

SUPPLEMENTARY WITNESS STATEMENT

Leonie Elizabeth FLYNN

1. I am 43 years of age and I live in [REDACTED], Victoria.
2. I refer to my Statement of Evidence provided to the Fair Work Commission (**the FWC**) dated 4 September 2013 (**Statement**). I wish to expand upon some of the matters contained in my Statement in this supplementary statement.
3. Copies of documents to which I refer in this Statement appear in a folder which has been marked **Leonie Flynn MFI-1**. Where in this statement a number appears in bold and in brackets, that is a reference to the tabulated number behind which the document appears.

Bullying and Intimidation

4. On 19 September 2013, I made a statement to Ms Victoria Martin (**Ms Martin**) Work Cover Investigator, that included an incident which occurred at "Molly's Coffee Shop" in Clarendon Street, South Melbourne.
5. A copy of my witness statement dated 19 September 2013, is located behind **Tab 1** of **Flynn MFI-1**.
6. Ms Diana Asmar (**Ms Asmar**), the Branch Secretary, met with me at Molly's Coffee Shop and effectively communicated to me that she sought to have control of the finances of the Victoria No. 1 Branch (**No. 1 Branch**).
7. Ms Asmar was demanding financial control of the Branch and I recall feeling undermined, intimidated and threatened. I did not agree to her demands or reach any compromise.
8. Following the election results on 21 December 2012, it took more than six weeks before I was provided with keys to the No. 1 Branch building on Park Street, South Melbourne, and a remote control to obtain access to the garage of the building.
9. Ms Asmar, Ms Kimberley Kitching (**Ms Kitching**) the General Manager of No. 1 Branch, Ms Kerry Georgiev (**Ms Georgiev**) the Finance Manager of No. 1 Branch, Mr Mark Donohue (**Mr Donohue**) and Ms Janine Ghantous (**Ms Ghantous**) the receptionist at No. 1 Branch, all had office keys and garage remotes.

10. I had to either phone Ms Kitching to open the garage for me or park outside the garage on the street, lock my car, and walk around to the front of the building.
11. If I parked on the street, I would then need to ask either Ms Kitching or the reception staff to open the garage to permit me access.
12. This was extremely inconvenient and I felt ostracized knowing that other employees had keys to the building and a garage remote, ahead of me, in circumstances where I was an elected official.
13. On Friday 4 January 2013, at approximately 6.15pm, following Ms Asmar's termination of the employment of many of the staff from the previous staffing of No. 1 Branch, I discovered that my mobile phone and a couple of other items were locked in Ms Asmar's office. I believe that, at this time, only Ms Asmar and Ms Kitching had keys to the building.
14. Ms Asmar had assured me that she would always be available to unlock the building for me if I needed to get in and that all I had to do was phone her and request access.
15. I phoned Ms Asmar several times before I attempted to phone Ms Kitching, who did not answer her phone either.
16. Eventually, Mr Luke Walladge (**Mr Walladge**) came to my aid. Mr Walladge had to crawl through a hole in the fence of the garage so that he could then open the garage for me.
17. I was then able to get my car out, however, my other belongings remained in Ms Asmar's office over the weekend, as Mr Walladge did not have a key to the building.

Financial Management

18. From the date of our appointment to office, Ms Asmar had Ms Kitching, in her roles as General Manager, Compliance Officer and Executive Advisor, attend to, or assist Ms Asmar with, all financial matters pertaining to No. 1 Branch.
19. Ms Kitching effectively took control of the financial management of No. 1 Branch.
20. A copy of an email from Ms Kerry Jones of "Where to Enjoy" to Ms Kitching dated 23 February 2013 is located behind **Tab 2 of Flynn MFI-1**. This correspondence shows that Ms Kitching was in receipt of supplier invoices for No. 1 Branch and was responsible for their payment.
21. On 3 January 2013, Ms Georgiev was employed as the Finance Manager and was privy to all financial matters.
22. On Saturday 22 December 2012, I first met Ms Georgiev in Ms Asmar's office.

