	The Real Issue
Jo Thomas	The Super Fund Auditor
Tom Thuijs	Encompass
Nirmala Todkar	CIB Accountants & Advisors
Mark Turner	Self employed
Ken Turner	Self employed
Peter van der Mei	Audit Investments
Frans Van Der Merwe	Nowra Taxation Service
Richard Vergona	VA Group
Chris Vocale	Complete View Super
Sue Voss	Robinson Voss Partners
Lewis Walker	Lewis Walker Accountancy Services



Rex Walker
Glen War
Liz Westover
Guy Wilkinson
Mark Wilkinson
Lata Wilkinson
Matthew Williams
Sacha Williams
Ben Willington
Lily Yan
Tiffany Yang
Robert Young
Michelle Ziller

Super Right
Glen War & Co
PwC
Wilkinson Partners
BDO
Wilkinson Super
CB Audit
SW Accounting
Audit Your Super Fund
James Barden Collings
Enlighten Super
Rankin & Young
The Tax Accountant

