STATUTORY DECLARATION

AMENDED RESPONSE TO CONSEQUENTIAL ORDERS OF Fagan J

12 March 2026

WRITTEN FOR 21 JULY 2026 BY PLAINTIFF

SELF REPRESENTED – LITIGANT

ANDREW JOHN BATES on 21 July 2026

Case Name:	**Bates v Edlington**
Medium Neutral Citation:	Not for publication on Caselaw
Hearing Date(s):	12 March 2026
Date of Orders:	12 March 2026
Date of Decision:	12 March 2026
Jurisdiction:	Common Law
Before:	Fagan J
Decision:	(1) The proceedings on the plaintiff's statement of claim filed 10 December 2024 are dismissed as against all defendants
Category:	Consequential orders
Parties:	Andrew Bates (plaintiff) Shona Bates (eighth defendant)
Representation:	Counsel: N/A Solicitors: Andrew Bates self-represented (plaintiff) Paul Reynolds Solicitor (eighth defendant)
File Number(s):	2024/462838
Publication Restriction:	No

********** AS PREVIOUSLY STATED **********

NEW STENOGRAPH TRANSLATER IS REQUESTED.

DURING THE EARLY STAGES OF THE HEARING THE FOLLOWING OCCURRED:

- "HARD DONE BY" WAS STATED BY MY SELF.
- "I DON'T BLAME YOU" WAS STATED BY YOUR HONOUR.

ON TRANSCRIPT.

NEW EVIDENCE PROVIDED – NOT SCHIZOPHRENIC – ANNEXURE 'A' ◀

JUDGMENT (EX TEMPORE, REVISED WITH ADDENDA)

1 Before the Court is a notice of motion by which the eighth defendant seeks to have these proceedings summarily dismissed pursuant to r 13.4 of the *Uniform Civil Procedure Rules* on the basis that the plaintiff's claim is frivolous, vexatious and discloses no reasonable cause of action.

1. - OMIT.

2 The plaintiff, Mr Andrew Bates commenced the proceedings on 10 December 2024 by filing a statement of claim. The relief claimed is as follows:

> Full reimbursement of all stolen money totalling approximately $1.8 billion to $8 billion Australian.

2. – ADDITIONALLY, THE BONDS THAT HAVE NOT BEEN DEPOSITED TO A BANK. I ESTIMATE AT LEAST TWENTY FIVE PERCENT OF THE BONDS HAVE NOT BEEN EXECUTED TO A BANK. I HAVE WITNESSED VISUALISING THIS NUMBER WITHOUT HANDWRITING ON THEM. FRAUD WAS COMMITTED UPON THE BONDS WITH HANDWRITING ON THEM. THESE BONDS WITH HANDWRITING ON THEM HAVE BEEN USED, THE OTHER BONDS HAVE NOT BEEN USED.

3 Under the heading "Pleadings and Particulars", in the standard form for a statement of claim, there appears the following:

> 1. Refer to prepared statement by my person dated 3 September 2024 - annexed A.
>
> 2. Refer to accompanying affidavits being eight in total.

3. – TRUE.

4 There is no prepared statement marked A annexed to the statement of claim. There were seven affidavits filed by Mr Bates at the same time as the statement of claim. He is the deponent of each of them and they are all dated 5 December 2024. They contain, respectively, assertions concerning seven of the eight defendants as follows. Each affidavit refers to annexed statement marked A but none of them has any such an

4. - ?. NOT WORDERED COMPLETELY.



5 With respect to the first defendant, Virginia Edlington, the following is deposed:

1. In the presence of Virginia Edlington, she had a discussion with myself relating to bonds that were later mishandled. See also incident 4, incident 5, incident 6 and incident 7 in annexure A.

2. I am the true owner of the bonds I claim to be stolen, annexed A is a prepared statement by my person dated 3 September 2024. Attention that in all correspondence my person is myself Andrew John Bates.

5. – TRUE.

6 With respect to the second defendant, John Hanna, Mr Bates does not appear to have filed any affidavit. He has included a notation on the statement of claim that Mr Hanna is deceased.

6. – TRUE.

7 With respect to the third defendant, David Vickers, there is an affidavit affirmed by Mr Bates on 5 December 2024 and filed on 10 December. It states the following:

1. In the presence of David Vickers, he had a discussion with myself relating to bonds that he intended to purchase from a third party being Peter Edlington, who is the father of Charles Edlington (defendant four). It was unknown to me that the bonds were belonging to myself at the time of the discussion. See incident 20 in annexure A.

The affidavit has a second paragraph in the same terms as that deposed in relation to the first defendant, as do all of the other affidavits referred to below.