23. Ms Georgiev was going over a financial statement compiled by Mr Stephen Miller and Ms Asmar said to me words to the effect of, "*Kerry is picking up many errors in the document.*"
24. I thought it was very inappropriate that Ms Asmar had Ms Georgiev looking at the Branch's financial records.
25. Ms Asmar continually said to me words to the effect of, "*Leonie, you've got to trust me, it's only for the interim. You will get to know me better over time, just trust me.*"
26. I wanted my working relationship with Ms Asmar to succeed following the election. I gave it my all in the best interests of the members. I gave up friendships and connections with the "previous regime" in order for Ms Asmar to understand that I was willing and motivated to undertake my role as Assistant Secretary and Treasurer of the No. 1 Branch.
27. I filled in a form so that a bank device known as "Commbiz" could be issued to me as first signatory to all financial disbursements for the No. 1 Branch.
28. This never occurred and I eventually learned that I was not one of the signatories to the No. 1 Branch bank accounts or for any financial disbursements.
29. The three signatories are Ms Asmar in the first instance, followed by two other BCOM members, Mr David Eden (**Mr Eden**) the President of No. 1 Branch, and Ms Rhonda Barclay (**Ms Barclay**) the Junior Vice President of No. 1 Branch.
30. I believe that Ms Asmar deliberately excluded me from performing this role, which I was supposed to perform pursuant to the Rules.
31. On several occasions, predetermined motions were moved by BCOM members with directions for Ms Asmar to undertake all of the related financial matters.

Pre-BCOM Meetings

32. I now know that prior to BCOM meetings, "pre-meetings" were held in local coffee shops, near the Park Street office, whereby certain motions were given to specific BCOM members to move at meetings.
33. I was not invited to attend any of these "pre-meetings".
34. I was also excluded from attending at:
 - a) all executive meetings;
 - b) meetings at a National level where travelling was involved;
 - c) meetings with Holding Redlich, the lawyers for No. 1 Branch; and
 - d) meetings with Mr Michael Shulman (**Mr Shulman**) the auditor for No. 1 Branch.

35. Ms Asmar would deliberately deny me access to information and other resources, particularly pertaining to my financial responsibilities.
36. Ms Asmar had Mr Shulman deal directly with her and seek instructions from her.

My Workload

37. Ms Asmar did not have an Organiser assigned to the Gippsland region following her election.
38. Mr Tim Rowley (**Mr Rowley**) commenced in this position on 12 March 2013.
39. Ms Asmar directed me to "help out" until she could "find somebody".
40. Even though my elected position is a full-time paid office, Ms Asmar ensured that I was always busy with duties other than the ones I should have been undertaking in my role as Assistant Secretary and Treasurer.
41. I assisted in the capacity of an Organiser for the Gippsland region, however, after a few weeks Ms Asmar then said to me words to the effect of, "*Leonie you mustn't hold any members' meetings unless I am present.*"
42. I felt victimised and I could not service members adequately under this direction.
43. I felt that I was being treated differently to other Organisers who held regular members' meetings without Ms Asmar being present.
44. On 5 March 2013, Ms Asmar and I met in her office in relation to a members' meeting to be held at Latrobe Regional Hospital (**LRH**) on Friday 8 March, and then at a Bairnsdale Regional Health Service (**BRHS**) members' meeting on Tuesday 12 March.
45. Ms Asmar informed me that she would be attending these meetings with me.
46. I sent flyers out to the delegates indicating that Ms Asmar, in her capacity as State Secretary, would also be in attendance.
47. Ms Asmar then informed me that she would be taking Mr Rowley, on 12 March 2013, to my BRHS members' meeting as well and that he would then be the Gippsland Organiser from this date forwards.
48. Ms Asmar did not, in the end, turn up to the LRH members' meeting as was organized.
49. At this time, my work mobile phone would not work and my laptop went missing. I later reported it to the Police as being stolen.
50. I had my phone repaired following my return to Melbourne on 16 March 2013.
51. The LRH members were extremely disappointed by Ms Asmar's non-attendance.

