

10 September 2025

The Law Society of NSW (ACN 000 000 699)
Professional Standards Department
Attention: Mr Christopher Nolan
170 Phillip Street,
SYDNEY NSW 2000

By Email: Christopher.Nolan@lawsociety.com.au

Also, formal notice to:

1. Ms Valerie Griswold, Director of PSD/Legal Regulation.
2. Ms Nadya Haddad, Deputy Director of PSD/Legal Regulation.

Dear Mr Nolan,

Re: Your Appointment as Manager - Notice: Unlawful Conduct, Breach of Statutory Duties, and Usurpation of Functions

1. Your Letter and Appointment

We refer to your letter dated 27 August 2025, which we have only recently received. We note your representation that you emailed this letter and referred to an attachment, but we received neither your email nor the attachment.

This is the first notice we have received of your interference with our firm's statutory trust account, accompanied by your demand for all client files and matters. Such interference is unlawful, as it stems from Ms Valerie Griswold's 30 May 2025 decisions, issued by email, without due process, findings, or a proven case, bypassing Chapter 5 of the *Legal Profession Uniform Law (Uniform Law)*.

1.1 Unlawful Appointment

We note that you were appointed Manager as a consequence of those decisions, where the Principal of the firm was refused a practising certificate for 2024/2025 despite having no breaches of law, conduct or ethics, no adverse records, and no convictions.

This letter also serves as formal notice to Ms Valerie Griswold and Ms Nadya Haddad (**Ms Haddad**), the Director and Deputy Director of the Law Society's Professional Standards Department (**PSD**) / Legal Regulation Department, under whose authority and direction you act. Both officers subjected us to almost a year of an undisclosed internal process, involving shifting allegations of "misconduct" and repeated ambush actions that were adverse to our rights and interests, undertaken without notice or record, before any decisions were issued.

1.2 Clean Record and Ignored Correspondences

Notwithstanding the Law Society's adverse actions and 'view of unfitness' decisions, we maintain a clean record, with no findings of misconduct, unsatisfactory conduct, or proven breaches.

We have never accepted the Law Society's views of unfitness decisions and maintain they are without lawful foundation. We reject the assertion that the appointment of a manager derives validity merely because it cites provisions of the Uniform Law. A document of purported legal effect, including section 45 decisions and the subsequent manager appointment decision, remains invalid if issued under false premises and in breach of the statutory framework.

We also refer you to our correspondence dated 13 and 15 August 2024, 12 February 2025, and 13 and 15 May 2025. These raised serious concerns, referred to supporting documents and evidence, reported suspected misconduct and offences, and sought clarification. To date, the Law Society Council, PSD, Registry Office, and the Office of the Legal Services Commissioner (**OLSC**) have ignored these matters, leaving them unanswered.

We note that you refer to Chapter 6 of the Uniform Law. However, it is our position that the foundation of your appointment is unlawful. The decisions were issued without the required Chapter 5 process, without findings, and without any proven case of unfitness.

We maintain that to exercise powers as manager arising from the appointment decision dated 2 June 2025 is to further perpetuate actions without lawful foundation.

As a lawyer and former police officer, you are aware, or ought to be aware, of the defects underlying your appointment. You would also have reference to our cases raising serious issues with the PSD/Legal Regulation Department, which were systematically ignored and never subjected to any lawful process and determination.

2. Timeline & Interference

- a. On 2 June 2025: Purported manager appointment, which we never accepted.
- b. Your letter dated 27 August 2025, which we recently received, is our first notice that you had already interfered with the firm's statutory trust account and now demand all files to "close" the firm. You referenced an email and attachment which we haven't received.

This is the first correspondence we have received from you since your purported appointment in June 2025, demanding files precisely when our Supreme Court affidavit evidence is due. This followed approximately 100 pages of written threats from Ms Griswold and Ms Haddad, which demanded, among other things:

- a. Deletion of our public-interest posts and evidence;
- b. Publication of false statements to mislead the public and authorities;
- c. Payments to Ms Griswold and Ms Haddad.

