

## Australian Based Bitcoin at its best.

Dear Committee Members,

Bitcoin Babe PTY LTD is pleased to make a submission to inform the Committee following the release of the Third Issues Paper on Australia as a Technology and Financial Centre. The paper calls for further commentary and information on cryptocurrency assets, debanking and regulatory framework inhibitors. We welcome the opportunity to provide unique insights for the Committee to consider in making recommendations and preparing its Final Report to Government.

Bitcoin Babe is an Australian based company that focuses on new age investment options with Cryptocurrency, specialising in bitcoin. Bitcoin Babe was launched in 2014, with the sole purpose of giving the Australian public the opportunity to buy, sell, invest, and earn bitcoin at reasonable market rates. We provide a premium customer experience for our clientele, and whilst traditionally have dealt mainly in bitcoin, are looking to expand to other digital assets per the increasing demand of our clientele and the Australian public.

Bitcoin Babe continues to strive to be known as a leader in the digital assets space. This includes maintaining compliance with the AML/CTF Act, as well as contributing to the design and development of regulatory guidance for both AUSTRAC, the ATO and Commonwealth Treasury. However, the limited and inconsistent guidance provided to stakeholders by policy makers and regulators have flow on impacts to market operators. A practical example of this, can be seen with regards to debanking of FinTech organisations and individuals. We welcome the opportunity to share our experience with debanking in Australia and provide our opinion.

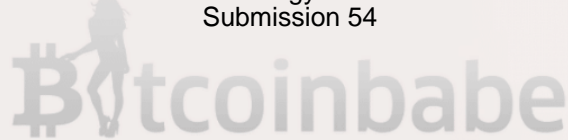
### **Debanking of Australian FinTechs**

The Committee's Third Issues Paper calls for comment on "issues relating to 'debanking' of Australian FinTechs". Merriam Webster defines 'FinTech' as "products and companies that employ newly developed digital and online technologies in the banking and financial services industries". As such, Bitcoin Babe can be defined as a FinTech and provide relevant evidence for your consideration.

When Bitcoin Babe (the 'company') first commenced trading, as with many new and innovative organisations, there was little regulatory guidance available. The need for self-regulation became apparent early in the company's trading, as customers were able to successfully chargeback transactions through their bank with no penalty. The lack of protection for the company from banks<sup>1</sup> performing chargebacks meant that identity verification and strict record keeping became important from 2015.

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<sup>1</sup> For the purpose of this submission, the use of the term 'banks' is used interchangeably to cover banks, credit unions and other financial institutions that provide banking and banking style services to businesses in Australia.



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The company first started to experience debanking as early as September 2014. The first experience was with Bank of Queensland, who debanked the company over a \$60 chargeback dispute. In this incident, Bitcoin Babe matched the customer's name supplied during the ordering process, to the name that appeared on the transaction, and relied on the bank's own security processes (such as two-factor authentication) as sufficient confirmation that this was a legitimate transaction. Once the sale had been completed, and the customer was in possession of their Bitcoin, the dispute was successfully charged back (i.e., the customer received a refund) and the Bank of Queensland provided notification they would be closing the company's account. This was an unreasonable approach by the bank, especially considering there was no opportunity for discussion. The transaction was valid, and the customer had received their bitcoin.

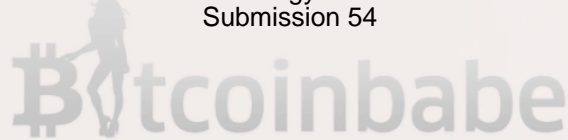
Later, Bitcoin Babe then experienced debanking from the Commonwealth Bank of Australia (CBA). In a similar scenario to the Bank of Queensland debanking event; a transaction was charged back successfully, even though the identity was verified, and the bank's own verification systems enabled the transaction to be successful. The debanking from CBA was particularly hurtful to the founder, Michaela Juric, who was also personally debanked from all her accounts she held with CBA. This included an account held since the age of five years old. Michaela is no longer able to access any bank account records or open an account with CBA.

The company then successfully migrated its accounts to Westpac. Soon, Bitcoin Babe and Michaela Juric were both debanked by Westpac. Subsequently, there was a widespread debanking initiative by Westpac. It is understood that dozens, if not hundreds of businesses and individuals were debanked for having purchased or sold bitcoin. It is important to note that this debanking was to an AML/CTF registered and compliant company with no evidence of wrongdoing.

