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Details of Filing

Document Lodged: Concise Statement File Number: NSD439/2022

File Title: SECRETARY OF THE DEPARTMENT OF HEALTH v PREFIXX PTY

LTD (ACN 639 094 698) & ANOR

Registry: NEW SOUTH WALES REGISTRY - FEDERAL COURT OF

AUSTRALIA



Dated: 10/06/2022 11:10:33 AM AEST Registrar

Important Information

Sia Lagos

As required by the Court's Rules, this Notice has been inserted as the first page of the document which has been accepted for electronic filing. It is now taken to be part of that document for the purposes of the proceeding in the Court and contains important information for all parties to that proceeding. It must be included in the document served on each of those parties.

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Concise Statement



No.

Federal Court of Australia

District Registry: New South Wales

Division: General

SECRETARY OF THE DEPARTMENT OF HEALTH

Applicant

PREFIXX PTY LTD (ACN 639 094 698) and another named in the schedule

Respondents

A. IMPORTANT FACTS GIVING RISE TO THE CLAIM

- 1. Prefixx Pty Ltd (First Respondent):
 - a. is a corporation with its registered office in New South Wales, Australia; and
 - b. from at least 1 October 2021 to 24 December 2021, operated websites and a social media account located at Universal Resource Locators (URL):
 - i. https://www.hqdtechaus.com;
 - ii. https://hqdtechaustralia.com;
 - iii. https://igetaustralia.com.au; and
- 2. Mr Brad Anthonisz (**Second Respondent**):
 - a. is a natural person who resides in New South Wales, Australia;
 - b. has been, since the First Respondent was registered on 13 February 2020, a director of the First Respondent;
 - c. has been, since on or around 24 July 2021, the sole director and shareholder of the First Respondent; and
 - d. at all relevant times, operated and/or controlled the Websites.

Filed on behalf of (name & role of party)	Secretary, Department of Health, Applicant
Prepared by (name of person/lawyer)	Andrew Korbel
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(include state and postcode)	

- From at least 1 October 2021 to 24 December 2021, the Respondents advertised or caused to be advertised and sold nicotine vaping products (NVP) on the Websites. A list of the NVP advertised and sold on the Websites is set out in <u>Annexure A</u> (Products).
- 4. The Products sold on the Websites were available for purchase on a delivered basis to addresses within all States and Territories of Australia and internationally.
- 5. The Products are therapeutic goods within the meaning of s 3(1) of the *Therapeutic Goods*Act 1989 (Cth) (**TG Act**) because they were represented to be, or were otherwise likely to be taken to be, for therapeutic uses (as defined in s 3 of the TG Act), including:
 - use in ceasing or partially substituting for the consumption of tobacco products, for the prevention of diseases, ailments, defects or injuries caused by use of tobacco products (such as various forms of cancer and cardiovascular disease); and
 - b. further or in the alternative, use in influencing, inhibiting or modifying physiological processes by the administration of nicotine, a substance with stimulatory and relaxant properties.

Nicotine vaping products

- 6. The NVP advertised on the Websites were devices containing a nicotine solution. When operated by a user, the devices were designed to apply heat to and vaporise the nicotine solution for inhalation by the user. Some of the devices allowed the nicotine solution to be refilled once it had been consumed.
- 7. Nicotine, as present in NVP such as the Products, was at all relevant times included in Schedule 4 of the Poisons Standard within the meaning of s 52A of the TG Act (**Poisons Standard**). Substances included in Schedule 4 of the Poisons Standard are prescription-only substances, and may only be supplied by or on the order of persons authorised to prescribe medicines under State or Territory legislation.
- 8. NVP are prescribed in Australia to assist persons addicted to cigarettes or other tobacco products in ceasing the use of those products, thereby preventing the various diseases, ailments, defects and injuries (such as various forms of cancer) associated with tobacco use. NVP are also, in some cases, abused for recreational purposes.