This timing demonstrates a strategy to harass us and to cause distress and pressure during critical evidence deadlines. This is consistent with the Law Society PSD's established pattern of unlawful conduct and retaliation.

3. Section 45 "Unfitness" Decisions & Appointment of Manager - Unlawful from Inception

On 30 May 2025, Ms Griswold issued her signed "decisions" recording nothing more than a "view" of unfitness, purportedly on behalf of the Council of the Law Society of NSW.

Allegations shifted from 'misconduct' to 'alleged misconduct,' then disappeared entirely. There was no Chapter 5 process, hearing, or independent NSW Civil and Administrative Tribunal (**NCAT**) determination, only an undisclosed internal process conducted by Ms Griswold and Ms Haddad.

The decisions did not address the notices we had issued since August 2024, which placed PSD, Ms Griswold, the Law Society Council, the OLSC, and the Attorney General on notice of unlawful and corrupt conduct. Those notices also called for Ms Griswold's removal from our matters and for an investigation into PSD's and the OLSC's concealment of prior reports. To date, all of these notices have been ignored.

Even before the “decisions” were issued on 30 May 2025, Law Society officers had already:

- a. interfered with our practising certificates, register data, and memberships; and
- b. removed us from the Law Society’s Register of Solicitors by ambush and without notice, thereby creating false and prejudicial records.

We maintain these “decisions” are without lawful foundation from inception.

4. NSW Court of Appeal Referrals

Ms Griswold’s first letters to us in July 2024 stated that the OLSC had referred three NSW Court of Appeal proceedings to the Law Society PSD. Those referrals raised disciplinary matters of possible breaches of the Solicitors’ Conduct Rules.

The proceedings were interlocutory leave-to-appeal hearings arising from Ms Odtojan’s private civil tort claims against Mr Nicolas Ford, Mr Thomas Glynn, and Mr Miles Condon SC. They were not disciplinary proceedings and did not result in any findings of misconduct.

PSD treated the referrals as misconduct, forcing us to operate “in force” from expired practising certificates, seeking admissions, and inviting us to withdraw our renewal applications.

In the Law Society’s May 2025 decisions, it relied solely on judicial commentary from those interlocutory hearings, commentary that was never a finding of misconduct, to justify its “view” of unfitness. The referrals produced no outcome, no investigation, and no NCAT process.

5. Longstanding Pattern (2016 - 2025) & Usurpation of Roles

Since 2016, we have repeatedly raised reports of misconduct and suspected criminal offences in relation to Piper Alderman, its employees, their client Credit Corp Services Pty Limited, and other lawyers involved, to the Law Society PSD and OLSC. All the reports were systematically ignored and closed, while those reported were shielded from investigations.

In 2023, our solicitor and law firm notifications from the Law Society were effectively switched off without explanation.

In 2024–2025, the Law Society’s Council and PSD were usurping the roles of NCAT, Parliament, and the courts by creating undisclosed internal processes and undertaking multiple adverse actions against us that affected our rights and interests without any formal decisions. This culminated the Law Society’s decisions issued on 30 May 2025.

6. Threat & Retaliation

After we served our Supreme Court summons on the Law Society, Ms Griswold and Ms Haddad issued written threats against us.

Twelve days after we spoke publicly about Law Society PSD’s conduct, our practising certificates were refused. This occurred after almost a year of being subjected to an undisclosed internal process, marked by and unfounded allegations of misconduct, repeated refusals to particularise them, and their ultimate disappeared entirely from the decisions.

This sequence confirms a pattern of retaliation, not regulation.

7. Trust Account Interference & Non-Acknowledgement of Payments

Under the Law Society's Legal Regulation/PSD authority, our trust account was tampered with.

Our payments made in May 2024 to the Law Society for our renewal applications and solicitor membership fees were banked, but never acknowledged by the Law Society.