Following this, it became increasingly hard to get a bank account for the company or Michaela Juric personally. It appeared that due to the use of third-party identity verification and data matching systems, such as those used by Equifax, the names 'Bitcoin Babe' and 'Michaela Juric' had been blacklisted. This led to any applications for a personal transaction account and any other basic banking products being automatically denied.

It is important to note the significant effects on individuals who have been debanked in Australia. The inability to secure a basic bank account, phone, or utility (such as an electricity or gas) account under your own name is extremely upsetting and unfair. The stress and mental toll this takes on individuals is immense and difficult to fully communicate to the Committee. It unfairly penalises fully compliant, innovative businesses and individuals - a clear disincentive and risk for those wanting to start-up or do business within Australia.

Many participants in the digital asset space either start off as, or remain, small businesses. They may not have teams of lawyers and policy advisers who are able to step in and negotiate with large banks or regulators. There is no human resources department to



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monitor or coach them through the hardships of running a small business in an area that seemingly fights back at every turn. Founders and owners of small businesses risk losing everything at the whim of the banks and regulators, even when fully compliant. The personal toll this takes and how this affects the mental health of small business owners and employees is significant and should be considered by the Committee.

Our view is that Australian banks, institutions, and credit unions are unfairly penalising new and innovative businesses by seeking to minimise their own compliance duties. There have been no prior breaches to the AML/CTF Act or incidents that warrant the debanking of Bitcoin Babe and its founder, Michaela Juric.

Further, it is our view that the banks are encouraged to debank bitcoin and other crypto asset market participants through the lack of, or inconsistent guidance that is provided by AUSTRAC. We believe that the banks are provided different guidance (either formal or informal) that encourages this debanking. There is a clear need for Government intervention in one form or another to protect fully AUSTRAC compliant organisations and individuals from the systematic debanking currently being seen.

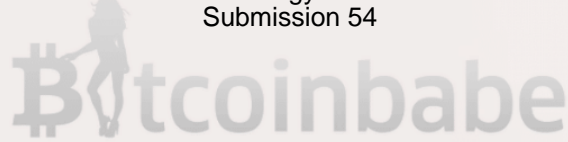
At **Attachment A**, we have provided examples of typical account closure letters as seen by organisations and individuals that are involved in the digital asset and cryptocurrency space. A list of the 90 banks that Bitcoin Babe and Michaela Juric have been debanked from, or denied access to basic banking products, can be found at **Attachment B**.

### **Cryptocurrency and Digital Assets**

Bitcoin was the first successful cryptocurrency invented and it enjoys widespread popularity. There are now many stablecoins and other new, innovative investments, digital assets, and stores of value. The rise in media reporting and investor interest in products such as non-fungible tokens (NFT's) demonstrates this market will continue to grow in new and unexpected ways. As the market continues to innovate, opportunities increase for Australian businesses to flourish, given the right regulatory framework.

Currently, Bitcoin Babe is the largest peer-to-peer bitcoin exchange in Australia. There has been consistent interest from clients for the provision of advice and acquisition of art NFTs (digital artwork). This is a product class that we will look to deal in the future, per our clientele's demand. This market is continuing to mature, with reputable market participants in the art NFT sector such as Sotheby's, and the new Museum of Art & Philosophy, Australia's first NFT gallery which has recently opened in Hobart.

Consumer and investor interest will only continue to grow as digital art rises in popularity. The use of NFTs as an ownership structure allows for lower transaction costs for artists, dealers, and investors, and more broadly allows for a more transparent view of ownership for regulators. The use of paper documents to demonstrate ownership will likely become a thing



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of the past. Blockchain technology will only increase in popularity, and this will become the normal method of doing business for many products and services.

Art NFT's are very similar in nature to cryptocurrencies as they are a store of value on a blockchain. What has been particularly frustrating to Bitcoin Babe, is the stigma and fear from both banks and regulators attached to blockchain and cryptocurrencies. Seemingly, the availability of banking services in Australia is reliant on this sentiment. For example, in looking to open bank accounts for Bitcoin Babe, there is a clear reluctance from banks to service the bitcoin and cryptocurrency space.

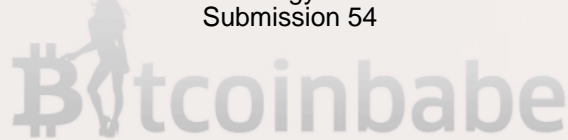
However, if approaching a bank to sell art NFTs or by simply using the word "gaming credits" instead of bitcoin, banks have no issue in providing an account and even go as far as to offer a line of credit. This inconsistency in approach demonstrates the fundamental lack of knowledge from Australian banks in what digital assets are and can be used for. We can only surmise that this is from a lack of clear regulatory guidance provided to banks in managing digital assets. This encourages a reduced appetite for risk to engage in FinTech and digital assets.

