

ROYAL COMMISSION INTO TRADE UNION
GOVERNANCE AND CORRUPTION

Public Hearing

(Day 9)

Level 5, 55 Market Street, Sydney

On Thursday, 19 June 2014 at 10.00am

Before the Commissioner: The Hon. John Dyson Heydon AC QC

Counsel Assisting: Mr Jeremy Stoljar SC
Ms Fiona Roughley

Instructed by: Minter Ellison, Solicitors

1 THE COMMISSIONER: Yesterday's transcript, at pages 806 to
2 811, records evidence and argument about the admissibility
3 of a tape-recording made on 13 February 2012. In the light
4 of the evidence, there is no legislative obstacle to the
5 playing of the relevant tape-recording or its reception
6 into evidence. See section 6 of the Telecommunications
7 (Interception and Access Act) 1979 (Commonwealth),
8 section 7(3)(a) and (b)(i) of the Surveillance Devices Act
9 2007 (New South Wales), and section 11(2)(a),(b)(ii) of the
10 Surveillance Devices Act 1999 (Victoria).

11
12 If there is no further objection to the proposed
13 evidence, it may be admitted. Is there any further
14 objection to its reception?

15
16 MR STOLJAR: No.

17
18 THE COMMISSIONER: Very well. Yes, Mr Stoljar.

19
20 MR STOLJAR: I would ask, first of all, that Ms Jackson
21 return to the witness box.

22
23 <KATHERINE JACKSON, on former oath: [10.05am]

24
25 <EXAMINATION BY MR STOLJAR CONTINUING:

26
27 Q. Ms Jackson, you are under your oath that you gave
28 yesterday. Yesterday, during your evidence, we heard from
29 you evidence about a meeting of the council that took place
30 on 13 February 2012, at which there was debate about what
31 had happened to financial records of the No 3 Branch. Do
32 you remember that evidence?

33 A. Yes.

34
35 Q. Your evidence in substance yesterday was to the effect
36 that after the merger, persons from the Sydney office had
37 come down to Melbourne in about September 2010 while you
38 were on leave and had gone through the records of the
39 branch, what used to be the No 3 Branch?

40 A. Yes.

41
42 Q. You were told, you said in your evidence yesterday,
43 that staff from the No 3 Branch who were there during that
44 visit described what had happened as a "chuckfest"?

45 A. Yes.

46
47 Q. You had some debate during the course of the meeting

1 on 13 February 2012 that you recorded with persons in
2 attendance in the meeting about what had actually happened
3 during the course of that visit in September 2010?

4 A. Yes.

5
6 Q. What I propose to do, although the minutes of that
7 meeting are in evidence, is to play a recording of a part
8 of that meeting which records some of that discussion and
9 then I'll ask you some questions about it to see whether it
10 sheds any further light as to what may have happened to the
11 records of No 3 Branch.

12
13 I would ask that an extract from the proceedings of
14 meeting be played?

15 A. Can I just say I think it is meeting of 28 March 2012.

16
17 Q. That may have been a meeting at which there was
18 separate discussion, but, in any event, we'll listen for
19 the time being to parts of the meeting of 13 February 2012.

20 A. Yes.

21
22 Q. I'd ask that the recording from the point 11 minutes
23 and 51 seconds be played.

24
25 (Audio played)

26
27 THE COMMISSIONER: Shall we mark that Jackson MFI3,
28 tape-recording of part of a meeting of HSU East executive
29 committee held on 13 February 2012?

30
31 MR STOLJAR: May it please the Commission.

32
33 **JACKSON MFI#3 TAPE-RECORDING OF PART OF A MEETING OF HSU**
34 **EAST EXECUTIVE COMMITTEE DATED 13/02/2012**

35
36 MR STOLJAR: Q. Ms Jackson, there were a number of
37 voices on that recording. Who is Stuart?

38 A. Stuart Miller was an administrative officer, admin
39 clerk, at the Victorian branch. On amalgamation, he
40 remained that. Once Ms Glen resigned, Mr Williamson
41 appointed Stuart Miller into Ms Glen's position as a
42 divisional secretary to pay off his loyalty to him because
43 he would do the right thing by Mr Williamson, which meant
44 that he would do as he was told by his factional leaders in
45 Victoria.

46
47 Q. I just want to clarify - he was someone who had worked

1 at the Victorian branch?
2 A. Yes.
3
4 Q. Was Mr Miller's voice the male voice saying that he
5 had gone through the boxes and sorted them into three
6 categories or was that someone else?
7 A. No, I think that was Mr Bob Hull.
8
9 Q. Mr Bob Hull?
10 A. Yes.
11
12 Q. Then Mr Hull said if it was him on MFI3, that he
13 identified documents in three categories: industrial,
14 secondly, personal and, thirdly, financial and then he said
15 he'd given them to Barry. Who is Barry?
16 A. Barry Gibson was the financial controller of the HSU
17 East Branch and previous to that he was the financial
18 controller for the New South Wales Branch.
19
20 Q. Prior to the merger, documents had been kept in the
21 way that you outlined yesterday, that is, Ms Holt had kept
22 all the primary records in lever-arch folders and so forth?
23 A. Yes.
24
25 Q. And also in MYOB. In this visit, documents were
26 bundled up by Mr Hull or others, as you understand it, you
27 weren't there, and given to Barry, and then what happened?
28 A. That's the whole point, I don't know what happened
29 then. We requested the documents. Once the allegations -
30 once they started to make allegations after I went to the
31 police, we kept on requesting those documents, I requested
32 those documents, and they kept on saying they didn't have
33 any documents to give me.
34
35 Q. The resolution requested that you, as executive
36 president, carry out some searches for documents and send
37 them to Sydney?
38 A. As the president of the branch, yes.
39
40 Q. As we stand here today, we still are not able to find
41 quite a number of minutes of BCOM meetings and the like, so
42 we don't know where they went but, in any event, you
43 certainly have not been able to find them in your searches
44 since that February meeting of the executive committee?
45 A. That's correct. Well, I understood from that February
46 meeting that whatever they took away when they did their
47 clean up, so to speak, went to Sydney, and then I heard

1 nothing else about it until the allegations started to be
2 made and then I sought those documents back from Sydney and
3 they said that they didn't have any documents and then
4 I asked the administrator the same questions and got the
5 same response.

6

7 Q. Do you know who precisely came - and if you don't
8 know, don't speculate - but do you know who actually came
9 from Sydney for the visit in September 2010 when there was
10 the clean up or reorganisation or whatever it was?

11 A. I think it was earlier than September. I believe it
12 was in August of 2010, but I'm not sure about that. No, I
13 don't know, but I've been told that Bob Hull was there,
14 Stuart Miller was there, Darren Williamson was there,
15 Michael Williamson was there, and did I say Barry Gibson?
16 I did say Barry Gibson.

17

18 Q. No, you haven't mentioned him.

19 A. And Barry Gibson.

20

21 Q. So he was there?

22 A. He was there. There may have been others from
23 New South Wales, but they're the ones that I was told were
24 there.

25

26 Q. When the male voice that may be Mr Hull says "I gave
27 them to Barry", Barry was likely, as far as you know, to
28 have been there on the same occasion?

29 A. Yes.

30

31 Q. Could I come to a different topic. Paragraph 416 of
32 your statement. You're dealing here with the National
33 Health Development Account.

34

35 I want to start off by asking you some questions about
36 the origin of the funds that went into that account. In
37 416 you say that in late 2003, No 3 Branch received an
38 amount of about \$250,000 from the Peter MacCallum Cancer
39 Institute - Peter Mac. I know this is a long time ago,
40 it's 11 years ago, and I gather - do you have, as you sit
41 here now, any records of the actual court proceedings,
42 written records?

43 A. I have an advice.

44

45 Q. Yes. You mention that in 417, but I meant the
46 underlying court records, you don't have those?

47 A. No.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47

Q. Doing as best you can with your memory, were proceedings brought by the No 3 Branch against the Peter MacCallum Cancer Institute in respect of some breaches of awards or the like?

A. Yes. Just from memory, Peter Mac, we were enterprise bargaining and we had been for a couple of years, and in those previous two agreements a new - not a new, but a structure had been reached for the research scientists at Peter MacCallum. Peter MacCallum did not apply those wage increases to those people because they thought they were outside that agreement but obviously they weren't. So eventually the union took action to resolve this dispute with Peter Mac and we took court action, but in that dispute there was a dispute that was launched against Peter Mac, and I say it was excellent industrial work that was done by the branch on behalf of its members. A large number of members received a settlement in respect of their outstanding entitlements, but they also received a new structure and a new enterprise agreement that came out of that and security of employment.

Q. I'll take you through it step by step just in bite sized pieces. The first point is did the proceedings actually go to a final hearing in court and was judgment given?

A. No.

Q. Was there a compromise of those proceedings, a settlement?

A. Yes.

Q. I think you were just enumerating various matters that were components of that settlement, so I'll endeavour to take them one by one. As a component of that settlement, did members of the union who were working at the Peter MacCallum Cancer Institute get some payment?

A. Yes. They got a - they got their own settlement in respect of their outstanding entitlements. There was millions of dollars at the time, so union reached agreement about that and, in return, the members got an enhanced career structure and security of employment, and that's how we settled with the Peter MacCallum Cancer Institute on behalf of the membership.

Q. So the members got some payment and in addition, on your memory, they got some guarantee about security of

1 tenure or the like going forward?

2 A. And a new structure.

3

4 Q. And a new structure. The proceedings had been brought
5 alleging breaches of the award; is that right?

6 A. Yes. Of the enterprise agreement.

7

8 Q. And the enterprise agreement. And separate from what
9 the members received, was some component of the settlement
10 referable to the union?

11 A. That's right.

12

13 Q. What was that?

14 A. In addition, the union was a separate litigant in its
15 own right pursuing fines against the employer, as it was
16 our right and as many unions do, and then we settled for a
17 sum of money that was properly payable to the union, and it
18 had nothing to do with the members' entitlements and the
19 whole arrangement was approved by a members' meeting at
20 Peter MacCallum because it affected them, and the advice we
21 received from counsel is somewhere in my affidavit or in
22 the tabs. As I've said - as I just said, the whole
23 arrangement was approved by the membership. They got their
24 entitlements as they were - you know, that's why you run
25 these cases, but in the same breath the union was a
26 litigant in its own right to seek penalties under the Act
27 for the employer being in breach. But what we've seen in
28 the media in the last couple of days is that I - you know,
29 I couldn't find the members and somehow the union took this
30 money secretly and we, you know, put it away and all this
31 sort of stuff. That did not happen. The union had its own
32 case that it ran for penalties under the Act, and we were
33 successful in getting those penalties.

34

35 THE COMMISSIONER: Q. Ms Jackson, you would understand
36 industrial law generally. This action was in the Victorian
37 tribunal, was it?

38 A. No, it was - Peter MacCallum is covered by a Federal
39 award.

40

41 Q. So it was in Federal industrial tribunals?

42 A. Yes.

43

44 Q. It is a feature of that type of litigation that if a
45 person other than the state or a government brings
46 proceedings for penalties, they can keep the whole of the
47 penalty or a fraction of the penalty?

1 A. Yes. The organisation. The penalties - the penalty
2 or the settlement that was reached with Peter MacCallum -
3 because it didn't end up going to court, it was a
4 settlement that we reached with Peter MacCallum, the
5 penalty was paid directly to the union and, separate to
6 that, Peter MacCallum reached an agreement through the
7 union with their employees.

8

9 THE COMMISSIONER: Yes. I understand.

10

11 MR STOLJAR: Q. Just to clarify, when you say "the
12 penalty was paid", it was an amount paid pursuant to the
13 compromise agreement that was reached?

14

15 A. Yes.

16

17 Q. The net result to the No 3 Branch was that an amount
18 of about \$250,000 was paid to it by Peter Mac?

19

20 A. Yes.

21

22 Q. You say at 421 there was a long discussion at a BCOM
23 meeting about what to do. Just pausing there, do you
24 recollect who were the members of the BCOM at about that
25 time?

26

27 A. No, I don't, only because I don't have access to the
28 minutes, but if you --

29

30 Q. I can take you to one minute. It is not late 2003,
31 but there are a few minutes still in existence, and one of
32 them is in Mr Dixon, MFI1. I'll just see if we can bring
33 that up. If you go to page 1 behind tab 1, it's a
34 committee - I'll keep calling it a BCOM meeting at 9 April
35 2003. I know that's not late 2003 but perhaps the
36 committee was similarly constituted in early 2003. It says
37 at the top third of the page "Present", and then there are
38 a number of people identified. Were they members of the
39 committee as best as you can recall or most of them in
40 2003?

41

42 A. Yes.

43

44 Q. Then there are some apologies in item 1. Were they
45 other persons who were members of the committee?

46

47 A. Yes.

Q. Who were the members of the committee? Where are they
drawn from?

A. The rank and file membership. For example,
Mark Hindson is a physiotherapist. Kathryn Whitfield was a

1 health information manager, a clinical coder. Kate
2 Wilkinson was a radiation therapist. Jenny Dunlop was a
3 deputy chief radiographer. Lisa was an occupational
4 therapist. Reuben Dixon was a radiographer. Olga Gountras
5 was a social worker.
6

7 Q. The persons who weren't able to attend that meeting?

8 A. Sorry, Bryan Yeates was a prosthetist and orthotist.
9 Kristine Olaris was or is a physiotherapist. Adriana
10 Vespecci is a speech pathologist and Robbie Matejin is a
11 radiographer or medical imaging technologist.
12

13 THE COMMISSIONER: Q. Did you say what Lisa Magnusson's
14 occupation was?

15 A. Occupational therapist.
16

17 Q. Right. Thank you. For some of these occupations one
18 needs significant training, presumably?

19 A. Yes. They're all Bachelor of Science, four year
20 qualified.
21

22 Q. Roughly what age span were they? Were they everything
23 from sort of 20s to 60s?

24 A. Maybe not 60s, but late 20s to - this is 2003 - to
25 50s, mid-50s.
26

27 THE COMMISSIONER: Thank you.
28

29 MR STOLJAR: Q. They were persons with significant
30 training and experience?

31 A. Yes, definitely, and some of the people - I don't know
32 at the time, but Jenny Dunlop was quite a senior person in
33 her organisation. As I said, she was a deputy chief
34 radiographer at Monash Medical Centre and I still think she
35 holds that role today. Kate Wilkinson was the clinical
36 educator in quite a senior position in her organisation.
37 Mark Hindson is quite a senior - I think he's a spinal
38 physiotherapist at Austin Health. Lisa Magnusson works in
39 occupational therapy and community health and
40 Mr Bryan Yeates has been one of our longest serving
41 members. He's recently retired, but I think he was a
42 member of the union for 40 years. He was one of the first
43 prosthetists and orthotists, which are limb-makers, that
44 were employed in Victoria.
45

46 Q. Coming back to your statement, you said in 421 there
47 was a long discussion at a BCOM meeting about what to do

1 with the Peter Mac settlement moneys.

2 A. Yes.

3

4 Q. You suggested - and I am now going to 422 - that this
5 was an opportunity to establish the discretionary fund.

6 Did you make that suggestion at a meeting of the BCOM?

7 A. Yes.

8

9 Q. What did you actually say?

10 A. I would have said words to the effect that - we would
11 have spoken about the settlement. Obviously members knew
12 about the settlement and talked about how there was, you
13 know, \$250,000 coming the union's way. The union at that
14 time, and at most times under my leadership, was in a very
15 healthy financial state for a small industrial
16 organisation, and I suggested to them, after speaking to
17 some of the members as well, that we should set up a
18 discretionary fund that we would be able to use to fund
19 campaigns and the political interests and industrial
20 interests of the branch.

21

22 As I said yesterday, because it was such a small
23 branch, just having a fund where members put money in per
24 week would not be sufficient for these activities and, more
25 importantly, when, for example, campaigns were being run,
26 be it your rights at work or campaigns where staff had to
27 be released to assist the ALP or other unions at times, we
28 weren't large enough to be able to do that because you
29 couldn't afford to have any employees off the job, so to
30 speak, going off to run campaigns elsewhere. So,
31 therefore, we decided to set up this discretionary fund
32 that instead of giving manpower or people power, booking
33 for staff off, that we would be able to contribute in a
34 financial manner.

35

36 Q. You say in 422 that the suggestion was supported by
37 several members of the BCOM?

38 A. Yes.

39

40 Q. We've just seen - I didn't count them - but there must
41 have been about 10 members at that time at least. Were
42 some members opposed?

43 A. From memory, no, I don't think they were opposed. It
44 was all about having - making the best use of the money and
45 we had situations in the past, particularly in the mid-90s,
46 when the union had almost - not gone under, so to speak,
47 but where there was a big case we'd run in the - I think it

1 was in the Supreme Court about entitlements and if we
2 hadn't won that case and had penalties awarded against us,
3 then that would have wiped out the union. But by
4 2003-2004, the union was in a very healthy financial
5 situation and that was never going to - we were never
6 going - that was never going to happen to us again because
7 payroll deductions had come - would fix the problems that
8 we had with payroll deductions or rather losing payroll
9 deductions. So no, there wasn't - from memory, there
10 wasn't any opposition. There were discussions certainly
11 about how we should do it and which was the right way -
12 which was the right path to take to establish this fund.
13

14 Q. You make reference in 422 to political donations. Was
15 there discussion about that topic at the BCOM?

16 A. Yes. The union was an affiliated - was affiliated to
17 the Labor Party and members understood - members of the
18 committee understood what that meant, and that's not to say
19 that every member of that committee of management was -
20 keep in mind this is a group of health professionals and it
21 wasn't a situation where, you know, this would just be used
22 for ALP purposes because there was a variety of views held
23 on that committee.
24

25 Q. In 423 you say:

26
27 *Eventually the BCOM reached agreement and a*
28 *resolution was passed ...*
29

30 Was that a formal resolution passed at a BCOM meeting?

31 A. Yes.
32

33 Q. Was it recorded in writing?

34 A. Yes.
35

36 Q. If we had the minutes, would we be able to --

37 A. You would easily be able to identify that the state
38 secretary would have said something like the state
39 secretary is authorised to put aside this money into the
40 NHDA and that we would not put the whole money in there
41 immediately but, as needed, the money would go into that
42 account and - sorry - and that we would use this money in
43 conjunction with the Victorian No 1 Branch.
44

45 Q. Did the resolution stipulate whether the whole of the
46 Peter Mac settlement moneys, if I can call them that, would
47 go into that or be covered by that arrangement or some

1 part?

2 A. The whole of the money.

3

4 Q. Was there any provision in the resolution concerning
5 whether or not you would have access to some component of
6 those moneys for your personal use?

7 A. Yes, there was.

8

9 Q. What was said about that?

10 A. The resolution, from memory, went on to say that
11 I could - I was authorised to spend up to \$4,000 of that
12 money per annum in lieu of sitting fees and the work
13 overtime, et cetera.

14

15 Understand that - most union officials will tell you
16 this - when you work in a union, it is not a nine to five
17 job. You're there, it's a lifestyle, so to speak, so that
18 was to compensate me for that sort of out of hours work and
19 the sitting fees and meetings that I did very regularly out
20 of hours.

21

22 Q. You say that you recorded that in - it's in the
23 minutes and you make reference, you've given evidence about
24 the minutes, but you also maintained a minute book.
25 I think you gave some evidence about that yesterday. The
26 minute book is among the records that can no longer be
27 found?

28 A. Yes.

29

30 Q. But you, to the best of your recollection, included
31 within the minute book that you maintained a copy of the
32 minute that was passed in late 2003?

33 A. Oh, definitely. Yes. Yes.

34

35 THE COMMISSIONER: I think there is a mistake in
36 paragraph 424 of the statement. It says.

37

38 *... the minute book has disappeared in the*
39 *circumstances addressed at paragraph 384*
40 *above.*

41

42 384 doesn't deal with that subject. It is probably
43 intended to say 388 to 390, or something like that. Those
44 paragraphs deal with the taking of the document.

45

46 MR STOLJAR: Q. Yes. Is that a correction that should
47 be made to your statement, Ms Jackson? Should the

1 reference to --
2 A. Yes.
3
4 Q. So in 424 the reference should be not to "384" but
5 rather to "388 to 390 inclusive above"?
6 A. Yes.
7
8 Q. You say that when there was discussion about it, it
9 was referred to as the Peter Mac money?
10 A. That's correct.
11
12 Q. When you talked about that at meetings and the like,
13 you tended to designate it as the "Peter Mac" money --
14 A. The Peter Mac money.
15
16 Q. -- rather than the NHDA?
17 A. That's correct.
18
19 Q. But as you say in 426, after the BCOM approval, you
20 opened a bank account at the Commonwealth Bank. Can
21 I provide you with a folder of documents which have been
22 produced in answer to a notice to produce by the
23 Commonwealth Bank.
24
25 THE COMMISSIONER: That should be marked Jackson MFI4,
26 Mr Stoljar?
27
28 MR STOLJAR: May it please the Commission.
29
30 **JACKSON MFI#4 FOLDER OF DOCUMENTS PRODUCED IN ANSWER TO A**
31 **NOTICE TO PRODUCE BY THE COMMONWEALTH BANK**
32
33 Q. Would you come to page 3 of MFI4. You are there
34 looking at a CBA authority for a non-personal account which
35 was completed on or about 4 December 2003. Have you seen
36 this document before?
37 A. No.
38
39 Q. When you said in your paragraph 426:
40
41 *In December 2003 ... I opened a bank*
42 *account ...*
43
44 That was just going on your memory at the time?
45 A. Yes.
46
47 Q. So you've got a reasonable memory of these events?

1 A. Yes.

2

3 Q. Is the handwriting on that document your handwriting?

4 A. No. The signature is mine but the handwriting is not.

5

6 Q. The name of the account is National Health Development
7 Account. Who came up with that name?

8 A. I think we just talked about it at that meeting and

9 I would have had discussions with the No 1 Branch as to
10 what we should call it, and that was the amount - sorry,
11 not the amount, that was the account name we came up with.

12

13 Q. On page 5 of the document, there is a signature in
14 section 8. Is that your signature?

15 A. Yes, it is.

16

17 Q. It says:

18

19 *Complete this section for Unincorporated*
20 *Association Accounts.*

21

22 Were you contemplating operating the account through an
23 unincorporated association?

24 A. At that point, just from memory, I just went down to
25 open the account. I had an intention that we would
26 formalise it at some point and have an incorporated
27 association with rules and constitution, what have you, but
28 never got around to doing that. But, yes, at that point,
29 it was set up as an unincorporated association.

30

31 Q. Is what you're saying that at that time, 4 December,
32 2003, you contemplated doing that but the fact is you never
33 ultimately did set up an unincorporated association?

34 A. That's correct.

35

36 Q. Do you remember why you were looking at using an
37 unincorporated association?

38 A. No.

39

40 Q. Is that something just from your time in the union
41 movement you'd come across before, unincorporated
42 associations running accounts of this kind?

43 A. Yes. Just from memory there was - I remember asking
44 various people - not just then but throughout the whole
45 time. For example, if you were running a campaign and -
46 I don't know, say you were running a campaign for a
47 particular electorate or a federal electoral committee, or

1 whatever, the advice that I'd been given by various people
2 within the Labor Party was just to set up an unincorporated
3 association.

4

5 Q. Were you given the --

6 A. When I say - sorry?

7

8 Q. Let's take that again in steps. First of all, you
9 were there referring more to the Labor Party. I was more
10 interested really in what unions did. Is that something
11 that other unions were doing that you know of, setting up
12 unincorporated associations?

13 A. That was my understanding, yes.

14

15 Q. Where did you derive that understanding?

16 A. Just from talking to other officials at that time and
17 through that time.

18

19 Q. Did those discussions you were having give you any
20 insight into the benefits that those officials apprehended
21 accompanied the establishment of an unincorporated
22 association?

23 A. No.

24

25 Q. It was just something that was done?

26 A. It was just something that was done, yes.

27

28 Q. Could I just ask you to put MFI4 to one side for a
29 moment. Keep it there. Just come back to your statement.
30 In fact, you say in 427 that you had planned to establish
31 an unincorporated association "in which my then husband,
32 Mr Jackson, would play a part", but in the end you didn't
33 get around to it?

34 A. Yes.

35

36 Q. Then you say:

37

38 *I was the sole operator of the NHDA since*
39 *its inception.*

40

41 A. Yes.

42

43 Q. And then 429:

44

45 *I certainly discussed the opening of the*
46 *NHDA with the BCOM ...*

47

1 When did you do that?
2 A. After that had occurred, once the bank had sent me
3 details and, you know, I had an account number and what
4 have you, I informed the branch committee of management
5 that the account had been opened and it was called the
6 NHDA, and also that there would be a separate ledger in the
7 accounts that recorded this.
8
9 Q. In the books of account maintained by the No 3 Branch?
10 A. Yes.
11
12 Q. In the MYOB records and the like?
13 A. In the MYOB records, yes.
14
15 Q. In 431 you say that the Peter Mac money was expended
16 by you over a period of years between 2004 and 2010. Just
17 tell us about the process pursuant to which you were able
18 to effect those expenditures?
19 A. So, depending on what was happening between those
20 years then there would be money withdrawn, money would be
21 kept. People would ask for money, or requests would come
22 in either from Mr Jackson at the No 1 Branch, or others,
23 about what they needed money for and then I would give them
24 the money for those purposes. For example, it may have
25 been for printing, as I said yesterday, it may have been
26 for campaigns, it may have been for staff events, but
27 usually it would be spent on campaigns and reimbursing of
28 members and the like.
29
30 Q. Yesterday you were giving evidence about a separate
31 sum of money which was the money remaining after members of
32 the BCOM had received the \$100 cash payment per meeting
33 each?
34 A. Yes.
35
36 Q. You said that you kept that in a kitty, in a steel tin
37 or the like, in your office?
38 A. Yes.
39
40 Q. And used it for purposes of the kind you were just
41 describing?
42 A. Yes.
43
44 Q. That process, as I understand it, continued through
45 this period?
46 A. Yes.
47

1 Q. So there was that fund and then separately from late
2 2003 or early 2004, there was this other NHDA fund?
3 A. But the money was used for the same purposes.
4
5 Q. The same purposes?
6 A. Yes.
7
8 Q. So a range of different purposes?
9 A. Yes.
10
11 Q. Did you go back to the BCOM and seek approval each
12 time you deployed some of the money that was in the NHDA?
13 A. Not every time, but at every committee meeting, if
14 money had been taken out, it will appear in the statement -
15 not in the statement, in the financial reports.
16 Occasionally a member would ask "What did we spend that
17 on?", and they would get a reply where the money was spent
18 when the financial report was given.
19
20 Q. When you say taken our, you mean --
21 A. A withdrawal.
22
23 Q. A withdrawal from the funds maintained by the union
24 which had been received by it in the settlement with Peter
25 Mac?
26 A. Yes.
27
28 Q. When you say "withdrawal", you mean funds were
29 transferred from some union account into the NHDA?
30 A. Yes.
31
32 Q. And you say that if people queried what was happening
33 with that, you would provide an explanation?
34 A. Yes.
35
36 Q. What about once funds had reached the NHDA, the
37 account that you were maintaining, and you were deploying
38 them in one way or another, did you go back to the BCOM and
39 seek approval for that?
40 A. No. No, I didn't, but - when I say I didn't, for
41 example, say the Australian Institute of Radiographers had
42 a ball on or a function on, then people would say "Well,
43 how are we paying for that?", and I would say, "Well, we
44 have the NHDA money to pay for that." So it was done in
45 that sort of fashion.
46
47 Q. You say in 432:

1
2 *Over the years, I often discussed with the*
3 *BCOM a proposal to transfer monies from the*
4 *Peter Mac Fund.*

5
6 When you say "the Peter Mac Fund", what do you mean?