7. – TRUE.

8 The fourth defendant to the proceedings is Charles Edlington, with respect to whom the plaintiff has deposed the following on 5 December 2024:

1. In the presence of Charles Edlington, I witnessed seeing bonds in Charles presence. See incident 41 in annexure A.

8. – TRUE.

9 With respect to the fifth defendant, Bruce Jones, the plaintiff affirmed an affidavit of 5 December 2024 containing the following:

1. I do solemnly swear in the presence of Bruce Jones, I witnessed seeing bonds in Bruce's presence. See incident 28 in annexure A.

9. – TRUE.

10 The sixth defendant to the proceedings is Janelle Shannon. The plaintiff affirmed on 5 December 2024 an affidavit in which he deposed as follows:

> 1. In the presence of Janelle Shannon, she had a discussion with myself relating to bonds that she had in her possession of which were belonging to me. See incident 29 in annexure A.

10. – TRUE.

11 The seventh defendant is Alex Brady, in relation to whom the plaintiff affirmed on 5 December 2024 an affidavit containing the following deposition:

> 1. In the presence of Alex Brady, I produced bonds in his presence and another being Shona Bates [defendant eight]. The bonds were later stolen. See incident 37 and incident 38 in annexure A.

11. – TRUE.

12 Concerning the eighth defendant, who is the applicant on the notice of motion before me today, Mr Bates affirmed an affidavit on 5 December 2024 in which he deposed in the first paragraph the following:

> 1. In the presence of Shona Bates, I produced bonds in her presence and another being Alex Brady [defendant seven]. See incident 37 and incident 38 in annexure A.

12. – TRUE – ALL READ IN CHAMBERS AS REQUESTED. ***************

13 No annexure A as referred to in either of the filed statement of claim or in the affidavits has been provided to the Court by the plaintiff on the hearing of this application. The plaintiff has filed two further affidavits affirmed on 3 and 5 June 2025, which contain incoherent and disconnected assertions about "whistleblower protection" and which refer to his desire to issue subpoenas to the Australian Securities and Investments Commission and to police. The court file shows that he has sought leave to issue subpoenas, which has been refused by the Registrar.

13. – COURT HAS STATEMENTS. **NOT KNOWLEDGABLE.** ***************

14 The totality of this material discloses no cause of action. At the outset of the hearing I called upon the plaintiff, Mr Bates, to explain to me orally what it is that he wishes to allege against each of the eight defendants or any of them. He referred repeatedly to bonds but disclosed in his rambling explanations to me no understanding of what a bond really is. He did not state in his submissions to me who was the obligor on the bonds.

14. – I WOULD LIKE MY MONEY RETURNED. DR SMETHILLS.

15 In the course of giving these reasons orally, the plaintiff interrupted to say that they were Australian Reserve Bank bonds. He had earlier in the hearing stated that they were bearer bonds. He also referred to them as being "bearable to anyone" and as "like a cheque". None of this provides any particulars, in intelligible legal terms, as to what these alleged instruments are or were. There is no coherent information provided in writing or in oral explanation from the plaintiff. There is no explanation of how these bonds have in any way given rise to any obligation of any of the defendant parties.

15. – NOT WORDER CORRECTLY. NEW STENOGRAPH ASSISTANT. EVIDENCE REQUIRED.

16 When delivering these reasons orally I observed that the transcript would show that Mr Bates addressed me on the subject of the case that he seeks to bring in terms that may fairly be described as an incoherent stream of consciousness. Upon revising the reasons, with the benefit of the transcript, I now set out some extracts of the plaintiff's submissions to the Court, as an aid to understanding why I came to the view that he had no justiciable grievance and that his commencement and prosecution of the proceedings is the product of a disorder of his mind:

16. (A) – EXPLAIN DEFORMATION.

> HIS HONOUR: [...] Just tell me what it is that you are alleging against these eight people. What are you saying has occurred that gives you a right to get a judgment against them for $1.8 billion?
>
> PLAINTIFF: Bonds that have been defrauded against me have been executed to a bank and they have taken the money.
>
> HIS HONOUR: That just doesn't mean anything to me. What bonds?

16. (B) – NOT KNOWLEDGABLE. **STOLEN MONEY.** **********

> PLAINTIFF: The bonds that had fraud committed upon them that are actually mine, owned by me, have been executed, or taken to a bank and deposited in a bank. In the first statement of claim
>
> [...]
>
> PLAINTIFF: Financial bonds.
>
> [...]
>
> PLAINTIFF: They're linked to the stock exchange. Financial bonds.
>
> HIS HONOUR: What does that mean: "linked to the stock exchange"?