The unequal treatment of digital asset classes poses a regulatory arbitrage risk and unfairly penalises established classes, such as bitcoin. A common and fair approach is needed across all FinTech, cryptocurrencies and digital asset classes to provide a safe and consistent regulatory environment.

### **Impacts from Regulation**

Currently, it is our view that most businesses involved in bitcoin, cryptocurrencies, digital assets and FinTech have poor guidance and operate in a regulatory 'no man's land'. Our experience is that the regulators, ASIC and AUSTRAC, are unwilling to engage and provide certainty to industry, consumers, and investors. Industry has been very vocal to the Commonwealth Treasury about the need to provide policy intent and certainty. The opacity of these government agencies in policy and direction fails to evoke or maintain a level of confidence for businesses to operate in the sector within Australia.

There is a clear need for a broader policy objective to enable digital assets, companies and FinTech to operate within Australia. The lack of guidance and policy direction has meant that banks are left to self-regulate in the cryptocurrency market. Bitcoin Babe is fully AML/CTF compliant, with an extremely low risk of money laundering or terrorism financing. The average customer makes three to four transactions below \$300AUD per annum. Our record keeping and reporting shows that there is no risk of 'cuckoo smurfing' or other money-laundering techniques. Banks do not have visibility or take comfort from this assurance, and in an environment where they are forced to self-regulate, they have taken the approach that it is best to debank any organisation that deals in cryptocurrencies.



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The lack of an overarching policy direction leaves government agencies under skilled and unprepared for what is going to be a burgeoning and commonplace part of the economy. Surveys show that one in four Australians invest in or plan to invest in cryptocurrency<sup>2</sup>. These investors need an environment where legitimate businesses are afforded an environment that is conducive of affording the necessary consumer protections, such as a dispute resolution mechanism through the Australian Financial Complaints Authority (AFCA). I note that whilst some exchanges are already registered with AFCA, AFCA itself does not have any digital asset expertise or experience. This is consistent with our experience across government.

The insatiable demand for digital assets means that consumers and investors will always be looking to acquire cryptocurrency or other digital assets. When the regulatory framework fails domestic businesses, it unwittingly encourages foreign unregulated entities to enter the market and fill this void. These organisations incur limited to no regulation within Australia and represent a similar risk as what is seen in illicit offshore gambling.

Illicit offshore gambling is accessible to anyone, anywhere, without any of the checks and balances to protect consumers from harm. The 2015 *Review of Illegal Offshore Wagering* noted that online wagering is the fastest growing gambling segment, with over \$1.4 billion gambled online each year<sup>3</sup>. There is no AML/CTF reporting applicable to these websites and in reality, the Government is reliant on the banks to correctly identify and regulate this sector. The most the Government is able to do in regulating this market is to utilise the Australian Communications and Media Authority (ACMA) to ban the access to websites that are identified as illegal offshore gambling websites<sup>4</sup>, which can easily be circumvented.

A self-regulatory and whack-a-mole approach is not sustainable or an ideal policy solution for bitcoin, cryptocurrencies, and other digital assets. This approach has failed, as we have seen with evidence presented on debanking. By stifling Australian businesses, consumers are deprived from accessing digital assets in the safest way possible, where there should be the right amount of consumer protection, and instead encouraging them to enter unregulated foreign markets.

The main source of suspicious matter reports our company provides to AUSTRAC, are relating to vulnerable people who are potentially acquiring bitcoin in a scam. Our operating procedures are to disallow the transaction, report this to AUSTRAC by way of a suspicious matter report and notify the client of our reasoning. Consumers are deprived of this analysis and service if forced to purchase from offshore unregulated organisations who will not operate to this standard.

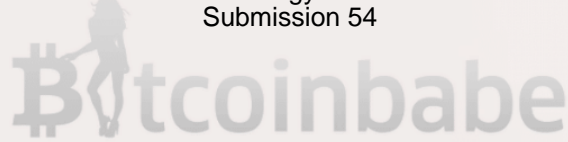
There is a clear need for an overarching government policy that encourages, legitimises, and provides the necessary comfort to enable a flourishing FinTech economy in Australia. The

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<sup>2</sup> <https://www.finder.com.au/cryptocurrency-statistics>

<sup>3</sup> <https://www.dss.gov.au/communities-and-vulnerable-people/programmes-services/gambling>

<sup>4</sup> <https://www.acma.gov.au/articles/2021-02/acma-moves-block-more-illegal-gambling-websites>



## Australian Based Bitcoin at its best.

key risk we, and other stakeholders, have identified is that when regulation or guidance is overly prescriptive it can quickly become outdated with technological advances. We ask that in providing recommendations, the Committee gives consideration to how policy intent can be provided to give clarity to industry and consumers, and how this aligns with a regulatory framework that anticipates and plans for growth and new technologies in the FinTech sector.