7 A. The NHDA.

8
9 Q. So you're saying - well, when you say the NHDA, you
10 mean the account with CBA that you opened in December 2003?

11 A. Yes.

12
13 Q. You say here:

14
15 *I often discussed with BCOM a proposal to*
16 *transfer monies from [that account].*

17
18 But you say:

19
20 *I did not seek the approval of the BCOM ...*
21 *because the transfers were all covered by*
22 *the original approval in late 2003.*

23
24 A. Yes.

25
26 Q. What did you mean by that?

27 A. What I meant by that was if I needed to withdraw, say,
28 I don't know, \$4,000 or \$5,000, or whatever the amount, I
29 would just withdraw that amount. That amount would then
30 appear on the financial statements. So I didn't go to the
31 Branch Committee of Management and before I withdrew the
32 money and say this is what was going to happen before
33 I withdrew the money.

34
35 Q. What was your practice? You say something about it in
36 432, was to go back to the BCOM afterwards; is that the
37 position?

38 A. That's correct. Particularly when the statements,
39 when the financial reports were being presented, on
40 occasion people would ask about the NHDA money.

41
42 Q. But did the financial reports presented to the BCOM
43 descend into the detail of - I'll take that step by step.
44 Did the financial reports presented to the BCOM identify
45 money that had come across from a union account to the
46 NHDA; that's right?

47 A. Yes.

1
2 Q. Did they descend into the detail of how the money had
3 been spent once it had reached the NHDA?
4 A. No.
5
6 Q. How would members of the BCOM find out, if they did,
7 about what had happened once it reached the NHDA?
8 A. Because I kept an exercise book that had - it was just
9 handwriting, when the withdrawal was made, how much it was
10 for and where it went.
11
12 Q. Is that the exercise book to which you refer in 439?
13 A. Yes.
14
15 Q. You kept a record of the money spent out of the NHDA.
16 Did you go back to the BCOM and discuss with them how the
17 money was being applied from time to time?
18 A. From time to time, yes.
19
20 Q. You say that was - tell me if this is correct or not.
21 Do you say that was an informal process?
22 A. Yes.
23
24 Q. Could you come, please, back to MFI4. That's the
25 folder of CBA accounts. On page 8 - I should mention,
26 Ms Jackson, the records the bank maintained only went back
27 a certain period of time. As I understand it, this was
28 about as early as we were able to obtain. Picking up the
29 story on page 8, 14 August 2007, there is an ATM --
30 A. Sorry, which page are you on?
31
32 Q. Page 8 in the top right-hand corner.
33 A. Yes.
34
35 Q. It says an opening balance of \$6,259.45 and then on
36 1 November there's a withdrawal in the amount of \$500.
37 Would that have been a withdrawal that you would have
38 effected?
39 A. Yes, probably.
40
41 Q. You were the only person operating the account?
42 A. Yes.
43
44 Q. Do you have any recollection, as you sit here today -
45 and I'm sure that you may well not - as to what that money
46 was spent on?
47 A. No.

1
2 Q. Is that money that you would have used for union
3 purposes or personal purposes?
4 A. Union purposes.
5
6 Q. Coming over to the next page, page 9, there are some
7 withdrawals on 26 November and 4 December respectively?
8 A. Correct.
9
10 Q. Do you have any recollection as to what matters those
11 withdrawals related?
12 A. Which dates are we talking about?
13
14 Q. 26 November and it says "YG'S" - it seems to be
15 Young Generation?
16 A. Oh, yes, yes, yes. Sorry, yes, I can. Sorry.
17
18 Q. And then on 4 December Kip McGrath Education?
19 A. Yes. So what I did was that - because I had been -
20 I had the - I thought it was prudent of me, so people
21 didn't make any allegations that I was misspending the cash
22 component, I decided in relation to that \$4,000 that
23 whatever withdrawal I made for my purposes that it would be
24 shown exactly where that money was spent, so if anybody
25 asked me about that money, then it was easily identifiable
26 as my expense, and that's why I used it in that fashion.
27 So 26 November, for example, is mine; 4 December is mine.
28
29 Q. Just pausing there.
30 A. Sorry.
31
32 Q. When you say "mine", what do you mean?
33 A. As part of my \$4,000.
34
35 Q. So those withdrawals, 26 November and 4 December
36 respectively, were effected by you?
37 A. Yes.
38
39 Q. And the money was applied for personal purposes, not
40 union purposes?
41 A. Yes.
42
43 Q. But is this the position - and please correct me if
44 I've got it wrong - you say that that was within the \$4,000
45 allowance that had been afforded you by the BCOM in late
46 2003?
47 A. Yes.

1
2 Q. On 6 December and then again on 21 December there were
3 transfers, it looks like, in amounts of \$8,000 each?
4 A. Yes.
5
6 Q. And one can see that that had come across from the
7 No 3 Branch account?
8 A. Yes.
9
10 Q. Would they have been transfers that you caused to be
11 effected?
12 A. Yes.
13
14 Q. Do you recollect what those two sums of \$8,000 each
15 were spent on?
16 A. Just looking at those dates, I imagine they would have
17 been spent on - around that time a lot of Christmas parties
18 and delegates things are being held. A lot of the time we
19 spent a lot of that money buying vouchers for different
20 delegates across the state.
21
22 Q. Vouchers for what purpose?
23 A. To thank members for work they had done.
24
25 Q. Gifts you mean?
26 A. Yes.
27
28 THE COMMISSIONER: Q. Have you finished your answer?
29 A. Yes.
30
31 Q. Ms Jackson, those two \$8,000 figures are credits in.
32 There are no debits out in December, or January, or
33 February there recorded; debits out again in March on
34 page 10.
35 A. Oh, I see.
36
37 Q. Do you see?
38 A. Yes.
39
40 Q. You couldn't have been funding vouchers and Christmas
41 parties merely by money going into the account. The
42 question is what happened when the money came out of the
43 account?
44 A. When the money came out of the account it sat in that
45 grey box, but I'm just saying that there would have been -
46 there may have been money in the box that we would have
47 used at that time, which was normal practice, to pay for

1 that, and that may have come out of the sitting fee
2 component and that would have been to top that up.

3

4 MR STOLJAR: Q. When you say "that box", you mean the
5 kitty, as you described it yesterday?

6 A. Yes.

7

8 Q. You didn't top up the box in the balance of 2007 going
9 into 2008. The first significant withdrawal was on 6 March
10 2008 for the sum of \$6,000. Do you know what that was for?

11 A. No, not from memory.

12

13 Q. What were the kinds of things that you were
14 withdrawing sums of that magnitude from the NHDA?

15 A. It would have been - just from memory, it would have
16 been withdrawn to pay for, I don't know, different
17 campaigns that people may have asked us money for at the
18 time, but just from looking at that date, I just can't
19 remember.

20

21 Q. Union campaigns or political campaigns?

22 A. Union and/or political campaigns.

23

24 Q. How would the withdrawal have been effected - by cash?

25 A. Yes.

26

27 Q. And then handed over to somebody?

28 A. Yes. And when I say handed over to somebody, they may
29 not have got the whole amount.

30

31 Q. Are there any records, or were there any records
32 identifying with any more precision how that cash was
33 applied?

34 A. No, other than what existed in my exercise book, no,
35 there isn't.

36

37 Q. I see. Just keeping that folder, MFI4, with you and
38 going back to 439, you say that the record that you kept
39 included the date, payee, amount and purpose?

40 A. Yes.

41

42 Q. There are some more comparatively small expenditures
43 during 2008 and I can see various cash sums. For example,
44 18 April, it says 50, and then the numeral 4, 349, and then
45 there's a payment --

46

47 THE COMMISSIONER: That's not a cash sum, that would be a

1 cheque, wouldn't it? I mean 6 March withdrawal, that seems
2 to be cash, but when there's a payee nominated, one would
3 expect it to be a cheque or possibly a direct transfer.
4
5 MR STOLJAR: Q. Ms Jackson, are you able to --
6 A. Which page are you on, sorry?
7
8 Q. Page 10 in the top right-hand corner.
9
10 THE COMMISSIONER: There is a cheque number it seems
11 likely, 930018.
12
13 MR STOLJAR: Ms Jackson may comment, but unless,
14 Commissioner, it is use of a card to which some receipt
15 number was allocated.
16
17 THE COMMISSIONER: Yes.
18
19 MR STOLJAR: Q. Ms Jackson, do you have a recollection
20 of how that --
21 A. No, I don't know what that is.
22
23 Q. Did you have a card that you used to operate this
24 account?
25 A. Yes.
26
27 Q. Was it also a cheque account?
28 A. No, not from memory. It says "cheque account" up here
29 but I don't ever recollect writing a cheque.
30
31 Q. For example, the payment on 6 May 2008, which looks
32 like to a doctor --
33 A. Yes.
34
35 Q. -- that would have been effected by use of the card?
36 A. Yes.
37
38 Q. That was presumably for a personal purpose?
39 A. Yes.
40
41 Q. Likewise, 18 April?
42 A. Yes.
43
44 Q. The smaller amounts that were coming out from time to
45 time were generally for personal purposes, is that right,
46 and the larger withdrawals may have been for some other
47 purpose?

1 A. Yes.
2
3 Q. Coming over to page 12, there are two withdrawals in
4 May of \$4,000 each. Were they cash withdrawals, do you
5 remember?
6 A. Yes.
7
8 Q. Do you remember what they were used for?
9 A. No.
10
11 Q. Would they have been used for personal purposes or
12 union purposes?
13 A. Definitely not. They were used for either political
14 or industrial purposes.
15
16 Q. If you come to page 14, there's an amount of \$8,000
17 transferred across and then there's another withdrawal of
18 \$3,000. Do you know what that was about?
19 A. No.
20
21 Q. What about the withdrawals on page 15, 26 November
22 2008, there's a withdrawal of \$7,000 and then on
23 24 December another withdrawal of \$5,000. Do you have any
24 recollection of what those withdrawals may have been used
25 for?
26 A. No. When I say "no", as I have said previously - what
27 year was that? Political or industrial purposes.
28
29 Q. Did you wish to add to your answer?
30 A. No. Sorry.
31
32 Q. Page 16, there's an amount of \$50,000 comes across on
33 23 March 2009 from HSU No 3 Branch and the following day a
34 withdrawal for the same amount, \$50,000. What was that
35 about?
36 A. That was in relation, I think, just from memory, with
37 the No 1 Branch, but I can't be certain of that, about
38 debts that they had, and I believe that that was given to
39 them.
40
41 Q. Do you remember how that withdrawal was effected?
42 A. No.
43
44 Q. It is unlikely that you went to the bank and withdrew
45 a cash sum in that amount, is it not?
46 A. I'm not - I'm not - I couldn't say either way, sorry.
47

1 Q. When you say it was paid across to the No 1 Branch,
2 was that done electronically or some other way?
3 A. Oh, look, this is the first time I've seen this, so
4 I'm not positive. It may have been paid across directly to
5 the No 1 Branch but I'm not - I'm just not positive of
6 that. I can't --
7
8 Q. When you say it is the first time you saw it, the
9 Commission provided you with these account statements?
10 A. Yes, but I did not go through every single page. I've
11 had Federal Court proceedings to deal with as well as this
12 Royal Commission.
13
14 Q. Can you come to page 18. There is a transfer across
15 on 5 October of \$8,000 and then two withdrawals on 16 and
16 22 October respectively in the amounts of \$5,000 and \$3,500
17 respectively. Do you remember what those transactions were
18 about?
19 A. No, I don't.
20
21 Q. Take a moment to read through the further pages of the
22 statement in MFI4, so pages 19 through to - in fact, if you
23 just go to page 25 because after that, just glancing at it,
24 there seems to be little activity on the account. Do you
25 have any memory, as you sit here today, of what the various
26 transactions, or the larger ones on that account, were for?
27 A. Depending on the time frame, it would have been used
28 for election purposes, be it at the various industrial
29 elections around that time, but I'm not positive.
30
31 Q. Can you be a bit more precise? Were there elections
32 in 2009?
33 A. Yes, there were.
34
35 Q. When did those elections take place in 2009, do you
36 remember?
37 A. No. No. It's in my affidavit somewhere though.
38
39 Q. You mean elections in the union?
40 A. Yes.
41
42 Q. HSU elections?
43 A. Yes.
44
45 Q. Could I take you to page 18, for example. On
46 16 October and 22 October 2009 there are two separate
47 withdrawals. Do you know whether either of those related

1 to those elections? If you don't know, just say.

2 A. I don't. I don't know.

3

4 Q. You don't know. In paragraph 444 of your statement
5 you say:

6

7 *I had no other record of the application*

8

9 *... apart from the ... exercise book.*

10 And you say that with your unaided memory, you can't recall
11 and that's in effect what you've said today. Then on the
12 top of page 50 of 63 you say.

13

14 *... most of the transactions I cannot now*

15

16 *recall without some other documents ...*

17 What other documents would assist you apart from the
18 exercise book?

19

20 A. Other documents that would assist me, I suppose, would
21 be when various elections were held, when various
22 State-Federal campaigns were held, when various fundraisers
23 were held, when various state- not state, local government
24 elections were held, and also when the various union
25 disputes/rallies and - what are they called - protests,
26 et cetera, that the union from time to time were involved
27 in.

28

29 Q. In 448 you say.

30

31 *... I did not claim or collect the*
32 *honorarium that had been approved by the*
33 *BCOM in respect of the additional duties*
34 *associated with performing the role of*
35 *Secretary of the No 3 Branch,*
36 *notwithstanding my full-time role as*
37 *National Secretary, I did not ...*

38

39 You're really just making two propositions in 448. The
40 first one relates to an honorarium that had been been
41 approved by the BCOM in respect of additional duties
42 associated with performing the role of secretary of the
43 No 3 Branch. You mean after the merger?

44

45 A. Yes. No, after - not after the merger. After I
46 became the national secretary.

47

48 Q. There was some evidence given about an honorarium that
49 accrued and ultimately reached the amount of about \$48,000,

1 from memory. Is that that honorarium you're talking about
2 there?

3 A. Yes.

4
5 Q. And that's quite separate from the sitting fees of the
6 BCOM that produced the funds or the money that was put in
7 the kitty?

8 A. Yes, that's correct.

9
10 Q. Then you say.

11
12 *... I did not utilise the full amount that*
13 *I had been authorised to utilise for*
14 *private purposes by the BCOM.*

15
16 What did you mean by that?

17 A. The \$4,000 that I was authorised to use, I did not use
18 the full amount per annum.

19
20 Q. You then deal with a \$5,000 payment to something
21 called AB Hinc. That relates to a dinner that was held at
22 a Lebanese restaurant on 22 April 2010. That's behind
23 tab 52. It is page 1032 of the third volume of MFI1.
24 There was a dinner at which Mr Pakula was speaking?

25 A. Yes.

26
27 Q. If you go over to 1033, that was recorded in the
28 branch accounts as a donation to a political party?

29 A. Yes.

30
31 Q. You say in 457 that the payment of \$5,000 to AB Hinc
32 was a lawful common garden political donation in the form
33 of the purchase of a table. In 458:

34
35 *I have no knowledge of any connection*
36 *between this transaction and the charity*
37 *known as "Australian Bringing Hope Inc".*

38
39 THE COMMISSIONER: Q. Mr Pakula was a member of the Labor
40 Party who was the Minister for Public Transport; is that
41 correct?

42 A. In Victoria, yes.

43
44 MR STOLJAR: Q. He was also the Minister for Industrial
45 Relations, was he not, at some point, or do you not
46 remember?

47 A. As much as you can be that in Victoria, yes,

1 I suppose.
2
3 Q. Could I show you John Agostinelli's statement. It is
4 the folder which has been marked MFI1 or Agostinelli MFI1.
5 Would you have a look at page 20. This is a bundle of
6 financial statements - I'm sorry, these are financial
7 statements for the period ending 24 May 2010, that's behind
8 tab 2.
9 A. Sorry, what tab are you on?
10
11 MR STOLJAR: Tab 2. Commissioner, in case of any
12 confusion, Mr Agostinelli's statement was contained within
13 a small folder that was marked on the cover MFI1 and there
14 were three volumes from the audit. I'm coming to the small
15 folder containing the statement itself.
16
17 THE COMMISSIONER: Yes, I've got that.
18
19 MR STOLJAR: I've handed the witness a copy. Behind
20 tab 2 --
21
22 THE COMMISSIONER: You mentioned page 20. Is that
23 numbering at the bottom?
24
25 MR STOLJAR: In the top right-hand corner.
26
27 THE COMMISSIONER: I haven't got that. What's the first
28 line on the page?
29
30 MR STOLJAR: Health Services Union Victoria No 3 Branch
31 for the period ending 24 May 2010.
32
33 THE COMMISSIONER: And then table of contents?
34
35 MR STOLJAR: No.
36
37 THE COMMISSIONER: What's the first important line on the
38 page?
39
40 MR STOLJAR: I'm sorry, yes, it is a table of contents
41 financial statements, yes, and there is a received date.
42
43 THE COMMISSIONER: Yes.
44
45 MR STOLJAR: Q. So that's the accounts audited by
46 Mr Agostinelli?
47 A. Yes.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47

Q. And if you come to page 38 --

THE COMMISSIONER: Does it have a number on the bottom of the front page?

MR STOLJAR: Top right.

THE COMMISSIONER: No, no, I haven't got it at the top right but I've got it --

MR STOLJAR: In the middle, at the bottom, it says 18.

Q. Mr Agostinelli, in item 13, has referred to Australia Bringing Hope Incorporated in an amount of \$5,000. Do you know where that's come from? Do you have any - is that just something that's happened subsequently?

A. I've never been asked about this. I saw this the first time when it was put up in here a couple of days ago, and I have had press inquiries about this obviously when they published a smear article about this. As far as I knew, when you look at that flyer that you showed me earlier or we went to earlier --

Q. Did you want to go back to that?

A. Yes.

Q. That's in volume 3 of your materials, tab 52.

A. 52. That was the flyer that we had received. I would have or - I or Frances Lindsay would have given this - we did attend this function. This would have been given to Frances and Frances would have passed it on to Jane for payment. The cheque was made out to AB Hinc and when I started to get calls from the media, particularly Fairfax, saying to me that I had sent \$5,000 to some organisation called Australia Bringing Hope Incorporated and they had been contacted and they had never received any money from the Health Services Union - and I explained to the journalist who obviously didn't listen to what I was saying that I had been to some charitable function but it wasn't this organisation, it was some organisation I believed at the time from Shepparton in Victoria and the union had donated money to them but this Martin Pakula fundraiser - when I say "Martin Pakula", he was the guest speaker, but the Marlene Kairouz fundraiser, the cheque was made out to that organisation by the union and whether it was just - I just can't remember. I think it was an

1 electronic funds transfer. Now, why it appears, this
2 donation number 13 appears as a donation rather than a
3 political donation, I don't know. I wasn't asked about
4 this. But, more importantly, as I understand it, is that
5 Fair Work Australia had some sort of query in relation to
6 this. At no point did Fair Work Australia, nor whoever
7 dealt with this, which I believe was Barry Gibson from the
8 New South Wales office, came to me to ask me about this
9 because - but when I Googled "AB Hinc", I came up with this
10 Australia Bringing Hope Incorporated.

11
12 Let me make it clear, the union has never, ever, sent
13 money to this charitable organisation. That just never
14 happened.

15
16 Now, what may have happened - and I am totally
17 speculating here - Ms Kairouz may have an account,
18 obviously has an account, because the payment was made
19 electronically by cheque to that BSB number that we see
20 after tab 52. The union sent the \$5,000 to that branch
21 account, BSB 013-375, account number 9017-200-64 and that's
22 where the money was sent.

23
24 Now, how it appears as this here, I don't know,
25 because in the MYOB statement it appears as a political
26 donation and that's exactly what it was.

27
28 Q. When you say the MYOB statement, you're talking about
29 the document at 1033 behind tab 53?

30 A. We just looked at it earlier. What one --

31
32 Q. Yes. In volume 3 of your materials, tab 53, page 1033
33 in the top right-hand corner?

34 A. That's right, yes.

35
36 Q. Is this the position, Ms Jackson, that in the internal
37 records of the branch, this was recorded as a donation to a
38 political party in the sum of \$5,000?

39 A. Yes.

40
41 Q. As appears from the document at 1033?

42 A. Yes.

43
44 Q. Those materials, or the underlying financial records
45 were provided to the auditor?

46 A. Yes.

47

1 Q. And at some point the audited accounts included the
2 information that we've just looked at at page 38, top
3 right-hand corner, or 18 middle at the bottom in
4 Mr Agostinelli's MFI1?

5 A. Yes.

6
7 Q. And you, as you sit here today, can't explain why the
8 auditor recorded it in that way on that page?

9 A. That's correct. And, more importantly, no-one asked
10 me. The first I ever knew there was any query by Fair Work
11 Australia was during these proceedings - no, when the press
12 spoke to me and then during these proceedings. No-one
13 I believe, no-one has come to me to ask me what it was and
14 quite disturbingly, you know, the allegation is made that
15 somehow I had made some sort of donation - I had tried to
16 cover up some sort of donation to the Labor Party by saying
17 that we gave some sort of donation to some group called
18 Australia Bringing Hope Inc. Let me make it quite clear,
19 we never made any donation to anybody called Australia
20 Bringing Hope Inc, but we did make a donation, a political
21 donation, to Marlene Kairouz. We did attend this dinner
22 and as you can see in 1032, tab 52, the cheque was made out
23 to AB Hinc and as I said, when I Googled that, I came up
24 with Australia Bringing Hope Incorporated. Now, I can't
25 say why the auditor or why Mr Gibson, or why Fair Work
26 Australia, whoever, has placed - has put it down as a
27 donation like that to that organisation when it never
28 occurred.

29
30 THE COMMISSIONER: Q. You just said in that answer the
31 cheque was made out to AB Hinc. Did you mean if you were
32 to pay by cheque, it should be made out to AB Hinc?

33 A. Yes.

34
35 Q. Because the actual payment was by electronic funds
36 transfer?

37 A. That's what I believed happened, yes. But why I use
38 that AB Hinc reference is when I Googled AB Hinc, I came -
39 the Google search gave me Australia Bringing Hope
40 Incorporated. At that point I looked at this organisation
41 and we had - from my memory, we had never been to any such
42 event or given them any sort of money, but when I spoke to
43 the media in that time, I did say to them that I had been
44 to a charitable function. I don't know whether it was this
45 one or another one, but it definitely was not this one once
46 I went to the website.

47

1 MR STOLJAR: Q. In 461 of your statement there is a
2 heading "NHDA Hudson". You say:

3
4 *Mr Williamson was aware that I had a*
5 *"fighting fund".*
6

7 When you say "fighting fund", are you referring to the
8 funds emanating from the Peter Mac settlement?

9 A. Yes, the NHDA.

10
11 Q. You say that you had a conversation with Mr Williamson
12 about a Mr Hudson. What's the context there? What was
13 happening at that time?

14 A. Mr Hudson had - the union had been put into
15 administration some time in, I think, 2009, this is the
16 No 1 Branch, and Mr Hudson was still owed a substantial
17 amount of money in outstanding entitlements, that the
18 No 1 Branch weren't able to meet those obligations at that
19 time. We had a discussion about how much money was
20 involved and how he needed the money to pay his solicitor,
21 and Williamson explained to me that they also had a cash
22 flow problem and whether I would be prepared to pay some of
23 the cash out from our fighting fund to Mr Hudson to shut
24 him up and that they would pay us back when it was
25 resolved. So I agreed to that proposition, that the
26 money - some of the money would come out of the fighting
27 fund and the rest would come out of the No 3 Branch
28 account.

29
30 Q. If you go to tab 54 of volume 3 of your materials,
31 page 1034 --

32 A. 1034.

33
34 Q. -- whose handwriting is that:

35
36 *As requested verbally by KJ.*
37

38 A. I believe that's Jane Holt's.

39
40 Q. This is the Commonwealth Bank transfer record relating
41 to the payment made to or for the benefit of Mr Hudson?

42 A. Yes.

43
44 Q. I just want to pick this up from the document, but did
45 this come from the NHDA account or from the Vic No 3
46 account?

47 A. Both.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47

Q. I see. So when you say "both", at the bottom it says:

*Account Name.
National Health Development [Account].*

In an amount of \$6,000 and then Vic No 3 has an amount of \$7,000?

A. Yes.

Q. Giving rise to a total of \$13,000?

A. Yes.

Q. When payments came out of the NHDA account, at least if they were some sort of transfers, were they effected by you or by Ms Holt?

A. Like, for example, this one?

Q. Yes.

A. Ms Holt. I didn't have access to the MYOB file.

MR STOLJAR: Commissioner, I note the time.

THE COMMISSIONER: Yes. We will adjourn until 10 to 12.

SHORT ADJOURNMENT

THE COMMISSIONER: Yes, Mr Stoljar.

MR STOLJAR: Q. Ms Jackson, I was asking you about a payment made to or in respect of a Mr Hudson. Could you go to 464 of your statement. You say.

... I gave Ms Holt instructions for the making of that payment, the cash component as a transfer ... and the balance from a No 3 Branch account ...

How much did Mr Hudson need or desire?

A. I can't remember but I think around \$13,000, just from memory.

Q. We looked at some bank records a moment ago. Was it the position that you say here - that \$6,000 came from a No 3 account and \$7,000 came in cash; is that correct?

A. The other way around.

1 Q. The other way around, I'm sorry. Do you know whether
2 the cash came out of the NHDA or the kitty that you were
3 maintaining, or are you not sure?

4 A. I'm not sure.

5

6 Q. Can I take you back to MFI4, that's the bundle of
7 documents produced by the Commonwealth Bank in answer to
8 the notice to produce.

9 A. Yes.

10

11 Q. If you come to page 22 in the top right-hand corner,
12 there's a transfer on 13 October 2010 of \$6,000 from the
13 HSU No 3 account. Did that relate to Mr Hudson?

14 A. A credit, yes.

15

16 Q. I'm sorry?

17 A. Yes.

18

19 Q. In order to pay Mr Hudson - well, does that mean that
20 \$13,000 came out of either this account or the kitty? I'll
21 call the other one the kitty.

22 A. Yes. When I say "yes", just from looking at
23 exhibit 1034, \$6,000 cash would have gone to Mr Hudson and
24 the rest would have been an EFT transaction of \$7,000.

25

26 Q. I see. So \$7,000 was an EFT, \$6,000 was paid to him
27 in cash, but that money was refunded, or that money came
28 from NHDA?

29 A. Yes.

30

31 Q. Are you able to identify whether there's a withdrawal
32 in cash from the NHDA account, the CBA account, which
33 corresponds to that payment?

34 A. No, because there would have been cash sitting in the
35 kitty, we would have given him the cash out of that, and
36 just credited or deposited into the account the \$6,000 that
37 sat there.

38

39 Q. So when Mr Williamson talked about the fighting fund,
40 he might have been talking about one or the other?

41 A. One or the other, yes. But the conversation I had
42 with him on that particular day was in relation to the
43 NHDA.

