

Admissions

- 2012 - Barrister, New South Wales
- 1997 - Solicitor, Supreme Court of New South Wales

Qualifications & Education

- 2021 - Master of Taxation, University of Sydney
- 2013 - Master of Laws, University of Sydney
- 1996 - Bachelor of Laws (Hons), University of Sydney
- 1994 - Bachelor of Economics, University of Sydney

Professional Experience

- Greg practices in taxation, criminal, administrative and commercial law. He has appeared in various jurisdictions including the District Court, Supreme Court, Federal Court and High Court of Australia. Before coming to the Bar, Greg was a tax consultant at Arthur Andersen, a manager in Ernst & Young's taxation, banking & finance division and an assistant fund manager to unlisted wholesale real estate equity funds at Macquarie Bank.

Criminal matters

- Briefed to appear led for the appellant, Menon, in NSWCCA appeal against conviction and sentence regarding the Plutus Payroll tax fraud (*Menon v R*). Briefed to appear led in *Jury Act* application: *Menon v R: Onley v R* [2025] NSWCCA 56. Briefed to appear led for the respondent, Menon, in proceedings under the *Proceeds of Crime Act* (*Commissioner of the Australian Federal Police v Cranston and Ors*).
- Briefed by the NSW DPP as Crown Prosecutor and appeared unled in complex fraud and other criminal prosecutions, including unled in *R v Bullard* 4-week NSW District Court jury trial (*R v Govinda, R v Burrow, R v Moussa, R v Hamilton, R v Vongsaykham; R v Lee, R v Bardossas, R v Lee, R v Sobhi, R v Khouzame, R v Bullard*).
- Appeared led in the NSW Supreme Court in a 4-week tax fraud jury trial of promoters of a \$30m+ UK & Hong Kong whisky production scheme (*R v Seller; R v McCarthy*).
- Briefed unled in proceedings (since discontinued) regarding the application for a release from the implied undertaking regarding transcript of telephone intercept recordings and the application of secrecy provisions in the *Telecommunications (Interception and Access) Act and Surveillance Devices Act* (*R v Martorano*).
- Volunteered as duty barrister at the Downing Centre Local Court and conducted short pro bono hearings and pleas in mitigation for taxation offences, traffic offences, assault and property damage offences. Criminal reading in Project Wickenby tax fraud District Court jury trial (*R v Isbester*).

Taxation matters

- Briefed to advise, led and unled, in various matters in relation to income tax, GST, FBT, payroll tax and duties. Briefed to advise and appear, led and unled, in various Pt IVC proceedings and tax debt recovery proceedings.
- Appeared led in the Federal Court in *Commissioner of Taxation v PricewaterhouseCoopers* [2022] FCA 278 regarding the application of legal professional privilege in the context of multi-disciplinary partnerships.
- Appeared led in the Federal Court in *Janet Heather Cameron v Commissioner of Taxation* regarding s39B *Judiciary Act* proceedings (discontinued) seeking declarations regarding the interaction of a non-resident CGT exemption and the taxation of foreign trusts.
- Appeared led in the Federal Court, Full Federal Court and High Court in *Peter Greensill Family Co Pty Ltd (trustee) v Commissioner of Taxation* [2020] FCA 559; *Peter Greensill Family Co Pty Ltd (trustee) v Commissioner of Taxation* [2021] FCAFC 99; *Peter Greensill Family Co Pty Ltd (trustee) v Commissioner of Taxation* [2022] HCATrans 19, regarding the interaction of non-resident CGT exemptions and trust capital gains streaming provisions.

- Appeared led in the Federal Court in *Caratti v Commissioner of Taxation* [2017] FCA 70 regarding taxation debt recovery proceedings and the construction of a deed of agreement between the Commissioner and the taxpayer, and in *Caratti v Commissioner of Taxation* [2016] FCA 754 regarding an application for an interlocutory injunction to restrain the Commissioner from taking recovery action in respect of a taxation debt.
- Appeared unled in the Federal Court in *Deputy Commissioner of Taxation v Garrick Michael Hawkins* (unreported) regarding an application for variation to freezing orders.
- Appeared led in a 4-week Federal Court trial in *Hua Wang Bank Berhad v Commissioner of Taxation* [2014] FCA 1392 regarding the tax residency of companies in Switzerland and Samoa and the Australian tax liability of the proceeds of sale of \$40m+ in ASX listed securities.
- Appeared led in the Federal Court in *Buckeridge v Commissioner of Taxation* (proceedings discontinued on day of hearing) regarding the application of anti-avoidance provisions to a proposed demerger.
- Appeared led in the High Court in *Mills v Commissioner of Taxation* [2012] HCA 51 regarding the application of anti-avoidance provisions to the Commonwealth Bank's \$2billion+ PERLS V hybrid security capital raising.

Administrative and commercial matters

- Appeared unled in the NSW Supreme Court regarding the judicial review of a decision of the NSW Department of Education in *Trustees of the Roman Catholic Church v NSW Department of Education* [2023] NSWSC 800.
- Appeared led in the Federal Court in *Bega v Lauvan Pty Ltd* [2021] FCA 1392 regarding an application to amend pleadings in the context of a dispute over property development finance.
- Appeared unled in NSW Supreme Court in *John v Toll North Pty Ltd* [2014] NSWSC 152 in an appeal regarding an error of law from Local Court proceedings in respect of a commercial dispute.
- Appeared led in the NSW Supreme Court in *Macquarie International Health Clinic Pty Ltd v Sydney Local Health District (No 6)* [2014] NSWSC 1549 regarding a \$100m+ damages inquiry regarding the termination of the lease of the site for the proposed Royal Prince Alfred Private Hospital.
- Appeared led in the Industrial Court of NSW for Workcover in *Inspector Shepherd v Vinsente Pty Ltd* [2013] NSWIRComm 8 in the prosecution of a workplace health and safety offence.
- Appeared unled and led in the Federal Court and Federal Circuit Courts in *SZRHS v Minister for Immigration & Citizenship* [2014] FCA 121, *WZARB v Minister for Immigration and Citizenship* [2013] FCA 523 and *WZAPI v Minister for Immigration and Citizenship* [2013] FCA 188 in pro bono migration appeals.

Memberships & Appointments

- Member, Professional Conduct Committee and Wellbeing Committee, New South Wales Bar Association. Chartered Tax Advisor, Tax Institute of Australia. Member, NSW ODPP Private Briefing Panel. Associate Member, Law Society of NSW. Director, Cruising Yacht Club of Australia. Chair, Premises Committee and Deputy Chair, Audit, Planning and Risk Committee, Cruising Yacht Club of Australia. Graduate Member, Australian Institute of Company Directors.
- Greg has previously served as Bar Councillor, chair of the New Barristers' Committee, member of the Finance Investment and Audit Committee and Education Committee of the NSW Bar Association. He has also served as a member of the Law Council of Australia Young Lawyers Committee.

Publications

- *What do the current issues in legal professional privilege mean for advisors?* Paper presented at Tax Institute of Australia, Qld Tax Forum, 13 May 2022.
- *The Harman undertaking and tax litigation*, (co-authored with R Seiden SC and R Johnson), *Taxation in Australia*, Vol 52(4), Oct 2017, p.191.
- *Tax crimes, the risks of using money laundering charges in the fight against tax evasion*, *Law Society Journal (NSW)*, Vol 51, May 2013, p.68.
- *Unreliable expert opinion evidence, exclusion proves difficult under existing law*, *Law Society Journal (NSW)*, Vol 50, Sept 2012, p.67.