

## TIM TIERNEY & ASSOCIATES PTY LIMITED

Parliament House  
Macquarie Street,  
Sydney NSW 2000

RE: Christian Ellis and Virginia Ellis  
REF: D23/10087 and D23/13758

Dear Tina,

As requested, please find enclosed the following report regarding the attempted service upon Christian Ellis and Virginia Ellis.

On the afternoon of the afternoon of the 16<sup>th</sup> February 2023, the agent noted a call from [redacted] of your office who requested the services of one of our Commercial Agents to travel to the [redacted] area of New South Wales as a matter of urgency in endeavour to attempt to serve the respondent Christian Ellis.

The agent noted advise from your office that Christian Ellis was believed to reside at property [redacted]. The agent would advise that this address is 435 kilometres from the agent's office.

The agent, [redacted] was advised to attend as a matter of priority that evening or early the following morning. The agent advised that an attempted service fee of [redacted] would be required to have the agent attend at this remote address as a matter of urgency. The agent noted advice from your office that you wish for the agent to proceed in regard to this matter.

After a number of arrangements were put in place by our office, the agent [redacted] travelled to the township of [redacted], NSW on the afternoon of the 16<sup>th</sup> February 2023.

Upon arrival in the township of [redacted] at approximately 8.20pm, the agent [redacted] proceeded to the address of [redacted] which our agent would advise is located in a rural area approximately 30 kilometres outside of [redacted]

Upon arrival at the given address, the agent [redacted] noted signage at the property indicating this was the property [redacted]. The agent [redacted] therefore travelled to the homestead which was located approximately 2 kilometres inside the front gate.

Upon arrival at the homestead on the property [redacted] at approximately 8.45pm, the agent [redacted] noted the homestead was a single storey brick home with the main entrance appearing to be located at the rear of the home. The agent [redacted] noted a number of lights on inside the property.

The agent [redacted] noted on your instructions the respondent, Christian Ellis was believed to drive a [redacted]. The agent [redacted] noted a [redacted] parked amongst a number of vehicles at the premises. Due to the darkness of the evening, the agent [redacted] was unable to confirm if the vehicle had a [redacted].

The agent [redacted] approached the premises and heard voices inside the residence, however after door knocking for a number of minutes the agent [redacted] found the voices to cease. Despite door knocking for a number of minutes, no person would answer the door. The agent [redacted] was unable to sight any persons at the address. The agent was unsuccessful in endeavours to serve the respondent, Christian Ellis. The agent [redacted] therefore left the property and returned to [redacted] NSW later that evening.

The following morning at approximately 9.15am, Our office received a call from [redacted] of your office regarding this matter. The agent [redacted] spoke with [redacted] and advised of the unsuccessful attempt to serve Christian Ellis at the address of [redacted] the previous evening. The agent [redacted] advised [redacted] of the observations the previous night. The agent [redacted] noted further instructions from [redacted] that attempts be made to serve a second respondent, Virginia Ellis at [redacted] or [redacted].

The agent was requested to return to the addresses as a matter of urgency to serve these documents. The agent [redacted] advised [redacted] of your office that we may not be able to return to Deniliquin until Sunday 19<sup>th</sup> February 2023.

The agent [redacted] noted further instructions regarding this matter after advising that further costs would apply to attend at these address as a matter of urgency. The agent [redacted] therefore made further arrangements and it was decided to return as a matter of urgency to [redacted] on Saturday the 18<sup>th</sup> February 2023.

The agent would advise that the following morning being Saturday the 18<sup>th</sup> February 2023, the agent [redacted] therefore left the office located in Young NSW to return to the addresses in Deniliquin in endeavour to serve each of the respondents.

At approximately 12.40pm, whilst the agent [redacted] was approximately 25 kilometres outside of the township of Deniliquin on route to the given address, the agent [redacted] received a call from [redacted] of your office who advised that a third party had provided information that people had been observed at the property [redacted] approximately 25 minutes prior to phone call, believed to be moving cattle.

The agent [redacted] advised [redacted] of your office that he was currently on route to Deniliquin and intentions were to attend firstly at the address for Virginia Ellis, [redacted] in endeavour to serve. The agent [redacted] was then going to proceed to [redacted] in endeavour to serve Christian Ellis. [redacted] advised the agent [redacted]

that it was more preferable to serve the documents of Christian Ellis first in regard to this matter and to thereafter make further endeavours to serve Virginia Ellis.

After discussing the matter with [redacted], it was decided that the agent [redacted] should attend at [redacted] as a matter of urgency. The agent [redacted] thereafter proceeded to [redacted] and upon arrival the agent entered the property and proceeded to the homestead on the premises.

As the agent [redacted] had previously been advised by your office that persons had previously been seen moving cattle, upon entering the property the agent made a observation at the cattle yards however found no persons in attendance or any activity.

The agent [redacted] thereafter attended at the rear of the homestead on the premises and noted vehicle motor vehicles parked thereat. The agent [redacted] was clearly able to view the motor vehicles with first being a [redacted].

The second vehicle parked at the premises was a [redacted].

The third vehicle parked at the premises was a [redacted].

The agent [redacted] thereafter obtained photographs of the vehicles before approaching the doorway of the homestead. The agent [redacted] doorknocked the homestead and shortly thereafter the door was answered by a female person of approximately 25-30 years of age. The agent [redacted] observed the female to be holding a [redacted]. Upon speaking with the female person, she confirmed that she was the respondent, Christian Ellis's wife.