### **Comments on Second Interim Report**

We note that Recommendation 22 in the *Second Interim Report* states:

*“The committee recommends that the Australian Government review its approach to the promotion of Australia as a destination for international talent in the FinTech and RegTech sectors, including through focussed marketing of the Global Talent Scheme and the Global Business and Talent Attraction Taskforce in target jurisdictions.”*

Our view is that this talent, both individual and organisational, is reliant on obtaining basic banking products in Australia. There is a clear and present risk that by doing business in Australia, you personally run the risk of being debanked in Australia as well as abroad. This is due to the third-party identity and data matching services that span multiple countries and jurisdictions. This risk is a consideration for any individual and organisation that is looking to trade or invest in FinTech or digital assets within Australia.

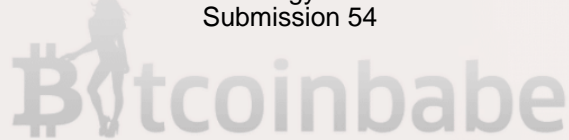
We welcome the government's investment in advancing Digital Identity reforms in Australia and believe that a federated system of digital identity services will provide further assurances for FinTechs and banks to use the data that AUSTRAC collects as part of Know Your Customer (KYC) obligations.

We recommend that the Government looks at how this data can be used, and what guidance can be provided, that allows for greater assurance and compliance and certainty in regulation for both banks and all other market participants such as exchanges, dealers, and brokers.

### **Summary**

Bitcoin Babe has highlighted the damage debanking has on both the company, as well as its founder. The personal toll that is a direct result from the inability to access basic banking products and utilities under your own name is immensely distressing, inappropriate and a disincentive to FinTech and business innovation in Australia.

Our submission highlights our concerns around the lack of regulatory guidance and the need for a clear regulatory framework that enables Australian businesses to operate in FinTech. We have outlined the risks to foreign investment and the suppression of local talent through debanking and a restrictive regulatory environment.



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The Committee, and the Commonwealth Government, are provided with the opportunity to make recommendations that will encourage Australia to be a world leader in FinTech, new and innovative businesses and technologies. We have a considerably less complex regulatory environment than the United States, Canada and other countries that have state-based regulators. This opportunity should not be squandered.

Our expectation is that the Commonwealth Government provides an environment that welcomes Australians to create and invest in FinTech businesses. Australia should be a safe environment for foreign and domestic investment in new and innovative technologies and businesses, not hamstrung by a poor regulatory framework, guidance, and a general lack of interest from policy makers and regulators to engage in the space.

This is a once in a generation opportunity to maintain Australia's position as a financial hub, and be the leader in financial innovation, taking on the likes of competitive jurisdictions such as Singapore, Hong Kong, and the United Arab Emirates.

We welcome the opportunity to communicate further with the Committee, and the Secretariat, and are open to presenting further evidence to support our views.

We thank you for your consideration of this submission.