52. The members wrote a letter of complaint and asked that I provide the original document to Ms Asmar, which I did. I did not retain a copy.
53. On 5 March 2013, I said to Ms Asmar words to the effect of, "*It is a 'big ask' and a long drive for you to travel from Melbourne to Traralgon on Friday [8 March 2013] and then again on Tuesday [12 March 2013].*"
54. Ms Asmar replied saying words to the effect of, "*It does not worry me.*"
55. On Wednesday 3 April 2013, I received an email from Ms Asmar, referring to various matters but, specifically, Ms Asmar wanted me to write a letter of apology to the members.
56. A copy of Ms Asmar's email to me dated 3 April 2013 is located behind **Tab 3** of **Flynn MFI-1**.
57. I did not comply with Ms Asmar's request because she was effectively asking me to lie to the members. I never received any follow up to Ms Asmar's email.
58. The second bullet point in Ms Asmar's email asked me to write a report for the new Gippsland Organiser. I did this as instructed and I returned all of my files as requested. The reason I had the files at home in Maffra is because my home had been my "regional office" for the previous two and a half years.
59. I do not believe my industrial report was lacking in detail. Previous Organisers who had worked for the HSU did not provide reports.
60. The third bullet point in Ms Asmar's email related to the requirement for me to undertake financial training pertaining to my role as Treasurer.
61. I provided a statutory declaration to Ms Kitching as instructed by Ms Asmar.
62. I submitted copies of all training/qualification certificates, except for my VCE certificate as I could not locate it after 25 years. In any event, the course which Ms Kitching was arranging was not the applicable training required by the Fair Work Commission.
63. The last matter addressed in Ms Asmar's email was a direction that I undertake tasks which, more properly, should have been undertaken by Industrial Officers.
64. I was more than happy to assist with disciplinary matters of an urgent nature and did do this on many occasions.
65. During one conversation I had with Ms Asmar, she said to me words to the effect of, "*Leonie, could you assist with some disciplinary matters as some Organisers are having difficulties with their heavy workloads?*"
66. Ms Asmar then wanted a report on each disciplinary matter, with the outcome I obtained, and the time spent on dealing with the matter.

67. Unlike other people, I believe that I was under excessive scrutiny at work.
68. To this day, some Organisers have never provided an Industrial report for matters they have undertaken, or which are currently active, or where further industrial advice is required.
69. Prior to two weeks annual leave in late March 2013, I had submitted an annual leave form and I awaited approval for the same.
70. I asked Ms Asmar and Ms Kitching on a couple of occasions whether my annual leave had been approved.
71. They would both say words to the effect of, "*Yes, it will be fine,*" however, no formal response was given.
72. I eventually emailed Ms Asmar and Ms Kitching, so that I had proof of my request. I did not receive any written response to my request.
73. A copy of my email correspondence to Ms Kitching, copying Ms Asmar, is located behind **Tab 4 of Flynn MFI-1**.
74. On return from my annual leave, and at the next BCOM meeting, it was noted that I had taken annual leave without BCOM approval. I was unaware of this process and Ms Asmar had never indicated prior to this that I was required to seek approval from the BCOM.
75. I made a note at this time that I did not take leave without the Branch Secretary's approval.
76. Since then, I have not viewed any policy which states that I must seek approval from the BCOM to take annual leave.
77. Located behind **Tab 5 of Flynn MFI-1** is a copy of an email dated 12 June 2013, from Mr Donohue to the No. 1 Branch Staff titled, "Housekeeping", in which he communicates to all staff wanting to be reimbursed for expenses or seeking accommodation approval, to first forward all requests to him and then await approval by Ms Asmar. Approval should have correctly been sought from me as the Assistant Secretary / Treasurer as per the Rules and procedures of the No. 1 Branch.

My Requests for Assistance

78. On 3 April 2013, I emailed Mr Lloyd Williams, who was at that time, the Acting National Secretary of the HSU, and requested a meeting with him in order that I might discuss the concerns I had about the management of No. 1 Branch and also about my being in a vulnerable position.

79. A copy of my email to Mr Williams dated 3 April 2013, is located behind **Tab 6** of **Flynn MFI-1**.
80. Mr Williams later phoned me and was reluctant to meet with me or to talk about my concerns.
81. Mr Williams said to me words to the effect of, *“Diana is a very paranoid person and if she finds out that we have spoken it will only make things worse.”*
82. Following this conversation, I felt that I had no other avenues of redress to turn to.
83. I felt lonely and unsupported.