The agent asked the female person "Is Christian Ellis home?" to which the female person replied "No, his not here." The agent [redacted] then asked "Do you know when Christian Ellis will be home? or how I can contact Christian Ellis?" to which the female person replied "No, I don't know his movements. I do not know where he is. I am sorry but I cannot help you." The agent [redacted] noted the female person to appear nervous and evasive in the answers towards the agent [redacted].

As the agent [redacted] was unable to locate Christian Ellis at the premises, the agent [redacted] exited the property. Whilst exiting the property, the agent [redacted] noted a [redacted] bearing [redacted] registration plates parked approximately 100-150 metres from the entrance of the property, [redacted] on the side of the road. The agent [redacted] noted a female person inside the vehicle. The agent [redacted] approached the vehicle and spoke with the occupant inside vehicle.

The agent [redacted] asked the occupant of the vehicle if she may be in assistance to help locate Christian Ellis. The female occupant of the vehicle advised the agent [redacted] "Hello, my name is [redacted] and I am here on behalf of [redacted]." The occupant of the vehicle advised the agent [redacted] that she had the property, [redacted] under surveillance and had been expecting the agent [redacted] attendance. The occupant of the vehicle advised the agent [redacted] that she had been located there for a number of days and had not observed Christian Ellis, however advised that not long prior to the agent [redacted] arrival, she had noted a [redacted] enter the property and observed a female person open and close the gate of the premises.

The occupant of the vehicle, advised the agent that she witnessed two persons inside the when it entered the property, was unable to assist the agent any further.

The agent was about to leave when the agent observed the previously sighted travelling towards the gateway exiting the property, The agent returned to the gateway of the property and noted a female driver exit the vehicle. The agent would advise that this female person was not the respondents wife. The agent spoke with the female person and asked "Hello, can you help me? I am trying to get in contact with Christian Ellis." The female person replied "I am sorry, I do not know where he is. I do not know how you can contact him. I have just come to the front gate to make sure it has been closed properly." The female person also appeared to be nervous and evasive in her answers.

The agent believed they would be unsuccessful in serving the respondent, Christian Ellis at this address so thereafter proceeded to an area with better mobile phone service. The agent contacted and spoke with her advising of the occurrences at the property. The agent advised that he would make further enquires as he had noted further information on your instructions which may assist in locating Christian Ellis.

The agent therefore contacted the local contact person provided by your office and had a lengthy conversation with her. The local contact person advised the agent that she believed Christian Ellis would most likely be located nearby the property, at due to his wife

The local contact person advised the agent that she believed the respondent, Christian Ellis was known to drive a with a , however the registration details to the vehicle were unknown. The local contact person advised the agent that she had not seen the respondent, Christian Ellis in the area in some time. The local contact person advised the agent that she had recently spoken with the manager of the who advised that Christian Ellis frequently attends the store, however had not been in for a for approximately 3 weeks.

The agent was advised by the local contact person that there was a possibility that Christian Ellis may be at his mother, Virginia Ellis's address, however it was unable to be confirmed.

The agent noted in your instructions that the respondent, Christian Ellis was believed to be associated with who reside at a property known as Approximately 60 kilometres away from the property,

At approximately 2.30pm, the agent travelled to the and attended upon the property known as The agent approached the homestead located on the property and found an old style single storey brick home. The agent found no person in attendance on the property. There was no sign of the respondents at this address.

The agent thereafter spoke again with the local contact person via mobile telephone who advised the agent that it would be highly unlikely that the respondent, Christian Ellis would be located at . The agent thereafter returned to the township of Deniliquin.

At approximately 4.30pm the agent attended upon . Upon arrival the agent found the premises to be a single storey hardy plank home. The agent noted parked under the carport of the address, a . The agent approached the door of the premises and after door knocking spoke with a male person of approximately 60-65 years of age.

Upon speaking with the male person, the agent asked "Is Virginia home?" to which the male occupant advised "There is no person named Virginia residing at the property." The male person advised the agent that he was from Melbourne visiting the owner of the property, . The agent was advised that there was no Virginia Ellis residing at the property. The agent noted the male person to appear truthful. The agent therefore left the property.

The agent placed a call to the local contact person who advised that the property at had been known to be rented out. The agent was advised that Virginia Ellis was believed to be the owner of the property, however the premises to be tenanted. The agent proceeded to neighbouring properties in endeavour to make enquiries who was residing at the address, however neighbours were unable to assist.

The agent attended at the township of later that afternoon. Upon arrival the agent made a number of enquiries with businesses open that time of day to ascertain if either of the respondents, Christian or Virginia Ellis had been seen thereat. The agent attended at a number of local hotels and local RSL Club where discreet enquiries were conducted. The agent found the respondents to either be unknown or had not been seen in some time. No further details were known.

The agent noted previous conversations with the local contact person had indicated that the property was believed to have a

The agent was advised that the respondent, Christian Ellis . The agent was provided with brief directions . Despite the agent making a number of endeavours to locate the , he was unsuccessful in doing so.

In a previous conversation with the local contact person, it was pointed out to the agent that Christian Ellis was believed to have a close association with other respondents regarding this matter being the two Perrottet brothers. The agent was advised that it was a possibility that Christian Ellis may be staying at another brother, residential address, . The exact location being unknown. The agent received information that was believed to be a . The agent provided this information to of your office.

The agent was advised by of your office to cease action in regard to this matter. Should you require the agent to conducted further enquiries, we would be happy to accept your further instructions.

We now thank you for your instructions in regard to this matter and would make the following points.

To action this matter as a matter of urgency as required, in excess of 1900 kilometres were travelled returned to the agent office.

In excess of 7 hours were spent in an around the area of New South Wales, making extensive enquiries as to the whereabouts of the defendants.

Overnight accommodation was required in endeavour to serve the defendants.