44

45 Q. Could you come back to paragraph 446. You say there:

46

47 *Every transfer of money to the NHDA and*

1 every expenditure of moneys by me out of
2 the NHDA was with BCOM approval.

3
4 A. Yes.

5
6 Q. Do you still have MFI4 there, the CBA bundle of
7 documents?

8 A. Yes.

9
10 Q. I asked you some questions about the transaction which
11 appears on page 16 being a transaction which occurred over
12 the two day period 23 to 24 March 2009, pursuant to which
13 there is a deposit of \$50,000 and a withdrawal of \$50,000
14 the following day.

15 A. Yes.

16
17 Q. Let's take it in steps. Firstly, \$50,000 came out of
18 the HSU Vic No 3 account, that's the first half. Did you
19 discuss that aspect of the transaction with anyone at the
20 BCOM?

21 A. I don't remember but I may - I don't remember. It was
22 around the time of - 2009. No.

23
24 Q. I'm going to show you some financial records. They
25 are contained within MFI1 for Jane Holt. Behind tab 3,
26 beginning on page 3, numbering in the top right-hand
27 corner, are some profit and loss statements in respect of
28 the No 3 Branch. These were prepared by Ms Holt?

29 A. Yes.

30
31 Q. You submitted regular profit and loss statements to
32 the BCOM as part of your financial report?

33 A. Yes.

34
35 Q. You used, for that purpose, profit and loss statements
36 created by Ms Holt?

37 A. Yes.

38
39 Q. Would you come through to page 9. You'll just have to
40 turn the folder around. There's a P&L for July through
41 January for the 2009 year?

42 A. Yes.

43
44 Q. Do you see in the right hand "Expenses column, just
45 above the line in bold "Total Expenses" the letters "NHDA"
46 and an amount of \$25,000?

47 A. Yes.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47

Q. So as at January 2009 - or this document in fact appears to be dated 15 February 2009 - I'm looking at the date in the top left-hand corner - an amount of \$25,000 had been paid across from the branch No 3 account to the NHDA?
A. Yes.

Q. That was something that was submitted to the BCOM, was it?
A. Yes, definitely. These are the sort of reports that were submitted - presented to the BCOM when they met.

Q. If I take you through to page 11, there's a date in the top right-hand corner, if you flip the page around on its side, 17 May 2010, and that reflects that there's an increased amount, \$75,000?
A. Yes.

Q. The difference between the 25 and the 75 is clearly the \$50,000?
A. The 50.

Q. Do you know whether there was any discussion about that expenditure of \$50,000 at BCOM level?
A. These reports, as I said previously, are the sort of reports that are presented to the Branch Committee of Management whenever they met, and if any member had asked a question - and I just can't - like, this is in 2009, they may have asked a question about that and they would have got the answer to that. Like, it wasn't hidden from them. Here it is in the accounts and every - and if you go through all the accounts, it appears as "NHDA" and the money was there. It was never hidden anywhere. So yes, this document was presented at a Branch Committee of Management. These financial reports were accepted and endorsed by the Branch Committee of Management.

Q. The day after the money was paid into the NHDA account, it was withdrawn again. That appears from page 16 of MFI4. You said before, when I asked you about it, that you thought that money was paid to the No 1 Branch?
A. No 1 Branch, yes, but I'm not positive about that.

Q. Are you sure or are you just guessing?
A. I'm guessing.

Q. If you had your exercise book, do you know whether you

1 recorded the payee and the purpose of the account in your
2 exercise book?

3 A. If I had my exercise book every transaction would have
4 been recorded faithfully and I - my position is, this is
5 exactly why they have taken this exercise book because
6 I imagine it would embarrass a lot of people about what's
7 in there and where the money went to, and what I say about
8 that is that NHDA was opened - the account was opened with
9 the endorsement and the approval of the Branch Committee of
10 Management. Some people may find that unpalatable but
11 that's how business was conducted. Not just in my union,
12 I imagine, but in other unions as well. Unless we have
13 different regulation and procedures, then this is how
14 people operate in this environment.

15
16 Q. Let me again break that into different steps. You say
17 that practices of this kind were occurring in other unions?

18 A. As I understand it, yes.

19
20 Q. Can you identify any other union which operated an
21 account like the NHDA?

22 A. I'm not sure whether they operated exactly like the
23 NHDA but I know from having conversations with officials
24 previously that other unions, such as the AWU, the NUW, the
25 SDA, et cetera, also had accounts that were run by the
26 organisation, but not audited as such by the branch
27 auditors, they were off-line sort of accounts. And let me
28 make that clear, as far as I understood, and still
29 understand to this day, as long as you had approval of your
30 Branch Committee of Management of how this money is being
31 spent and you make a recording - like you account for it,
32 that there's nothing illegal about doing business that way
33 for a better term. But I understand, as I said before,
34 that people may find that unpalatable, but unless there is
35 different regulation and procedures in place, this is what
36 people do. This is how - this is how the movement operates
37 and that's why at some point in my - I'm not sure which
38 volume it's in, I did present a paper to my National
39 Executive about seeking regulatory change about how union
40 elections were conducted and, for example, funded and how
41 there should be full disclosure about these matters,
42 because I understand that the majority of the public and
43 members and the community would find this sort of stuff
44 unpalatable. But let me say again, this was how business
45 was conducted, not just in my organisation but across the
46 movement.

47

1 Q. Was the NHDA account itself audited?

2 A. No.

3

4 Q. You described it as "off-line". What did you mean by
5 that?

6 A. What I meant by that was that there was - the Branch
7 Committee of Management, as I said previously, approved the
8 setting up of this account. The money that went into it we
9 saw as a windfall, it wasn't members' money, it wasn't
10 going to come out of members' dues, and that money was set
11 aside in a discrete account that I was authorised to use
12 for the purposes that I outlined earlier.

13

14 We didn't go to - like other organisations would have
15 had - larger organisations than ours would have had grand
16 fundraisers, big balls, big events where big corporate
17 sponsors would come along and contribute, you know,
18 \$10,000, \$20,000, or you would have events where a certain
19 minister would turn up and, you know, access to that
20 minister meant you had to, I don't know, pay \$5,000,
21 \$10,000 for a table. We didn't have the luxury of that in
22 a small branch, and for us to have any sort of political
23 influence, or be at the table, then you had to have money
24 to be able to do this. You had to have money to be able to
25 contribute to campaigns, be they political or industrial,
26 but mainly political, and that's how it was done.

27

28 Q. You said unless there are changes to regulations and
29 procedures, this will be the way people conduct business,
30 in effect. Do you regard the way this NHDA account was
31 conducted by you as falling short of proper practice?

32 A. I would say it would fall short of proper practice in
33 relation to what the public expect, but I don't say that
34 it's an illegal account. I say that it's an account that
35 was set up to meet the needs of the organisation at the
36 time, and that's how it was transacted.

37

38 Q. You said that you presented a paper to the Executive -
39 I think you may have said --

40 A. To the National Executive.

41

42 Q. To the National Executive calling for changes to
43 regulation. Is that in your evidence?

44 A. Yes, it is. I'll just have a look. Just give me a
45 second. I think it's at - is it in volume 2, tab 27?

46

47 Q. That's a report that you make reference to at

1 paragraph 299 of your statement?

2 A. Yes.

3

4 Q. I won't go through the document at tab 27 which begins
5 on page 413 in detail, but were there aspects of this
6 document that you would point to as relevant to the conduct
7 of accounts such as the one that we've seen this morning?

8 A. Hang on a minute. I'll just read - I'll just start at
9 page 414, and what I say to the National Executive at this
10 time, in November of 2011, was that - and this was in the
11 context that I was seeking to introduce preferential voting
12 into union elections and I say:

13

14 *And continuing on the issue of undemocratic*
15 *practices, in recent years the union has*
16 *abolished the previous practice of*
17 *permitting a candidate to submit a*
18 *photograph and short election statement to*
19 *be included in a booklet posted out by the*
20 *Returning Officer with ballot papers. This*
21 *move was deliberately and shockingly*
22 *undemocratic. I am surprised that FWA*
23 *(previously the Industrial Registrar*
24 *allowed this rule to be certified. At any*
25 *rate this earlier action is a stain on the*
26 *union.*

27

28 *For this reason I am proposing that*
29 *candidates' photographs and election*
30 *statements be restored.*

31

32 *This attempt to gag candidates was even*
33 *more gratuitous since incumbents already*
34 *have an enormous advantage in elections.*

35

36 Q. If I can just cut in there, I was really focusing more
37 on the question of --

38 A. I'm coming to it.

39

40 Q. -- the account. Perhaps you're coming to it in about
41 the third paragraph?

42 A. The next sentence:

43

44 *Throughout their period of office they can*
45 *use union journals to promote themselves.*
46 *They commonly build up "war chests" with*
47 *which to fight elections, sometimes*

1 *involving very large sums. In light of*
2 *recent events, particularly, I hope we can*
3 *expect greater external scrutiny of the*
4 *source of those funds.*

5
6 *As is the case in political life generally,*
7 *the incentive to raise electoral funds can*
8 *be a pathway to corruption. It is commonly*
9 *argued, rightly in my view, that big money*
10 *politics subverts democracy by making*
11 *politicians beholden to campaign donors.*

12
13 *So as to both give reformist and*
14 *independent candidates a fair chance of*
15 *electoral success, as a bulwark against*
16 *prospective corruption, I now propose that*
17 *we limit campaign spending per candidate to*
18 *\$1000. I note that even this amount would*
19 *mean that a ticket of 50 to 60 candidates*
20 *would still be able to spend \$50-\$60,000, a*
21 *very significant sum.*

22
23 I go on to talk about how we should change our rules to
24 limit electoral funding, have electoral funding disclosed,
25 et cetera, et cetera and I also recommended that the union
26 instruct or request Mr Temby SC, in conjunction with the
27 union's solicitors, to set up such a rule change to reflect
28 these recommendations, and I go on to talk about gender
29 equity and, you know, the role of the National Executive.

30
31 My proposals were soundly defeated at the National
32 Executive. Believe it or not, the Health Services Union,
33 according to the National Executive at that time, did not
34 need any such changes to the way elections were funded, and
35 my concern all along has been - and I say this to you, and
36 to the members of the Health Services Union and to the
37 public - there is a problem. There is a problem where, to
38 be able to effective, to be an effective union leader in
39 this country, that you do have to have money to fight those
40 elections because there are people out there, factional
41 warlords out there, that are always on the hunt to take
42 over a union, to make sure that union's alliances or
43 allegiances changes whether they're Left or Right, to
44 whoever is funding that election. To do business - and
45 I hate putting it that way, but to be able to survive in
46 that political environment, you have to have a war chest.
47 You have to have money in an account such as the NHDA to be

1 able to be an effective union leader. Otherwise, look what
2 happened at the Health Services Union. The Health Services
3 Union up until - I mean, I can put a date on it. I mean,
4 I'm not sure whether you're interested but I'm happy to
5 talk about it --
6

7 THE COMMISSIONER: Q. Ms Jackson, you've drifted a long
8 way from Mr Stoljar's question.

9 A. Okay. Sorry.

10
11 MR STOLJAR: Q. Ms Jackson, could I just ask you to deal
12 with one other matter. I note that you've prepared a
13 detailed written statement. I'm not going to take you
14 through the whole thing, but you've been able to set out
15 quite a deal of the matters that I think you were just
16 raising in the balance of your statement. Can I just deal
17 with the matters at paragraph 467.

18 A. Yes.

19
20 Q. You're dealing there with another article in the press
21 but it's talking about the funding of candidates by tobacco
22 companies. In 468 you say:

23
24 *I did support the candidacy of Mr Bolano.*

25
26 Did you support that financially, in a financial sense?

27 A. Yes.

28
29 Q. Where did those funds come from?

30 A. The funds came out of the NHDA and/or the honorariums.

31
32 Q. When you say the honorariums, you mean what I have
33 been calling the kitty?

34 A. The kitty, yes.

35
36 Q. Do you recollect how much you actually drew from one
37 or other of those funds?

38 A. Not exactly, but at least - I would say at least 10 if
39 not more. A lot of the money was also spent on, as I said
40 yesterday, buying overnight bags because it is really
41 important to have lots of overnight bags to be able to send
42 members things as they happen. When I say that, postage
43 overnight bags.

44
45 Q. Oh, I see.

46 A. Not - sorry.
47

1 Q. You don't mean carry-on bags?
2 A. No, not carry-on bags. Australia Post overnight bags,
3 and it was very important to have lots of those in stock,
4 particularly at election time, and money was also spent on,
5 for example, paying for people that had come out to help,
6 giving people some cash to buy dinner or what have you, and
7 those sort of things.
8
9 Q. You say that you attended a lunch. Actually, before
10 I come to that, setting aside things like contributing by
11 buying overnight bags or the like, did you actually pay
12 funds over to any person?
13 A. Yes, I gave some money, cash, to Marco Bolano.
14
15 Q. When you say to him, how physically does it work? You
16 physically handed him cash?
17 A. Yes, in an envelope.
18
19 Q. And that was money drawn from one or other of the
20 kitty or the NHDA?
21 A. Yes. And I should add, I also, I don't know if it's
22 come out anywhere else, but I also contributed - well, when
23 I say "I", the organisation contributed money to the Fleur
24 Behrens campaign in that election as well.
25
26 Q. She was also a candidate for office in the HSU
27 elections?
28 A. In the No 3 Branch election.
29
30 Q. Was that in 2009 or 2012?
31 A. 2012.
32
33 Q. You are talking here about the 2009 election?
34 A. Sorry.
35
36 Q. You also supported Ms Behrens's candidature in the
37 2012 election?
38 A. Yes.
39
40 Q. You attended a lunch with some representatives of
41 Philip Morris, that was in 2009. You deal with that in 470
42 and following.
43 A. Yes.
44
45 Q. Is the short point that there was discussion about
46 donation, but you reach a conclusion in 480?
47 A. Yes.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47

Q. You don't know for certain one way or the other?
A. I'm not certain how much money was contributed to Mr Bolano's campaign, or any other campaign for that matter. What I do know is that I have a recollection of this meeting only because the gentleman that was there from Philip Morris, his name was Bede Fennelly and I just thought it was a very unusual name, only because I'd been reading that week a book about Bede Griffith, a Benedictine monk who went on to live in an ashram, I think, and made a comment to him about, you know, his unusual name and, you know, was he named after Bede Griffith, and that's why I remember his name. At that meeting I thought it was quite strange that here they were a tobacco company, and I think Mad Men had just started on the TV and I said, "My God, you people should watch this", you know, "It's all about you people", and I did ask at the time, you know, "What are you doing contributing money to Health Services Union elections?", and basically the response was, you know, "We can't give it away. It's very hard to give our money away to political parties these days", and that's how it was left.

MR STOLJAR: I have nothing further, thank you.

THE COMMISSIONER: Yes. Ms Jackson, at a later time there may be legal representatives who want to ask you some more questions, and what that time is will be arranged with you later. So you can leave the witness box now.

A. Can I just say - I won't take much of your time because I've been here a while.

Q. Yes.

A. I just wanted to say that I welcome this Royal Commission and I believe that I speak for many unionists when I say that. I remain fully committed to cooperating with the Commission. I remain totally committed to the idea of unionism, and I believe it's essential that working people organise and unionise.

I very much hope that any recommendations for reform that might eventually arise from this Commission will increase the governance and effectiveness of unions for the good of all union members in this country. So, I thank you for that.

THE COMMISSIONER: Thank you.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47

<THE WITNESS WITHDREW

THE COMMISSIONER: Who is the next witness, Mr Stoljar?

MR STOLJAR: It is Mr Dick.

<IAAN GRAEME FORBES DICK, affirmed: [12.42pm]

<EXAMINATION BY MR STOLJAR:

MR STOLJAR: Q. Your name is Iaan Graeme Forbes Dick?

A. That's correct.

Q. You're an auditor by profession?

A. Auditor or accountant.

Q. You are a resident of Victoria?

A. Sorry?

Q. You're a resident of Victoria?

A. Yes.

Q. Have you prepared a witness statement in these proceedings?

A. That's correct.

Q. It's dated 3 June 2014?

A. Yes.

Q. Is the content of that statement true and correct?

A. Yes.

MR STOLJAR: Commissioner, I'd ask that that statement be received into evidence, together with the bundle of documents which has been marked provisionally MFI1.

THE COMMISSIONER: The statement will be received into evidence, and the documents just referred to will be known as Dick MFI1.

DICK MFI#1 WITNESS STATEMENT OF IAAN GRAEME FORBES DICK DATED 3/6/2014 TOGETHER WITH BUNDLE OF DOCUMENTS

MR STOLJAR: Q. Mr Dick, I'm going to show you some MYOB screen-shots, and they appear in Holt MFI1. If you go through to tab 14, that's page 329 in the top right-hand

1 corner.
2 A. I'm hard of hearing, I'm having trouble.
3
4 Q. I'm sorry. If you go to page 329 of that folder.
5 A. 329?
6
7 Q. Yes. Are you looking at a document with the date
8 23 June 2005 at the top, some MYOB screen-shots?
9 A. Yes, NHDA.
10
11 Q. Yes. You were the auditor for the Victorian
12 No 3 Branch for the years 2002 through to 2008?
13 A. Yes.
14
15 Q. And before that you had been an auditor for the
16 Federal Health Services Union?
17 A. Yes.
18
19 Q. You would receive, for the purposes of conducting your
20 audit, documents from Ms Jane Holt, the bookkeeper for the
21 No 3 Branch?
22 A. Yes.
23
24 Q. Did those documents include MYOB statements or MYOB
25 information?
26 A. Yes.
27
28 Q. Have you seen screen-shots of this kind before?
29 A. Yes.
30
31 Q. The only point I was really going to draw your
32 attention to in these screen-shots is that the NHDA was
33 allocated its own account number in the MYOB files for the
34 No 3 account?
35 A. Yes, that's correct.
36
37 Q. It was account number 6-4000; is that right?
38 A. Yes.
39
40 Q. The MYOB screen-shots, first of all on page 329,
41 reflect funds which had been paid from the No 3 Branch
42 accounts over to the National Health Development Account
43 from time to time?
44 A. Yes.
45
46 Q. And those were transactions that you were familiar
47 with from your audits that you carried out; is that right?

1 A. I would have seen them, yes.

2

3 Q. You describe the way you did the audit in your
4 statement. If you have a look at paragraph 24, you say:

5

6 *I would normally obtain a copy of the MYOB*
7 *database from Ms Holt and I would take it*
8 *off-site and review it for about three to*
9 *four hours.*

10

11 Was that your practice throughout the whole period?

12

13

14 Q. If you come through to 44, you say you'd also look
15 through the minutes of the Branch Committee of Management?

16

17

18 Q. Come through to 68. You're talking there about
19 categories. There are 150 categories. What do you mean by
20 "categories"?

21

22

23

24

25

26

27

28

29

30

31

32

33

34

35

36

37

38

39

40

41

42

43

44

45

46

47

I do not recall being given a copy.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47

But in any event, on page 29 there's a list of items that need to be disclosed on accounts?

A. Yes.

Q. And that doesn't come as any surprise to you, I take it, you were familiar with those matters?

A. I can't have thought that those things were loans - not loans. I can't think of - at the time I couldn't have thought that those NHDA things were donations, or one of the special items that needed to be classified.

Q. Yes, I hadn't quite come to that yet. I'm just saying that you were familiar with what needed to be disclosed or didn't?

A. Yes, I think so.

Q. Why don't we start with tab 1. So page 1 in the top right-hand corner, that's the financial report for the financial year ended 30 June 2004?

A. Yes.

Q. You've signed off on that account - page 17 in the top right-hand corner?

A. Yes.

Q. If you come back to paragraph 61 of your statement, you're giving evidence there about an "original \$80,000 payment through the BCOM meeting minutes". That's a payment to the NHDA?

A. Yes.

Q. When you prepared your audited reports, did you include or did you take account of, or make reference to that payment of \$80,000?

A. No.

Q. It must have been --

A. Oh, no.

Q. You mean not individually? Did you include it in one of the other items?

A. Well, in the statements to the committee of management, it was a separate item, NHDA. But in the actual statutory accounts that went to the registrar, it wasn't included as a donation. It wasn't highlighted out as a donation.

1
2 Q. Is it included in other expenses from ordinary
3 activity?
4 A. Yes.
5
6 Q. Is that on page 3, if you look in the top right-hand
7 corner?
8 A. Yes.
9
10 Q. That's the 2004-2005 year.
11
12 THE COMMISSIONER: Actually page 3 is surely the year 2003
13 to 2004.
14
15 MR STOLJAR: Yes. I'm sorry.
16
17 Q. Could I come to the next year which is behind tab 5.
18 Again, you've signed off on those accounts at page 45?
19 A. Yes.
20
21 Q. If you come to page 47, there's an income and
22 expenditure statement.
23 A. Yes.
24
25 Q. The third last entry you've got under the heading
26 "2005. NHDA 20,000", and for the comparative 2004 year
27 you've got 80,000?
28 A. Yes.
29
30 Q. That's in the 2005 year. In the 2006 year, which is
31 at page 59, you've done a different treatment. Just before
32 I come to that, can I take you to paragraph 57 of your
33 statement. You say there that you've reviewed your records
34 and you've identified the number of items of expenditure to
35 the NHDA for the years 2004 through to 2007?
36 A. Yes.
37
38 Q. And these are payments that you identified from your
39 recent review of the records, are they? When you came to
40 make your statement, you didn't recall particular details
41 of your audit?
42 A. I just went back into the financial records and dug
43 them out.
44
45 Q. In paragraph 58, you say.
46
47 *... I would have queried the Payments ...*

1 *as I was not aware of what [it] was.*

2

3 And then you say:

4

5 *From what I remember, I just checked out*
6 *what it was and that it was approved by*
7 *BCOM.*

8

9 A. Yes.

10

11 Q. You have a memory of doing that, do you?

12 A. No. But that's what - that was my procedure. I don't
13 remember specifically to these payments, no. It's a while
14 ago.

15

16 Q. Yes. The 2006 year begins on page 59. You've signed
17 off on that at page 71. On page 73, you have the income
18 and expenditure statement for the financial year ended
19 30 June 2006. Under the heading "2006", you haven't
20 included as an expense item NHDA, although you say in 57 of
21 your statement that an amount of \$18,000 was paid. In
22 effect, you say that from (c) and (d) - 10 and 8 - was paid
23 out --

24

25 THE COMMISSIONER: Isn't it \$8,000?

26

27 MR STOLJAR: It's two payments, Commissioner, 6 January
28 and 30 June.

29

30 THE COMMISSIONER: I see, yes, 18. That's correct.

31

32 MR STOLJAR: Q. I perhaps elided the two.

33 A. They were netted off into sundry income, weren't they,
34 or other income?

35

36 Q. You netted it off - can you just explain your process
37 there?

38 A. I can't really remember, you know, why I did it but --

39

40 Q. No, I'm not asking you why. I'm just saying what have
41 you actually done? When you say "netted it off", what do
42 you mean?

43 A. Well, in sundry income I think it's explained. Say
44 the sundry income category was \$40,000 in 2006, I netted
45 off the payment to NHDA against that sundry income to my
46 knowledge.

47

1 Q. Is sundry income the same as other income in the third
2 entry under --
3 A. Yes, "Other Income", sorry, yes.
4
5 Q. -- "Other Income." The heading "2005", that's the
6 comparative year?
7 A. Yes.
8
9 Q. We just looked at the 2005 income and expenditure
10 statement. It is on page 47. In the statement on page 47,
11 you've included an expense of NHDA in the amount of
12 \$20,000, do you see that?
13 A. Yes.
14
15 Q. If I come to page 73, under the heading "2005" for the
16 comparative year --
17 A. It's not there.
18
19 Q. -- it's not there?
20 A. Yes.
21
22 Q. Why was that?
23 A. I suspect at the time I was just trying to reduce the
24 number of categories to make it more meaningful, but
25 specifically I can't remember, but that's what's happened.
26
27 Q. But it is something you've done in the course of your
28 audit, is it?
29 A. Yes.
30
31 Q. Is that the same explanation in respect of - I'll take
32 that in steps. Go back to page 47. "Other Income", this
33 is on page 47, you have an amount of \$58,000?
34 A. Yes.
35
36 Q. If I take you through to page 73, that comparable
37 figure has come down to \$38,058, do you see that?
38 A. Yes.
39
40 Q. The \$20,000-odd has come out of expenditures in
41 respect of the NHDA?
42 A. Yes.
43
44 Q. The numbers, I don't think, then quite add up, do
45 they?
46 A. No. There's been other documents I have provided that
47 would show the make-up of what's actually gone on there.

1 There's been another accountant working with it, I think,
2 that shows how that's all been --
3
4 Q. I see. But it is a product of your netting off,
5 because you net off one against the other, you net off some
6 expenses --
7 A. I was just trying to reduce the number of categories;
8 that's what I was trying to do, rightly or wrongly.
9
10 Q. And you explain that in your statement in
11 paragraphs 68, 69 and following?
12 A. Yes. I've tried to explain it.
13
14 Q. Good, bad or indifferent, that's what you did in the
15 course of your audit?
16 A. Yes.
17
18 Q. Did you retain copies of the BCOM minutes that you
19 looked at in the course of your audit?
20 A. No.
21
22 Q. In fact, you say in 82:
23
24 *I would have disposed ...*
25
26 I'm sorry, you're talking about the hard copy of the ledger
27 you printed out in 82, are you?
28 A. Yes.
29
30 Q. And 79 records the only documents that you retained
31 from your audit?
32 A. Yes.
33
34 Q. You describe the practice that you undertook when
35 preparing your audit in paragraph 38 of your statement.
36 You say there:
37
38 *My normal practice was to speak to either*
39 *Ms Holt or Ms Jackson about my concerns.*
40
41 Were they any concerns you might have had after your
42 initial review of the documentation?
43 A. They might just be things that I thought were in one
44 spot that should be somewhere else and then, if they both
45 agreed, it would be --
46
47 Q. And then in 41 you say:

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47

... with other clients, I would expect to make a greater number of corrections ... [but] there were very few corrections required in the accounting records for No 3 Branch.

A. Yes.

Q. Did Ms Holt keep pretty good records?

A. Yes. She was really good.

Q. She was really good?

A. Yes.

MR STOLJAR: Nothing further. Thank you, Commissioner.

THE COMMISSIONER: You have no more questions of Mr Dick?

MR STOLJAR: No.

THE COMMISSIONER: Yes. It's possible, Mr Dick, that the legal representatives of various parties may wish you to come back here to be examined further. I just don't know how likely it is, but if that happens, you will be given notification and some date will be worked out. Thank you for your attendance.

A. Thank you.

MR STOLJAR: There is one more witness, Mr Donnelly, there's no statement, and he has been issued with a summons. I'll perhaps try and have some discussion with Mr Donnelly over the lunch break and see if we can progress that position, but otherwise Mr Donnelly would be at 2pm.

THE COMMISSIONER: We will resume sitting at 2 o'clock.

<THE WITNESS WITHDREW

LUNCHEON ADJOURNMENT

1 UPON RESUMPTION:

2

3 THE COMMISSIONER: Yes, Mr Stoljar.

4

5 MR STOLJAR: Commissioner, the next witness is
6 Mr Stephen Donnelly. Just before Mr Donnelly is sworn in,
7 his legal representative is in the court, Dr Marich.