16. € – NOT KNOWLEDGABLE. **IDIOT.** **********



PLAINTIFF: They're order papers. So there is a purchaser who buys a bond and then has a series of stocks linked to that bond, and that bond was intended for me. I signed for it and I take it to a bank and then I executed. In the process before I obtained the bonds, they were taken by a third party. That's a legal practice that Virginia Edlington [first defendant] worked for. I went overseas

HIS HONOUR: What you are saying does not make any sense in commercial terms. Bonds linked to the stock exchange: What did they provide? What obligations did these bonds create?

16. (D) – NOT KNOWLEDGABLE. IDIOT. NEW STENOGRAPH ASSISTANT.

PLAINTIFF: They're called bearer bonds, or really order papers. So a bearer bond is bearable to anyone. I have an order paper

[...]

PLAINTIFF: Bearable is like a $100 bill you find on the street, that's yours. Whereas what these bonds are are order papers or order instruments, which is like a cheque which is written to me. That's all in

16. € – FINISH PROPERLY. **TRUE.** *****

HIS HONOUR: What do you mean "written" to you?

PLAINTIFF: It's a cheque which is written, paid out to me. Somehow that has been interfered with and there's people who are allowed to bank them into a bank. I complained to the police in 1998 when the bonds I saw the bonds in an envelope. I complained to police that they were stolen from me and the police have said they are under investigation, there's an ongoing investigation in 1998 to 1999. The bonds resurface in 2003

HIS HONOUR: What do you mean "resurface"?

PLAINTIFF: They were discussed in 2003 by police with me in person, and some other people. Then years later these bonds have there's about 80 of them I believe, these bonds have surfaced amongst family and friends.

HIS HONOUR: What do you mean "surfaced"?

PLAINTIFF: They have been given to family and friends to then give to me, and I haven't received any.

HIS HONOUR: But who gave them to family and friends?

PLAINTIFF: The criminals I guess or the criminals.

HIS HONOUR: Who are the criminals?

PLAINTIFF: I've tried one is [decedent], defendant 2 I believe, deceased. He's defendant 2. Defendant 1, she worked for the legal practice which lost the bonds. And then family and friends. I was if I'm out drinking, these people would say to me: what are the bonds about? And they'd discuss them briefly at functions like a wedding or something, just with friends.

HIS HONOUR: Under these bonds, who was obliged to pay money?

16. (F) – PURCHASER DR ROBERT SMETHILLS. **(OBLIGOR).** **********

PLAINTIFF: No one. It was a gift to me. They did try to sell them to me, but the bonds were a gift to me. The original

HIS HONOUR: How do the bonds have value?

16. (G) – TRUE. NOT CORRECT ANSWER. **********

PLAINTIFF: A close personal friend asked me for some ideas. He was investing money. He said I have some money spare, if you can come up with some ideas then maybe we can work something out, cut you in, and that it would be a gift. I came up with the idea of a car wash. There was a car wash next door to his practice, a doctor's practice. He then built a chain of car washes and sold that. He made a lot of money, made 100 million. He wanted to give me 10 million. He said what do I invest in. I said what about those bonds in Diehard(?). He said they were stolen, stupid idea. And I said well go and make them so they can't be stolen, which is the cheque. So he made himself a cheque. Then there needed to be a third party he did go to the Supreme Court in Canberra to see if they could hold on to it and then the third party then exchanges. This is in 1992 or 91. Then the Supreme Court then said no, we will do it through a legal practice. I selected

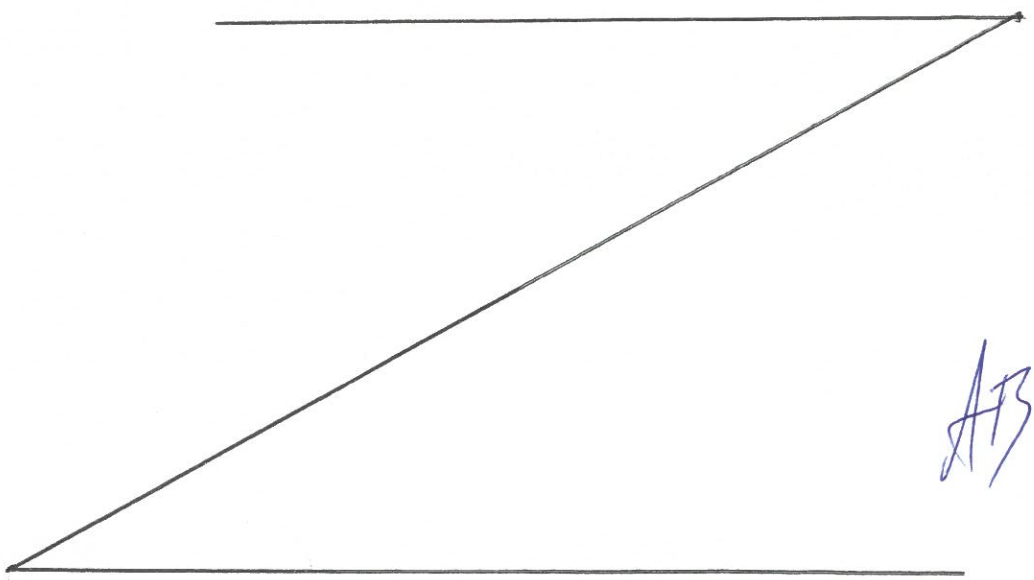
16. (H) – READ WHOLE STATEMENT.