Advertising goods not included in the Australian Register of Therapeutic Goods and referring to substances included in Schedule 4 to the Poisons Standard

- 9. From at least 1 October 2021 to 24 December 2021, or as otherwise specified in Annexure A:
 - a. the First Respondent advertised or caused the Products to be advertised on the Websites; and

- b. the Second Respondent caused the Products to be advertised on the Websites; within the meaning of s 3(1) of the TG Act.
- 10. The Products were not at any relevant time entered in the Register maintained by the Applicant pursuant to s 9A(1) of the TG Act (**Register**).
- 11. The Products were not at any relevant time the subject of an exemption, approval or authority under the TG Act, nor an exemption, approval or authority under regulations made under the TG Act. Consequently, the Products were at all relevant times prescribed by reg 7(i) of the *Therapeutic Goods Regulations 1990* (Cth) (**TG Regulations**) for the purposes of s 42DLB(9) of the TG Act, and the advertising of the Products contravened s 42DLB(1) of the TG Act, where s 42DLB(9) of the TG Act applied.
- 12. The advertisements referred to at paragraph 9 above referred to the Products, being goods containing a substance, nicotine, which as contained in the Products was included in Schedule 4 to the Poisons Standard but not in Appendix H of the Poisons Standard. Those references were not authorised or required by a government or government authority (not including a foreign government or foreign government authority). The advertising of the Products therefore contravened s 42DLB(1) of the TG Act where s 42DLB(7) of the TG Act applied.
- 13. The Second Respondent knew each of the matters set out in paragraphs 3 to 5 and 9 to 12 above and caused or aided, abetted, counselled or procured the conduct of the First Respondent alleged in paragraph 9.

B. SUMMARY OF RELIEF SOUGHT FROM THE COURT

- 14. The Applicant seeks the relief set out in the Originating Application, comprising:
 - a. declarations under s 21 of the Federal Court of Australia Act 1976 (Cth);
 - b. orders for pecuniary penalties under s 42Y of the TG Act; and
 - c. costs.

C. PRIMARY LEGAL GROUNDS FOR RELIEF SOUGHT

- 15. The conduct described in paragraph 9 above was done in the course of, or in preparation for, trade or commerce between Australia and a place outside Australia, among the States, or between a State and a Territory.
- 16. By the conduct described in paragraph 9, the Respondents contravened s 42DLB(1) of the TG Act because s 42DLB(9) applied. A separate contravention occurred, with respect to each of the Products on each day that the Websites were published or available to be accessed by consumers.

- 17. By the conduct described in paragraph 9, the Respondents further contravened s 42DLB(1) of the TG Act because s 42DLB(7) applied. A separate contravention occurred, with respect to each of the Products on each day that the Websites were published or available to be accessed by consumers.
- 18. In the alternative to paragraphs 15 to 17, by reason of the matters alleged in paragraph 13, the Second Respondent aided, abetted, counselled or procured the First Respondent's contraventions of s 42DLB(1) alleged in paragraphs 15 to 17 above, and was therefore involved in those contraventions for the purposes of s 42YC of the TG Act.

D. ALLEGED HARM

- 19. Nicotine is highly addictive, and therefore presents a risk of abuse for recreational purposes.
- 20. Due to these risks, the nicotine in NVP is included in Schedule 4 to the Poisons Standard as a prescription-only substance and is not included in Appendix H to the Poisons Standard as a substance that is permitted to be advertised. As a result, the advertising of NVP is prohibited by the TG Act. This prohibition is intended to ensure that patients decide whether to use prescription-only medicines such as NVP based on information from trusted sources such as their medical practitioner, rather than from commercial advertising.
- 21. The risks associated with NVP vary depending on the composition of the nicotine solution. As the Products were advertised and supplied outside the TG Act framework, they were not subject to the appropriate regulatory controls required to ensure that they did not contain ingredients that presented an elevated risk to consumers and were otherwise suitable for use in smoking cessation.
- 22. The prohibition on the advertising of products that are not entered in the Register and not otherwise subject to an exemption, approval or authority is intended to prevent the promotion of goods posing these kinds of risks to patients or consumers, and thereby reduce consumer use of such goods.
- 23. Even NVP that do not contain ingredients that are specifically known to be harmful are associated with serious risks that should be managed by a patient in consultation with their medical practitioner. Those risks include poisoning, toxicity from inhalation (including seizures) and lung injury. The long-term health risks of NVP are still unclear and evidence of their potential efficacy for smoking cessation is currently mixed.
- 24. The Websites advertised the Products to the public at large. While viewers were asked to self-certify that they were over 18, there were no meaningful measures in place to prevent the purchase and abuse of the NVP advertised and sold through the Websites for

recreational purposes, including by children. The nature of the Products advertised on the Websites, and in particular their high concentration of nicotine, brightly coloured presentation and range of flavours are likely to encourage purchase and abuse for recreational purposes, particularly by children and young people.