Renewal Law Society memberships and practising certificates were never issued despite payments.

We maintain that receiving payment without providing any product, benefit, or service constitutes fraud.

Despite repeated requests, we have not received any answers regarding our payments.

This conduct compounds the pattern of unlawful interference and disregard for notices of concerns and requests for clarifications.

8. Duty to Protect Clients & Refusal to Hand Over Files

We owe a duty to protect our clients and the public. The moment our practising rights were unlawfully stripped, our clients were already harmed, deprived of their legal representation and exposed to prejudice and disruption by a process that targeted us without lawful basis. To now demand their files compounds that damage and creates foreseeable harm.

The Law Society officers we have dealt with, under whose direction you act, have already demonstrated improper conduct, including:

- a. Creating false records and fabricating misconduct allegations;
- b. Shifting narratives to suit predetermined outcomes;
- c. Repeated ambush actions without notice or record;
- d. Tampering with solicitor data and erasing records;
- e. Dishonesty in relation to funds, including failure to acknowledge payments;
- f. Misuse of privileged data, including providing it to third parties for self-interest;
- g. Threats, demands for payments, and false representations;
- h. Retaliation against those who act lawfully, including framing innocent parties with prejudicial entries.

This consistent pattern demonstrates that Law Society officers, including Ms Griswold and Ms Haddad, cannot be trusted with client matters, account documents, or financial records. Even our own payments to the Law Society were banked but never acknowledged. To hand over files would expose innocent clients to foreseeable harm, including the risk of additional false records, misuse, or fraudulent conduct under the guise of lawful authority.

This conduct demonstrates an agenda that harms us, our firm, and our clients. In our view, Law Society officers have become a danger to clients and the public, the very people they are supposed to protect.

As both victims and witnesses to this conduct, we will not subject any client to the same unlawful treatment. If you persist with demands for files or information, this will be reported to the appropriate authorities accordingly.

We will not participate in or perpetuate actions which are without a lawful basis and harmful to clients and the public.

9. Improper Purpose in Demanding Files

As set out herein, Law Society have deprived us of our ability to continue to practise law, without lawful basis and determination. Against that background, and considering PSD and OLSC's longstanding disregard of reports of suspected offences which they have a statutory duty to refer to authorities, we reject any demand for client files. Such manager appointment and demands do not arise from a genuine lawful process and risk perpetuating concealment or other improper purposes

10. Statutory Referral Duties

Section 465 of the Uniform Law imposes a duty on regulatory officers to refer suspected offences to the appropriate authorities.

The Law Society officers who have implicated themselves in our matters have failed to self-report and failed to refer suspected offences, including fabricated allegations of misconduct, false records, and tampering with records, despite repeated notices.

We rely on our prior correspondences giving notice of unlawful and corrupt conduct and the positive obligation to self-report. These notices have been consistently ignored.

11. Supreme Court Proceedings & Our Position

While this matter is before the Supreme Court, our position remains that the impugned Law Society "unfitness" decisions and the subsequent manager appointment are unlawful and without legal foundation.

12. Consequences & Notice

As set out herein, we give notice as follows:

- a. We maintain that your appointment and demands are without lawful foundation and, in our position, of no legal effect.
- b. We refuse to provide any files or documents as the process underpinning your appointment is not founded in law.
- c. We note that we have already called for the investigation and removal from office the Law Society officers involved in this matter, including Ms Griswold, Ms Haddad, the Law Society President, the Council members, and the Legal Services Commissioner.
- d. This letter also serves as a public-interest disclosure. It will be published for transparency and for the protection of ourselves, our clients, and the public.
- e. In our position, this appointment rests on nothing more than a section 45 certificate issued without lawful foundation. It may carry the appearance of authority on paper, but it has no lawful basis, no process, and no validity.

Regards

M. Odtojan. A. Bryl

Marie Odtojan & Artem Bryl