The Audit and Compliance Committee meetings and BCOM meetings

84. On 24 June 2013, the Audit and Compliance Committee meetings and the BCOM meetings were the worst meetings I have attended in my life.
85. A copy of the Minutes of Meeting of the Finance Sub-Committee dated 24 June 2013 and marked “Draft Only” are located behind **Tab 7** of **Flynn MFI-1**. This document demonstrates the active role which Mr Shulman was playing in the financial management of No. 1 Branch.
86. I believe that Ms Asmar and Ms Kitching deliberately attempted to book me in to another conference on 24 June 2013, in Sydney, so that I would not be available to attend the Finance Committee Meeting on 24 June 2013.
87. On Friday 21 June 2013, Ms Asmar and Ms Kitching phoned me, text me and emailed me in relation to attending the course on 24 June 2013, even though I was on sick leave on 21 June 2013.
88. A copy of this correspondence is located behind **Tab 8** of **Flynn MFI-1**.
89. I now believe that the intention was for me to attend the course so that I could not be present at the BCOM meeting on 24 June 2013 because they intended to move a motion removing me from the Audit and Compliance Committee and having Ms Asmar and Mr David Eden appointed to the Committee.
90. At the Audit and Compliance Committee Meeting, on 24 June 2013, Ms Asmar produced a few pages of documents, held them in the air, and told us that they would be the new rules as per the direction and recommendations of the Fair Work Commission (FWC) (the **Recommendations**).
91. Ms Asmar then said words to the effect of, *“These are recommendations following a meeting with the Fair Work Commission on 6 June 2013.”*
92. Whilst I was not in attendance at the meeting with the FWC on 6 June 2013, I understand that the purpose of the meeting was to discuss and review the financial

- policies and procedures of No. 1 Branch and was clearly pertaining to my role as Assistant Secretary/Treasurer.
93. When I asked Ms Asmar why I had not been included in the meeting, she said to me words to the effect of, "*the meeting was organized on a "whim" and I grabbed Kerry and Kimberley as they were close by.*"
 94. Located behind **Tab 9 of Flynn MFI-1** is a copy of my related correspondence with Ms Cameron of the Fair Work Commission which shows that the meeting was not organised on a whim but that I was deliberately excluded.
 95. Mr Shulman, the auditor for No. 1 Branch, informed me at the meeting that he had received a text and was able to attend the meeting within the small time frame.
 96. I was not communicated with in relation to this meeting with the FWC and was never invited to attend.
 97. When I queried this, Ms Asmar said to me words to the effect of, "*We thought you would be busy!*"
 98. I felt extremely undermined and believed, by this stage, that maybe I was being set up to fail and look incompetent in my role as Treasurer.
 99. Ms Asmar was extremely rude and yelled at me during the Audit and Compliance Committee meeting on 24 June 2013.
 100. Ms Asmar intimidated me and made me feel "ganged up" on. She criticized me during the meeting and was verbally "on the attack" until I was reduced to tears.
 101. I had to leave the meeting for approximately ten minutes until I had stopped crying.
 102. Ms Asmar yelled at me saying words to the effect of, "*Leonie, move on. We're not listening to you. For God's sake, you're going around in circles. Where's your headspace today? Get over it.*"
 103. Ms Asmar then went on to say, "*Some people are getting anxious and paranoid around the table.*" I believe she was referring to me at the time.
 104. These comments made me feel completely belittled and embarrassed.
 105. Ms Asmar, Mr Shulman, Ms Georgiev, Ms Kitching, Mr Eden, and four BCOM members were present at the meeting.
 106. Nobody said anything following Ms Asmar's outburst. I felt that the other people present at the meeting were either condoning Ms Asmar's behaviour, or were just not confident to support me in front of her.
 107. A copy of the Minutes of Meeting, dated 24 June 2013, and marked "DRAFT ONLY", are located behind **Tab 10 of Flynn MFI-1**.
 108. I went downstairs to have a cigarette and to call my husband for advice and support.