********** **NEW EVIDENCE SOUGHT ???** *********

17 Mr Bates submitted that he wishes to amend his statement of claim to the form of a document which he identified in the course of the hearing which is marked for identification 1. In this document, the relief claimed is as in the current statement of claim, filed on 10 December 2010 before. Under the heading "Pleadings and Particulars" in the proposed amended document, there are a series of seven paragraphs concerning, respectively, defendants 1 to 7, in relation to each of which it is stated that the pleading of a cause of action is "TBC", apparently meaning to be confirmed. Clearly, the document in this form, if leave were granted to file it, would not on its face disclose any cause of action against the first to seventh defendants.

17. - THIS IS THE FIRST STATEMENT OF CLAIM. AN AMENDED STATEMENT OF CLAIM HAS BEEN SERVED SEPERATELY TO DEFENDANTS. ALL SEPERATE STATEMENT OF CLAIM APPLICATIONS ADDRESS EACH INDIVIDUAL DEFENDANT APPROPRIATELY. THE PRIVACY OF EACH DEFENDANT IS INTACT WITH THE USE OF TBC FOR OTHER DEFENDANTS.
THE AMENDED STATEMENT OF CLAIM WAS SERVED ONLY AS REQUESTED BY THE COURT DATED 28 FEBRUARY 2025. NOT FILED.

18 CONTINUED ON FOLLOWING PAGE.



18 Against the eighth defendant, the proposed amended statement of claim contains the following under the heading :

> Location 1 - lower level living room at the residence of Shona Bates - same residence as above (def 7)
>
> (a) In approximately 2014, I opened an envelope in the living room of the property of Shona Bates, with both Shona Bates and Alex Brady (def 7)_ witnessing the event. In the envelope were bonds. My brother Stephen Bates was also in the room at the time I opened an envelope. Stephen Bates was not interested in the conversation that occurred at the same time.
>
> (b) I produced bonds to Shona Bates in the presence of Alex Brady [def 7].
>
> (c) I did notice a variety of handwriting on several bonds, which I produced to Shona Bates a second time, with Alex Brady (def 7) witnessing.
>
> (d) Alex Brady (def 7) informed myself he knew of bonds in the presence of Shona Bates.
>
> (e) Shona Bates did say verbally from the other side of the room: "put them away".
>
> (f) I did incidentally leave the envelope and its contents for safekeeping in the kitchen at the property of Shona Bates.
>
> (g) Approximately two months later the bonds are missing from the property of Shona Bates.

18. - ALL TRUE

19 It is apparent that that amended pleading, if it were filed, would not disclose any cause of action against anybody. There is no reason to grant the plaintiff an adjournment to give him more opportunity to amend his statement of claim. The application to have the proceedings struck out must be dealt with on the basis of the document that was filed on 10 December 2024.

19. - STRUCK OUT ****************

20 There is an email from the plaintiff's father dated 4 September 2019 attached to the affidavit of the eighth defendant sworn 27 April 2025. In that email the plaintiff's father states that he had seen a psychiatrist the preceding day and he had been prescribed antipsychotic medication. The email recorded the plaintiff's psychiatrist had spoken to the plaintiff's father over the phone and information had been provided to the psychiatrist to assist with diagnosis. This apparently was a female psychiatrist. The email further states the plaintiff had been referred to the Newcastle Area Health Service. The plaintiff was concerned about possible weight gain side effects of the medication he had been prescribed, which I infer from the terms of the email was Olanzapine.

20. - OLANZAPINE NOT CORRECTLY PERSCRIBED. *****

- **REFER TO ANNEXURE 'A'**

21 A further email attached to the same affidavit recorded that the plaintiff had told his father he had not started taking his medication because he felt better. From the Bar table today the plaintiff has informed me he was diagnosed with schizophrenia as early as 2014 but he disputes the diagnosis.