8

9 DR M MARICH: Commissioner, Martine Marich from
10 Marich Legal and I seek leave to appear for Mr Stephen
11 Donnelly.

12

13 THE COMMISSIONER: Yes, you have authorisation.

14

15 <STEPHEN PAUL DONNELLY, sworn: [2.00pm]

16

17 <EXAMINATION BY MR STOLJAR

18

19 MR STOLJAR: Q. Could you tell the Commission your full
20 name?

21 A. Stephen Paul Donnelly.

22

23 Q. And you're a resident of Victoria?

24 A. I am.

25

26 Q. What's your current occupation, Mr Donnelly?

27 A. I'm the assistant secretary of the Victorian branch of
28 the Australian Labor Party.

29

30 Q. In 2009, for whom were you working?

31 A. I was working for Senator David Feeney.

32

33 Q. And he was a senator for the ALP?

34 A. For the state of Victoria, yes.

35

36 MR STOLJAR: Could I provide you with a bundle of
37 documents.

38

39 THE COMMISSIONER: Do we have one for Dr Marich?

40

41 MR STOLJAR: Yes, I will provide a copy to Dr Marich.

42

43 Q. Mr Donnelly, you were involved in the campaign by
44 Mr Bolano for office in the HSU in 2009?

45 A. That is correct.

46

47 Q. At that time you were working, as you said, for

1 Senator Feeney. Can you describe the nature of your role
2 in that election?

3 A. I performed a voluntary role in assisting the Marco
4 Bolano team with the HSU election and provided logistical
5 advice and support for the Marco Bolano team in two
6 particular areas of interest. The first being the
7 communications aspect to the campaign, the way in which we
8 communicated to the union members during the election
9 period about why they should vote for the Marco Bolano
10 team, and the development of the messaging and the output
11 of direct mail and various other forms of communication to
12 those voting eligible members.

13
14 The second area was in, I guess, what you would call
15 the voter contact area of the campaign which is going out
16 there into the workplaces where eligible members were and
17 having structured conversations with them about why they
18 should vote for the Marco Bolano team but using essentially
19 a grassroots organising model that would empower both
20 delegates and lead activists and lead volunteers to get
21 involved in Marco Bolano's team, to encourage the people
22 that they worked with to vote for the Marco Bolano team
23 during the election period.

24
25 Q. How did you come to have that position or do that
26 work?

27 A. I was introduced to Marco Bolano, Carol Carmichael, as
28 she was then, now Carol Glen, and Jamie Mantirana, through
29 David Feeney and Kathy Jackson.

30
31 Q. Had you known them before?

32 A. I'd never met those three candidates that were running
33 on the team before. I'd known Kathy from my younger,
34 Young Labor days and I'd obviously known then
35 Senator Feeney since I was about 18 years of age.

36
37 Q. So Senator Feeney and or Ms Jackson asked you to work
38 on the campaign, is that what happened?

39 A. Yes, they'd asked me if I would be interested in
40 helping the campaign with some of the areas that I was
41 experienced in.

42
43 Q. You said you were still working for Senator Feeney?

44 A. I was. So I was doing it on a voluntary role.

45
46 Q. Was that the first campaign or union campaign you had
47 been involved in?

1 A. It was. Sorry, that's not entirely true. As a
2 Young Labor person I was recruited to make calls for a
3 previous union election campaign when I would have been 18
4 or 19, but that was simply, you know, two or three hours
5 work.

6
7 Q. Would it be fair to describe you as Mr Bolano's
8 campaign manager?

9 A. No, I don't think so. That title wasn't formally
10 attributed to myself. I do recall having a conversation
11 early in the piece in the year 2009, after that campaign,
12 in which another person who was involved in the HSU and the
13 campaign had indicated that they were the campaign manager
14 which - I mean that's fine. So I don't agree with the
15 notion that I actually technically was the campaign
16 manager.

17
18 Q. Were you administering the finances for the campaign?

19 A. No, I was not.

20
21 Q. Who was doing that?

22 A. There wasn't really a single person that was
23 responsible for taking charge of the finances for the
24 campaign. It kind of fell down to a number of people who
25 had various interests in running the campaign.

26
27 Q. Were accounts kept?

28 A. No. No, they were not.

29
30 Q. Were things just done on an ad hoc basis?

31 A. Yes, they were.

32
33 Q. Was there a budget for the campaign?

34 A. I'm not aware of any formal budget that was presented
35 to me. It had been indicated to me that with the
36 production of a certain amount of direct mails, that
37 I could work towards, which I did, but in terms of a formal
38 budget at the beginning of the campaign, like you would do
39 for a traditional political campaign, there wasn't any
40 formal budget that was structured.

41
42 Q. You said it had been indicated to you?

43 A. Yes.

44
45 Q. Someone said something to you, did they?

46 A. Yes.

47

1 Q. Who?
2 A. Kathy Jackson had indicated that to me.
3
4 Q. What did she say?
5 A. She said that we probably have budget to do four,
6 maybe five, direct mails to the membership.
7
8 Q. What was the membership at that time?
9 A. That's a good question. I should know the answer to
10 that. I think it was around about 12,000, from memory.
11
12 Q. So three or four mail-outs. How did the mail-outs
13 work? Who was the mail-out company?
14 A. The mail-out company - there was a mail house company
15 that printed, bundled and then sent to Australia Post,
16 which was based in New South Wales. I don't know the name
17 of that company, or I don't recall at this point in time.
18
19 Q. You knew it at the time?
20 A. I probably did, yes.
21
22 MR STOLJAR: I gave you a bundle of documents at the
23 beginning of your evidence and indeed, Commissioner,
24 I would ask that that bundle be marked for identification.
25
26 THE COMMISSIONER: Yes. That will be Donnelly MFI1.
27
28 **DONNELLY MFI#1 BUNDLE OF DOCUMENTS**
29
30 MR STOLJAR: Q. That contains only a very small bundle
31 of documents. You were issued with a notice to produce by
32 the Commission, 17 pages, seeking all documents including
33 emails and the like relevant to the campaign and you've
34 produced only this very few documents, the 17 pages or so.
35 Did you send emails and the like in the course of the
36 campaign?
37 A. Yes, I did.
38
39 Q. Have you been able to locate the email account in
40 respect of which you sent those emails?
41 A. No, I haven't.
42
43 Q. Who was the server?
44 A. I don't even recall which server I was using. It was
45 a Gmail or a Hotmail type.
46
47 Q. Did you set up an account specifically for the

1 purposes of the campaign?
2 A. I did.
3
4 Q. Did you cease to operate that account subsequent to
5 the completion of the campaign?
6 A. I did.
7
8 Q. Is this fair, Mr Donnelly, there would be a great
9 deal, many more documents in existence electronically, at
10 least, relative to the campaign but you no longer have
11 access to them?
12 A. That is correct.
13
14 Q. And it may be that those documents include materials
15 identifying with more precision the way the finances
16 operated?
17 A. Not necessarily. The majority of the emails on that
18 server would be related to designing of materials,
19 communicating with campaign team members about activities
20 in workplaces and hospitals and organising - campaign
21 organising in a general sense.
22
23 Q. The total cost of the campaign, would it be in the
24 order of \$150,000?
25 A. I don't feel comfortable in picking a figure. If
26 I did some crude maths off the top of my head, I don't feel
27 it would be as high as \$150,000. I know that figures like
28 to get thrown around in the media a lot and every time
29 someone writes a story it seems to get higher. I don't
30 think it would be as high as 150,000.
31
32 Q. Between 100 and 150,000, is that a fair range?
33 A. Yes. That would be a safe bet, yes.
34
35 Q. You indicated that there were four mail-outs. Who
36 paid for the mail-outs?
37 A. Who specifically paid for those mail-outs, I do not
38 know.
39
40 Q. They were organised in Sydney, were they?
41 A. They were.
42
43 Q. To your understanding, was the payment procured by or
44 on behalf of Mr Williamson?
45 A. That was the inference that I'd received, yes.
46
47 Q. Was the mail house his preferred mail house?

1 A. My understanding was that was correct, yes.
2
3 Q. That was a large component of the 100 to 150,000, was
4 it, the cost of the mail-out?
5 A. It was.
6
7 Q. That was contributed by - well, to your inference,
8 Mr Williamson?
9 A. To my understanding, yes.
10
11 Q. Did other persons or entities contribute to
12 Mr Bolano's campaign?
13 A. Yes, there were.
14
15 Q. Did the AWU contribute?
16 A. There was speculation early in the campaign that the
17 AWU were going to make a contribution to the campaign.
18 I never saw the evidence of that contribution, but it is my
19 understanding that the AWU did make a contribution to the
20 Marco Bolano campaign.
21
22 Q. Was that in the order of \$30,000?
23 A. My understanding was that it wasn't.
24
25 Q. What do you say it was?
26 A. Once again I'm only speculating, but my understanding
27 was it was in the order of around \$10,000.
28
29 Q. There's no books or records of this campaign. Let's
30 take it in steps. On your understanding, how was the
31 \$10,000 contribution actually paid?
32 A. I'm not clear on how that was done. It wasn't a - I
33 was not a part of that process.
34
35 Q. Was it in cash or cheque, or do you not know?
36 A. No. Once again I don't know.
37
38 Q. To whom on your understanding - I mean you were
39 working in the campaign every day. Was there discussion
40 about it?
41 A. Not so much with myself, actually. As I said, I'd
42 heard inferences that the AWU were considering making that
43 donation, but I didn't inquire as to how or when or --
44
45 Q. What was the background to all this? Was there some
46 power struggle, for want of a better word, going on in the
47 Labor Party in Victoria?

1 A. Yes, there was.

2

3 Q. Tell us about that? Who was on what side?

4 A. The Victorian Right wing grouping within the ALP had
5 broken apart in early 2009, I think, and it created schisms
6 where various I guess players, members of parliament who
7 also had allegiances with various unions, they may have
8 worked for that union or come from that union, lined up
9 with those players as politicians, lined up with those
10 respective unions.

11

12 When the Health Services Union election came about in
13 late 2009, various elements of the Right wing of the Labor
14 Party got involved in that union election by running their
15 own proxy candidates, essentially.

16

17 Q. Who were those elements of the Right wing?

18 A. It was - I mean, it's speculated that
19 Senator Stephen Conroy was backing the Doug Byron ticket,
20 that Bill Shorten was backing the Asmar ticket and that -
21 and this has all attributed to in the media -and that
22 David Feeney was backing the HSU - sorry, the Marco Bolano
23 ticket.

24

25 Q. Was Mr Shorten still at the AWU at that time or had he
26 moved on?

27 A. No. He was the member for Maribyrnong.

28

29 Q. Was there any discussion about the AWU having a bet
30 each way?

31 A. I don't know if there was a discussion. I certainly
32 thought to myself that that might be the case. I don't
33 know if I shared that with anyone.

34

35 Q. Ordinarily, they would vote in accordance with the
36 candidate being backed by Mr Shorten; is that right?

37 A. Yes, that would be right.

38

39 Q. In any event, did the National Union of Workers
40 contribute any funds or make any other contribution to the
41 campaign?

42 A. I'm not aware of them contributing any funds to the
43 campaign. However, they did make their call centre
44 available to volunteers from the Marco Bolano team in the
45 evenings to make calls to members of the union.

46

47 Q. What about the Shop Distributive Association - did

1 they provide any contribution?

2 A. Yes. The Shop Distributive and Allied Employees
3 Association also, for roughly about a two-week period, made
4 their call centre available to employees of their own union
5 who could volunteer to make calls on behalf of the
6 Marco Bolano team to union HSU members.

7

8 Q. I asked you about whether the AWU had provided any
9 contribution or funding and you thought it might be in the
10 order of \$10,000. Do unions to your knowledge, from your
11 experience, generally maintain fighting funds that they can
12 use for election purposes?

13 A. Generally speaking, yes, that's my understanding, that
14 a lot of the unions do do that.

15

16 Q. Can those funds also be called a war chest?

17 A. Yes, they could be called that.

18

19 Q. You were present when you heard Ms Jackson giving
20 evidence this morning?

21 A. I was.

22

23 Q. Are those the sorts of funds, that she was
24 describing - two different kinds of funds - that unions
25 maintain for the purposes of funding elections?

26 A. In a general sense, yes.

27

28 Q. Was it your understanding at the time that the AWU had
29 such a fund?

30 A. I think it's an assumption from people who are
31 involved in the labour movement or in the Labor Party
32 itself that most unions do have those funds. I guess we
33 always speculate and there have been occasions in the past
34 where other unions had been - where the media had reported
35 that this particular union had this fund and I think it's
36 just fair to assume that most unions do have these funds,
37 so people would speculate that the AWU would also have a
38 similar fund.

39

40 Q. Is a fund like that generally kept off-line or kept
41 separately from the union?

42 A. I would not be able to answer that question. I've
43 never been in a leadership position of a union to
44 understand how they do that.

45

46 Q. In any event, the evidence that Ms Jackson was giving
47 didn't come to any great surprise to you?

1 A. No, not necessarily.
2
3 Q. Did Mr Shorten himself to your knowledge contribute
4 any funds to Mr Bolano's campaign?
5 A. No, not to my knowledge.
6
7 Q. But the AWU did?
8 A. Yes.
9
10 Q. Is it possible that you said something to Mr Bolano or
11 others in the HSU at some point to the effect that,
12 "Mr Shorten's contributed some money" or "Bill Shorten's
13 contributed some money", meaning that as a shorthand for
14 the AWU.
15 A. I'd like to think that I would be more careful with my
16 words, but sometimes there are occasions where we refer to
17 a politician which by proxy means that union, so I could
18 understand where people could think that if you were to say
19 that Bill Shorten is donating to the campaign, that they
20 literally mean that Bill Shorten is donating to the
21 campaign, whereas the inference actually is that his union
22 that he once was the secretary for was supporting that
23 particular campaign.
24
25 Q. Or the fighting fund associated with that union?
26 A. Absolutely, indeed, yes.
27
28 Q. By the way, did the HSU as a union at the time control
29 votes at the ALP Conference?
30 A. Yes, they did.
31
32 Q. How many votes?
33 A. From memory, at the time the HSU No 1 Branch, as an
34 affiliated union to the Victorian Branch of the Labor
35 Party, had around 15 votes or delegates on the conference
36 floor.
37
38 Q. That's the No 1 Branch?
39 A. That's the No 1 Branch.
40
41 Q. What about the No 3 Branch?
42 A. I think the No 3 Branch may have had five.
43
44 THE COMMISSIONER: Q. Is this the Victorian Conference,
45 is it, not the National?
46 A. Yes, this is the Victorian Conference.
47

1 THE COMMISSIONER: Yes. Thank you.

2

3 MR STOLJAR: Q. Was the expectation in Senator Feeney's
4 office that if Mr Bolano was successful in the election, he
5 would exercise his votes at the Victorian Conference in a
6 particular way?

7 A. No.

8

9 Q. You are saying no, but you'd be surprised if he
10 exercised them contrary to the wishes of Mr Feeney,
11 wouldn't you?

12 A. You'd have to ask David Feeney. We wouldn't take the
13 support from Marco Bolano as the Secretary of that No
14 1 Branch for granted. However, we would expect that if we
15 were to speak to Marco and his union about a particular
16 issue that was going to be debated on the floor of the
17 State Conference, that we could get a fair hearing and the
18 strong relationship that we have or had built up over that
19 time would enable us to get that fair hearing.

20

21 Q. If I'm understanding your evidence correctly, you're
22 saying that there's not some binding agreement that you'll
23 exercise your vote in a particular way; is that fair?

24 A. Yes, that's all.

25

26 Q. But there may be an expectation or understanding that
27 the HSU would vote in a particular way if the leadership
28 had assumed that position with the assistance of Mr Feeney?

29 A. Yes, that's true but, you know, union secretaries are
30 their own - they're strong-minded individuals and they'll
31 do as they see fit.

32

33 Q. To your knowledge did Philip Morris make any donation
34 to Mr Bolano's campaign?

35 A. No, not to my knowledge.

36

37 Q. Did you attend a lunch at a restaurant called "Becco"
38 at any stage during the campaign?

39 A. Yes, I did.

40

41 Q. Who was in attendance at that lunch?

42 A. From memory, the people that attended that lunch were
43 Marco Bolano, Kathy - sorry, Marco Bolano, Carol Glen,
44 David Feeney, myself, Stanley Chang, and that was for the
45 lunch that I had and that was it.

46

47 Q. Were there any representatives of the Philip Morris

1 company there?
2 A. No, not to my knowledge.
3
4 Q. When you say not to your knowledge, what do you mean?
5 You were there.
6 A. I mean, I'm just trying to think if there was anyone
7 else at that lunch. It was quite a small table, so I feel
8 confident in saying that they were the people around that
9 table at that point in time.
10
11 Q. You say, do you, that, so far as you are aware,
12 Philip Morris didn't make any donation to the Bolano
13 campaign, but it's possible, is it, that a donation was
14 made and you're just simply not aware of it?
15 A. Yes. I mean, it certainly is possible, but to my
16 knowledge no-one had inferred to me that Philip Morris
17 would be donating.
18
19 Q. There was no discussion about that. Was there a
20 lunch, whether this one or a separate one, attended by
21 Ms Jackson at Becco and yourself?
22 A. Yes, there was a dinner in the evening that was
23 attended by Ms Jackson, David Feeney, myself, Carol Glen,
24 Marco Bolano, but that happened after the election campaign
25 and that was a celebratory election victory dinner.
26
27 Q. Was anyone at Philip Morris at the dinner?
28 A. No, there wasn't.
29
30 Q. You said that you had worked on a union campaign back
31 in, I think you said, your student days or Young Labor
32 days. Have you worked on any campaigns subsequent to the
33 2009 HSU campaign?
34 A. Yes, I have.
35
36 Q. Can you give me an example?
37 A. Yes, I volunteered on the TWU Queensland Branch
38 campaign in 2010 I think.
39
40 Q. Tell me about that campaign. Who was the incumbent
41 secretary and who was challenging who; who were you
42 campaigning for?
43 A. The incumbent secretary was Hughie Williams who had
44 been secretary at that branch for the better part of 20 or
45 30 years.
46
47 Q. He's Left Wing ALP, isn't he?

1 A. Notionally, yes.
2
3 Q. What do you mean by that?
4 A. I don't know if Hughie ever tied himself to the Left
5 in Queensland's Labor politics but he certainly had Left
6 leanings.
7
8 Q. What was happening? Was he under challenge, was he?
9 A. Yes, he was.
10
11 Q. Who was the challenger?
12 A. The candidate that was running for secretary of that
13 branch was a union member by the name of Peter Biagini.
14
15 Q. Whose campaign were you working on?
16 A. I was supporting the Biagini campaign.
17
18 Q. That campaign was successful, wasn't it?
19 A. Yes. The Biagini ticket won by I think 70 per cent of
20 the membership.
21
22 Q. Did that campaign also receive funding from any fund?
23 A. Once again, my role wasn't associated with the
24 fundraising or the allocation of resources.
25 My understanding is that there perhaps may have been a fund
26 that would be supporting that campaign.
27
28 Q. When you say "perhaps may have been", what was that
29 fund?
30 A. I don't know the name of that fund.
31
32 Q. Are you sure?
33 A. Yes, I am.
34
35 Q. The McLean Forum?
36 A. I've heard that name before and during that campaign
37 I never heard the word McLean Forum mentioned.
38
39 Q. I'm probably putting this crudely, Mr Donnelly, but is
40 it correct to say that the Biagini ticket was associated
41 with the right-wing faction and the Williams ticket was
42 associated with the left-wing faction, or is that putting
43 it too crudely?
44 A. Yes, that's correct.
45
46 Q. Tell me, what role precisely did you have in that
47 campaign?

1 A. A similar role to the HSU election campaign.
2 I provided support and logistics and organising. A lot of
3 the lessons I'd learnt from the HSU campaign I sort of
4 adopted to change for the TWU campaign. It was very much a
5 very grass-roots organised campaign of working with the
6 delegates to go out there and converse with members.
7
8 Q. That was up in Queensland, wasn't it?
9 A. It was.
10
11 Q. Who were you working for at that time?
12 A. Senator Feeney.
13
14 Q. Did you have to go up to Queensland to do that work?
15 A. I did.
16
17 Q. How long were you in Queensland for?
18 A. I think probably a month and a half to two months.
19
20 Q. Who told you or asked you to work on that campaign?
21 A. Senator Feeney.
22
23 Q. Why did Senator Feeney to your knowledge ask you to
24 work on the HSU campaign?
25 A. To my knowledge, David had a longstanding
26 relationship, both professionally and in a friendship
27 sense, with Kathy Jackson and other people within the HSU
28 over a longstanding time.
29
30 Q. Why did he to your knowledge ask you to work on the
31 TWU campaign?
32 A. David and myself both regard ourselves as part of the
33 TWU family. I was an organiser with the South Australian
34 and Northern Territory Branch of the Transport Workers
35 Union for three and a half years. David worked for the
36 National Office, prior to becoming a politician, with the
37 Transport Workers Union and we both were keen to see a good
38 rank-and-file ticket get elected to represent the members
39 in Queensland.
40
41 Q. Can you recollect from your work what the budget
42 approximately was for the TWU campaign?
43 A. Once again, that was another figure that got thrown
44 around a lot. I don't feel confident in actually putting a
45 price or a figure on what the size of the budget was.
46
47 Q. Can you give me a range?

1 A. It was certainly more than - it would be around the
2 \$100,000 mark.
3
4 Q. It was a bigger campaign than the Bolano campaign,
5 wasn't it?
6 A. It was a bigger campaign from an organising
7 perspective. The amount of phone calls and yard meetings
8 that we had talking to members was much larger. I don't
9 think we put out as much mail as we may have done in the
10 HSU campaign.
11
12 Q. Who else was involved in running that campaign, the
13 Biagini campaign?
14 A. Well, I worked closely with Peter himself as the
15 number one candidate on the ticket and members, rank and
16 file members who were previously on the Branch Committee of
17 Management or are delegates or had been delegates that sort
18 of played the - that were also on the ticket, the new
19 Transport Workers team ticket.
20
21 Q. Did you have any official title on that? Were you the
22 campaign manager?
23 A. No, not really.
24
25 Q. Was there a gentleman by the name of Daniel Mookhey
26 working on the campaign?
27 A. Certainly not in Queensland, no.
28
29 Q. How many votes at the Queensland ALP State Conference
30 did the Queensland TWU have?
31 A. I actually don't know the answer to that. I don't
32 know how many votes they have on the conference floor.
33
34 Q. Have you worked on any other union campaigns since
35 2010?
36 A. No, I have not.
37
38 Q. Were you on leave for the month and a half or so that
39 you were in Queensland?
40 A. It followed the time that I worked on the Federal
41 election campaign in which I'd accrued enough time in lieu
42 that I was working on my own time under an arrangement with
43 Senator Feeney.
44
45 Q. Did you deploy a similar arrangement in respect of the
46 hours you worked on the HSU campaign in 2009?
47 A. As in did I work a similar amount of hours?

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47

Q. Did you work a similar amount of hours?
A. I probably worked more in the Queensland campaign.

Q. In the Queensland campaign?
A. Yes.

Q. But in the HSU were you also working in some time-in-lieu arrangement?
A. Most of my work that I did on the HSU campaign was after hours.

MR STOLJAR: I have nothing further, thank you, Commissioner.

THE COMMISSIONER: Yes.

Q. Thanks for coming, Mr Donnelly. It's possible that some legal representative of some of the parties may want to ask you questions on a future occasion. If so, an attempt will be made to accommodate your convenience, but thank you for your attendance today.

A. Thank you.

<THE WITNESS WITHDREW

THE COMMISSIONER: Is there anything more, Mr Stoljar?

MR STOLJAR: No, nothing further, Commissioner.

THE COMMISSIONER: We will adjourn until 10 o'clock on Monday in Perth.