- 25. Recreational users are likely to become addicted to nicotine. Persons addicted to nicotine have considerable difficulty ceasing the use of nicotine products if they attempt to do so and are exposed to the health risks referred to at paragraph 23 above.
- 26. In some cases, users of NVP subsequently begin using tobacco products such as combustible cigarettes. Where this occurs, the user will be exposed to the serious adverse health effects that can be caused by such products, including cancer, cardiovascular disease and respiratory conditions. Tobacco use is a significant public health problem in Australia, and the promotion of NVP to persons not requiring those goods for smoking cessation may therefore increase the overall public health burden created by tobacco use.

Certificate of lawyer

I Andrew Korbel certify to the Court that, in relation to the concise statement filed on behalf of the Applicant, the factual and legal material available to me at present provides a proper basis for each allegation in the statement.

Date: 9 June 2022

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Signed by Andrew Korbel

Lawyer for the Applicant

Schedule

No. of 2022

Federal Court of Australia

District Registry: New South Wales

Division: General

Respondents

Second Respondent: Brad Anthonisz

Date: 9 June 2022

ANNEXURE A – Products

No.	Product	URL
1.	Cuvie Disposable Nicotine Vape 300 Puffs, in the following flavours:	www.hqdtechaus.com/product/hpd-cuvie-disposable-nicotine-vape-
	(a) Apple Crush	300-puffs-35-flavours-available/
	(b) Banana Ice	
	(c) Blue Razz	
	(d) Blueberry	
	(e) Bubble Gum	hqdtechaustralia.com
	(f) Candy	
	(g) Cantaloupe	
	(h) Cheesecake	www.hqdtechaus.com/product/cuvie-disposable-vape-x-30-
	(i) Cherry	wholesale-300-puffs-x-30-35-flavours-available
	(j) Classic Tobacco	
	(k) Energy Drink	various in the sure reason (or /CT a sur CC Field / /Finish Finish as flower up)
	(I) Fruit Fusion	www.instagram.com/p/CTggrOGFnI4/ (Fruit Fusion flavour)
	(m) Grapey	See post dated 7 September 2021.
	(n) Green Blast (o) Guava Ice	www.instagram.com/p/CSYQPMAIN0P/ (Cheese cake flavour)
	(p) HQD Cola	, , , , , , , , , , , , , , , , , , , ,
	(q) Ice Mint	See post dated 10 August 2021.
	(r) Lush Ice	www.instagram.com/p/CQkjmolrzix/
	(s) Lychee Ice	See post dated 26 June 2021.
	(t) Mango Ice	oce post dated 20 date 2021.
	(u) Melon Ice	
	(v) Mixed Fruit	
	(w) Nuts Tobacco	
	(x) Orange Soda	
	(y) Passion Fruit	
	(z) Peach Ice	
	(aa) Pina Colada	
	(bb) Pineapple	
	(cc) Siberia	
	(dd) Strawberry	
	(ee) Strawberry Banana	