109. Upon turning around, Mr Donohue was standing about six metres away, looking at me and smiling. He gave a little wave and also had a cigarette.
110. I believe Mr Donohue was sent downstairs by Ms Asmar to see what I was doing because he was busy speaking with BCOM members upstairs when I left the Boardroom.
111. We had back to back meetings between the Audit and Compliance Committee Meeting and the BCOM meeting.
112. Mr Lance Smith (**Mr Smith**) who is a member on both committees moved a motion to remove me from the Audit and Compliance Committee which is contrary to the Rules.
113. A record of the Motion is contained at the bottom of page 5 of the draft BCOM Minutes dated 24 June 2013, which are located behind **Tab 11** of **Flynn MFI-1**.
114. I believe that this was a premeditated and predetermined motion as Mr Smith knew the exact wording from the Recommendations, even though the 30 odd recommendations were never provided to any of the BCOM members prior to him moving the motion.
115. I explained to the BCOM that this act was in breach of the Rules and that they were the governing body and should not support the motion.
116. Mr Patrick O'Brien (**Mr O'Brien**) suggested that we all be provided with a copy of the Recommendations, and afforded the opportunity to review them, and discuss the matter at the next month's BCOM meeting, so that all of the members could make an informed decision.
117. Ms Asmar then accused me of attacking the BCOM members and then said words to the effect of, "*the motion has already been moved so we should vote on it.*"
118. Ms Asmar intimidated me and so I did not say anything more.
119. Once again, I felt extremely humiliated and embarrassed by the way Ms Asmar spoke to me during this meeting. She spoke to me in a loud and aggressive manner. I felt shaky and my voice was quivering. I felt shut down and broken.
120. I called Mr Chris Brown (**Mr Brown**), the HSU National President, following the meeting, in tears, and explained what Ms Asmar had done.
121. Located behind **Tab 12** of **Flynn MFI-1** is a copy of BCOM Minutes of Meeting dated 2 September 2013 and 5 August 2013 (I do not know why these Minutes were issued in DRAFT). I believe these Minutes are an example as to how nothing was ever recorded favourably in relation to me.

122. It was following the Audit and Compliance Committee Meeting and the BCOM meeting on 24 June 2013, that I sought to meet with Ms Joanne Fenwick from the FWC, and discuss the Recommendations.
123. It was at my meeting with Ms Fenwick, that I found out that the meeting of 6 June 2013 had been organised over a 2 to 3 week period and that I had been deliberately excluded from being involved.
124. Under the Rules, Ms Asmar and Mr Eden, the President of No. 1 Branch, are not to be members of the Audit and Compliance Committee.
125. As far as I am aware, Ms Asmar, Mr Eden, Ms Kitching, Mr Shulman and Ms Georgiev have attended all of the Audit and Compliance Committee meetings (although, Ms Kitching did not attend the first meeting).
126. Ms Asmar ensured that Mr Eden chaired these meetings except for the 5 August 2013 Audit and Compliance Committee meeting whereby Mr Gordon Driscoll chaired the meeting under Ms Asmar's and Ms Kitching's directions. Ms Asmar and Ms Kitching sat on either side of Mr Driscoll and prompted him throughout the meeting.
127. I queried and opposed Ms Asmar, Ms Kitching and Mr Eden's attendance at these meetings.
128. Ms Asmar and Ms Kitching, in particular, monopolized these meetings and directed and controlled the motions.
129. Mr Shulman was in favour of their being in attendance and voiced this openly at the first Audit and Compliance Committee meeting on 3 June 2013.
130. I do not find Mr Shulman to be an independent auditor. It is highly irregular that he performed a dual role of both accountant and auditor at No. 1 Branch. In my view, he acts more like an employee of Ms Asmar's.
131. On 30 July 2013, I had a conversation with Mr Shulman, during which, I expressed my concerns to him in relation to the apparently dual and non-independent role he was performing and requested that I be copied to all correspondence concerning the finances for No. 1 Branch.
132. Following this conversation, Mr Shulman started to copy me to emails. He had not copied me to emails for several months.
133. Examples of my email correspondence with Mr Shulman, is located behind **Tab 13 of Flynn MFI-1**.
134. I understand that Mr Shulman was suspended and fined in 2004 for not properly or adequately performing the duties of an auditor.

