



**Pentagon
Property
Group**

Pentagon Financial Services Pty
Limited
ABN 38 135 307 121

GPO Box 5483
Sydney NSW 2001

Level 8 56 Pitt Street
Sydney NSW 2000

Phone: (+61 2) 9238 0918

FAX

To: Company Announcements Office

Company: Trafalgar Corporate Group Limited TGP

Fax: 1300 135 638

From: Alan Sutton

Date: 24 November 2011

Re: Change of Substantial Shareholding

Pages: 5

Dear Sir/Madam,

Please find attached Form 604 Notice of change of interests of substantial shareholder in respect of Pentagon Financial Services Pty Limited security holding in Trafalgar Corporate Group Limited.

Regards,

Alan Sutton - Company Secretary

Form 604
Corporations Act 2001
Section 671B

Notice of change of interests of substantial holder

To Company Name/Scheme Trafalgar Corporate Group Limited

ACN/ARSN 113 569 121

1. Details of substantial holder (1)

Name Pentagon Financial Services Pty Limited

ACN/ARSN (if applicable) 135 307 121

There was a change in the interests of the
substantial holder on

24/11/2011

The previous notice was given to the company on

14/09/2010

The previous notice was dated

14/09/2010

2. Previous and present voting power

The total number of votes attached to all the voting shares in the company or voting interests in the scheme that the substantial holder or an associate (2) had a relevant interest (3) in when last required, and when now required, to give a substantial holding notice to the company or scheme, are as follows:

Class of securities (4)	Previous notice		Present notice	
	Person's votes	Voting power (5)	Person's votes	Voting power (5)
Fully paid stapled Securities	20,000,000	23.43%	21,479,009	25.17%

3. Changes in relevant interests

Particulars of each change in, or change in the nature of, a relevant interest of the substantial holder or an associate in voting securities of the company or scheme, since the substantial holder was last required to give a substantial holding notice to the company or scheme are as follows:

Date of change	Person whose relevant interest changed	Nature of change (6)	Consideration given in relation to change (7)	Class and number of securities affected	Person's votes affected
		AS PER ATTACHED			
		SCHEDULE "A"			

4. Present relevant interests

Particulars of each relevant interest of the substantial holder in voting securities after the change are as follows:

Holder of relevant interest	Registered holder of securities	Person entitled to be registered as holder (8)	Nature of relevant interest (6)	Class and number of securities	Person's votes
		AS PER ATTACHED	SCHEDULE "A"		

5. Changes in association

The persons who have become associates (2) of, ceased to be associates of, or have changed the nature of their association (9) with, the substantial holder in relation to voting interests in the company or scheme are as follows:

Name and ACN/ARSN (if applicable)	Nature of association

6. Addresses

The addresses of persons named in this form are as follows:

Name	Address
Pentagon Financial Services Pty	and Pentagon Property Group Pty Limited
Limited	Level 8 , 56 Pitt Street SYDNEY NSW 2000

Signature

print name TONY R PITT

capacity DIRECTOR

sign here



date 24/11/2011

DIRECTIONS

- (1) If there are a number of substantial holders with similar or related relevant interests (eg. a corporation and its related corporations, or the manager and trustee of an equity trust), the names could be included in an annexure to the form. If the relevant interests of a group of persons are essentially similar, they may be referred to throughout the form as a specifically named group if the membership of each group, with the names and addresses of members is clearly set out in paragraph 6 of the form.
- (2) See the definition of "associate" in section 9 of the Corporations Act 2001.
- (3) See the definition of "relevant interest" in sections 608 and 671B(7) of the Corporations Act 2001.
- (4) The voting shares of a company constitute one class unless divided into separate classes.
- (5) The person's votes divided by the total votes in the body corporate or scheme multiplied by 100.
- (6) Include details of:
 - (a) any relevant agreement or other circumstances because of which the change in relevant interest occurred. If subsection 671B(4) applies, a copy of any document setting out the terms of any relevant agreement, and a statement by the person giving full and accurate details of any contract, scheme or arrangement, must accompany this form, together with a written statement certifying this contract, scheme or arrangement; and
 - (b) any qualification of the power of a person to exercise, control the exercise of, or influence the exercise of, the voting powers or disposal of the securities to which the relevant interest relates (indicating clearly the particular securities to which the qualification applies).

See the definition of "relevant agreement" in section 9 of the Corporations Act 2001.
- (7) Details of the consideration must include any and all benefits, money and other, that any person from whom a relevant interest was acquired has, or may, become entitled to receive in relation to that acquisition. Details must be included even if the benefit is conditional on the happening or not of a contingency. Details must be included on any benefit paid on behalf of the substantial holder or its associate in relation to the acquisitions, even if they are not paid directly to the person from whom the relevant interest was acquired.
- (8) If the substantial holder is unable to determine the identity of the person (eg. if the relevant interest arises because of an option) write "unknown".
- (9) Give details, if appropriate, of the present association and any change in that association since the last substantial holding notice.