	(ff) Strawberry Shortcake (gg) Strawberry Watermelon (hh) Tangerine Ice (ii) Tres Leches (jj) Watermelon	
2.	Gunpod/Xcelencia Dual-X Disposable Nicotine Vape 1400 Puff, in the following flavours:	www.hqdtechaus.com/product/gunpod-xcelencia-dual-x-disposable-nicotine-vape-1400-puff/
	(a) Blueberry Ice/Peach Ice Cream(b) Blueberry Jazz/Ice Orange Cola(c) Bubble Gum/Cola Ice	
	(c) Bubble Gum/Cola Ice(d) Mango/Lychee	www.instagram.com/p/CRA2ts3LPt5/
	(e) Passion Fruit/Grape(f) Peach Ice/Grape(g) Peach Oolong Tea/Grape	See post dated 7 July 2021.
	(h) Pineapple Ice/Watermelon(i) Summer Berry/Passion Fruit	www.instagram.com/p/CR-XZX0Ii1M/
	(i) Suffiller Berry/Fassion Fluit	See post dated 31 July 2021.
		www.instagram.com/p/CSqJxgTF-A9/
		See post dated 17 August 2021.
		www.instagram.com/p/CTonjt9PuTK/
		See post dated 10 September 2021.
		www.instagram.com/p/CUwVomePnut/
		See post dated 8 October 2021.
3.	HQD Cuvie Plus Disposable Nicotine Vape 1200 Puffs, in the following flavours:	www.hqdtechaus.com/product/hqd-cuvie-plus-disposable-nicotine-vape-1200-puffs-32-flavours-available/
	(a) Apple Crush	

(b)	Apple Peach	
(c)	Banana Ice	
(d)	Black Ice	
(e)	Blueberry	
(f)	Blueberry Lemonade	
(g)	Blueberry Raspberry	hqdtechaustralia.com
(h)	Bubblewater	
(i)	Candy	www.hadtochaus.com/product/had.cuvic.plus.dicposchlo.vapo
(j)	Cataloupe	www.hqdtechaus.com/product/hqd-cuvie-plus-disposable-vape- wholesale-x-6-packs-1200-puffs-32-flavours-available/
(k)	Energy Drink Fresh Berries	wholesale-x-0-packs-1200-pulls-32-llavours-available/
(l) (m)	Fruit Fusion	
(n)	Grapey	www.instagram.com/p/CWm-2D5PcAa/ (Raspberry flavour)
(o)	Ice Mint	See post dated 23 November 2021.
(p)	Kiwi Pomegranate	•
(q)	Kiwi Strawberry	www.instagram.com/ p/CVwsvCbPqex/ (Sweet menthol flavour)
(r)	Lush Ice	See post dated 2 November 2021.
(s)	Lychee Ice	www.instagram.com/p/CTEQQTrIAGD/ (Candy flavour)
(t)	Mango Guava	· · · · · · · · · · · · · · · · · · ·
(u) (v)	Mango Ice Melon Ice	See post dated 27 August 2021.
(v) (w)	Miami Vice	www.instagram.com/p/CSVi4a-Imwp/ (Kiwi Pomegranate flavour
(x)	Passion Fruit	See post dated 9 August 2021.
(y)	Pina Colada	· · · · · · · · · · · · · · · · · · ·
(z)	Pineapple	www.instagram.com/p/CR729-PIEWo/ (Blueberry Lemonade
(aa)		flavour)
(bb)	Pog Orange Guava	See post dated 30 July 2021.
(cc)	Rainbow	www.instagram.com/p/CRkWDj_rd3d/ (Apple flavour)
(dd) (ee)	Raspberry Lemonade Red Ice	, , , , , , , , , , , , , , , , , , , ,
(ff)	SBCC Ice Cream	See post dated 21 July 2021.
(gg)	Strawberry	www.instagram.com/p/COBT7zMLyMP/
(hh)	Strawberry Banana	See post dated 24 April 2021 .
(ii)	Strawberry Lemonade	www.instagram.com/p/CQAOI5IraRt/
(jj) (kk)	Strawberry Shortcake Strawberry Watermelon	, i
(VV)	Oliawberry Walerinelon	See post dated 12 June 2021.