21. – TRUE. NOT SCHIZOPHRENIC. ***

- **REFER TO ANNEXURE 'A'** ◀

22 The manner in which Mr Bates has prepared his documents and the manner in which he has addressed me in court is consistent with him being in a delusional state. It is beyond my expertise to express any opinion about what mental condition that presentation may reflect.

22. - UNTRUE DEFAMED?

********** IDIOT **********

23 I am informed by the eighth defendant's legal representative that members of his family are well aware of his mental state and that endeavours have been made to assist him with managing his affairs. In the face of the difficulties that his mental presentation presents it appears, from what I have been told by the eighth defendant's representative, that advice, assistance and intervention of family members has not been effective.

23. - NOT TRUE. BORROWED MONEY OFF MORTGAGE. FINANCES OWING PAID TO LENDING VENDOR IN FULL. AS ABOVE.

24 Regrettably the Court has not been provided with a contact name for any medical practitioner or psychologist, who may be keeping an eye on the plaintiff. The Court is not in a position to refer the papers to any responsible mental health authority, who might be able to assist with his care in the community. The Court is left in a situation of being powerless to do any more than deal with the proceedings before it and leave the question of Mr Bates' future management to members of his family, who are aware of the problem and may bring any adverse developments to the attention of mental health authorities.

24. – OMIT. I VISITED A PSYCHOLOGIST TEN YEARS PRIOR. NOT SCHIZOPHRENIC. I WILL BE OBTAINING EVIDENCE OF THIS FROM THE CLINICAL PSYCHOLOGIST IN QUESTION. DIAGNOSIS ANXIETY.

- **REFER TO ANNEXURE 'A'** ◀

25 CONTINUED ON FOLLOWING PAGE.

25 As an addendum to these reasons, I observe that the plaintiff's incoherent and apparently delusional presentation strongly suggests that there would be grounds for an application to the NSW Civil and Administrative Tribunal, pursuant to s 25I of the *Guardianship Act 1987* (NSW) for the appointment of a financial manager to make decisions about the plaintiff's financial affairs. Such an application may be made by, inter alia, "any person who, in the opinion of the Tribunal, has a genuine concern for the welfare of the person who is the subject of the application". It appears that the plaintiff's father, his siblings and the spouses of his siblings would all be potential applicants. An appointed financial manager would have the power to instruct solicitors and would thereby be in a position to determine, on behalf of the plaintiff, whether any proceedings in his name should be instituted or continued. In the course of the proceedings I was informed by the solicitor for the eighth defendant that the plaintiff had sold his home in Newcastle and that family members had been unable to dissuade him from doing so, despite considering the sale to be improvident. Such dissipation of the plaintiff's assets could be averted if his financial affairs were in the hands of an appointed guardian.

25. OVERRULE. NOT WORDED CORRECTLY. NO FINANCIAL MANAGER PERMITTED. AT WHAT COST IS THE FINANCIAL MANAGER.

26 The order of the Court, entered on 12 March 2026, is in the following terms:

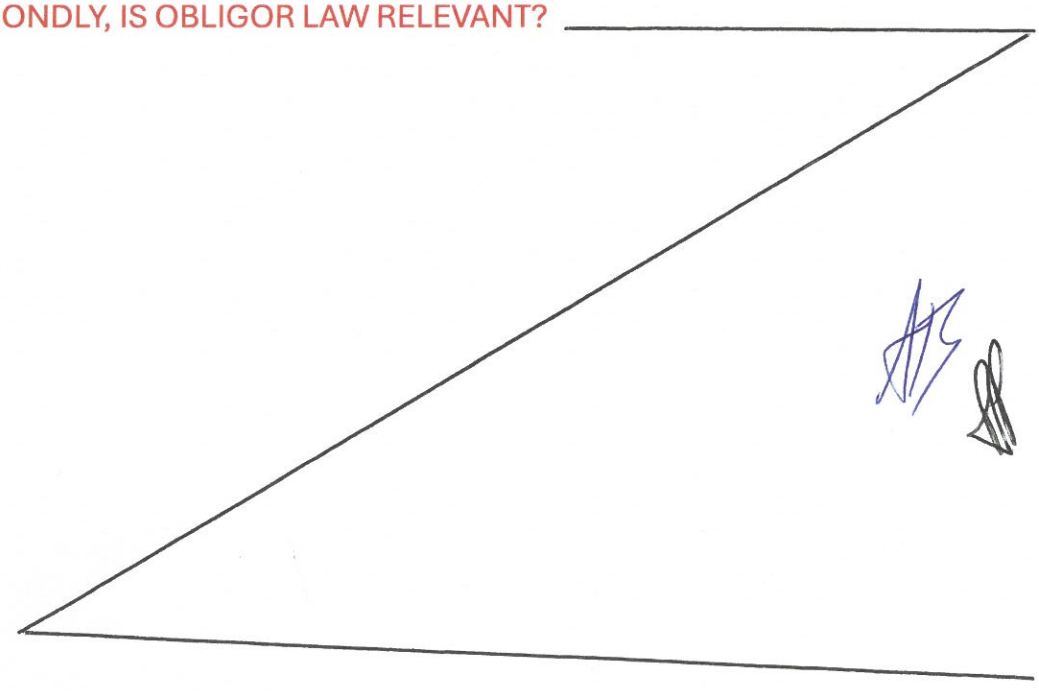
> The proceedings on the plaintiff's statement of claim filed 10 December 2024 are dismissed as against all defendants.