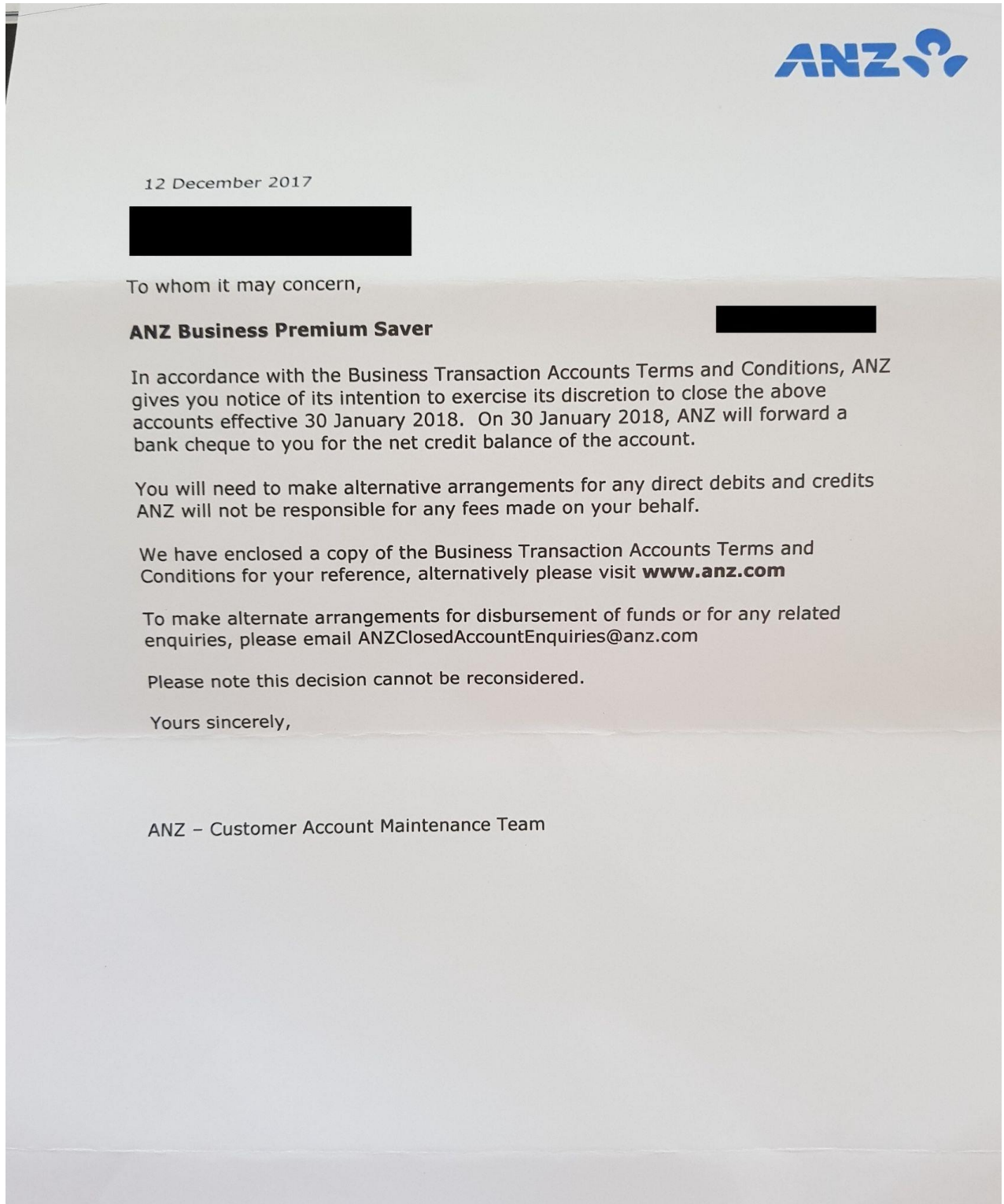
Kind Regards,

Michaela Juric  
Bitcoin Babe PTY LTD



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**Attachment A - Examples of debanking letters**



12 December 2017



To whom it may concern,

**ANZ Business Premium Saver**

In accordance with the Business Transaction Accounts Terms and Conditions, ANZ gives you notice of its intention to exercise its discretion to close the above accounts effective 30 January 2018. On 30 January 2018, ANZ will forward a bank cheque to you for the net credit balance of the account.

You will need to make alternative arrangements for any direct debits and credits ANZ will not be responsible for any fees made on your behalf.

We have enclosed a copy of the Business Transaction Accounts Terms and Conditions for your reference, alternatively please visit [www.anz.com](http://www.anz.com)

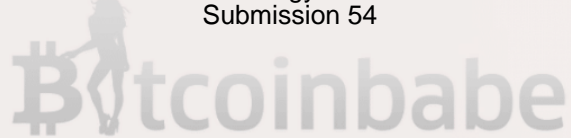
To make alternate arrangements for disbursement of funds or for any related enquiries, please email [ANZClosedAccountEnquiries@anz.com](mailto:ANZClosedAccountEnquiries@anz.com)

Please note this decision cannot be reconsidered.

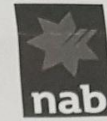
Yours sincerely,

ANZ – Customer Account Maintenance Team



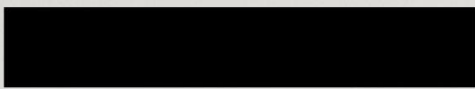


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NAB Operations  
Level 27, 500 Bourke Street  
Melbourne VIC 3000  
Ph: 1800 152 015 Fax: 1300 306 013

31<sup>st</sup> March 2017



Dear Sir/Madam

We refer to the accounts you hold at NAB:

**Account Number**



NAB undertakes reviews of its customers and their product/services from time to time. Unfortunately, NAB wishes to inform you that as part of a recent review of products that we provide to you, we are no longer able to offer this service/facility to you.