AT 2.32PM THE COMMISSION WAS ADJOURNED TO MONDAY, 23 JUNE 2013 AT 10AM

\$

\$10,000 [5] - 865:18,
865:21, 885:27,
885:31, 887:10
\$100 [1] - 843:32
\$100,000 [1] - 893:2
\$1000 [1] - 867:18
\$13,000 [3] - 860:11,
860:40, 861:20
\$150,000 [2] - 884:24,
884:27
\$18,000 [1] - 876:21
\$20,000 [2] - 865:18,
877:12
\$25,000 [2] - 862:46,
863:4
\$250,000 [3] - 832:38,
835:17, 837:13
\$3,000 [1] - 851:18
\$3,500 [1] - 852:16
\$30,000 [1] - 885:22
\$38,058 [1] - 877:37
\$4,000 [7] - 839:11,
845:28, 847:22,
847:33, 847:44,
851:4, 854:17
\$40,000 [1] - 876:44
\$48,000 [1] - 853:47
\$5,000 [10] - 845:28,
851:23, 852:16,
854:20, 854:31,
856:15, 856:35,
857:20, 857:38,
865:20
\$50,000 [7] - 851:32,
851:34, 862:13,
862:17, 863:20,
863:24
\$50-\$60,000 [1] -
867:20
\$500 [1] - 846:36
\$58,000 [1] - 877:33
\$6,000 [7] - 849:10,
860:7, 860:44,
861:12, 861:23,
861:26, 861:36
\$6,259.45 [1] - 846:35
\$7,000 [5] - 851:22,
860:8, 860:45,
861:24, 861:26
\$75,000 [1] - 863:16
\$8,000 [6] - 848:3,
848:14, 848:31,
851:16, 852:15,
876:25
\$80,000 [2] - 874:28,
874:35

0

013-375 [1] - 857:21

1

1 [20] - 835:30, 835:40,
838:43, 841:9,
843:22, 846:36,
851:37, 852:1,
852:5, 859:16,
859:18, 863:41,
863:42, 874:18,
888:33, 888:38,
888:39, 889:14
10 [7] - 837:41,
848:34, 850:8,
860:24, 868:38,
876:22, 894:31
10.00am [1] - 828:26
10.05am [1] - 829:23
100 [2] - 884:32, 885:3
1032 [2] - 854:23,
858:22
1033 [4] - 854:27,
857:29, 857:32,
857:41
1034 [3] - 859:31,
859:32, 861:23
10AM [1] - 894:35
11 [3] - 830:22,
832:40, 863:13
11(2)(a),(b)(ii) [1] -
829:9
12 [2] - 851:3, 860:24
12,000 [1] - 883:10
12.42pm [1] - 871:8
13 [8] - 829:3, 829:30,
830:1, 830:19,
830:29, 856:14,
857:2, 861:12
13/02/2012 [1] -
830:34
14 [3] - 846:29,
851:16, 871:47
15 [3] - 851:21, 863:3,
888:35
150 [1] - 873:19
150,000 [3] - 884:30,
884:32, 885:3
16 [5] - 851:32,
852:15, 852:46,
862:11, 863:39
17 [4] - 863:15,
874:23, 883:32,
883:34
18 [9] - 849:44,
850:41, 852:14,

852:45, 856:12,
858:3, 876:30,
881:35, 882:3
19 [3] - 828:26,
852:22, 882:4
1979 [1] - 829:7
1999 [1] - 829:10

2

2 [6] - 855:8, 855:11,
855:20, 865:45,
873:42, 879:36
2.00pm [1] - 880:15
2.32PM [1] - 894:34
20 [3] - 855:5, 855:22,
890:44
20,000 [1] - 875:26
20,000-odd [1] -
877:40
2002 [1] - 872:12
2003 [16] - 832:37,
835:27, 835:32,
835:33, 835:37,
836:24, 839:32,
840:35, 840:41,
841:32, 844:2,
845:10, 845:22,
847:46, 875:12
2003-2004 [1] - 838:4
2004 [6] - 843:16,
844:2, 874:20,
875:13, 875:26,
875:35
2004-2005 [1] - 875:10
2005 [6] - 872:8,
875:26, 875:30,
877:5, 877:9, 877:15
2006 [5] - 875:30,
876:16, 876:19,
876:44
2007 [4] - 829:9,
846:29, 849:8,
875:35
2008 [6] - 849:9,
849:10, 849:43,
850:31, 851:22,
872:12
2009 [21] - 851:33,
852:32, 852:35,
852:46, 859:15,
862:12, 862:22,
862:41, 863:2,
863:3, 863:28,
869:30, 869:33,
869:41, 880:30,
880:44, 882:11,
886:5, 886:13,
890:33, 893:46

2010 [12] - 829:37,
830:3, 832:9,
832:12, 843:16,
854:22, 855:7,
855:31, 861:12,
863:15, 890:38,
893:35
2011 [1] - 866:10
2012 [9] - 829:3,
829:30, 830:1,
830:15, 830:19,
830:29, 869:30,
869:31, 869:37
2013 [1] - 894:35
2014 [2] - 828:26,
871:28
20s [2] - 836:23,
836:24
21 [1] - 848:2
22 [4] - 852:16,
852:46, 854:22,
861:11
23 [4] - 851:33,
862:12, 872:8,
894:34
24 [5] - 851:23, 855:7,
855:31, 862:12,
873:4
25 [2] - 852:23, 863:19
26 [5] - 847:7, 847:14,
847:27, 847:35,
851:21
27 [3] - 865:45, 866:4,
873:43
28 [1] - 830:15
29 [1] - 874:2
299 [1] - 866:1
2pm [1] - 879:34

3

3 [39] - 829:31, 829:39,
829:43, 830:11,
832:37, 833:3,
835:16, 840:33,
843:9, 848:7,
851:33, 853:34,
853:42, 855:30,
856:28, 857:32,
859:27, 859:30,
859:45, 860:7,
860:37, 860:45,
861:13, 862:18,
862:25, 862:26,
862:28, 863:5,
869:28, 871:28,
872:12, 872:21,
872:34, 872:41,
875:6, 875:12,

879:6, 888:41,
888:42
3/6/2014 [1] - 871:43
30 [4] - 874:20,
876:19, 876:28,
890:45
329 [4] - 871:47,
872:4, 872:5, 872:40
349 [1] - 849:44
38 [3] - 856:2, 858:2,
878:35
384 [3] - 839:39,
839:42, 840:4
388 [2] - 839:43, 840:5
390 [2] - 839:43, 840:5

4

4 [8] - 840:35, 841:31,
847:7, 847:18,
847:27, 847:35,
849:44, 847:45
40 [1] - 836:42
41 [1] - 878:47
413 [1] - 866:5
414 [1] - 866:9
416 [2] - 832:31,
832:37
417 [1] - 832:45
421 [2] - 835:20,
836:46
422 [3] - 837:4,
837:36, 838:14
423 [1] - 838:25
424 [2] - 839:36, 840:4
426 [2] - 840:19,
840:39
427 [1] - 842:30
429 [1] - 842:43
431 [1] - 843:15
432 [2] - 844:47,
845:36
439 [2] - 846:12,
849:38
44 [1] - 873:14
444 [1] - 853:4
446 [1] - 861:45
448 [2] - 853:28,
853:38
45 [1] - 875:18
457 [1] - 854:31
458 [1] - 854:33
461 [1] - 859:1
464 [1] - 860:32
467 [1] - 868:17
468 [1] - 868:22
47 [5] - 875:21,
877:10, 877:32,
877:33

470 [1] - 869:41
480 [1] - 869:46

5

5 [4] - 828:22, 841:13,
852:15, 875:17
50 [4] - 849:44,
853:12, 863:21,
867:19
50s [1] - 836:25
51 [1] - 830:23
52 [5] - 854:23,
856:28, 856:29,
857:20, 858:22
53 [2] - 857:29, 857:32
54 [1] - 859:30
55 [1] - 828:22
57 [2] - 875:32, 876:20
58 [1] - 875:45
59 [2] - 875:31, 876:16

6

6 [6] - 829:6, 848:2,
849:9, 850:1,
850:31, 876:27
6-4000 [1] - 872:37
60 [1] - 867:19
60s [2] - 836:23,
836:24
61 [1] - 874:27
63 [1] - 853:12
68 [2] - 873:18, 878:11
69 [1] - 878:11

7

7(3)(a) [1] - 829:8
70 [1] - 891:19
71 [1] - 876:17
73 [3] - 876:17,
877:15, 877:36
75 [1] - 863:19
79 [1] - 878:30

8

8 [5] - 841:14, 846:25,
846:29, 846:32,
876:22
80,000 [1] - 875:27
806 [1] - 829:1
811 [1] - 829:2
82 [2] - 878:22, 878:27

9

9 [4] - 828:19, 835:31,
847:6, 862:39
9017-200-64 [1] -
857:21
930018 [1] - 850:11

A

AB [9] - 854:21,
854:31, 856:33,
857:9, 858:23,
858:31, 858:32,
858:38
able [23] - 831:40,
831:43, 836:7,
837:18, 837:28,
837:33, 838:36,
838:37, 843:17,
846:28, 850:5,
859:18, 861:31,
865:24, 867:20,
867:38, 867:45,
868:1, 868:14,
868:41, 883:39,
887:42
abolished [1] - 866:16
absolutely [1] -
888:26
AC [1] - 828:31
accepted [1] - 863:35
access [5] - 835:24,
839:5, 860:20,
865:19, 884:11
Access [1] - 829:7
accommodate [1] -
894:21
accompanied [1] -
842:21
accordance [1] -
886:35
according [1] - 867:33
Account [3] - 832:33,
841:7, 872:42
account [67] - 832:36,
838:42, 840:20,
840:34, 840:42,
841:6, 841:11,
841:22, 841:25,
843:3, 843:5, 843:9,
844:29, 844:37,
845:10, 845:45,
846:41, 848:7,
848:41, 848:43,
848:44, 850:24,
850:27, 850:28,
852:9, 852:24,
852:26, 857:17,

857:18, 857:21,
859:28, 859:45,
859:46, 860:4,
860:14, 860:37,
860:45, 861:13,
861:20, 861:32,
861:36, 862:18,
863:5, 863:39,
864:1, 864:8,
864:21, 864:31,
865:1, 865:8,
865:11, 865:30,
865:34, 866:40,
867:47, 872:33,
872:34, 872:37,
873:30, 874:23,
874:34, 883:39,
883:47, 884:4
Account [1] - 860:5
account [1] - 845:16
accountant [2] -
871:16, 878:1
accounting [1] - 879:5
Accounts [1] - 841:20
accounts [20] -
841:42, 843:7,
846:25, 854:28,
855:45, 858:1,
863:31, 863:32,
864:25, 864:27,
866:7, 872:42,
873:21, 873:23,
873:26, 873:39,
874:3, 874:45,
875:18, 882:27
accrued [2] - 853:47,
893:41
Act [5] - 829:7, 829:8,
829:10, 834:26,
834:32
action [4] - 833:13,
833:14, 834:36,
866:25
activists [1] - 881:20
activities [2] - 837:24,
884:19
activity [2] - 852:24,
875:3
actual [3] - 832:41,
858:35, 874:45
ad [1] - 882:30
add [3] - 851:29,
869:21, 877:44
addition [2] - 833:46,
834:14
additional [2] -
853:32, 853:40
addressed [1] -
839:39
adjourn [2] - 860:24,

894:31
ADJOURNED [1] -
894:34
ADJOURNMENT [2] -
860:26, 879:40
admin [1] - 830:38
administering [1] -
882:18
administration [1] -
859:15
administrative [1] -
830:38
administrator [1] -
832:4
admissibility [1] -
829:2
admitted [1] - 829:13
adopted [1] - 892:4
Adriana [1] - 836:9
advantage [1] -
866:34
advice [4] - 832:43,
834:20, 842:1, 881:5
affected [1] - 834:20
affidavit [2] - 834:21,
852:37
affiliated [3] - 838:16,
888:34
affirmed [1] - 871:8
afford [1] - 837:29
afforded [1] - 847:45
afterwards [1] -
845:36
age [2] - 836:22,
881:35
ago [5] - 832:39,
832:40, 856:19,
860:43, 876:14
Agostinelli [3] - 855:4,
855:46, 856:14
Agostinelli's [3] -
855:3, 855:12, 858:4
agree [1] - 882:14
agreed [2] - 859:25,
878:45
agreement [9] -
833:12, 833:20,
833:40, 834:6,
834:8, 835:6,
835:13, 838:27,
889:22
agreements [1] -
833:8
allegation [1] - 858:14
allegations [4] -
831:29, 831:30,
832:1, 847:21
allegiances [2] -
867:43, 886:7
alleging [1] - 834:5

alliances [1] - 867:42
Allied [1] - 887:2
allocated [2] - 850:15,
872:33
allocation [1] - 891:24
allowance [1] - 847:45
allowed [1] - 866:24
almost [1] - 837:46
ALP [7] - 837:27,
838:22, 880:33,
886:4, 888:29,
890:47, 893:29
amalgamation [1] -
830:39
amount [33] - 832:38,
835:12, 835:16,
841:10, 841:11,
845:28, 845:29,
846:36, 849:29,
849:39, 851:16,
851:32, 851:34,
851:45, 853:47,
854:12, 854:18,
856:15, 859:17,
860:7, 862:46,
863:4, 863:16,
867:18, 876:21,
877:11, 877:33,
882:36, 893:7,
893:47, 894:2
amounts [3] - 848:3,
850:44, 852:16
AND [1] - 828:13
annum [2] - 839:12,
854:18
ANSWER [1] - 840:30
answer [9] - 840:22,
848:28, 851:29,
858:30, 861:7,
863:30, 883:9,
887:42, 893:31
apart [3] - 853:8,
853:17, 886:5
apologies [1] - 835:40
appear [4] - 844:14,
845:30, 871:46,
880:10
application [1] - 853:7
applied [3] - 846:17,
847:39, 849:33
apply [1] - 833:10
appointed [1] - 830:41
apprehended [1] -
842:20
approval [8] - 840:19,
844:11, 844:39,
845:20, 845:22,
862:2, 864:9, 864:29
approved [6] - 834:19,
834:23, 853:31,

853:40, 865:7, 876:6
April [4] - 835:31,
849:44, 850:41,
854:22
arch [1] - 831:22
area [2] - 881:14,
881:15
areas [2] - 881:6,
881:40
argued [1] - 867:9
argument [1] - 829:2
arise [1] - 870:42
arranged [1] - 870:28
arrangement [6] -
834:19, 834:23,
838:47, 893:42,
893:45, 894:9
article [2] - 856:21,
868:20
ashram [1] - 870:10
aside [3] - 838:39,
865:11, 869:10
Asmar [1] - 886:20
aspect [2] - 862:19,
881:7
aspects [1] - 866:5
assist [3] - 837:27,
853:17, 853:19
assistance [1] -
889:28
assistant [1] - 880:27
Assisting [1] - 828:38
assisting [1] - 881:3
associated [6] -
853:33, 853:41,
888:25, 891:23,
891:40, 891:42
Association [3] -
841:20, 886:47,
887:3
association [8] -
841:23, 841:27,
841:29, 841:33,
841:37, 842:3,
842:22, 842:31
associations [2] -
841:42, 842:12
assume [1] - 887:36
assumed [1] - 889:28
assumption [1] -
887:30
AT [2] - 894:34,
894:35
ATM [1] - 846:29
attempt [2] - 866:32,
894:21
attend [4] - 836:7,
856:31, 858:21,
889:37
attendance [4] -
830:2, 879:27,
889:41, 894:22
attended [5] - 869:9,
869:40, 889:42,
890:20, 890:23
attention [1] - 872:32
attributed [2] -
882:10, 886:21
audio [1] - 830:25
audit [10] - 855:14,
872:20, 873:3,
873:33, 875:41,
877:28, 878:15,
878:19, 878:31,
878:35
audited [5] - 855:45,
858:1, 864:26,
865:1, 874:33
auditor [7] - 857:45,
858:8, 858:25,
871:15, 871:16,
872:11, 872:15
auditors [1] - 864:27
audits [1] - 872:47
August [2] - 832:12,
846:29
Austin [1] - 836:38
Australia [13] -
856:14, 856:36,
857:5, 857:6,
857:10, 858:11,
858:18, 858:19,
858:24, 858:26,
858:39, 869:2,
883:15
Australian [4] -
844:41, 854:37,
880:28, 892:33
authorisation [1] -
880:13
authorised [5] -
838:39, 839:11,
854:13, 854:17,
865:11
authority [1] - 840:34
available [2] - 886:44,
887:4
award [2] - 834:5,
834:39
awarded [1] - 838:2
awards [1] - 833:5
aware [6] - 859:4,
876:1, 882:34,
886:42, 890:11,
890:14
AWU [12] - 864:24,
885:15, 885:17,
885:19, 885:42,
886:25, 886:29,
887:8, 887:28,
887:37, 888:7,
888:14

B

b(i) [1] - 829:8
Bachelor [1] - 836:19
backed [1] - 886:36
background [1] -
885:45
backing [3] - 886:19,
886:20, 886:22
bad [1] - 878:14
bags [7] - 868:40,
868:41, 868:43,
869:1, 869:2, 869:11
balance [4] - 846:35,
849:8, 860:36,
868:16
ball [1] - 844:42
ballot [1] - 866:20
balls [1] - 865:16
BANK [1] - 840:31
bank [6] - 840:20,
840:41, 843:2,
846:26, 851:44,
860:43
Bank [4] - 840:20,
840:23, 859:40,
861:7
bargaining [1] - 833:7
Barry [10] - 831:15,
831:16, 831:27,
832:15, 832:16,
832:19, 832:27,
857:7
based [1] - 883:16
basis [1] - 882:30
BCOM [37] - 831:41,
835:20, 835:22,
835:31, 836:47,
837:6, 837:37,
838:15, 838:27,
838:30, 840:19,
842:46, 843:32,
844:11, 844:38,
845:3, 845:15,
845:20, 845:36,
845:42, 845:44,
846:6, 846:16,
847:45, 853:32,
853:40, 854:6,
854:14, 862:2,
862:20, 862:32,
863:8, 863:11,
863:24, 874:29,
876:7, 878:18
became [1] - 853:44
Becco [2] - 889:37,
890:21
becoming [1] - 892:36
Bede [3] - 870:7,
870:9, 870:12
beginning [3] -
862:26, 882:38,
883:23
begins [2] - 866:4,
876:16
behalf [4] - 833:17,
833:44, 884:44,
887:5
behind [8] - 835:30,
854:22, 855:7,
855:19, 857:29,
862:25, 873:42,
875:17
beholden [1] - 867:11
Behrens [1] - 869:24
Behrens's [1] - 869:36
Benedictine [1] -
870:9
benefit [1] - 859:41
benefits [1] - 842:20
best [4] - 833:2,
835:36, 837:44,
839:30
bet [2] - 884:33,
886:29
better [3] - 864:33,
885:46, 890:44
between [5] - 843:16,
843:19, 854:36,
863:19, 884:32
Biagini [5] - 891:13,
891:16, 891:19,
891:40, 893:13
big [5] - 837:47,
865:16, 867:9
bigger [2] - 893:4,
893:6
Bill [4] - 886:20,
888:12, 888:19,
888:20
binding [1] - 889:22
bit [1] - 852:31
bite [1] - 833:23
Bob [3] - 831:7, 831:9,
832:13
Bolano [21] - 868:24,
869:13, 880:44,
881:4, 881:5, 881:9,
881:18, 881:22,
881:27, 885:20,
886:22, 886:44,
887:6, 888:10,
889:4, 889:13,
889:43, 890:12,
890:24, 893:4
Bolano's [6] - 870:4,
881:21, 882:7,
885:12, 888:4,
889:34
bold [1] - 862:45
book [14] - 839:24,
839:26, 839:31,
839:38, 846:8,
846:12, 849:34,
853:8, 853:18,
863:47, 864:2,
864:3, 864:5, 870:9
booking [1] - 837:32
bookkeeper [1] -
872:20
booklet [1] - 866:19
books [2] - 843:9,
885:29
bottom [5] - 855:23,
856:4, 856:12,
858:3, 860:2
box [6] - 829:21,
848:45, 848:46,
849:4, 849:8, 870:29
boxes [1] - 831:5
Branch [51] - 829:31,
829:39, 829:43,
830:11, 831:17,
831:18, 832:37,
833:3, 835:16,
838:43, 841:9,
843:9, 843:22,
845:31, 848:7,
851:33, 851:37,
852:1, 852:5,
853:34, 853:42,
855:30, 859:16,
859:18, 859:27,
860:37, 862:28,
863:26, 863:34,
863:36, 863:41,
863:42, 864:9,
864:30, 865:6,
869:28, 872:12,
872:21, 872:41,
873:15, 879:6,
888:33, 888:34,
888:38, 888:39,
888:41, 888:42,
889:14, 890:37,
892:34, 893:16
branch [17] - 829:39,
830:39, 831:1,
831:38, 833:17,
837:20, 837:23,
843:4, 854:28,
857:20, 857:37,
863:5, 864:26,
865:22, 880:27,
890:44, 891:13
breach [1] - 834:27

breaches [2] - 833:5, 834:5
break [2] - 864:16, 879:33
breath [1] - 834:25
bring [1] - 835:29
Bringing [8] - 854:37, 856:15, 856:36, 857:10, 858:18, 858:20, 858:24, 858:39
brings [1] - 834:45
broken [1] - 886:5
brought [2] - 833:3, 834:4
Bryan [2] - 836:8, 836:40
BSB [2] - 857:19, 857:21
budget [7] - 882:33, 882:34, 882:38, 882:40, 883:5, 892:41, 892:45
build [1] - 866:46
built [1] - 889:18
bulwark [1] - 867:15
bundle [8] - 855:5, 861:6, 862:6, 871:35, 880:36, 883:22, 883:24, 883:30
BUNDLE [2] - 871:43, 883:28
bundled [2] - 831:26, 883:15
business [5] - 864:11, 864:32, 864:44, 865:29, 867:44
buy [1] - 869:6
buying [3] - 848:19, 868:40, 869:11
BY [4] - 829:25, 840:31, 871:10, 880:17
Byron [1] - 886:19

C

campaign [82] - 841:45, 841:46, 867:11, 867:17, 869:24, 870:4, 880:43, 881:7, 881:15, 881:38, 881:40, 881:46, 882:3, 882:8, 882:11, 882:13, 882:15, 882:18, 882:24, 882:25, 882:33, 882:38, 882:39, 883:33, 883:36, 884:1, 884:5, 884:10, 884:19, 884:20, 884:23, 885:12, 885:16, 885:17, 885:20, 885:29, 885:39, 886:41, 886:43, 888:4, 888:19, 888:21, 888:23, 889:34, 889:38, 890:13, 890:24, 890:30, 890:33, 890:38, 890:40, 891:15, 891:16, 891:18, 891:22, 891:26, 891:36, 891:47, 892:1, 892:3, 892:4, 892:5, 892:20, 892:24, 892:31, 892:42, 893:4, 893:6, 893:10, 893:12, 893:13, 893:22, 893:26, 893:41, 893:46, 894:3, 894:5, 894:10
campaigning [1] - 890:42
campaigns [14] - 837:19, 837:25, 837:26, 837:30, 843:26, 843:27, 849:17, 849:21, 849:22, 853:21, 865:25, 890:32, 893:34
Cancer [4] - 832:38, 833:4, 833:37, 833:43
candidacy [1] - 868:24
candidate [6] - 866:17, 867:17, 869:26, 886:36, 891:12, 893:15
candidates [6] - 866:32, 867:14, 867:19, 868:21, 881:32, 886:15
candidates* [1] - 866:29
candidature [1] - 869:36
cannot [1] - 853:14
card [3] - 850:14, 850:23, 850:35
career [1] - 833:42
careful [1] - 888:15
Carmichael [1] - 881:27
Carol [4] - 881:27, 881:28, 889:43, 890:23
carried [1] - 872:47
carry [3] - 831:36, 869:1, 869:2
carry-on [2] - 869:1, 869:2
case [6] - 834:32, 837:47, 838:2, 855:11, 867:6, 886:32
cases [1] - 834:25
cash [23] - 843:32, 847:21, 849:24, 849:32, 849:43, 849:47, 850:2, 851:4, 851:45, 859:21, 859:23, 860:35, 860:45, 861:2, 861:23, 861:27, 861:32, 861:34, 861:35, 869:6, 869:13, 869:16, 885:35
categories [8] - 831:6, 831:13, 873:19, 873:20, 873:35, 877:24, 878:7
category [3] - 873:30, 873:35, 876:44
caused [1] - 848:10
CBA [5] - 840:34, 845:10, 846:25, 861:32, 862:6
cease [1] - 884:4
celebratory [1] - 890:25
cent [1] - 891:19
Centre [1] - 836:34
centre [2] - 886:43, 887:4
certain [6] - 846:27, 851:37, 865:18, 870:2, 870:3, 882:36
certainly [8] - 831:43, 838:10, 842:45, 886:31, 890:15, 891:5, 893:1, 893:27
certified [1] - 866:24
cetera [5] - 839:13, 853:25, 864:25, 867:25
challenge [1] - 891:8
challenger [1] - 891:11
challenging [1] - 890:41
chance [1] - 867:14
Chang [1] - 889:44
change [4] - 864:39, 867:23, 867:27, 892:4
changes [4] - 865:28, 865:42, 867:34, 867:43
charge [1] - 882:23
charitable [3] - 856:40, 857:13, 858:44
charity [1] - 854:36
checked [1] - 876:5
cheque [13] - 850:1, 850:3, 850:10, 850:27, 850:28, 850:29, 856:33, 856:45, 857:19, 858:22, 858:31, 858:32, 885:35
chest [2] - 867:46, 887:16
chests [1] - 866:46
chief [2] - 836:3, 836:33
Christmas [2] - 848:17, 848:40
chuckfest [1] - 829:44
circumstances [1] - 839:39
claim [1] - 853:30
clarify [2] - 830:47, 835:11
classified [1] - 874:11
clean [2] - 831:47, 832:10
clear [4] - 857:12, 858:18, 864:28, 885:32
clearly [1] - 863:19
clerk [1] - 830:39
clients [1] - 879:2
clinical [2] - 836:1, 836:35
closely [1] - 893:14
coder [1] - 836:1
collect [1] - 853:30
column [1] - 862:44
combine [1] - 873:35
comfortable [1] - 884:25
coming [9] - 836:46, 837:13, 847:6, 850:44, 851:3, 855:14, 866:38, 866:40, 894:18
comment [2] - 850:13, 870:11
Commission [9] - 830:31, 840:28, 852:9, 852:12, 870:35, 870:37, 870:42, 880:19, 883:32
COMMISSION [2] - 828:12, 894:34
commissioner [1] - 860:22
Commissioner [11] - 828:31, 850:14, 855:11, 871:34, 876:27, 879:16, 880:5, 880:9, 883:23, 894:14, 894:29
COMMISSIONER [45] - 829:1, 829:18, 830:27, 834:35, 835:9, 836:13, 836:27, 839:35, 840:25, 848:28, 849:47, 850:10, 850:17, 854:39, 855:17, 855:22, 855:27, 855:33, 855:37, 855:43, 856:4, 856:9, 858:30, 860:24, 860:28, 868:7, 870:26, 870:47, 871:4, 871:38, 875:12, 876:25, 876:30, 879:18, 879:22, 879:36, 880:3, 880:13, 880:39, 883:26, 888:44, 889:1, 894:16, 894:27, 894:31
committed [2] - 870:36, 870:38
Committee [9] - 845:31, 863:26, 863:34, 863:36, 864:9, 864:30, 865:7, 873:15, 893:16
committee [14] - 830:29, 831:44, 835:31, 835:33, 835:36, 835:41, 835:44, 838:18, 838:19, 838:23, 841:47, 843:4, 844:13, 874:43
COMMITTEE [1] - 830:34
common [1] - 854:32
commonly [2] - 866:46, 867:8

COMMONWEALTH [1] - 840:31
Commonwealth [5] - 829:7, 840:20, 840:23, 859:40, 861:7
communicated [1] - 881:8
communicating [1] - 884:19
communication [1] - 881:11
communications [1] - 881:7
community [2] - 836:39, 864:43
companies [1] - 868:22
company [6] - 870:14, 883:13, 883:14, 883:17, 890:1
comparable [1] - 877:36
comparative [3] - 875:26, 877:6, 877:16
comparatively [1] - 849:42
compensate [1] - 839:18
complete [1] - 841:19
completed [1] - 840:35
completion [1] - 884:5
component [7] - 833:35, 834:9, 839:5, 847:22, 849:2, 860:35, 885:3
components [1] - 833:34
compromise [2] - 833:29, 835:13
concern [1] - 867:35
concerning [1] - 839:4
concerns [2] - 878:39, 878:41
conclusion [1] - 869:46
conduct [2] - 865:29, 866:6
conducted [4] - 864:11, 864:40, 864:45, 865:31
conducting [1] - 872:19
Conference [6] - 888:29, 888:44, 888:46, 889:5, 889:17, 893:29
conference [2] - 888:35, 893:32
confident [2] - 890:8, 892:44
confusion [1] - 855:12
conjunction [2] - 838:43, 867:26
connection [1] - 854:35
Conroy [1] - 886:19
considering [1] - 885:42
constituted [1] - 835:33
constitution [1] - 841:27
contact [1] - 881:15
contacted [1] - 856:37
contained [2] - 855:12, 862:25
containing [1] - 855:15
contains [1] - 883:30
contemplated [1] - 841:32
contemplating [1] - 841:22
content [1] - 871:31
contents [2] - 855:33, 855:40
context [2] - 859:12, 866:11
continued [1] - 843:44
continuing [1] - 866:14
CONTINUING [1] - 829:25
contrary [1] - 889:10
contribute [7] - 837:33, 865:17, 865:25, 885:11, 885:15, 886:40, 888:3
contributed [6] - 869:22, 869:23, 870:3, 885:7, 888:12, 888:13
contributing [3] - 869:10, 870:18, 886:42
contribution [7] - 885:17, 885:18, 885:19, 885:31, 886:40, 887:1, 887:9
control [1] - 888:28
controller [2] - 831:16, 831:18
convenience [1] - 894:21
conversation [3] - 859:11, 861:41, 882:10
conversations [2] - 864:23, 881:17
converse [1] - 892:6
cooperating [1] - 870:37
copied [1] - 873:44
copies [1] - 878:18
copy [6] - 839:31, 855:19, 873:6, 873:47, 878:26, 880:41
corner [13] - 846:32, 850:8, 855:25, 857:33, 858:3, 861:11, 862:27, 872:1, 874:19, 874:24, 875:7
corporate [1] - 865:16
correct [23] - 831:45, 840:10, 840:17, 841:34, 845:38, 846:20, 847:8, 847:43, 854:8, 854:41, 858:9, 860:45, 871:13, 871:26, 871:31, 872:35, 873:40, 876:30, 880:45, 884:12, 885:1, 891:40, 891:44
correction [1] - 839:46
corrections [2] - 879:3, 879:4
correctly [1] - 889:21
corresponds [1] - 861:33
CORRUPTION [1] - 828:13
corruption [2] - 867:8, 867:16
cost [2] - 884:23, 885:4
council [1] - 829:29
Counsel [1] - 828:38
counsel [1] - 834:21
count [1] - 837:40
country [2] - 867:39, 870:44
couple [3] - 833:7, 834:28, 856:19
course [6] - 829:47, 830:3, 877:27, 878:15, 878:19, 883:35
court [6] - 832:41, 832:46, 833:14, 833:25, 835:3, 880:7
Court [2] - 838:1, 852:11
cover [2] - 855:13, 858:16
covered [3] - 834:38, 838:47, 845:21
created [2] - 862:36, 886:5
credit [1] - 861:14
credited [1] - 861:36
credits [1] - 848:31
crude [1] - 884:26
crudely [2] - 891:39, 891:43
current [1] - 880:26
cut [1] - 866:36

