October 2025

Investigation Report

Leading Global Pty Ltd

Foreword

The objective of the financial disclosure provisions contained in Part XX of the *Commonwealth Electoral Act 1918* (Electoral Act) is to ensure disclosure. This is to enable voters to inform themselves of the financial dealings of entities engaged in the electoral process.

The matter

Whether the entity known as Leading Global Pty Ltd – ACN: 649 193 804 (Leading Global), for the purposes of Part XX of the Electoral Act, was a third party in 2021–22 and therefore has an obligation to lodge a disclosure return in accordance with s 314AEB of the Electoral Act.

When and how the matter was raised

The matter was brought to the attention of the Australian Electoral Commission (AEC) by way of a tip-off.

Why the investigation was conducted

Electoral expenditure incurred by Leading Global in 2021–22 was estimated to be close to, or in excess of, the third party disclosure threshold of $14,500. In relation to the 2021–22 disclosure period, the failure of a third party to lodge a return on or before 17 November 2022 may amount to a contravention of s 314AEB of the Electoral Act.

Legislation

Part XX of the *Commonwealth Electoral Act 1918*

AEC process

The AEC considered information from the following sources:

- Company information purchased through the Australian Securities and Investment Commission (ASIC) website.
- Information and documents received from Aojiao Group Pty Ltd in response to a notice issued by a delegate of the Electoral Commissioner under s 321F of the Electoral Act.
- Information and documents received from Aojiao Group Pty Ltd in response to a notice issued by an authorised officer of the Electoral Commission under s 316(3)[1] of the Electoral Act.

[1] This section of the Electoral Act was in force at the time the investigation was conducted, being later repealed in the legislative reforms which received Royal Assent on 20 February 2025.

Considerations

The disclosures required under Part XX of the Electoral Act underpin the integrity of the Australian electoral system and provides transparency to voters.

Under s 316(3) of the Electoral Act, an authorised officer may require a person to produce documents or give evidence if the authorised officer has reasonable grounds for believing the person is capable of producing evidence relating to a possible contravention.

On 12 August 2024, an authorised officer of the Electoral Commission issued a notice under s 316(3) of the Electoral Act to Aojiao Group Pty Ltd (t/a AJ Studio). The notice required the production of documents and other information relevant to determining whether certain materials they produced for clients were electoral matter and who paid for these services.

In the interests of natural justice, persons responding to the s 316(3) notice and any other further queries were provided a reasonable period of time to provide a response.

Based on the documents and other information produced in response to the notice, the AEC sent a letter to Leading Global on 16 December 2024 in relation to their potential disclosure obligations. On 21 December 2024, Leading Global lodged a third party disclosure return for the 2021–22 period disclosing $22,558 of electoral expenditure.

Leading Global lodged an application with ASIC for voluntary deregistration of a company on 26 August 2024 and was subsequently deregistered on 25 October 2025.

Returns lodged during the investigation

Based on the evidence gathered during the course of the investigation, the AEC has concluded that the disclosure return lodged by Leading Global on 21 December 2024 provides the relevant disclosure in the context of the requirements of Part XX of the Electoral Act.

Conclusion

The AEC has decided in this case that it will not be seeking pecuniary penalties for Leading Global's non-compliance with disclosure requirements, nor will it be taking further enforcement action. This decision has been made in consideration of Leading Global's:

- lodgement of an accurate return and disclosure having been achieved;
- prompt action to lodge once made aware of its failure to disclose;
- deregistration as a company. Any enforcement action would need to be taken against the entity which now no longer exists, and
- Leading Global and its principal have not had a disclosure obligation since 2021–22.

Further to the above, the pursuit of enforcement actions generally was considered:

- incommensurate to the significance of the amount which was eventually disclosed; and
- unlikely to result in an outcome that would justify the amount of Commonwealth resources required.

In the AEC's view, the intent of the Electoral Act has now been achieved and the matter is considered closed.