NAB appreciates that you will need to make alternative banking arrangements and invites you to consider making alternate banking arrangements immediately. NAB will otherwise close your account after 30 days. Therefore your transaction account(s) will be closed on **1<sup>st</sup> May 2017**.

If you have not made alternative arrangements by the closure date, NAB will immediately close each of your accounts on the closure date and any funds remaining in the accounts will be refunded to you, by post, in the form of a Bank Cheque

We appreciate your understanding, however, if you need any assistance in closing the accounts, or have any other questions, please contact NAB Resolve 1800 152 015

Sincerely,

NAB Operations  
National Australia Bank Limited



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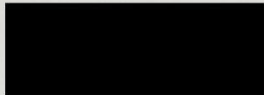
st.george



St.George Bank  
Locked Bag 1  
KOGARAH NSW 1485

REGISTERED MAIL

15 February 2016



Dear Ms [REDACTED]

**Your accounts are being closed**

St.George Bank – a Division of Westpac Banking Corporation – has considered your circumstances in accordance with our policies for providing financial services to customers. We have determined that we will no longer be able to provide you with financial services.

**How this will affect you**

This letter is providing you with notice that the following account will be closed on **16 March 2016**:

Account Name	Product Type	Account Number
[REDACTED]	COMPLETE FREEDOM	[REDACTED]

**What to do next**

You may personally close the account before **16 March 2016**. If the account is not closed by then, we will close the account and post you a bank cheque for the credit balance of your account.

**General**

If you have direct debits and/or credit established on your account, we encourage you to make alternative arrangements for these payments and/or deposits at your earliest convenience. Any services/facilities offered in connection with the above accounts will cease on closure of the accounts.

Following the closure of the accounts, access to other Westpac Group services including Westpac, Bank of Melbourne, BankSA, RAMS or BT will not be available to you.

If you have any questions, please contact Customer Relations on 1800 804 728 or [CustomerRelations@stgeorge.com.au](mailto:CustomerRelations@stgeorge.com.au).

Yours sincerely

**St.George Bank**



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Suncorp-Metway Ltd  
ABN 66 010 831 722  
Lv9, 388 Queen St  
BRISBANE QLD 4000  
Banking Investigation - 4F1008  
GPO Box 1453  
BRISBANE QLD 4001  
Phone: 13 11 75  
Web: [www.suncorp.com.au](http://www.suncorp.com.au)

Our Ref: F28293

26/04/2016

MISS MICHAELA [REDACTED]  
[REDACTED]

Dear Miss [REDACTED]

**RE: SUNCORP ACCOUNT NUMBERS: 054362039 and 054362136**

Further to our conversation on 26/04/2016, and as per section 15 of the Terms and Conditions of Suncorp Bank Accounts "We will give you reasonable notice if we intend to close your accounts". As such I advise that Suncorp will be closing your bank accounts at the close of business on 10/05/2016.

Should you wish to close your accounts prior you may attend your local branch. If the accounts are still open on 10/05/2016 I will post you a free bank cheque to the address we have on file for the closing balances.

If you have any questions please feel free to phone me on 07 3362 4906.

Yours sincerely

Andrew Sheldon  
Investigator  
**Suncorp Group Investigations**



Australian Based Bitcoin at its best.



Westpac Banking Corporation  
Reply Paid 5265  
SYDNEY NSW 2001

REGISTERED POST

15 February 2016

THE SECRETARY  
[REDACTED]

Dear Secretary,

**Your account is being closed**

Westpac has considered your circumstances in accordance with our policies for providing financial services to customers. We have determined that we will no longer be able to provide you with financial services.

**How this will affect you**

This letter is providing you with notice that the following account will be closed on **16 March 2016**:

Account Name	Product Type	Account Number
[REDACTED]	BUSINESS ONE HIGH	[REDACTED]

**What to do next**

You may personally close the account before **16 March 2016**. If the account is not closed by then, we will close the account and post you a cheque for any credit balance of your account.

**General**

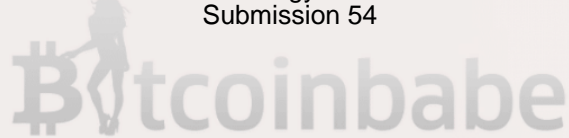
If you have direct debits and/or credits established on your account, we encourage you to make alternative arrangements for these payments and/or deposits at your earliest convenience. Any services/facilities offered in connection with the above accounts will cease on closure of the accounts.