D

Daniel [1] - 893:25
Darren [1] - 832:14
database [1] - 873:7
date [8] - 849:18, 849:39, 855:41, 863:4, 863:13, 868:3, 872:7, 879:26
dated [2] - 863:3, 871:28
DATED [2] - 830:34, 871:43
dates [2] - 847:12, 848:16
David [9] - 880:31, 881:29, 886:22, 889:12, 889:44, 890:23, 892:25, 892:32, 892:35
days [6] - 834:28, 856:19, 870:21, 881:34, 890:31, 890:32
deal [9] - 839:42, 839:44, 852:11, 854:20, 868:11, 868:15, 868:16, 869:41, 884:9
dealing [2] - 832:32, 868:20
dealt [1] - 857:7
debate [2] - 829:30, 829:47
debated [1] - 889:16
debts [2] - 848:32, 848:33
debts [1] - 851:38
December [12] - 840:35, 840:41, 841:31, 845:10, 847:7, 847:18, 847:27, 847:35, 848:2, 848:32, 851:23
decided [2] - 837:31, 847:22
deductions [3] - 838:7, 838:8, 838:9
defeated [1] - 867:31
definitely [5] - 836:31, 839:33, 851:13, 858:45, 863:10
delegates [7] - 848:18, 848:20, 881:20, 888:35, 892:6, 893:17
deliberately [1] - 866:21
democracy [1] - 867:10
deploy [1] - 893:45
deployed [1] - 844:12
deploying [1] - 844:37
deposit [1] - 862:13
deposited [1] - 861:36
deputy [2] - 836:3, 836:33
derive [1] - 842:15
descend [2] - 845:43, 846:2
describe [4] - 873:3, 878:34, 881:1, 882:7
described [3] - 829:44, 849:5, 865:4
describing [2] - 843:41, 887:24
designate [1] - 840:13
designing [1] - 884:18
desire [1] - 860:39
detail [3] - 845:43, 846:2, 866:5
detailed [1] - 868:13
details [2] - 843:3, 875:40
development [1] - 881:10
Development [4] - 832:33, 841:6, 860:5, 872:42
Devices [2] - 829:8, 829:10
Dick [6] - 871:6, 871:12, 871:40, 871:45, 879:18, 879:22
DICK [3] - 871:8, 871:42
difference [1] - 863:19
different [10] - 832:31, 844:8, 848:19, 849:16, 864:13, 864:16, 864:35,

873:26, 875:31,
887:24
dinner [7] - 854:21,
854:24, 858:21,
869:6, 890:22,
890:25, 890:27
direct [4] - 850:3,
881:11, 882:36,
883:6
directly [2] - 835:5,
852:4
disappeared [1] -
839:38
disclosed [3] -
867:24, 874:3,
874:14
disclosure [1] -
864:41
discrete [1] - 865:11
discretionary [3] -
837:5, 837:18,
837:31
discuss [2] - 846:16,
862:19
discussed [3] -
842:45, 845:2,
845:15
discussion [14] -
830:8, 830:18,
835:20, 836:47,
838:15, 840:8,
859:19, 863:23,
869:45, 879:32,
885:39, 886:29,
886:31, 890:19
discussions [3] -
838:10, 841:9,
842:19
disposed [1] - 878:24
dispute [3] - 833:13,
833:15
disputes/rallies [1] -
853:24
Distributive [2] -
886:47, 887:2
disturbingly [1] -
858:14
divisional [1] - 830:42
Dixon [2] - 835:29,
836:4
doctor [1] - 850:32
document [12] -
839:44, 840:36,
841:3, 841:13,
857:29, 857:41,
859:44, 863:2,
863:34, 866:4,
866:6, 872:7
documentation [1] -
878:42

DOCUMENTS [3] -
840:30, 871:43,
883:28
documents [29] -
831:13, 831:20,
831:25, 831:29,
831:31, 831:32,
831:33, 831:36,
832:2, 832:3,
840:21, 853:15,
853:17, 853:19,
861:7, 862:7,
871:36, 871:39,
872:20, 872:24,
877:46, 878:30,
880:37, 883:22,
883:31, 883:32,
883:34, 884:9,
884:14
dollars [1] - 833:40
donated [1] - 856:43
donating [3] - 888:19,
888:20, 890:17
donation [21] -
854:28, 854:32,
857:2, 857:3,
857:26, 857:37,
858:15, 858:16,
858:17, 858:19,
858:20, 858:21,
858:27, 869:46,
874:46, 874:47,
885:43, 889:33,
890:12, 890:13
donations [2] -
838:14, 874:10
done [13] - 833:17,
842:25, 842:26,
844:44, 848:23,
852:2, 865:26,
875:31, 876:41,
877:27, 882:30,
885:32, 893:9
Donnelly [13] -
879:30, 879:33,
879:34, 880:6,
880:11, 880:21,
880:26, 880:43,
883:26, 884:8,
891:39, 894:18
DONNELLY [2] -
880:15, 883:28
donors [1] - 867:11
Doug [1] - 886:19
down [5] - 829:37,
841:24, 858:26,
877:37, 882:24
Dr [3] - 880:7, 880:39,
880:41
DR [1] - 880:9

draw [1] - 872:31
drawn [2] - 835:45,
869:19
drew [1] - 868:36
drifted [1] - 868:7
dues [1] - 865:10
dug [1] - 875:42
Dunlop [2] - 836:2,
836:32
during [11] - 829:28,
829:43, 829:47,
830:3, 849:43,
858:11, 858:12,
881:8, 881:23,
889:38, 891:36
duties [2] - 853:32,
853:40
Dyson [1] - 828:31

E

early [6] - 835:33,
844:2, 846:28,
882:11, 885:16,
886:5
easily [2] - 838:37,
847:25
East [2] - 830:28,
831:17
EAST [1] - 830:34
Education [1] - 847:18
educator [1] - 836:36
effect [7] - 829:35,
837:10, 843:18,
853:11, 865:30,
876:22, 888:11
effected [7] - 846:38,
847:36, 848:11,
849:24, 850:35,
851:41, 860:15
effective [3] - 867:38,
868:1
effectiveness [1] -
870:43
EFT [2] - 861:24,
861:26
either [6] - 843:22,
851:13, 851:46,
852:47, 861:20,
878:38
elected [1] - 892:38
election [22] - 852:28,
866:18, 866:29,
867:44, 869:4,
869:24, 869:28,
869:33, 869:37,
881:2, 881:4, 881:8,
881:23, 882:3,
886:12, 886:14,
887:12, 889:4,
890:24, 890:25,
892:1, 893:41
elections [17] -
852:29, 852:31,
852:35, 852:39,
852:42, 853:1,
853:20, 853:23,
864:40, 866:12,
866:34, 866:47,
867:34, 867:40,
869:27, 870:19,
887:25
electoral [5] - 841:47,
867:7, 867:15,
867:24
electorate [1] - 841:47
electronic [2] - 857:1,
858:35
electronically [3] -
852:2, 857:19, 884:9
elements [2] - 886:13,
886:17
elided [1] - 876:32
eligible [2] - 881:12,
881:16
Ellison [1] - 828:43
elsewhere [1] - 837:30
email [1] - 883:39
emails [4] - 883:33,
883:35, 883:40,
884:17
emanating [1] - 859:8
embarrass [1] - 864:6
employed [1] - 836:44
employees [3] - 835:7,
837:29, 887:4
Employees [1] - 887:2
employer [2] - 834:15,
834:27
employment [2] -
833:21, 833:42
empower [1] - 881:19
enable [1] - 889:19
encourage [1] -
881:21
end [2] - 835:3, 842:32
endeavour [1] -
833:34
ended [2] - 874:20,
876:18
ending [2] - 855:7,
855:31
endorsed [1] - 863:36
endorsement [1] -
864:9
enhanced [1] - 833:41
enormous [1] - 866:34
enterprise [4] - 833:6,
833:20, 834:6, 834:8

entirely [1] - 882:1
entities [1] - 885:11
entitlements [6] -
833:19, 833:39,
834:18, 834:24,
838:1, 859:17
entry [2] - 875:25,
877:2
enumerating [1] -
833:33
envelope [1] - 869:17
environment [2] -
864:14, 867:46
equity [1] - 867:29
essential [1] - 870:39
essentially [2] -
881:18, 886:15
establish [3] - 837:5,
838:12, 842:30
establishment [1] -
842:21
et [5] - 839:13, 853:25,
864:25, 867:25
evening [1] - 890:22
evenings [1] - 886:45
event [6] - 830:18,
831:42, 858:42,
874:2, 886:39,
887:46
events [5] - 840:47,
843:26, 865:16,
865:18, 867:2
eventually [3] -
833:13, 838:27,
870:42
evidence [23] - 829:2,
829:4, 829:6,
829:13, 829:28,
829:29, 829:32,
829:35, 829:42,
830:7, 839:23,
839:25, 843:30,
853:46, 865:43,
871:35, 871:39,
874:28, 883:23,
885:18, 887:20,
887:46, 889:21
exactly [5] - 847:24,
857:26, 864:5,
864:22, 868:38
EXAMINATION [3] -
829:25, 871:10,
880:17
examined [1] - 879:24
example [14] - 835:46,
837:25, 841:45,
843:24, 844:41,
847:27, 849:43,
850:31, 852:45,
860:17, 864:40,

869:5, 873:29,
890:36
excellent [1] - 833:16
Executive [8] -
864:39, 865:38,
865:40, 865:42,
866:9, 867:29,
867:32, 867:33
executive [3] - 830:28,
831:35, 831:44
EXECUTIVE [1] -
830:34
exercise [11] - 846:8,
846:12, 849:34,
853:8, 853:18,
863:47, 864:2,
864:3, 864:5, 889:5,
889:23
exercised [1] - 889:10
exhibit [1] - 861:23
existed [1] - 849:34
existence [2] - 835:28,
884:9
expect [5] - 850:3,
865:33, 867:3,
879:2, 889:14
expectation [2] -
889:3, 889:26
expended [1] - 843:15
expenditure [6] -
862:1, 863:24,
875:22, 875:34,
876:18, 877:9
expenditures [3] -
843:18, 849:42,
877:40
expense [3] - 847:26,
876:20, 877:11
expenses [2] - 875:2,
878:6
Expenses [2] -
862:44, 862:45
experience [2] -
836:30, 887:11
experienced [1] -
881:41
explain [4] - 858:7,
876:36, 878:10,
878:12
explained [3] -
856:38, 859:21,
876:43
explanation [2] -
844:33, 877:31
external [1] - 867:3
extract [1] - 830:13

F

fact [5] - 841:32,
842:30, 852:22,
863:2, 878:22
faction [2] - 891:41,
891:42
factional [2] - 830:44,
867:40
fair [8] - 867:14,
882:7, 884:8,
884:32, 887:36,
889:17, 889:19,
889:23
Fair [4] - 857:5, 857:6,
858:10, 858:25
Fairfax [1] - 856:35
faithfully [1] - 864:4
fall [1] - 865:32
falling [1] - 865:31
familiar [3] - 872:46,
874:7, 874:14
family [1] - 892:33
far [4] - 832:27,
856:21, 864:28,
890:11
fashion [2] - 844:45,
847:26
feature [1] - 834:44
February [9] - 829:3,
829:30, 830:1,
830:19, 830:29,
831:44, 831:45,
848:33, 863:3
federal [1] - 841:47
Federal [6] - 834:38,
834:41, 852:11,
853:21, 872:16,
893:40
fee [1] - 849:1
Feeney [16] - 880:31,
881:1, 881:29,
881:35, 881:37,
881:43, 886:22,
889:10, 889:12,
889:28, 889:44,
890:23, 892:12,
892:21, 892:23,
893:43
Feeney's [1] - 889:3
fees [3] - 839:12,
839:19, 854:5
fell [1] - 882:24
Fennelly [1] - 870:7
few [3] - 835:28,
879:4, 883:34
fight [2] - 866:47,
867:39
fighting [7] - 859:5,
859:7, 859:23,
859:26, 861:39,
887:11, 888:25
figure [4] - 877:37,
884:25, 892:43,
892:45
figures [2] - 848:31,
884:27
file [4] - 835:46,
860:20, 892:38,
893:16
files [1] - 872:33
final [1] - 833:25
finances [3] - 882:18,
882:23, 884:15
financial [25] - 829:31,
831:14, 831:16,
831:17, 837:15,
837:34, 838:4,
844:15, 844:18,
845:30, 845:39,
845:42, 845:44,
855:6, 855:41,
857:44, 862:24,
862:32, 863:35,
868:26, 874:19,
874:20, 875:42,
876:18
financially [1] - 868:26
fine [1] - 882:14
fines [1] - 834:15
finished [1] - 848:28
Fiona [1] - 828:39
first [16] - 829:20,
833:24, 836:42,
842:8, 849:9, 852:3,
852:8, 853:39,
855:27, 855:37,
856:19, 858:10,
862:18, 872:40,
881:6, 881:46
firstly [1] - 862:17
fit [1] - 889:31
five [4] - 839:16,
873:35, 883:6,
888:42
fix [1] - 838:7
Fleur [1] - 869:23
flip [1] - 863:14
floor [3] - 888:36,
889:16, 893:32
flow [1] - 859:22
flyer [2] - 856:22,
856:29
focusing [1] - 866:36
folder [9] - 840:21,
846:25, 849:37,
855:4, 855:13,
855:15, 862:40,
872:4, 873:43

FOLDER [1] - 840:30
folders [1] - 831:22
followed [1] - 893:40
following [4] - 851:33,
862:14, 869:42,
878:11
FORBES [2] - 871:8,
871:42
Forbes [1] - 871:12
form [1] - 854:32
formal [4] - 838:30,
882:34, 882:37,
882:40
formalise [1] - 841:26
formally [1] - 882:9
former [1] - 829:23
forms [1] - 881:11
forth [1] - 831:22
Forum [2] - 891:35,
891:37
forward [1] - 834:1
four [6] - 836:19,
873:9, 873:35,
883:5, 883:12,
884:35
fraction [1] - 834:47
frame [1] - 852:27
Frances [3] - 856:30,
856:32
friendship [1] - 892:26
front [1] - 856:5
full [5] - 853:35,
854:12, 854:18,
864:41, 880:19
full-time [1] - 853:35
fully [1] - 870:36
function [4] - 844:42,
856:31, 856:40,
858:44
fund [21] - 837:5,
837:18, 837:23,
837:31, 838:12,
844:1, 844:2, 859:7,
859:23, 859:27,
861:39, 887:29,
887:35, 887:38,
887:40, 888:25,
891:22, 891:25,
891:29, 891:30
Fund [2] - 845:4,
845:6
fund" [1] - 859:5
funded [2] - 864:40,
867:34
funding [8] - 848:40,
867:24, 867:44,
868:21, 887:9,
887:25, 891:22
fundraiser [2] -
856:44, 856:45

fundraisers [2] -
853:21, 865:16
fundraising [1] -
891:24
funds [24] - 832:36,
844:23, 844:28,
844:36, 854:6,
857:1, 858:35,
859:8, 867:4, 867:7,
868:29, 868:30,
868:37, 869:12,
872:41, 886:40,
886:42, 887:11,
887:16, 887:23,
887:24, 887:32,
887:36, 888:4
future [1] - 894:20
FWA [1] - 866:22

G

gag [1] - 866:32
garden [1] - 854:32
gather [1] - 832:40
gender [1] - 867:28
general [2] - 884:21,
887:26
generally [6] - 834:36,
850:45, 867:6,
887:11, 887:13,
887:40
Generation [1] -
847:15
gentleman [2] - 870:6,
893:25
Gibson [6] - 831:16,
832:15, 832:16,
832:19, 857:7,
858:25
gifts [1] - 848:25
given [15] - 831:15,
831:27, 833:26,
839:23, 842:1,
842:5, 844:18,
851:38, 853:46,
856:30, 856:31,
858:42, 861:35,
873:47, 879:25
glancing [1] - 852:23
Glen [4] - 830:40,
881:28, 889:43,
890:23
Glen's [1] - 830:41
Gmail [1] - 883:45
God [1] - 870:16
Google [1] - 858:39
Googled [3] - 857:9,
858:23, 858:38
Goutras [1] - 836:4

GOVERNANCE [1] - 828:13
governance [1] - 870:43
government [2] - 834:45, 853:22
GRAEME [2] - 871:8, 871:42
Graeme [1] - 871:12
grand [1] - 865:15
granted [1] - 889:14
grass [1] - 892:5
grass-roots [1] - 892:5
grassroots [1] - 881:19
gratuitous [1] - 866:33
great [2] - 884:8, 887:47
greater [2] - 867:3, 879:3
grey [1] - 848:45
Griffith [2] - 870:9, 870:12
group [2] - 838:20, 858:17
grouping [1] - 886:4
guarantee [1] - 833:47
guess [3] - 881:14, 886:6, 887:32
guessing [2] - 863:44, 863:45
guest [1] - 856:44

H

half [4] - 862:18, 892:18, 892:35, 893:38
hand [14] - 846:32, 850:8, 855:25, 857:33, 858:3, 861:11, 862:26, 862:44, 863:4, 863:14, 871:47, 874:19, 874:24, 875:6
handed [4] - 849:27, 849:28, 855:19, 869:16
handwriting [5] - 841:3, 841:4, 846:9, 859:34
hang [1] - 866:8
happy [1] - 868:4
hard [3] - 870:20, 872:2, 878:26
hate [1] - 867:45

head [1] - 884:26
heading [5] - 859:2, 875:25, 876:19, 877:5, 877:15
health [3] - 836:1, 836:39, 838:20
Health [14] - 832:33, 836:38, 841:6, 855:30, 856:38, 860:5, 867:32, 867:36, 868:2, 870:18, 872:16, 872:42, 886:12
healthy [2] - 837:15, 838:4
heard [6] - 829:28, 831:47, 885:42, 887:19, 891:36, 891:37
hearing [4] - 833:25, 872:2, 889:17, 889:19
Hearing [1] - 828:17
held [8] - 830:29, 838:22, 848:18, 853:20, 853:21, 853:22, 853:23, 854:21
help [1] - 869:5
helping [1] - 881:40
Heydon [1] - 828:31
hidden [2] - 863:30, 863:33
high [2] - 884:27, 884:30
higher [1] - 884:29
highlighted [1] - 874:46
himself [3] - 888:3, 891:4, 893:14
Hinc [9] - 854:21, 854:31, 856:33, 857:9, 858:23, 858:31, 858:32, 858:38
Hindson [2] - 835:47, 836:37
hoc [1] - 882:30
holds [1] - 836:35
Holt [12] - 831:21, 860:16, 860:20, 860:34, 862:25, 862:28, 862:36, 871:46, 872:20, 873:7, 878:39, 879:10
Holt's [1] - 859:38
Hon [1] - 828:31
honorarium [4] - 853:31, 853:39,

853:46, 854:1
honorariums [2] - 868:30, 868:32
hope [2] - 867:2, 870:41
Hope [8] - 854:37, 856:15, 856:36, 857:10, 858:18, 858:20, 858:24, 858:39
hospitals [1] - 884:20
Hotmail [1] - 883:45
hours [8] - 839:18, 839:20, 873:9, 882:4, 893:46, 893:47, 894:2, 894:11
house [3] - 883:14, 884:47
HSU [26] - 830:28, 830:33, 831:16, 851:33, 852:42, 861:13, 862:18, 869:26, 880:44, 881:4, 882:12, 886:22, 887:6, 888:11, 888:28, 888:33, 889:27, 890:33, 892:1, 892:3, 892:24, 892:27, 893:10, 893:46, 894:8, 894:10
Hudson [10] - 859:12, 859:14, 859:16, 859:23, 859:41, 860:31, 860:39, 861:13, 861:19, 861:23
Hudson" [1] - 859:2
Hughie [2] - 890:43, 891:4
Hull [6] - 831:7, 831:9, 831:12, 831:26, 832:13, 832:26
hunt [1] - 867:41
husband [1] - 842:31

I

IAAN [2] - 871:8, 871:42
iaan [1] - 871:12
idea [1] - 870:38
identifiable [1] - 847:25
identification [1] - 883:24
identified [4] - 831:13,

835:35, 875:34, 875:38
identify [4] - 838:37, 845:44, 861:31, 864:20
identifying [2] - 849:32, 884:15
illegal [2] - 864:32, 865:34
imagine [3] - 848:16, 864:6, 864:12
imaging [1] - 836:11
immediately [1] - 838:41
important [3] - 855:37, 868:41, 869:3
importantly [3] - 837:25, 857:4, 858:9
IN [1] - 840:30
Inc [2] - 858:18, 858:20
Inc" [1] - 854:37
incentive [1] - 867:7
inception [1] - 842:39
include [4] - 872:24, 874:34, 874:41, 884:14
included [9] - 839:30, 849:39, 858:1, 866:19, 873:38, 874:46, 875:2, 876:20, 877:11
including [1] - 883:32
inclusive [1] - 840:5
income [10] - 875:21, 876:17, 876:33, 876:34, 876:43, 876:44, 876:45, 877:1, 877:9
Income [3] - 877:3, 877:5, 877:32
incorporated [1] - 841:26
Incorporated [5] - 856:15, 856:36, 857:10, 858:24, 858:40
increase [1] - 870:43
increased [1] - 863:16
increases [1] - 833:11
incumbent [2] - 890:40, 890:43
incumbents [1] - 866:33
indeed [2] - 883:23, 888:26
independent [1] - 867:14
indicated [5] - 882:13,

882:35, 882:42, 883:2, 884:35
indifferent [1] - 878:14
individually [1] - 874:41
individuals [1] - 889:30
industrial [10] - 831:13, 833:16, 834:36, 834:41, 837:15, 837:19, 851:14, 851:27, 852:28, 865:25
Industrial [2] - 854:44, 866:23
inference [3] - 884:45, 885:7, 888:21
inferences [1] - 885:42
inferred [1] - 890:16
influence [1] - 865:23
informal [1] - 846:21
information [3] - 836:1, 858:2, 872:25
informed [1] - 843:4
initial [1] - 878:42
inquire [1] - 885:43
inquiries [1] - 856:20
insight [1] - 842:20
instead [1] - 837:32
Institute [5] - 832:39, 833:4, 833:37, 833:43, 844:41
instruct [1] - 867:26
Instructed [1] - 828:43
instructions [1] - 860:34
intended [1] - 839:43
intention [1] - 841:25
Interception [1] - 829:7
interest [1] - 881:6
interested [3] - 842:10, 868:4, 881:39
interests [3] - 837:19, 837:20, 882:25
internal [1] - 857:36
INTO [1] - 828:12
introduce [1] - 866:11
introduced [1] - 881:27
involved [9] - 853:25, 859:20, 880:43, 881:21, 881:47, 882:12, 886:14, 887:31, 893:12
involving [1] - 867:1
issue [2] - 866:14,

889:16
issued [2] - 879:31,
883:31
item [4] - 835:40,
856:14, 874:44,
876:20
items [4] - 874:2,
874:11, 874:42,
875:34
itself [3] - 855:15,
865:1, 887:32

J

Jackson [28] - 829:20,
829:27, 830:27,
830:36, 834:35,
839:47, 840:25,
842:32, 843:22,
846:26, 848:31,
850:5, 850:13,
850:19, 857:36,
860:30, 868:7,
868:11, 870:26,
878:39, 881:29,
881:37, 883:2,
887:19, 887:46,
890:21, 890:23,
892:27
JACKSON [3] -
829:23, 830:33,
840:30
Jamie [1] - 881:28
Jane [4] - 856:32,
859:38, 862:25,
872:20
January [4] - 848:32,
862:41, 863:2,
876:27
Jenny [2] - 836:2,
836:32
Jeremy [1] - 828:38
job [2] - 837:29,
839:17
John [2] - 828:31,
855:3
journalist [1] - 856:39
journals [1] - 866:45
judgment [1] - 833:25
July [1] - 862:40
JUNE [1] - 894:34
June [6] - 828:26,
871:28, 872:8,
874:20, 876:19,
876:28
K
Kairouz [3] - 856:45,

857:17, 858:21
Kate [2] - 836:1,
836:35
KATHERINE [1] -
829:23
Kathryn [1] - 835:47
Kathy [5] - 881:29,
881:33, 883:2,
889:43, 892:27
keen [1] - 892:37
keep [5] - 834:46,
835:31, 838:20,
842:29, 879:10
keeping [1] - 849:37
kept [12] - 831:20,
831:21, 831:31,
831:32, 843:21,
843:36, 846:8,
846:15, 849:38,
882:27, 887:40
kind [5] - 841:42,
843:40, 864:17,
872:28, 882:24
kinds [2] - 849:13,
887:24
Kip [1] - 847:18
kitty [10] - 843:36,
849:5, 854:7, 861:2,
861:20, 861:21,
861:35, 868:33,
868:34, 869:20
KJ [1] - 859:36
knowledge [13] -
854:35, 876:46,
887:10, 888:3,
888:5, 889:33,
889:35, 890:2,
890:4, 890:16,
892:23, 892:25,
892:30
known [5] - 854:37,
871:39, 881:31,
881:33, 881:34
kristine [1] - 836:9