	(II) Tres Leches	
4.	HQD King Disposable Nicotine Vape 2000 Puffs, in the following flavours: (a) Blueberry (b) Bubblewater (c) Energy Drink (d) Fruit Fusion	www.hqdtechaus.com/product/hqd-king-disposable-nicotine-vape-2000-puffs-11-flavours-available/
	(e) Grape(f) Ice Mint(g) Kiwi Strawberry(h) Lush Ice	hqdtechaustralia.com
	(i) Pina Colada (j) Pineapple Ice (k) Raspberry Lemonade (l) Strawberry	www.hqdtechaus.com/product/hqd-king-disposable-vape-wholesale-x-6-2000-puffs-11-flavours-available/
(m) Strawberry Banana		www.instagram.com/p/CXifVk9vEnb/ (Lush Ice flavour)
		See post dated 16 December 2021.
		www.instagram.com/p/CV4pXOxPCWi (Fruit fusion flavour)
		See post dated 5 November 2021.
		www.instagram.com/p/CSOC4xFlpLp (Blueberry flavour)
		See post dated 6 August 2021.
		www.instagram.com/p/CRsr3bCL81q/ (Grape flavour)
		See post dated 24 July 2021.
		www.instagram.com/p/CQ2cnslrLJV/ (Ice Mint flavour)
		See post dated 3 July 2021.
		www.instagram.com/p/CNaXpA6LzKI/
		See post dated 9 April 2021.

		www.instagram.com/p/CNkqG0VLYJR/
		See post dated 13 April 2021.
		www.instagram.com/p/CNrGXC-rjNK/
		See post dated 15 April 2021.
		www.instagram.com/p/CUeXuMwL3SC/
		See post dated 1 October 2021.
5.	HQD Maxx Disposable Nicotine Vape 2500 Puffs, in the following flavours:	www.hqdtechaus.com/product/hqd-maxx-disposable-nicotine-vape-2500-puffs-10-flavours-available/
	(a) Black Ice(b) Blue Razz(c) Blueberry(d) Grape	
	(e) Ice Mint (f) Kiwi Pomegranate (g) Lush Ice (h) Pineapple (i) Strawberry Banana (j) Strawberry Watermelon	www.hqdtechaus.com/product/hqd-maxx-disposable-vape-wholesale-x-10-2500-puffs-10-flavours-available/
		www.instagram.com/p/CSf7r42l5Gd/
		See post dated 13 August 2021.
		www.instagram.com/p/CTyxFlel8ru/
		See post dated 14 September 2021.
		www.instagram.com/p/CVe4PdCPNRC/
		See post dated 26 October 2021.

6.	HQD Mega – Disposable Nicotine Vape 1800 puffs, in the following flavours:	www.hqdtechaus.com/product/hqd-mega-disposable-nicotine-vape-1800-puffs-10-flavours-available/
	 (a) Apple Peach (b) ASAP Grape (c) Candy (d) Cubano (e) Iced Pineapple (f) Lush Ice 	
	(g) Mango Melon Ice (h) Mint Ice	hqdtechaustralia.com
	 (i) Mixed Fruit (j) Pina Colada (k) Strawberry Cream (l) Strawberry Donut (m) Very Berry 	www.hqdtechaus.com/product/hqd-mega-disposable-vape-wholesale-x-8-1800-puffs-10-flavours-available/
		www.instagram.com/p/CXNkywZPJIn/ (Candy flavour)
		See post dated 8 December 2021.
		ww.instagram.com/p/CVM5C-mlfls/ (ASAP Grape flavour)
		See post dated 19 October 2021.
		www.instagram.com/p/CT6LAZZqK9C/ (Lush flavour)
		See post dated 17 September 2021.
		www.instagram.com/p/CSyAF-VFtI4/ (Mixed flavour)
		See post dated 20 August 2021.
		www.instagram.com/p/CR0Hh5zrwti/ (Apple Peach flavour)
		See post dated 27 July 2021.
		www.instagram.com/p/CQSYrNQLAZe/ (Mango Melon Ice flavour)
		See post dated 19 June 2021.
		www.instagram.com/p/CNK0LzynWtA/
		See post dated 3 April 2021.

		www.instagram.com/p/CPGyvSQL1fn/ See post dated 21 May 2021.
7.	HOD I Super I Dianagable Nigotine Vana I 600 puffs, in the following	www.instagram.com/p/CPui0Fnr1_2/ See post dated 5 June 2021.
7.	HQD Super Disposable Nicotine Vape 600 puffs, in the following flavours: (a) Blue Razz (b) Cataloupe	www.hqdtechaus.com/product/hqd-super-disposable-nicotine-vape-600-puffs-16-flavours-available/
	 (c) Cotton Candy (d) Energy Drink (e) Grapey (f) Ice Mint (g) Lush Ice (h) Lychee Ice (i) Mango Ice (j) Mango Lychee (k) Mixed Fruit (l) Orange Soda (m) Peach Ice (n) Pineapple (o) Strawberry Banana (p) Strawberry Watermelon 	www.instagram.com/p/COdsKc-rKwy/ See post dated 5 May 2021.
8.	IGET Nova Reusable Nicotine Vape Pod Kit 500 Puff, in the following flavours: (a) Grape Freeze + (b) Iced Blueberry +	www.hqdtechaus.com/product/iget-nova-reusable-nicotine-vape-pod-kit-500-puff/
	(c) Lush Fruit +	