ANNEXURE "A"

SCHEDULE to FORM 604

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Notice of Change of Interests of Substantial Holder

Trafalgar Corporate Group Limited

A.C.N. 113 569 136

3. Changes in relevant interests

Date of Change	Person whose relevant interest changed	Nature of Change	Consideration given in relation to change	Class and number of securities affected	Person's votes affected
31/08/2011	Pentagon Financial Services Pty Limited and its parent company and its parent company Pentagon Property Group Pty Limited	Acquisition of Securities	\$ 3,633.80	4,542	4,542
1/09/2011	Pentagon Financial Services Pty Limited and its parent company and its parent company Pentagon Property Group Pty Limited	Acquisition of Securities	\$ 20,800.00	26,000	26,000
7/09/2011	Pentagon Financial Services Pty Limited and its parent company and its parent company Pentagon Property Group Pty Limited	Acquisition of Securities	\$ 1,950.00	2,600	2,600
12/09/2011	Pentagon Financial Services Pty Limited and its parent company and its parent company Pentagon Property Group Pty Limited	Acquisition of Securities	\$ 3,000.00	4,000	4,000
13/09/2011	Pentagon Financial Services Pty Limited and its parent company and its parent company Pentagon Property Group Pty Limited	Acquisition of Securities	\$ 6,150.00	8,200	8,200
14/09/2011	Pentagon Financial Services Pty Limited and its parent company and its parent company Pentagon Property Group Pty Limited	Acquisition of Securities	\$ 5,250.00	7,000	7,000
15/09/2011	Pentagon Financial Services Pty Limited and its parent company and its parent company Pentagon Property Group Pty Limited	Acquisition of Securities	\$ 7,060.00	9,500	9,500
20/09/2011	Pentagon Financial Services Pty Limited and its parent company and its parent company Pentagon Property Group Pty Limited	Acquisition of Securities	\$ 7,125.00	9,500	9,500
22/09/2011	Pentagon Financial Services Pty Limited and its parent company and its parent company Pentagon Property Group Pty Limited	Acquisition of Securities	\$ 7,875.00	10,500	10,500
23/09/2011	Pentagon Financial Services Pty Limited and its parent company and its parent company Pentagon Property Group Pty Limited	Acquisition of Securities	\$ 3,285.00	4,500	4,500
26/09/2011	Pentagon Financial Services Pty Limited and its parent company and its parent company Pentagon Property Group Pty Limited	Acquisition of Securities	\$ 32,120.00	44,000	44,000
27/09/2011	Pentagon Financial Services Pty Limited and its parent company and its parent company Pentagon Property Group Pty Limited	Acquisition of Securities	\$ 26,499.00	36,300	36,300
28/09/2011	Pentagon Financial Services Pty Limited and its parent company and its parent company Pentagon Property Group Pty Limited	Acquisition of Securities	\$ 11,002.00	14,880	14,880
3/10/2011	Pentagon Financial Services Pty Limited and its parent company and its parent company Pentagon Property Group Pty Limited	Acquisition of Securities	\$ 6,615.00	8,940	8,940
4/10/2011	Pentagon Financial Services Pty Limited and its parent company and its parent company Pentagon Property Group Pty Limited	Acquisition of Securities	\$ 11,840.00	16,000	16,000
5/10/2011	Pentagon Financial Services Pty Limited and its parent company and its parent company Pentagon Property Group Pty Limited	Acquisition of Securities	\$ 2,283.00	3,045	3,045
10/10/2011	Pentagon Financial Services Pty Limited and its parent company and its parent company Pentagon Property Group Pty Limited	Acquisition of Securities	\$ 193,276.00	257,702	257,702
11/10/2011	Pentagon Financial Services Pty Limited and its parent company and its parent company Pentagon Property Group Pty Limited	Acquisition of Securities	\$ 8,850.00	11,800	11,800
22/11/2011	Pentagon Financial Services Pty Limited and its parent company and its parent company Pentagon Property Group Pty Limited	Acquisition of Securities	\$ 680,000.00	1,000,000	1,000,000

ANNEXURE "A"

SCHEDULE to FORM 604

Notice of Change of Interests of Substantial Holder

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Trafalgar Corporate Group Limited

A.C.N. 113 569 136

4 Present relevant interest

Holder of relevant interest	Registered holder of securities	Person entitled to be registered as holder	Nature of relevant interest	Class and number of securities	Person's votes
Pentagon Financial Services Pty Limited	Pentagon Financial Services Pty Limited	Pentagon Financial Services Pty Limited	Pentagon Financial Services Pty Limited in its capacity as trustee of Pentagon Investment Trust	21,479,009 fully paid stapled securities	25.17%
Pentagon Financial Services Pty Limited	Pentagon Financial Services Pty Limited	Pentagon Financial Services Pty Limited	Pursuant to Section 608(3) of Corporations Act 2001 (Cth)	21,479,009 fully paid stapled securities	25.17%

This is Annexure "A" to in Form 604 Notice of change of interests of substantial shareholder,
 Section 3 Changes in relevant interests and Section 4 Changes in relevant interests

This is attachment 'A' of
 2 pages to Form 604
 " Notice of change of interests of
 substantial holder
 Pentagon Financial Services Pty Ltd
 signed 24th November 2011


 Tony Pitt
 - Director