L

Labor [14] - 838:17,
842:2, 842:9,
854:39, 858:16,
880:28, 881:34,
882:2, 885:47,
886:13, 887:31,
888:34, 890:31,
891:5
labour [1] - 887:31
large [4] - 833:17,
837:28, 867:1, 885:3
larger [4] - 850:46,
852:26, 865:15,
893:8
last [2] - 834:28,
875:25
late [9] - 832:37,
835:27, 835:32,
836:24, 839:32,
844:1, 845:22,
847:45, 886:13
launched [1] - 833:15
law [2] - 834:36,
873:39
lawful [1] - 854:32
lead [2] - 881:20
leader [2] - 867:38,
868:1
leaders [1] - 830:44
leadership [3] -
837:14, 887:43,
889:27
leanings [1] - 891:6
learnt [1] - 892:3
least [5] - 837:41,
860:14, 868:38,
884:10
leave [4] - 829:38,
870:29, 880:10,
893:38
Lebanese [1] - 854:22
ledger [2] - 843:6,
878:26
Left [4] - 867:43,
890:47, 891:4, 891:5
left [3] - 863:4, 870:22,
891:42
left-hand [1] - 863:4
left-wing [1] - 891:42
legal [4] - 870:27,
879:23, 880:7,
894:19
Legal [1] - 880:10
legislative [1] - 829:4
lessons [1] - 892:3
letter [2] - 873:42,
873:44
letters [1] - 862:45
Level [1] - 828:22
level [1] - 863:24
lever [1] - 831:22
lever-arch [1] - 831:22
lieu [3] - 839:12,
893:41, 894:9
life [1] - 867:6
lifestyle [1] - 839:17
light [3] - 829:3,
830:10, 867:1
likely [3] - 832:27,
850:11, 879:25
likewise [1] - 850:41
limb [1] - 836:43

limb-makers [1] -
836:43
limit [2] - 867:17,
867:24
Lindsay [1] - 856:30
line [5] - 855:28,
855:37, 862:45,
864:27, 887:40
line" [1] - 865:4
lined [2] - 886:8, 886:9
Lisa [3] - 836:3,
836:13, 836:38
list [1] - 874:2
listen [2] - 830:18,
856:39
literally [1] - 888:20
litigant [2] - 834:14,
834:26
litigation [1] - 834:44
live [1] - 870:10
loans [2] - 874:8,
874:9
local [1] - 853:22
locate [1] - 883:39
logistical [1] - 881:4
logistics [1] - 892:2
longest [1] - 836:40
longstanding [2] -
892:25, 892:28
look [8] - 852:3, 855:5,
856:22, 865:44,
868:1, 873:4,
873:14, 875:6
looked [6] - 857:30,
858:2, 858:40,
860:43, 877:9,
878:19
looking [7] - 840:34,
841:36, 848:16,
849:18, 861:22,
863:3, 872:7
looks [2] - 848:3,
850:31
losing [1] - 838:8
loss [3] - 862:27,
862:31, 862:35
loyalty [1] - 830:42
lunch [9] - 869:9,
869:40, 879:33,
889:37, 889:41,
889:42, 889:45,
890:7, 890:20
LUNCHEON [1] -
879:40
luxury [1] - 865:21
M
Mac [15] - 832:39,
833:6, 833:14,
833:16, 835:17,
837:1, 838:46,
840:9, 840:13,
840:14, 843:15,
844:25, 845:4,
845:6, 859:8
MacCallum [11] -
832:38, 833:4,
833:10, 833:37,
833:43, 834:20,
834:38, 835:2,
835:4, 835:6
Mad [1] - 870:15
magnitude [1] -
849:14
Magnusson [1] -
836:38
Magnusson's [1] -
836:13
mail [13] - 881:11,
883:12, 883:13,
883:14, 884:35,
884:36, 884:37,
884:47, 885:4, 893:9
mail-out [3] - 883:13,
883:14, 885:4
mail-outs [5] - 883:12,
884:35, 884:36,
884:37
mails [2] - 882:36,
883:6
maintain [2] - 887:11,
887:25
maintained [5] -
839:24, 839:31,
843:9, 844:23,
846:26
maintaining [2] -
844:37, 861:3
majority [2] - 864:42,
884:17
make-up [1] - 877:47
makers [1] - 836:43
male [2] - 831:4,
832:26
management [3] -
838:19, 843:4,
874:44
Management [9] -
845:31, 863:27,
863:35, 863:36,
864:10, 864:30,
865:7, 873:15,
893:17
manager [5] - 836:1,
882:8, 882:13,
882:16, 893:22
manner [1] - 837:34
manpower [1] -

837:32
Mantirana [1] - 881:28
March [6] - 830:15, 848:33, 849:9, 850:1, 851:33, 862:12
Marco [17] - 869:13, 881:3, 881:5, 881:9, 881:18, 881:21, 881:22, 881:27, 885:20, 886:22, 886:44, 887:6, 889:13, 889:15, 889:43, 890:24
Maribynong [1] - 886:27
Marich [5] - 880:7, 880:9, 880:10, 880:39, 880:41
MARICH [1] - 880:9
mark [3] - 830:27, 836:37, 893:2
Mark [1] - 835:47
marked [6] - 840:25, 855:4, 855:13, 871:36, 873:43, 883:24
Market [1] - 828:22
Marlene [2] - 856:45, 858:21
Martin [2] - 856:43, 856:44
Martine [1] - 880:9
Matejin [1] - 836:10
materials [6] - 856:28, 857:32, 857:44, 859:30, 884:14, 884:18
maths [1] - 884:26
matter [2] - 868:12, 870:5
matters [7] - 833:33, 847:10, 864:41, 868:15, 868:17, 873:38, 874:7
McGrath [1] - 847:18
McLean [2] - 891:35, 891:37
mean [31] - 844:20, 844:28, 845:6, 845:10, 845:26, 847:32, 848:25, 849:4, 850:1, 852:39, 853:42, 854:16, 858:31, 861:19, 865:4, 867:19, 868:3, 868:32, 869:1, 873:19, 874:41, 876:42, 882:14, 885:38, 886:18, 888:20, 890:4, 890:6, 890:15, 891:3
meaning [1] - 888:13
meaningful [1] - 877:24
means [1] - 888:17
meant [6] - 830:43, 832:45, 838:18, 845:27, 865:6, 865:20
media [6] - 834:28, 856:34, 858:43, 884:28, 886:21, 887:34
Medical [1] - 836:34
medical [1] - 836:11
meet [2] - 859:18, 865:35
meeting [25] - 829:29, 829:47, 830:2, 830:7, 830:8, 830:14, 830:15, 830:17, 830:19, 830:28, 831:44, 831:46, 834:19, 835:21, 835:31, 836:7, 836:47, 837:6, 838:30, 841:8, 843:32, 844:13, 870:6, 870:13, 874:29
MEETING [1] - 830:33
meetings [4] - 831:41, 839:19, 840:12, 893:7
Melbourne [1] - 829:37
member [7] - 836:42, 838:19, 844:16, 854:39, 863:27, 886:27, 891:13
members [40] - 833:17, 833:18, 833:36, 833:41, 833:46, 834:9, 834:29, 835:22, 835:35, 835:41, 835:44, 836:41, 837:11, 837:17, 837:23, 837:37, 837:41, 837:42, 838:17, 843:28, 843:31, 846:6, 848:23, 864:43, 867:36, 868:42, 870:44, 881:8, 881:12, 881:16, 884:19, 886:6, 886:45, 887:6, 892:6, 892:38, 893:8, 893:15, 893:16
members' [4] - 834:18, 834:19, 865:9, 865:10
membership [6] - 833:44, 834:23, 835:46, 883:6, 883:8, 891:20
memory [23] - 833:2, 833:6, 833:47, 837:43, 838:9, 839:10, 840:44, 840:47, 841:24, 841:43, 849:11, 849:15, 850:28, 851:36, 852:25, 853:10, 854:1, 858:41, 860:41, 876:11, 883:10, 888:33, 889:42
Men [1] - 870:15
mention [2] - 832:45, 846:25
mentioned [3] - 832:18, 855:22, 891:37
merely [1] - 848:41
merger [4] - 829:36, 831:20, 853:42, 853:43
messaging [1] - 881:10
met [3] - 863:11, 863:27, 881:32
MFI#1 [2] - 871:42, 883:28
MFI#3 [1] - 830:33
MFI#4 [1] - 840:30
MF11 [12] - 835:29, 854:23, 855:4, 855:13, 858:4, 862:25, 871:36, 871:40, 871:46, 873:43, 883:26
MF13 [2] - 830:27, 831:12
MF14 [9] - 840:25, 840:33, 842:28, 846:24, 849:37, 852:22, 861:6, 862:6, 863:40
Michael [1] - 832:15
mid-50s [1] - 836:25
mid-90s [1] - 837:45
middle [2] - 856:12, 858:3
might [6] - 861:40, 870:42, 878:41, 878:43, 886:32, 887:9
Miller [3] - 830:38, 830:41, 832:14
Miller's [1] - 831:4
millions [1] - 833:40
mind [1] - 838:20
minded [1] - 889:30
mine [4] - 841:4, 847:27, 847:32
minister [2] - 865:19, 865:20
Minister [2] - 854:40, 854:44
Minter [1] - 828:43
minute [7] - 835:27, 839:24, 839:26, 839:31, 839:32, 839:38, 866:8
minutes [10] - 830:6, 830:22, 831:41, 835:25, 835:28, 838:36, 839:23, 839:24, 873:15, 878:18
minutes" [1] - 874:29
misspending [1] - 847:21
mistake [1] - 839:35
model [1] - 881:19
moment [3] - 842:29, 852:21, 860:43
Monash [1] - 836:34
Monday [1] - 894:32
MONDAY [1] - 894:34
money [81] - 834:17, 834:30, 837:23, 837:44, 838:39, 838:40, 838:41, 838:42, 839:2, 839:12, 840:9, 840:13, 840:14, 843:15, 843:20, 843:21, 843:23, 843:24, 843:31, 844:3, 844:12, 844:14, 844:17, 844:44, 845:32, 845:33, 845:40, 845:45, 846:2, 846:15, 846:17, 846:45, 847:2, 847:24, 847:25, 847:39, 848:19, 848:41, 848:42, 848:44, 848:46, 849:17, 854:6, 856:38, 856:43, 857:13, 857:22, 858:42, 859:17, 859:19, 859:20, 859:26, 861:27, 861:47, 863:33, 863:38, 863:41, 864:7, 864:30, 865:8, 865:9, 865:10, 865:23, 865:24, 867:9, 867:39, 867:47, 868:39, 869:4, 869:13, 869:19, 869:23, 870:3, 870:18, 870:21, 888:12, 888:13
moneys [4] - 837:1, 838:46, 839:6, 862:1
monies [2] - 845:3, 845:16
monk [1] - 870:10
month [2] - 892:18, 893:38
months [1] - 892:18
Mookhey [1] - 893:25
morning [2] - 866:7, 887:20
Morris [7] - 869:41, 870:7, 889:33, 889:47, 890:12, 890:16, 890:27
most [7] - 835:36, 837:14, 839:15, 853:14, 887:32, 887:36, 894:10
move [1] - 866:26
moved [1] - 886:26
movement [4] - 841:41, 864:36, 864:46, 887:31
MR [49] - 829:16, 829:20, 829:25, 830:31, 830:36, 835:11, 836:29, 839:46, 840:28, 849:4, 850:5, 850:13, 850:19, 854:44, 855:11, 855:19, 855:25, 855:30, 855:35, 855:40, 855:45, 856:7, 856:12, 859:1, 860:22, 860:30, 868:11, 870:24, 871:6, 871:10, 871:12, 871:34, 871:45, 875:15, 876:27, 876:32, 879:16, 879:20, 879:30, 880:5, 880:17, 880:19, 880:36,

880:41, 883:22,
883:30, 889:3,
894:13, 894:29
must [2] - 837:40,
874:38
MYOB [14] - 831:25,
843:12, 843:13,
857:25, 857:28,
860:20, 871:45,
872:8, 872:24,
872:33, 872:40,
873:6, 873:26

N

Name [1] - 860:4
name [14] - 841:6,
841:7, 841:11,
870:7, 870:8,
870:11, 870:13,
871:12, 880:20,
883:16, 891:13,
891:30, 891:36,
893:25
named [1] - 870:12
national [1] - 853:44
National [15] - 832:32,
841:6, 853:36,
860:5, 864:38,
865:40, 865:42,
866:9, 867:29,
867:31, 867:33,
872:42, 886:39,
888:45, 892:36
nature [1] - 881:1
necessarily [2] -
884:17, 888:1
need [3] - 860:39,
867:34, 874:3
needed [6] - 838:41,
843:23, 845:27,
859:20, 874:11,
874:14
needs [2] - 836:18,
865:35
net [3] - 835:16, 878:5
netted [4] - 876:33,
876:36, 876:41,
876:44
netting [1] - 878:4
never [17] - 838:5,
838:6, 841:28,
841:32, 856:18,
856:37, 857:12,
857:13, 858:19,
858:27, 858:41,
863:33, 881:32,
885:18, 887:43,
891:37

New [5] - 829:9,
831:18, 832:23,
857:8, 883:16
new [7] - 833:8,
833:19, 833:20,
834:2, 834:4, 893:18
next [5] - 847:6,
866:42, 871:4,
875:17, 880:5
NHDA [52] - 838:40,
840:16, 842:38,
842:46, 843:6,
844:2, 844:12,
844:29, 844:36,
844:44, 845:7,
845:9, 845:40,
845:46, 846:3,
846:7, 846:15,
849:14, 859:2,
859:9, 859:45,
860:14, 861:2,
861:28, 861:32,
861:43, 861:47,
862:2, 862:45,
863:5, 863:32,
863:38, 864:8,
864:21, 864:23,
865:1, 865:30,
867:47, 868:30,
869:20, 872:9,
872:32, 873:29,
874:10, 874:30,
874:44, 875:26,
875:35, 876:20,
876:45, 877:11,
877:41
nine [1] - 839:16
no-one [4] - 858:9,
858:12, 858:13,
890:16
nominated [1] - 850:2
non [1] - 840:34
non-personal [1] -
840:34
normal [2] - 848:47,
878:38
normally [1] - 873:6
Northern [1] - 892:34
note [3] - 860:22,
867:18, 868:12
nothing [7] - 832:1,
834:18, 864:32,
870:24, 879:16,
894:13, 894:29
notice [3] - 840:22,
861:8, 883:31
NOTICE [1] - 840:31
notification [1] -
879:26
notion [1] - 882:15

notionally [1] - 891:1
notwithstanding [1] -
853:35
November [7] -
846:36, 847:7,
847:14, 847:27,
847:35, 851:21,
866:10
number [19] - 830:36,
831:41, 833:18,
835:35, 843:3,
850:10, 850:15,
856:4, 857:2,
857:19, 857:21,
872:33, 872:37,
875:34, 877:24,
878:7, 879:3,
882:24, 893:15
numbering [2] -
855:23, 862:26
numbers [1] - 877:44
numeral [1] - 849:44
NUW [1] - 864:24

O

o'clock [2] - 879:36,
894:31
oath [2] - 829:23,
829:27
objection [2] - 829:12,
829:14
obligations [1] -
859:18
obstacle [1] - 829:4
obtain [2] - 846:28,
873:6
obviously [6] -
833:12, 837:11,
856:20, 856:39,
857:18, 881:34
occasion [3] - 832:28,
845:40, 894:20
occasionally [1] -
844:16
occasions [2] -
887:33, 888:16
occupation [2] -
836:14, 880:26
occupational [3] -
836:3, 836:15,
836:39
occupations [1] -
836:17
occurred [3] - 843:2,
858:28, 862:11
occurring [1] - 864:17
October [5] - 852:15,
852:16, 852:46,
861:12
OF [7] - 830:33,
840:30, 871:42,
871:43, 883:28
off-line [2] - 864:27,
887:40
off-line" [1] - 865:4
off-site [1] - 873:8
Office [1] - 892:36
office [7] - 829:36,
843:37, 857:8,
866:44, 869:26,
880:44, 889:4
Officer [1] - 866:20
officer [1] - 830:38
official [1] - 893:21
officials [4] - 839:15,
842:16, 842:20,
864:23
often [2] - 845:2,
845:15
Olaris [1] - 836:9
Olga [1] - 836:4
once [13] - 830:40,
831:29, 831:30,
843:2, 844:36,
846:3, 846:7,
858:45, 885:26,
885:36, 888:22,
891:23, 892:43
one [40] - 833:35,
835:27, 835:28,
836:17, 836:40,
836:42, 842:28,
844:38, 848:6,
850:2, 853:39,
857:30, 858:9,
858:12, 858:13,
858:45, 860:17,
861:21, 861:40,
861:41, 866:7,
868:12, 868:36,
869:19, 870:2,
873:29, 873:35,
874:10, 874:41,
878:5, 878:43,
879:30, 880:39,
890:16, 890:20,
893:15
ones [2] - 832:23,
852:26
open [1] - 841:25
opened [6] - 840:20,
840:41, 843:5,
845:10, 864:8
opening [2] - 842:45,
846:35
operate [3] - 850:23,
864:14, 884:4
operated [3] - 864:20,

864:22, 884:16
operates [1] - 864:36
operating [2] - 841:22,
846:41
operator [1] - 842:38
opportunity [1] -
837:5
opposed [2] - 837:42,
837:43
opposition [1] -
838:10
order [5] - 861:19,
884:24, 885:22,
885:27, 887:10
ordinarily [1] - 886:35
ordinary [1] - 875:2
organisation [15] -
835:1, 836:33,
836:36, 837:16,
856:36, 856:41,
856:46, 857:13,
858:27, 858:40,
864:26, 864:45,
865:35, 869:23
organisations [2] -
865:14, 865:15
organise [1] - 870:39
organised [2] -
884:40, 892:5
organiser [1] - 892:33
organising [5] -
881:19, 884:20,
884:21, 892:2, 893:6
origin [1] - 832:36
original [2] - 845:22,
874:28
orthotist [1] - 836:8
orthotists [1] - 836:43
otherwise [2] - 868:1,
879:34
ourselves [1] - 892:32
outlined [2] - 831:21,
865:12
output [1] - 881:10
outs [5] - 883:12,
884:35, 884:36,
884:37
outside [1] - 833:12
outstanding [3] -
833:19, 833:39,
859:17
overnight [5] - 868:40,
868:41, 868:43,
869:2, 869:11
overtime [1] - 839:13
owed [1] - 859:16
own [9] - 833:38,
834:15, 834:26,
834:31, 872:33,
886:15, 887:4,

889:30, 893:42

P

P&L [1] - 862:40

page [63] - 835:30,

835:34, 840:33,

841:13, 846:25,

846:29, 846:30,

846:32, 847:6,

848:34, 850:6,

850:8, 851:3,

851:16, 851:21,

851:32, 852:10,

852:14, 852:23,

852:45, 853:12,

854:23, 855:5,

855:22, 855:28,

855:38, 856:2,

856:5, 857:32,

858:2, 858:8,

859:31, 861:11,

862:11, 862:26,

862:39, 863:13,

863:14, 863:39,

866:5, 866:9,

871:47, 872:4,

872:40, 873:43,

874:2, 874:18,

874:23, 875:6,

875:12, 875:18,

875:21, 875:31,

876:16, 876:17,

877:10, 877:15,

877:32, 877:33,

877:36

pages [5] - 829:1,

852:21, 852:22,

883:32, 883:34

paid [16] - 835:5,

835:12, 835:17,

852:1, 852:4,

861:26, 863:5,

863:38, 863:41,

872:41, 876:21,

876:22, 884:36,

884:37, 885:31

Pakula [4] - 854:24,

854:39, 856:43,

856:44

paper [2] - 864:38,

865:38

papers [1] - 866:20

paragraph [15] -

832:31, 839:36,

839:39, 840:39,

853:4, 861:45,

866:1, 866:41,

868:17, 873:4,

873:45, 874:27,

875:32, 875:45,

878:35

paragraphs [2] -

839:44, 878:11

parliament [1] - 886:6

part [9] - 830:7,

830:28, 839:1,

842:32, 847:33,

862:32, 885:33,

890:44, 892:32

PART [1] - 830:33

particular [10] -

841:47, 861:42,

875:40, 881:6,

887:35, 888:23,

889:6, 889:15,

889:23, 889:27

particularly [5] -

837:45, 845:38,

856:34, 867:2, 869:4

parties [5] - 848:17,

848:41, 870:21,

879:23, 894:19

parts [1] - 830:19

Party [10] - 838:17,

842:2, 842:9,

854:40, 858:16,

880:28, 885:47,

886:14, 887:31,

888:35

party [2] - 854:28,

857:38

passed [4] - 838:28,

838:30, 839:32,

856:32

past [2] - 837:45,

887:33

path [1] - 838:12

pathologist [1] -

836:10

pathway [1] - 867:8

PAUL [1] - 880:15

Paul [1] - 880:21

pausing [2] - 835:21,

847:29

pay [11] - 830:42,

844:44, 848:47,

849:16, 858:32,

859:20, 859:22,

859:24, 861:19,

865:20, 869:11

payable [1] - 834:17

payee [3] - 849:39,

850:2, 864:1

paying [2] - 844:43,

869:5

payment [19] - 833:37,

833:46, 843:32,

849:45, 850:31,

854:20, 854:31,

856:33, 857:18,

858:35, 859:41,

860:31, 860:35,

861:33, 874:29,

874:30, 874:35,

876:45, 884:43

Payments [1] - 875:47

payments [4] -

860:14, 875:38,

876:13, 876:27

payroll [3] - 838:7,

838:8

penalties [6] - 834:26,

834:32, 834:33,

834:46, 835:1, 838:2

penalty [5] - 834:47,

835:1, 835:5, 835:12

people [32] - 833:11,

835:35, 836:31,

837:32, 841:44,

842:1, 843:21,

844:32, 844:42,

845:40, 847:20,

849:17, 864:6,

864:10, 864:14,

864:34, 864:36,

865:29, 867:40,

869:5, 869:6,

870:16, 870:17,

870:39, 881:21,

882:24, 887:30,

887:37, 888:18,

889:42, 890:8,

892:27

per [6] - 837:23,

839:12, 843:32,

854:18, 867:17,

891:19

performed [1] - 881:3

performing [2] -

853:33, 853:41

perhaps [6] - 835:32,

866:40, 876:32,

879:32, 891:25,

891:28

period [11] - 843:16,

843:45, 846:27,

855:7, 855:31,

862:12, 866:44,

873:11, 881:9,

881:23, 887:3

permitting [1] -

866:17

person [7] - 834:45,

836:32, 846:41,

869:12, 882:2,

882:12, 882:22

personal [8] - 831:14,

839:6, 840:34,

847:3, 847:39,

850:38, 850:45,

851:11

persons [6] - 829:36,

830:1, 835:41,

836:7, 836:29,

885:11

perspective [1] -

893:7

Perth [1] - 894:32

Peter [28] - 832:38,

832:39, 833:4,

833:6, 833:10,

833:14, 833:16,

833:37, 833:43,

834:20, 834:38,

835:2, 835:4, 835:6,

835:17, 837:1,

838:46, 840:9,

840:13, 840:14,

843:15, 844:24,

845:4, 845:6, 859:8,

891:13, 893:14

Philip [7] - 869:41,

870:7, 889:33,

889:47, 890:12,

890:16, 890:27

phone [1] - 893:7

photograph [1] -

866:18

photographs [1] -

866:29

physically [2] -

869:15, 869:16

physiotherapist [3] -

835:47, 836:9,

836:38

pick [1] - 859:44

picking [2] - 846:28,

884:25

piece [1] - 882:11

pieces [1] - 833:24

place [3] - 829:29,

852:35, 864:35

placed [1] - 858:26

planned [1] - 842:30

play [2] - 830:7,

842:32

played [4] - 830:14,

830:23, 830:25,

893:18

players [2] - 886:6,

886:9

playing [1] - 829:5

point [17] - 830:22,

831:28, 833:24,

841:24, 841:26,

841:28, 854:45,

857:6, 858:1,

858:40, 864:37,

866:6, 869:45,

872:31, 883:17,

888:11, 890:9

police [1] - 831:31

political [19] - 837:19,

838:14, 849:21,

849:22, 851:13,

851:27, 854:28,

854:32, 857:3,

857:25, 857:38,

858:20, 865:22,

865:25, 865:26,

867:6, 867:46,

870:21, 882:39

politician [2] - 888:17,

892:36

politicians [2] -

867:11, 886:9

politics [2] - 867:10,

891:5

position [11] - 830:41,

836:36, 845:37,

847:43, 857:36,

860:44, 864:4,

879:34, 881:25,

887:43, 889:28

positive [4] - 852:4,

852:5, 852:29,

863:42

presented [8] - 845:39, 845:42, 845:44, 863:11, 863:26, 863:34, 865:38, 882:34
president [2] - 831:36, 831:38
press [3] - 856:20, 858:11, 868:20
presumably [2] - 836:18, 850:38
pretty [1] - 879:10
previous [4] - 831:17, 833:8, 866:16, 882:3
previously [6] - 851:26, 863:25, 864:24, 865:7, 866:23, 893:16
price [1] - 892:45
primary [1] - 831:22
printed [2] - 878:27, 883:15
printing [1] - 843:25
private [1] - 854:14
problem [3] - 859:22, 867:37
problems [1] - 838:7
procedure [1] - 876:12
procedures [3] - 864:13, 864:35, 865:29
proceedings [11] - 830:13, 832:41, 833:3, 833:24, 833:29, 834:4, 834:46, 852:11, 858:11, 858:12, 871:25
process [5] - 843:17, 843:44, 846:21, 876:36, 885:33
procured [1] - 884:43
PRODUCE [1] - 840:31
produce [3] - 840:22, 861:8, 883:31
produced [4] - 840:22, 854:6, 861:7, 883:34
PRODUCED [1] - 840:30
product [1] - 878:4
production [1] - 882:36
profession [1] - 871:15
professionally [1] - 892:26
professionals [1] - 838:20
profit [3] - 862:27, 862:31, 862:35
progress [1] - 879:33
promote [1] - 866:45
proper [2] - 865:31, 865:32
properly [1] - 834:17
proposal [2] - 845:3, 845:15
proposals [1] - 867:31
propose [2] - 830:6, 867:16
proposed [1] - 829:12
proposing [1] - 866:28
proposition [1] - 859:25
propositions [1] - 853:38
prospective [1] - 867:16
prosthetist [1] - 836:8
prosthetists [1] - 836:43
protests [1] - 853:24
provide [5] - 840:21, 844:33, 880:36, 880:41, 887:1
provided [6] - 852:9, 857:45, 877:46, 881:4, 887:8, 892:2
provision [1] - 839:4
provisionally [1] - 871:36
proxy [2] - 886:15, 888:17
prudent [1] - 847:20
Public [2] - 828:17, 854:40
public [3] - 864:42, 865:33, 867:37
published [1] - 856:21
purchase [1] - 854:33
purpose [6] - 848:22, 849:39, 850:38, 850:47, 862:35, 864:1
purposes [25] - 838:22, 843:24, 843:40, 844:3, 844:5, 844:8, 847:3, 847:4, 847:23, 847:39, 847:40, 850:45, 851:11, 851:12, 851:14, 851:27, 852:28, 854:14, 865:12, 872:19, 873:33, 884:1, 887:12, 887:25
pursuant [3] - 835:12, 843:17, 862:12
pursuing [1] - 834:15
put [11] - 834:30, 837:23, 838:39, 838:40, 842:28, 854:6, 856:19, 858:26, 859:14, 868:3, 893:9
putting [4] - 867:45, 891:39, 891:42, 892:44

Q

QC [1] - 828:31
qualified [1] - 836:20
Queensland [11] - 890:37, 892:8, 892:14, 892:17, 892:39, 893:27, 893:29, 893:30, 893:39, 894:3, 894:5
Queensland's [1] - 891:5
queried [2] - 844:32, 875:47
query [2] - 857:5, 858:10
questions [7] - 830:9, 832:4, 832:35, 862:10, 870:28, 879:18, 894:20
quite [12] - 831:41, 836:32, 836:36, 836:37, 854:5, 858:14, 858:18, 868:15, 870:14, 874:13, 877:44, 890:7