26. AGAIN, HARD DONE BY. ***************

****

IN SUMMARY, I WOULD LIKE TO OVERTURN THE RULING ON THE CURRENT CASE, EFFECTIVELY RE-INSTATING THE CASE.

SECONDLY, IS OBLIGOR LAW RELEVANT?



RITA R PORTELLI
J.P REG NO.
170540

AFFIRMED at Sydney 21/7/2026

Signature of deponent

Name of witness Rita Portelli

Address of witness C/- Legal Aid NSW, 323 Castlereagh Street Sydney NSW 2000

Capacity of witness [#Justice of the peace ~~#Solicitor #Barrister #Commissioner for affidavits #Notary~~ public]

And as a witness, I certify the following matters concerning the person who made this affidavit (the **deponent**):

1 #I saw the face of the deponent. [OR, delete whichever option is inapplicable]

~~#I did not see the face of the deponent because the deponent was wearing a face covering, but I am satisfied that the deponent had a special justification for not removing the covering.[1]~~

2 ~~#I have known the deponent for at least 12 months.~~ [OR, ~~delete whichever option is~~ inapplicable]

#I have confirmed the deponent's identity using the following identification document:

NSW Driver Licence, Expires on 3/1/2030

Identification document relied on (may be original or certified copy)[2]

Signature of witness

Note: The deponent and witness must sign each page of the affidavit. See UCPR 35.7B.

RITA R PORTELLI
J.P REG NO.
170540

[1] The only "special justification" for not removing a face covering is a legitimate medical reason (at April 2012).]

[2] "Identification documents" include current driver licence, proof of age card, Medicare card, credit card, Centrelink pension card, Veterans Affairs entitlement card, student identity card, citizenship certificate, birth certificate, passport or see Oaths Regulation 2011 or refer to the guidelines in the NSW Department of Attorney General and Justice's "Justices of the Peace Handbook" section 2.3 "Witnessing an affidavit" at the following address: http://www.jp.nsw.gov.au/Documents/jp%20handbook%202014.pdf]

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(A) AS BELOW

Thursday, 9 July 2026

Mr Andrew Bates
Unit 2, 10 Croudace Road
Tingira Heights NSW 2290
eMail: andrewbates.au@gmail.com

CONFIDENTIAL & PRIVELEGED

RE: Andrew Bates; DOB: 16/09/1970

Dear Andrew,

Thankyou for your request for a letter relating to the findings of the assessment I have conducted of you in between 25/03/2026 and June 2026.

I will outline my findings below. This report is being provided to you not to any other party. I understand you may use it for legal purposes and that you understand that I am not responsible for the manner in which you choose to use this letter or the effects of disseminating it to other parties.

No generative AI has been utilised to develop any of the opinions stated in this letter which are my own opinions and based on the information available to me at the time of writing. Thus my findings from the assessment are limited by the extent of information available to me. My opinion may change if I were presented with other information.

Sources of Information

- Your reports to me during sessions with me on 25/03/2026 and 17/4/2026
- Personality Assessment Inventory (PAI) results from 14/04/2026
- Document marked 'Annexure A' and email dated 05/06/2026
- 'Discharge Referral' from POW Hospital for discharge dated 14/08/2015 MRN: 1579339
- 'Discharge / Transfer Summary' from Sutherland Hospital MRN: 1579339 dated 02/12/2016
- Mental health Care Plan by Dr Hany Ibrahim 23/11/2026
- Mental health Care Plan by Dr Khayat Girgis dated 01/02/2017
- eMail from yourself to admin@wellbeingclinic.com.au dated 23 November 2016
- Victims support consent form dated 8/11/2023
- eMail from Victims Support ACT dated 10/11/2023

Mental Health History

You originally contacted Wellbeing Clinic by email on 23 November 2016 requesting assistance with anxiety and panic attacks and provided a mental health care plan from Dr Hany Ibrahim at Cronulla medical Practice.