Following the closure of the accounts, access to other Westpac Group services including St George Bank, Bank of Melbourne, BankSA, RAMS or BT will not be available to you.

If you have any questions, please contact Customer Relations on 1300 130 206 or via email to [customerrelations@westpac.com.au](mailto:customerrelations@westpac.com.au)

Yours sincerely

**Westpac Banking Corporation**



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**Heritage Bank**  
People first.

26 October 2020



Dear Miss Juric-Donlan,

We're writing in regard to your Heritage account 15445380.

Your account activity indicates you may be using this account to provide digital currency services. As Heritage Bank does not offer our services for this purpose, we are contacting you to provide 14 days' notice of our intention to close your account in accordance with the Terms and Conditions outlined in our *Guide to Deposit Products* (available in branch, at [heritage.com.au](http://heritage.com.au) or call 13 14 22).

Heritage will arrange closure of your account 15445380 by close of business on 09/11/2020. Any funds remaining at the time of closure will be provided to you by bank cheque. Any funds credited to the account after the closure date will be returned to the sender.

You can request a review of this decision by contacting our Customer Relations Team via email to [feedback@heritage.com.au](mailto:feedback@heritage.com.au). Alternatively, you may request an independent review with the Australian Financial Complaints Authority (AFCA):

Telephone: 1800 931 678  
Email: [info@afca.org.au](mailto:info@afca.org.au)  
Online: [www.afca.org.au](http://www.afca.org.au)  
Mail: GPO Box 3  
Melbourne VIC 3001

Should you have any questions or wish to take immediate action to close your account, please contact us on 131422.

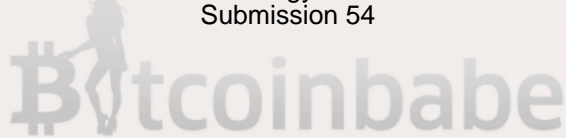
Kind regards,

Banking Operations

People first.

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Heritage Bank Limited ABN 32 067 652 024 - AFSL 240984 - Australian Credit Licence 240984



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31 May 2018



008



**Important notice: Closure of your HSBC Account(s)**

Dear

At HSBC, we regularly conduct reviews of our services, products and accounts. Following a recent review of your account(s), we regret to advise that we will no longer be able to provide you with banking services.

As such, the following account(s) will be closed after 21 days of this letter being issued.

**Banking, Savings and Loans**

095-729604-090	MULTI CCY A/C
096-125661-090	MULTI CCY A/C
095-729604-051	TERM DEPOSIT
095-729604-412	DAY TO DAY ACCOUNT
095-729604-900	MULTI CCY A/C

**What you need to do now**

**Banking and Savings**

Where there is a credit balance on your Banking and Savings account(s), you can:

- Withdraw the remaining balance at any HSBC branch
- Make a payment to a non-HSBC bank account via HSBC Internet Banking
- Take no action and we will send you a bank cheque

Please ensure that any automatic credits and debits which usually are paid to/from your account(s) are transferred to a non-HSBC bank account by the above date.

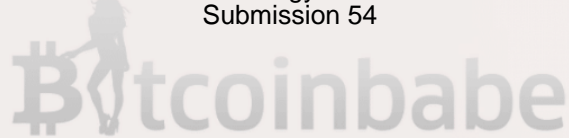
No action is required where a nil balance is shown above and the account will be closed on the date advised. In the interim, credit and debit transactions may be refused.

**Term Deposit accounts**

On the date indicated above, we will cancel your Term Deposit(s). The balance and any interest accrued as at that date will be returned to you by bank cheque. No break fee is payable.

Issued by HSBC Bank Australia Limited ABN 48 006 434 162 AFSL/Australian Credit Licence 232595.  
Level 36, Tower 1, International Towers Sydney, 100 Barangaroo Avenue, Sydney NSW 2000 Australia.

HBAA1000EN R2 (07/11)



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**CUA**

BANKING | INSURANCE

3 February 2020



Dear 

**Re: We are closing your CUA memberships and accounts**

We are writing to advise that CUA will no longer be providing banking or financial services to any crypto-currency facilities.

Consequently, we are providing you with notice that your accounts and membership with Credit Union Australia Limited will be closed in 20 business days on 2<sup>nd</sup> March 2020.

Account numbers: 50572100, 50660850, 50660851, 50853644, 50986865, 50858551  
Memberships: 9048876, 9128334

Any funds remaining within your account will be disbursed by Financial Institution Cheque (bank cheque) to your current address.