R

radiation [1] - 836:2
radiographer [4] - 836:3, 836:4, 836:11, 836:34
Radiographers [1] - 844:41
raise [1] - 867:7
raising [1] - 868:16
ran [1] - 834:32
range [3] - 844:8, 884:32, 892:47
rank [3] - 835:46, 892:38, 893:15
rank-and-file [1] - 892:38
rate [1] - 866:25
rather [4] - 838:8, 840:5, 840:16, 857:2
reach [1] - 869:46
reached [11] - 833:9, 833:40, 835:2, 835:4, 835:6, 835:13, 838:27, 844:36, 846:3, 846:7, 853:47
read [2] - 852:21, 866:8
reading [1] - 870:9
really [10] - 842:10, 853:38, 866:36, 868:40, 872:31, 876:38, 879:11, 879:13, 882:22, 893:23
reason [1] - 866:28
reasonable [1] - 840:47
receipt [1] - 850:14
receive [2] - 872:19, 891:22
received [13] - 832:37, 833:18, 833:19, 834:9, 834:21, 843:32, 844:24, 855:41, 856:29, 856:37, 871:35, 871:38, 884:45
recent [3] - 866:15, 867:2, 875:39
recently [1] - 836:41
reception [2] - 829:5, 829:14
recollect [5] - 835:22, 848:14, 850:29, 868:36, 892:41
recollection [6] - 839:30, 846:44, 847:10, 850:19, 851:24, 870:5
recommendations [2] - 867:28, 870:41
recommended [1] - 867:25
record [4] - 846:15, 849:38, 853:7, 859:40
recorded [10] - 830:1, 838:33, 839:22, 843:7, 848:33, 854:27, 857:37, 858:8, 864:1, 864:4
recording [7] - 829:3, 830:22, 830:28, 830:37, 864:31
RECORDING [1] - 830:33
records [26] - 829:2, 829:31, 829:38, 830:8, 830:11, 831:22, 832:41, 832:42, 832:46, 839:26, 843:12, 843:13, 846:26, 849:31, 857:37, 857:44, 860:43, 862:24, 875:33, 875:39, 875:42, 878:30, 879:5, 879:10, 885:29
recruited [1] - 882:2
reduce [2] - 877:23, 878:7
refer [2] - 846:12, 888:16
referable [1] - 834:10
reference [7] - 838:14, 839:23, 840:1, 840:4, 858:38, 865:47, 874:34
referred [3] - 840:9, 856:14, 871:39
referring [2] - 842:9, 859:7
reflect [2] - 867:27, 872:41
reflects [1] - 863:15
reform [1] - 870:41
reformist [1] - 867:13
refunded [1] - 861:27
regard [2] - 865:30, 892:32
Registrar [1] - 866:23
registrar [1] - 874:45
regular [1] - 862:31
regularly [1] - 839:19
regulation [3] - 864:13, 864:35, 865:43
regulations [1] - 865:28
regulatory [1] - 864:39
reimbursing [1] - 843:27
relate [1] - 861:13
related [3] - 847:11, 852:47, 884:18
relates [2] - 853:39, 854:21
relating [1] - 859:40
relation [5] - 847:22, 851:36, 857:5, 861:42, 865:33
Relationships [1] - 854:45
relationship [2] - 889:18, 892:26
relative [1] - 884:10

released [1] - 837:27
relevant [3] - 829:5, 866:6, 883:33
remain [2] - 870:36, 870:37
remained [1] - 830:40
remaining [1] - 843:31
remember [19] - 829:32, 841:36, 841:43, 849:19, 851:5, 851:8, 851:41, 852:17, 852:36, 854:46, 856:47, 860:40, 862:21, 870:13, 876:5, 876:13, 876:38, 877:25
remind [1] - 873:45
reorganisation [1] - 832:10
reply [1] - 844:17
report [4] - 844:18, 862:32, 865:47, 874:19
reported [1] - 887:34
reports [9] - 844:15, 845:39, 845:42, 845:44, 863:10, 863:25, 863:26, 863:35, 874:33
represent [1] - 892:38
representative [2] - 880:7, 894:19
representatives [4] - 869:40, 870:27, 879:23, 889:47
request [1] - 867:26
requested [4] - 831:29, 831:31, 831:35, 859:36
requesting [1] - 831:31
requests [1] - 843:21
required [2] - 873:38, 879:5
research [1] - 833:9
resident [3] - 871:18, 871:21, 880:23
resigned [1] - 830:40
resolution [6] - 831:35, 838:28, 838:30, 838:45, 839:4, 839:10
resolve [1] - 833:13
resolved [1] - 859:25
resources [1] - 891:24
respect [11] - 833:4, 833:18, 833:39, 853:32, 853:40, 860:31, 862:27, 877:31, 877:41, 883:40, 893:45
respective [1] - 886:10
respectively [4] - 847:7, 847:36, 852:16, 852:17
response [2] - 832:5, 870:19
responsible [1] - 882:23
rest [2] - 859:27, 861:24
restaurant [2] - 854:22, 889:37
restored [1] - 866:30
result [1] - 835:16
resume [1] - 879:36
RESUMPTION [1] - 880:1
retain [1] - 878:18
retained [1] - 878:30
retired [1] - 836:41
return [2] - 829:21, 833:41
Returning [1] - 866:20
Reuben [1] - 836:4
review [3] - 873:8, 875:39, 878:42
reviewed [1] - 875:33
right-hand [12] - 846:32, 850:8, 855:25, 857:33, 858:3, 861:11, 862:26, 863:14, 871:47, 874:19, 874:24, 875:6
right-wing [1] - 891:41
rightly [2] - 867:9, 878:8
rights [1] - 837:26
rise [1] - 860:11
Robbie [1] - 836:10
role [11] - 836:35, 853:33, 853:35, 853:41, 867:29, 881:1, 881:3, 881:44, 891:23, 891:46, 892:1
roots [1] - 892:5
Roughley [1] - 828:39
roughly [2] - 836:22, 887:3
ROYAL [1] - 828:12
Royal [2] - 852:12, 870:35
rule [2] - 866:24, 867:27
rules [2] - 841:27, 867:23
run [5] - 834:24, 837:25, 837:30, 837:47, 864:25
running [8] - 841:42, 841:45, 841:46, 881:32, 882:25, 886:14, 891:12, 893:12

S

safe [1] - 884:33
sat [2] - 848:44, 861:37
saw [4] - 852:8, 856:18, 865:9, 885:18
SC [2] - 828:38, 867:26
schisms [1] - 886:5
Science [1] - 836:19
scientists [1] - 833:9
screen [5] - 871:46, 872:8, 872:28, 872:32, 872:40
screen-shots [5] - 871:46, 872:8, 872:28, 872:32, 872:40
scrutiny [1] - 867:3
SDA [1] - 864:25
search [1] - 858:39
searches [2] - 831:36, 831:43
second [2] - 865:45, 881:14
secondly [1] - 831:14
seconds [1] - 830:23
secretaries [1] - 889:29
secretary [11] - 830:42, 838:38, 838:39, 853:41, 853:44, 880:27, 888:22, 890:41, 890:43, 890:44, 891:12
Secretary [3] - 853:34, 853:36, 889:13
secretly [1] - 834:30
section [5] - 829:6, 829:8, 829:9, 841:14, 841:19
security [3] - 833:21, 833:42, 833:47
see [21] - 829:6, 830:9, 835:29, 848:6, 848:35, 848:37, 849:37, 849:43, 857:19, 858:22, 860:2, 861:26, 862:44, 868:45, 876:30, 877:12, 877:37, 878:4, 879:33, 889:31, 892:37
seek [5] - 834:26, 844:11, 844:39, 845:20, 880:10
seeking [3] - 864:39, 866:11, 883:32
Senator [11] - 880:31, 881:1, 881:35, 881:37, 881:43, 886:19, 889:3, 892:12, 892:21, 892:23, 893:43
senator [1] - 880:33
send [3] - 831:36, 868:41, 883:35
senior [3] - 836:32, 836:36, 836:37
sense [4] - 868:26, 884:21, 887:26, 892:27
sent [7] - 843:2, 856:35, 857:12, 857:20, 857:22, 883:15, 883:40
sentence [1] - 866:42
separate [10] - 830:18, 834:8, 834:14, 835:5, 843:6, 843:30, 852:46, 854:5, 874:44, 890:20
separately [2] - 844:1, 887:41
September [4] - 829:37, 830:3, 832:9, 832:11
server [3] - 883:43, 883:44, 884:18
Services [9] - 855:30, 856:38, 867:32, 867:36, 868:2, 870:18, 872:16, 886:12
servicing [1] - 836:40
set [10] - 837:17, 837:31, 841:29, 841:33, 842:2, 865:10, 865:35, 867:27, 868:14, 883:47
setting [3] - 842:11, 865:8, 869:10
settled [2] - 833:43, 834:16
settlement [14] - 833:18, 833:30, 833:34, 833:35, 833:38, 834:9, 835:2, 835:4, 837:1, 837:11, 837:12, 838:46, 844:24, 859:8
several [1] - 837:37
shall [1] - 830:27
shared [1] - 886:33
sheds [1] - 830:10
Shepparton [1] - 856:42
shockingly [1] - 866:21
Shop [2] - 886:47, 887:2
SHORT [1] - 860:26
short [4] - 865:31, 865:32, 866:18, 869:45
Shorten [5] - 886:20, 886:25, 886:36, 888:19, 888:20
shorten [1] - 888:3
shorten's [1] - 888:12
Shorten's [1] - 888:12
shorthand [1] - 888:13
shots [5] - 871:46, 872:8, 872:28, 872:32, 872:40
show [4] - 855:3, 862:24, 871:45, 877:47
showed [1] - 856:22
shown [1] - 847:24
shows [1] - 878:2
shut [1] - 859:23
side [3] - 842:28, 863:15, 886:3
signature [3] - 841:4, 841:13, 841:14
signed [3] - 874:23, 875:18, 876:16
significant [4] - 836:18, 836:29, 849:9, 867:21
similar [5] - 887:38, 892:1, 893:45, 893:47, 894:2
similarly [1] - 835:33
simply [2] - 882:4, 890:14
single [2] - 852:10, 882:22
sit [4] - 832:40, 846:44, 852:25, 858:7

site [1] - 873:8
sitting [6] - 839:12, 839:19, 849:1, 854:5, 861:34, 879:36
situation [2] - 838:5, 838:21
situations [1] - 837:45
size [1] - 892:45
sized [1] - 833:24
small [8] - 837:15, 837:22, 849:42, 855:13, 855:14, 865:22, 883:30, 890:7
smaller [1] - 850:44
smear [1] - 856:21
social [1] - 836:5
sole [1] - 842:38
solicitor [1] - 859:20
Solicitors [1] - 828:43
solicitors [1] - 867:27
someone [4] - 830:47, 831:6, 882:45, 884:29
sometimes [2] - 866:47, 888:16
somewhere [3] - 834:21, 852:37, 878:44
sorry [27] - 836:8, 838:42, 841:10, 842:6, 846:30, 847:16, 847:30, 850:6, 851:30, 851:46, 855:6, 855:9, 855:40, 861:1, 861:16, 868:9, 868:46, 869:34, 871:19, 872:4, 875:15, 877:3, 878:26, 882:1, 886:22, 889:43
sort [18] - 834:31, 836:23, 839:18, 844:45, 857:5, 858:15, 858:16, 858:17, 858:42, 860:15, 863:10, 863:25, 864:27, 864:43, 865:22, 869:7, 892:3, 893:17
sorted [1] - 831:5
sorts [1] - 887:23
sought [1] - 832:2
soundly [1] - 867:31
source [1] - 867:4
South [6] - 829:9, 831:18, 832:23, 857:8, 883:16, 892:33
span [1] - 836:22
speaker [1] - 856:45
speaking [3] - 837:16, 854:24, 887:13
special [1] - 874:11
specifically [4] - 876:13, 877:25, 883:47, 884:37
speculate [3] - 832:8, 887:33, 887:37
speculated [1] - 886:18
speculating [2] - 857:17, 885:26
speculation [1] - 885:16
speech [1] - 836:10
spend [3] - 839:11, 844:16, 867:20
spending [1] - 867:17
spent [12] - 843:27, 844:17, 846:3, 846:15, 846:46, 847:24, 848:15, 848:17, 848:19, 864:31, 868:39, 869:4
spinal [1] - 836:37
spoken [1] - 837:11
sponsors [1] - 865:17
spot [1] - 878:44
staff [4] - 829:43, 837:26, 837:33, 843:26
stage [1] - 889:38
stain [1] - 866:25
stand [1] - 831:40
Stanley [1] - 889:44
start [3] - 832:35, 866:8, 874:18
started [4] - 831:30, 832:1, 856:34, 870:15
state [8] - 834:45, 837:15, 838:37, 838:38, 848:20, 853:22, 880:34
State [3] - 853:21, 889:17, 893:29
State-Federal [1] - 853:21
statement [36] - 832:32, 836:46, 839:36, 839:47, 842:29, 844:14, 844:15, 852:22, 853:4, 855:3, 855:12, 855:15, 857:25, 857:28, 859:1, 860:32, 866:1, 866:18, 868:13, 868:16, 871:24, 871:31, 871:34, 871:38, 873:4, 874:27, 875:22, 875:33, 875:40, 876:18, 876:21, 877:10, 878:10, 878:35, 879:31
STATEMENT [1] - 871:42
statements [12] - 845:30, 845:38, 852:9, 855:6, 855:7, 855:41, 862:27, 862:31, 862:35, 866:30, 872:24, 874:43
statutory [1] - 874:45
steel [1] - 843:36
step [4] - 833:23, 845:43
Stephen [4] - 880:6, 880:10, 880:21, 886:19
STEPHEN [1] - 880:15
steps [5] - 842:8, 862:17, 864:16, 877:32, 885:30
still [9] - 831:40, 835:28, 836:34, 859:16, 862:6, 864:28, 867:20, 881:43, 886:25
stipulate [1] - 838:45
stock [1] - 869:3
STOLJAR [49] - 829:16, 829:20, 829:25, 830:31, 830:36, 835:11, 836:29, 839:46, 840:28, 849:4, 850:5, 850:13, 850:19, 854:44, 855:11, 855:19, 855:25, 855:30, 855:35, 855:40, 855:45, 856:7, 856:12, 859:1, 860:22, 860:30, 868:11, 870:24, 871:6, 871:10, 871:12, 871:34, 871:45, 875:15, 876:27, 876:32, 879:16, 879:20, 879:30, 880:5, 880:17, 880:19, 880:36, 880:41, 883:22, 883:30, 889:3, 894:13, 894:29
Stoljar [7] - 828:38, 829:18, 840:26, 860:28, 871:4, 880:3, 894:27
Stoljar's [1] - 868:8
story [2] - 846:29, 884:29
strange [1] - 870:14
Street [1] - 828:22
strong [2] - 889:18, 889:30
strong-minded [1] - 889:30
structure [5] - 833:9, 833:20, 833:42, 834:2, 834:4
structured [2] - 881:17, 882:40
struggle [1] - 885:46
Stuart [4] - 830:37, 830:38, 830:41, 832:14
student [1] - 890:31
stuff [2] - 834:31, 864:43
subject [1] - 839:42
submit [1] - 866:17
submitted [3] - 862:31, 863:8, 863:11
subsequent [2] - 884:4, 890:32
subsequently [1] - 856:17
substance [1] - 829:35
substantial [1] - 859:16
subverts [1] - 867:10
success [1] - 867:15
successful [3] - 834:33, 889:4, 891:18
sufficient [1] - 837:24
suggested [2] - 837:4, 837:16
suggestion [2] - 837:6, 837:36
sum [7] - 834:17, 843:31, 849:10, 849:47, 851:45, 857:38, 867:21
summons [1] - 879:32
sums [4] - 848:14, 849:14, 849:43, 867:1
sundry [5] - 876:33, 876:43, 876:44, 876:45, 877:1
support [5] - 868:24, 868:26, 881:5, 889:13, 892:2
supported [2] - 837:36, 869:36
supporting [3] - 888:22, 891:16, 891:26
suppose [2] - 853:19, 855:1
Supreme [1] - 838:1
surely [1] - 875:12
surprise [2] - 874:6, 887:47
surprised [2] - 866:22, 889:9
Surveillance [2] - 829:8, 829:10
survive [1] - 867:45
suspect [1] - 877:23
sworn [2] - 880:6, 880:15
Sydney [7] - 828:22, 829:36, 831:37, 831:47, 832:2, 832:9, 884:40

T

tab [19] - 835:30, 854:23, 855:8, 855:9, 855:11, 855:20, 856:28, 857:20, 857:29, 857:32, 858:22, 859:30, 862:25, 865:45, 866:4, 871:47, 873:42, 874:18, 875:17
table [7] - 854:33, 855:33, 855:40, 865:21, 865:23, 890:7, 890:9
tabs [1] - 834:22
TAPE [1] - 830:33
tape [3] - 829:3, 829:5, 830:28
TAPE-RECORDING [1] - 830:33
tape-recording [3] - 829:3, 829:5, 830:28
team [11] - 881:4, 881:5, 881:10, 881:18, 881:21, 881:22, 881:33,

884:19, 886:44,
887:6, 893:19
technically [1] -
882:15
technologist [1] -
836:11
Telecommunication
s [1] - 829:6
Temby [1] - 867:26
tended [1] - 840:13
tenure [1] - 834:1
term [1] - 864:33
terms [1] - 882:37
Territory [1] - 892:34
THE [50] - 829:1,
829:18, 830:27,
834:35, 835:9,
836:13, 836:27,
839:35, 840:25,
840:31, 848:28,
849:47, 850:10,
850:17, 854:39,
855:17, 855:22,
855:27, 855:33,
855:37, 855:43,
856:4, 856:9,
858:30, 860:24,
860:28, 868:7,
870:26, 870:47,
871:2, 871:4,
871:38, 875:12,
876:25, 876:30,
879:18, 879:22,
879:36, 879:38,
880:3, 880:13,
880:39, 883:26,
888:44, 889:1,
894:16, 894:25,
894:27, 894:31,
894:34
themselves [1] -
866:45
therapist [3] - 836:2,
836:4, 836:15
therapy [1] - 836:39
therefore [1] - 837:31
third [5] - 835:34,
854:23, 866:41,
875:25, 877:1
thirdly [1] - 831:14
three [8] - 831:5,
831:13, 855:14,
873:8, 881:32,
882:4, 883:12,
892:35
throughout [3] -
841:44, 866:44,
873:11
thrown [2] - 884:28,
892:43

Thursday [1] - 828:26
ticket [11] - 867:19,
886:19, 886:20,
886:23, 891:19,
891:40, 891:41,
892:38, 893:15,
893:18, 893:19
tied [1] - 891:4
time-in-lieu [1] - 894:9
tin [1] - 843:36
title [2] - 882:9, 893:21
TO [3] - 840:30,
840:31, 894:34
tobacco [2] - 868:21,
870:14
today [7] - 831:40,
836:35, 846:44,
852:25, 853:11,
858:7, 894:22
together [1] - 871:35
TOGETHER [1] -
871:43
took [5] - 829:29,
831:46, 833:13,
833:14, 834:29
top [21] - 835:34,
846:32, 849:2,
849:8, 850:8,
853:12, 855:25,
856:7, 856:9,
857:33, 858:2,
861:11, 862:26,
863:4, 863:14,
871:47, 872:8,
874:18, 874:23,
875:6, 884:26
topic [2] - 832:31,
838:15
total [2] - 860:11,
884:23
Total [1] - 862:45
totally [2] - 857:16,
870:37
towards [1] - 882:37
TRADE [1] - 828:12
traditional [1] - 882:39
training [2] - 836:18,
836:30
transacted [1] -
865:36
transaction [6] -
854:36, 861:24,
862:10, 862:11,
862:19, 864:3
transactions [4] -
852:17, 852:26,
853:14, 872:46
transcript [1] - 829:1
transfer [10] - 845:3,
845:16, 850:3,

852:14, 857:1,
858:36, 859:40,
860:36, 861:12,
861:47
transferred [2] -
844:29, 851:17
transfers [4] - 845:21,
848:3, 848:10,
860:15
Transport [4] -
854:40, 892:34,
892:37, 893:19
treatment [1] - 875:31
tribunal [1] - 834:37
tribunals [1] - 834:41
tried [2] - 858:15,
878:12
trouble [1] - 872:2
true [3] - 871:31,
882:1, 889:29
try [1] - 879:32
trying [4] - 877:23,
878:7, 878:8, 890:6
turn [2] - 862:40,
865:19
TV [1] - 870:15
two [15] - 833:8,
848:14, 848:31,
851:3, 852:15,
852:46, 853:38,
862:12, 876:27,
876:32, 881:5,
882:4, 887:3,
887:24, 892:18
two-week [1] - 887:3
TWU [6] - 890:37,
892:4, 892:31,
892:33, 892:42,
893:30
type [2] - 834:44,
883:45

U

ultimately [2] -
841:33, 853:47
unaided [1] - 853:10
undemocratic [2] -
866:14, 866:22
under [11] - 829:27,
834:26, 834:32,
837:14, 837:46,
875:25, 876:19,
877:2, 877:15,
891:8, 893:42
underlying [2] -
832:46, 857:44
understood [4] -
831:45, 838:17,
838:18, 864:28
undertook [1] -
878:34
Unincorporated [1] -
841:19
unincorporated [9] -
841:23, 841:29,
841:33, 841:37,
841:41, 842:2,
842:12, 842:21,
842:31
UNION [1] - 828:12
union [71] - 833:13,
833:36, 833:40,
834:10, 834:14,
834:17, 834:25,
834:29, 834:31,
835:5, 835:7,
836:42, 837:13,
837:46, 838:3,
838:4, 838:16,
839:15, 839:16,
841:40, 844:23,
844:29, 845:45,
847:2, 847:4,
847:40, 849:21,
849:22, 851:12,
852:39, 853:23,
853:25, 856:43,
856:46, 857:12,
857:20, 859:14,
864:11, 864:20,
864:39, 866:12,
866:15, 866:26,
866:45, 867:25,
867:38, 867:42,
868:1, 870:44,
881:8, 881:46,
882:3, 886:8,
886:14, 886:45,
887:4, 887:6,
887:35, 887:41,
887:43, 888:17,
888:21, 888:25,
888:28, 888:34,
889:15, 889:29,
890:30, 891:13,
893:34
Union [12] - 855:30,
856:38, 867:32,
867:36, 868:2,
868:3, 870:19,
872:16, 886:12,
886:39, 892:35,
892:37
union's [3] - 837:13,
867:27, 867:42
unionise [1] - 870:39
unionism [1] - 870:38
unionists [1] - 870:36

unions [16] - 834:16,
837:27, 842:10,
842:11, 864:12,
864:17, 864:24,
870:43, 886:7,
886:10, 887:10,
887:14, 887:24,
887:32, 887:34,
887:36
unless [4] - 850:13,
864:12, 864:34,
865:28
unlikely [1] - 851:44
unpalatable [3] -
864:10, 864:34,
864:44
unusual [2] - 870:8,
870:11
up [38] - 831:26,
831:47, 832:10,
835:3, 835:30,
837:17, 837:31,
839:11, 841:7,
841:11, 841:29,
841:33, 842:2,
842:11, 846:28,
849:2, 849:8,
850:28, 856:19,
857:9, 858:16,
858:23, 859:24,
859:44, 865:8,
865:19, 865:35,
866:46, 867:27,
868:3, 877:44,
877:47, 883:47,
886:8, 886:9,
889:18, 892:8,
892:14
UPON [1] - 880:1
utilise [2] - 854:12,
854:13

V

variety [1] - 838:22
various [17] - 833:33,
841:44, 842:1,
849:43, 852:25,
852:28, 853:20,
853:21, 853:22,
853:23, 879:23,
881:11, 882:25,
886:6, 886:7, 886:13
verbally [1] - 859:36
Vespecci [1] - 836:10
Vic [3] - 859:45, 860:7,
862:18
Victoria [11] - 830:45,
836:44, 854:42,
854:47, 855:30,

856:42, 871:18,
871:21, 880:23,
880:34, 885:47
Victoria [1] - 829:10
Victorian [11] -
830:39, 831:1,
834:36, 838:43,
872:11, 880:27,
886:4, 888:34,
888:44, 888:46,
889:5
victory [1] - 890:25
view [1] - 867:9
views [1] - 838:22
visit [4] - 829:44,
830:3, 831:25, 832:9
voice [3] - 831:4,
832:26
voices [1] - 830:37
volume [6] - 854:23,
856:28, 857:32,
859:30, 864:38,
865:45
volumes [1] - 855:14
voluntary [2] - 881:3,
881:44
volunteer [1] - 887:5
volunteered [1] -
890:37
volunteers [2] -
881:20, 886:44
vote [6] - 881:9,
881:18, 881:22,
886:35, 889:23,
889:27
voter [1] - 881:15
votes [6] - 888:29,
888:32, 888:35,
889:5, 893:29,
893:32
voting [2] - 866:11,
881:12
vouchers [3] - 848:19,
848:22, 848:40

W

wage [1] - 833:10
Wales [5] - 829:9,
831:18, 832:23,
857:8, 883:16
war [3] - 866:46,
867:46, 887:16
warlords [1] - 867:41
WAS [1] - 894:34
watch [1] - 870:16
website [1] - 858:46
week [3] - 837:24,
870:9, 887:3

welcome [1] - 870:34
whereas [1] - 888:21
Whitfield [1] - 835:47
whole [11] - 831:28,
834:19, 834:22,
834:46, 838:40,
838:45, 839:2,
841:44, 849:29,
868:14, 873:11
Wilkinson [2] - 836:2,
836:35
Williams [2] - 890:43,
891:41
Williamson [10] -
830:40, 830:43,
832:14, 832:15,
859:4, 859:11,
859:21, 861:39,
884:44, 885:8
windfall [1] - 865:9
wing [5] - 886:4,
886:13, 886:17,
891:41, 891:42
Wing [1] - 890:47
wiped [1] - 838:3
wish [2] - 851:29,
879:23
wishes [1] - 889:10
WITH [1] - 871:43
withdraw [2] - 845:27,
845:29
withdrawal [17] -
844:21, 844:23,
844:28, 846:9,
846:36, 846:37,
847:23, 849:9,
849:24, 850:1,
851:17, 851:22,
851:23, 851:34,
851:41, 861:31,
862:13
withdrawals [10] -
847:7, 847:11,
847:35, 850:46,
851:3, 851:4,
851:21, 851:24,
852:15, 852:47
withdrawing [1] -
849:14
withdrawn [3] -
843:20, 849:16,
863:39
WITHDREW [3] -
871:2, 879:38,
894:25
withdrew [3] - 845:31,
845:33, 851:44
WITNESS [4] - 871:2,
871:42, 879:38,
894:25

witness [7] - 829:21,
855:19, 870:29,
871:4, 871:24,
879:30, 880:5
won [2] - 838:2,
891:19
word [2] - 885:46,
891:37
words [2] - 837:10,
888:16
worker [1] - 836:5
Workers [4] - 886:39,
892:34, 892:37,
893:19
workplaces [2] -
881:16, 884:20
works [1] - 836:38
writes [1] - 884:29
writing [2] - 838:33,
850:29
written [2] - 832:42,
868:13
wrongly [1] - 878:8

Y

yard [1] - 893:7
year [15] - 836:19,
851:27, 862:41,
874:20, 875:10,
875:12, 875:17,
875:26, 875:30,
876:16, 876:18,
877:6, 877:16,
882:11
years [12] - 832:40,
833:7, 836:42,
843:16, 843:20,
845:2, 866:15,
872:12, 875:35,
881:35, 890:45,
892:35
Yeates [2] - 836:8,
836:40
yesterday [11] -
829:28, 829:35,
829:42, 831:21,
837:22, 839:25,
843:25, 843:30,
849:5, 868:40
yesterday's [1] - 829:1
YG'S [1] - 847:14
Young [4] - 847:15,
881:34, 882:2,
890:31
younger [1] - 881:33
yourself [1] - 890:21