When you presented for assessment on 02/12/2026 you reported that your anxiety symptoms were greatly improved since the original enquiry and that your main difficulty was harassment from your neighbours. You stated that they had accused you of being a paedophile and that had the label would come up as an intrusive thought. You stated that harassment from your neighbours could generate anxiety and panic when you are harassed and that you were seeking assistance to regulate your emotions in that context.

You also reported an ex-girlfriend had been subjected to having her drink spiked and she was raped, and that she had a history of childhood abuse from a 'father Richards'. You also reported a previous insurance

claim with NRMA in relation to a car accident and a belief that some people involved with the ex-girlfriend's drink spiking were somehow involved with the NRMA, possibly as investigators although conceded that perhaps your thoughts were somewhat paranoid.

My initial opinion at the time was one of delusional disorder, my differential was an obsessive compulsive disorder or possibly an anxiety disorder and I expressed this opinion to Dr Ibrahim in my initial report on 02/12/2016. From our first appointment we made a plan to commence ACT based strategies to assist with your symptoms.

On 5/12/2016 I received a discharge summary from the Acute Care team at Sutherland Hospital. The report related to a home visit with yourself. ACT noted the presence of some paranoid ideations but no risk and that you declined further service from the team as you would be following up with myself. The report summary was:

"46 years old male referred by police and neighbours. reported that at night times he yells and causes disruption, ACT attended H/V. client anxious during visit. clear paranoid and delusional ideas about FP who spread a rumor about him being a paedophile. due to the same he moved from his previous home and rented a new place, However, after being 6/52 in the new address believes that his neighbour is a FP member. claims can hear her through the roof cavity, speaking about him and mentioning FP. He also admitted to responding to voices at night but refused to provide detailed Information
denied any thought of harm to self/others
declined any contact from CMHS,
Nil insight and impaired judgement not schedulable"

This report was generally consistent with my opinion from your assessment with me on 02/12/2026.

We then engaged in strategies for managing intrusive thoughts on 07/12/2016, 14/12/2016, and 21/12/2016, 10/01/2017, 24/01/2017, 14/02/2017, 07/03/2017, and 18/05/2017. Treatment ended when you reported moving to Newcastle and that you would consult a local psychologist, and we discussed how you could locate one.

During that treatment period you appeared to improve, however I note during that time you also talked about being targeted by Police somehow in relation to your insurance claim with the NRMA. I also note that on 18/05/2017 you reported that an AVO had been taken out protecting a woman with you as the alleged offender. The AVO, which I sighted but do not have a copy of, stated that she had been told by mental health that you were a 'paranoid schizophrenic'.

I heard from you again briefly in November of 2023 when you requested your records from the clinic, at which time you also reported you had a history of childhood sexual abuse and that you had been consulting a psychologist after moving north but had since ceased those appointments.

The next contact I had with you was then on 25/03/2026 when you presented for assessment stating that you had a matter in the Supreme Court in relation to financial bonds that were never provided to you some 30 years prior, that you had been misdiagnosed with Schizophrenia by the mental health team at Prince of Wales Hospital, and that you were seeking an assessment and documentation as to your current mental state.

Since that request on 25/03/2026 you have provided me with a discharge referral from POW Hospital dated 14/08/2015.

The discharge referral dated 14/08/2015 from POW Hospital indicates that you were admitted on 31/07/2015 following referral tot he Acute Care team by Maroubra Police. It details that neighbours called the police reporting that you had been screaming continuously through the night and that when

seen by the police you had stated that you were responding to voices. It details you had appeared confused at the time but also notes you had been drinking.

It also details that you had originally been seen by POW ACT and that there was a 5 year history of paranoid ideas that people are spreading rumours alleging you to be a paedophile, that those beliefs had intensified over the course of 18 months, had been interfering with your life, led to you being socially isolated and fired from your employment, and you were experiencing anxiety at the time as a result.

The discharge referral detailed that Dr Lam Po-Tang, the consultant psychiatrist's impression was a diagnosis of chronic schizophrenia and that a trial of Aripiprazole was recommended at a dosage of 5mg daily, increasing to 10mg daily after 4 days. The referral indicates you were discharged to the ACT board to be followed up and that the consultant attempted to contact a Dr Poulos, who was listed as your GP at the time.