If you require any further information regarding this matter, you may write to me at the address below:

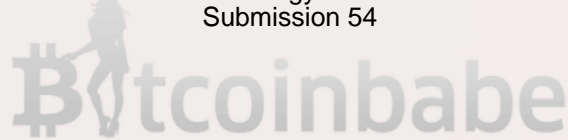
Operations Support Member Relations  
Credit Union Australia  
GPO Box 100  
Brisbane, QLD, 4001

We take this opportunity to thank you for past support of CUA.

Yours sincerely

The Manager  
Operations Support Member Relations

Home Loans | Everyday Accounts | Savings | Personal Loans | Credit Cards | Health Insurance | Motor & Home Insurance  
Credit Union Australia Limited ABN 44 087 650 959 AFSL and Australian credit licence 238317. GPO Box 100, Brisbane QLD 4001 P 133 282 W [cua.com.au](http://cua.com.au)

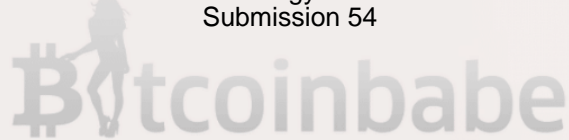


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**Attachment B - List of organisations that have debanked or declined services.**

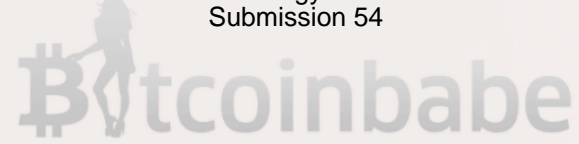
Adelaide Bank  
Alliance Bank  
AMP Bank Ltd  
Arab Bank Australia Ltd  
Assembly Pay  
Australia and New Zealand Banking Group Ltd (ANZ)  
Australian Central Credit Union Ltd (People's Choice Credit Union)  
Australian Military Bank Ltd  
Auswide Bank Ltd  
AWA Alliance Bank  
B & E Ltd  
Bananacoast Community Credit Union Ltd (BCU)  
Bank Australia Ltd  
Bank of China (Australia) Ltd  
Bank of Melbourne  
Bank of Queensland Ltd  
Bank of Sydney Ltd  
BankSA  
Bankstown City Credit Union Ltd  
BankWest  
BDCU Alliance Bank  
Bendigo and Adelaide Bank Ltd  
Bendigo Bank  
Bill Buddy  
BNK  
BOQ Specialists (BOQS)  
Circle Alliance Bank  
Citigroup Pty Ltd (trading as Citibank and Citi)  
Coastline Credit Union Ltd  
Commonwealth Bank of Australia  
Community CPS Australia Ltd (Beyond Bank Australia)  
Community First Credit Union Ltd  
Community Sector Banking  
Comtax Credit Union (Sydney Mutual)  
Credit Union Australia Ltd (CUA)  
Delphi Bank  
Esanda  
eWay  
G&C Mutual Bank  
Goldfields  
Greater Bank Ltd  
Heritage Bank Ltd





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HSBC Bank Australia Ltd  
Hume Bank Ltd  
Illawarra Credit Union  
IMB Ltd (IMB Bank)  
ING Bank (Australia) Ltd (ING Direct)  
Macquarie Bank Ltd  
Maitland Mutual Building Society Ltd (The Mutual)  
Maleny Credit Union  
Manly Warringah Credit Union  
MCU Ltd  
Members Equity Bank Ltd (ME Bank)  
MoneyGram  
MoneyTech Ltd (Monoova)  
MyState Bank Ltd  
National Australia Bank Ltd (NAB)  
Newcastle Permanent Building Society Ltd  
Northern Inland Credit Union Ltd  
OFX  
Pay Advantage  
PayPal  
Police Bank  
Pulse Credit Union Ltd  
Qantas Credit Union  
Qudos Mutual Ltd (Qudos Bank)  
Queensland Country Credit Union Ltd  
Regional Australia Bank  
Reliance Bank  
Service One Alliance Bank  
South-West Credit Union Co-Operative Ltd (South-West Credit)  
Southern Cross Credit Union Ltd  
Square Payments  
St. George Bank  
Suncorp-Metway Ltd  
Sydney Credit Union Ltd (Sydney Mutual Bank)  
The Broken Hill Community Credit Union Ltd  
The Capricornian Ltd  
The Shire  
TorFX  
Transferwise  
Tyro Payments Ltd  
UBank  
Up Bank  
Warwick Credit Union Ltd  
WAW Credit Union Co-Operative Ltd



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Western Union  
Westpac Banking Corporation  
WorldRemit  
Xinja