		www.hqdtechaus.com/product/iget-nova-reusable-vape-pod-kit-wholesale-x-5-500-puff/
		www.instagram.com/p/CUEvFtaMRI8/
		See post dated 21 September 2021
9.	IGET Nova Reusable Nicotine Vape Replacement Pod 500 Puff, in the following flavours:	www.hqdtechaus.com/product/iget-nova-reusable-nicotine-vape-replacement-pod-x-3-500-puff/
	 (a) Blueberry Raspberry Grape (b) Cranberry Ice (c) Double Apple (d) Energy Drink 	
	(e) Grape Freeze (f) Iced Blueberry (g) Juicy Peach Ice (h) Kiwi Strawberry Ice (i) Lush Fruit (j) Mango Bomb (k) Passionfruit King (l) Pineapple Juice Ice (m) Strawberry Banana	www.hqdtechaus.com/product/iget-nova-reusable-vape-replacement-pod-x-30-wholesale-500-puff/
		www.instagram.com/p/CXDLeZiPv6f/ (Pineapple Juice Ice flavour)
		See post dated 4 December 2021.
		www.instagram.com/p/CVUbXi-v5AD/ (Juicy Peach Ice flavour)
		See post dated 22 October 2021.
		www.instagram.com/p/CUMuplJrZZp/
		See post dated 24 September 2021
10.	IGET Plus Disposable Nicotine Vape 1200 Puff, in the following flavours:	www.hqdtechaus.com/product/iget-plus-disposable-nicotine-vape-1200-puff/
	(a) ASAP Grape(b) Blackberry Raspberry Ice(c) Blueberry Ice(d) Lush Ice	
	(e) Lychee Lemon Ice (f) Mango Strawberry Juice	www.hqdtechaus.com/product/iget-plus-disposable-vape-wholesale-x-10-1200-puff/

	(g) P.F.O Ice (h) Peach Banana Ice (i) Pineapple Coconut Ice (j) Raspberry Ice (k) Red Wine (l) Strawberry Watermelon (m) Sweet Menthol	www.instagram.com/hqd_tech_aus/ (Pineapple Coconut Ice flavour) See post dated 26 November 2021. www.instagram.com/CUWoHnyvbAX/ See post dated 28 September 2021
11.	IGET Shion Disposable Nicotine Vape 600 Puff, in the following flavours:	www.hqdtechaus.com/product/iget-shion-disposable-nicotine-vape-600-puff/
	 (a) Apple (b) Banana Ice (c) Blackberry Ice (d) Blue Razz (e) Blueberry Ice (f) Bubble Gum (g) Cantaloupe (h) Cinnamon 	igetaustralia.com.au
	(i) Classic Tobacco(j) Cola Ice(k) Cool Mint(l) Cranberry Ice	www.hqdtechaus.com/product/iget-shion-disposable-vape-x-30-wholesale-600-puff/
	(m) Flavour Burst (n) Grape (o) Lush Ice	www.instagram.com/p/CXsbJ_4PdZS/ (Peach Ice flavour) See post dated 20 December 2021.
	(p) Lychee Ice (q) Mango (r) Mixed Fruit	www.instagram.com/p/CWchHJGvzHf/ (Mango flavour) See post dated 19 November 2021.
	(s) Mystery Fruit (t) Passion Fruit (u) Peach Ice	www.instagram.com/p/CTWG0ISvH2T/ (Cola Ice flavour) See post dated 3 September 2021)
	(v) Pineapple Ice(w) Pink Lemonade(x) Strawberry	www.instagram.com/p/CSDcsXnF3m5/ (Classic Tobacco flavour) See post dated 2 August 2021