I have been attempting to access more detailed mental health records from POW Hospital in relation to your admission in 2015, the request has been acknowledged by email from SESLHD-POW-ROI@health.nsw.gov.au, however the hospital has to date not been forthcoming in providing the records despite multiple attempts.

Current Presentation

I have already outlined your stated reason for re-presenting on 25/03/2026 above. I note that in the explanation of the matter relating to the financial bonds you explained that your sister-in-law had circulated an email amongst family members stating that you were not taking recommended medication. You alleged that your sister-in-law was seeking to argue that you lack mental competency to manage your own financial affairs.

On the basis of your explanations and the history we agreed to conduct more in depth assessment and psychometric testing and I recommended you complete the Personality Assessment Inventory as a psychometric battery that broadly assesses clinical disorders and maladaptive personality traits.

The sessions on 25/03/2026 and 17/04/2026 were conducted over telephone. I note that you were cooperative with the assessment process and recommendations. Your speech rate, tone and volume were normal. Your speech was coherent and goal-directed. Your thought process was linear and goal-directed, there was nothing to suggest disordered thinking. You appeared to be making considered decisions in relation to your legal matter and requesting a mental health assessment to counter your sister-in-law's alleged allegations.

Personality Assessment Inventory (PAI)

You completed the PAI remotely online on 14th April 2026 via the PARiConnect system.

There was some usual characteristics to your responses in that they were defensive about some problems but then exaggerated others. There was some positive impression management that indicates the results must be reviewed cautiously but not to an extent that it would suggest any intentional effort to distort the profile. The results may be under representative though.

There was then some problems of greater intensity than is typical for a defensive respondent including poor interpersonal rapport; failures in close relationships; hostility and bitterness; stress in the environment; impaired empathy; alcohol abuse or
dependence; suspiciousness; poor control over anger; low frustration tolerance; and preoccupation with physical functioning.

The clinical profile contained no marked elevations that would be consistent clinical psychopathology. Some scales had moderate elevations suggesting difficulties with being more wary and sensitive in interpersonal relationships than the average adult. Others are likely to see you as tough-minded, skeptical, and somewhat hostile.

No problems were reported in unusual thoughts or peculiar experiences; antisocial behaviour; problems with empathy; extreme moodiness and impulsivity; unhappiness and depression; unusually elevated mood or heightened activity; marked anxiety; problematic behaviours used to manage anxiety; difficulties with health or physical functioning. You also reported no significant problems with alcohol or drug abuse or dependence.

Your self concept appears to be generally stable and positive in self-evaluation. The results suggested a person who is confident, optimistic, and approaches life with a clear sense of purpose and distinct convictions and these characteristic make you resilient and adaptive in the face of stressors.

Your interpersonal style is characterised by being somewhat distant in personal relationships and the results suggest that you do not place a high value on close relationships. This may make others see you as reserved or possibly aloof.

The computer generated report deferred any diagnosis. In examining the individual subscales of the test, the only moderate elevations were for social detachment, negative relationships, and grandiosity. Your pattern of responses does not match profile overlays for Bipolar Disorder I, Schizoaffective Disorder or Schizophrenia.

Taken as a whole the pattern of responses matches your report of a tendency for being a loner and experiencing significant family conflict.

Opinion

I note the discharge summary I have sighted for admission in 2015 indicates alcohol use and interpersonal conflict with neighbours. There is nothing contained in that report that justifies or outlines the doctors impression of chronic schizophrenia. I note a trial of aripiprazole was recommended but not insisted upon. I also note the report indicates that you became less distressed and calm prior to discharge. The report seems to have relied upon your concerns about your neighbours spreading rumours as paranoia. Even if true this is insufficient for a diagnosis of schizophrenia in accordance with the DSM-5.

Based on the information available to me at the time of writing I have deferred any clinical diagnosis. I cannot establish schizophrenia and your test results are not consistent with that diagnosis.

Other

I hope that the information contained in this letter is of assistance to you.

If you would like to discuss any of the above further I can be contacted by telephone on 0413 256 118 or at Wellbeing Clinic on 02 9540 3999 or by email at john.mcquillen@wellbeingclinic.com.au

Yours Faithfully,

John McQuillen MAPS FCCLP

Clinical Psychologist

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This and the following number of pages 5 is the annexure marked with the letter/s A referred to in the ~~Affidavit~~/Statutory Declaration of Andrew Bates
~~sworn~~/affirmed/~~declared~~ before me at Sydney
on the 21st day of July 2026

.....
A Justice of the Peace in and for the State of NSW

RITA R PORTELLI
J.P REG NO.
170540