	(y) Strawberry Watermelon(z) Very Berry	www.instagram.com/p/CQuuG8BLq48/ See post dated 30 June 2021.
		www.instagram.com/p/CRaZYjML8RZ/
		See post dated 17 July 2021.
		www.instagram.com/p/CU64Zn5vMtN/
		See post dated 12 October 2021.
12.	IGET XXL Disposable Nicotine Vape 1800 Puff, in the following flavours: (a) B.R.G Ice (b) Blackberry Ice (c) Blackberry Raspberry Orange (d) Blue Razz (e) Blueberry Ice (f) Bubble Gum (g) Cherry Ice	www.hqdtechaus.com/product/iget-shion-disposable-nicotine-vape-1800-puff/ igetaustralia.com.au
	 (h) Cotton Candy (i) Cucumber Ice (j) Energy Drink (k) Grape (l) Guava Ice (m) Kiwi Ice (n) Lush Ice (o) Mango 	www.hqdtechaus.com/product/iget-shion-disposable-nicotine-vape- 1800-puff/?v=f719d57e3882
	(p) Mango Guava (q) Mint Ice (r) Mint Lemonade	www.hqdtechaus.com/product/iget-xxl-disposable-vape-wholesale-x-10-1800-puff/
	(s) Mixed Berry	www.instagram.com/p/CWU8U6pPNi4/ (Mango flavour)
	(t) Mojito Lime	See post dated 16 November 2021.

	(u) Passion Fruit Mango (v) Peach Ice (w) Pineapple Juice Ice (x) Pink Lemonade (y) Strawberry Watermelon	www.instagram.com/p/CVCYp8SOvZU/ (Grape flavour) See post dated 15 October 2021. www.instagram.com/p/CTOr61Yv3ds/ (Pink Lemonade flavour) See post dated 31 August 2021. www.instagram.com/p/CSGFwy0liiW/ (Mojito Lime flavour) See post dated 3 August 2021. www.instagram.com/p/CRYEZPFridv/ See post dated 16 July 2021
13.	Puff Bar Puff Bar Disposable Nicotine Vape 300 Puff, in the following flavours: (a) Banana Ice (b) Blue Razz (c) Blueberry (d) Clear (e) Grape (f) Lush Ice (g) Lychee Ice (h) Mango (i) Pineapple Lemonade (j) Strawberry Banana	www.hqdtechaus.com/product/puff-bar-disposable-nicotine-vape/ www.instagram.com/p/CWC-Yx-vGvB/ (Tangerine Ice flavour) See post dated 9 November 2021. www.instagram.com/p/CRIHbBRreDy/ See post dated 10 July 2021
14.	Vaporlax Disposable Nicotine Vape 800 Puffs, in the following flavours: (a) Blue Razz (b) Crush Grape (c) Double Apple (d) Ice cola (e) Icy Fruits (f) Lush Ice (g) Lychee Ice	www.hqdtechaus.com/product/vaporlax-disposable-nicotine-vape-800-puffs-10-flavours-available/ www.instagram.com/CWKyv91L6vy/ (Double Apple flavour) See post dated 12 November 2021.

	(h) Mango Ice (i) Strawberry Cream	
	(i) Strawberry Cream (j) Tropical Punch	www.instagram.com/p/CS8U3vblbqo/ (Ice Cola flavour)
		See post dated 24 August 2021
		www.instagram.com/p/CRS3rRxL3yA/ (Grush Grape flavour)
		See post dated 14 July 2021
		www.instagram.com/p/CQcqwd2rD93/ (Lush Ice flavour)
		See post dated 23 June 2021.
		www.instagram.com/p/CUoknJLrEgR/ (Lush Ice flavour)
		See post dated 5 October 2021.
		www.instagram.com/p/CP4saYXLTy1/
		See post dated 9 June 2021.
		www.instagram.com/p/CQKhUHPLfqt/
		See post dated 16 June 2021.
15.	IGET Max Disposable Vape 2300 Puffs in Blueberry Ice Flavour	www.instagram.com/p/CX0XV_hv_vc/
		See post dated 23 December 2021.