135. A copy of the Notice of Decision concerning Mr Shulman in *ASIC v Michael Bernard Shulman* is located behind **Tab 14** of **Flynn MFI-1**.
136. Ms Georgiev, the Finance Manager, reports directly to Ms Asmar.
137. Nobody reports to me, even though the HSU Governance Principles state that a Finance Manager shall be employed to assist the Assistant Secretary/ Treasurer.
138. On 27 and 28 June 2013, Ms Georgiev made it quite clear to me via email that she could not allow me to access any financial documents before Ms Asmar had given her approval.
139. A copy of Ms Georgiev's email correspondence is located behind **Tab 15** of **Flynn MFI-1**.
140. Ms Georgiev was always polite to me, and I understood that she was loyal to Ms Asmar, however, her inability and reluctance to assist me was very disappointing.
141. In early June 2013, I met with Mr Brown and relayed to him my concerns in relation to the financial management of No. 1 Branch.
142. I met Mr Brown at a hotel he was staying at, I cannot now recall the name of the hotel, and it was an informal meeting. I believe it was the Windsor Hotel.
143. On Monday 29 July, 2013, I met with Mr Brown again, along with Mr Williams, at the HACSU (HSU No. 2 Branch) head office in Carlton.
144. My major concern at this stage was that I would be required to sign certain documents for the FWC pertaining to the finances of No. 1 Branch.
145. I was concerned that I would carry the responsibility for any wrongdoing and also be accountable to the membership.
146. This worried me greatly as I had been obstructed from performing my elected role, yet I would be expected to sign documentation in relation to which I could not offer any supporting documentation.
147. Mr Williams, in particular, seemed horrified by what I conveyed to them both and said words to the effect of, "*There is definitely no ambiguity here, she [Ms Asmar] is clearly in breach of the Rules.*"
148. I took a tape recording of this meeting so that I could take notes of the meeting later.
149. Mr Brown advised me that perhaps I should write a letter to Ms Asmar regarding the concerns I had and copy him to the letter.
150. I was unsure about this, as Ms Asmar and I had had many conversations over several months about my concerns in relation to the financial governance of No. 1 Branch and potential breaches of the Rules.

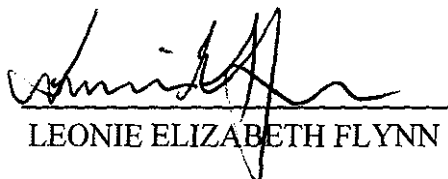
151. Ms Asmar kept reassuring me that everything was being done in accordance with the Rules and that there was nothing to worry about.
152. After the meeting, I advised Mr Brown that after careful consideration, I had decided to write to the FWC in relation to my concerns.
153. I had a “gut feeling” that if I did not adopt this course, my concerns would be “swept under the carpet” and there would be an attempt to cover up what had occurred. I felt that this was deceitful of the membership and that they deserved better.
154. Prior to extended personal leave from 8 August 2013, I was working full-time attending to Aged Care Enterprise Bargaining negotiations with one other staff member, Ms Peggy (Piki) Lee (**Ms Lee**).
155. We would be required to attend up to eight meetings on any given day.
156. The Australian Nursing Federation (**ANF**) had 4 to 5 experienced Industrial Officers who all had personal assistants attending to the same negotiations on behalf of the ANF. This gives an indication as to the workload Ms Lee and I were attending to for the HSU.
157. This task was very time consuming and exhausting. Many hours were spent by me and Ms Lee at home drafting agreements in our own time. Ms Asmar was aware of our workload, however, she did not allocate more staff to undertake this role.
158. Since this time, it has been brought to my attention by Ms Denise Gregor, a member of the BCOM, that my Work Cover claim form was distributed by Ms Asmar to all BCOM members.
159. A copy of my Work Cover claim is located behind **Tab 16** of **Flynn MFI-1**.
160. Located behind **Tab 17** of **Flynn MFI-1** is a copy of a “tweet” posted by Mr Landeryou, Ms Kitching’s husband, on 23 May 2014, in which he says, “*Isn’t it wonderful when those feigning illness under Workcover miraculously recover for media interviews #fraud #leonieflynn #marcobolano.*” The only way Mr Landeryou could have known about my Work Cover claim is because his wife Ms Kitching informed him of it.
161. My personal details are no longer confidential along with other names and contact details that I gave to support my claim.
162. Whilst I think that the BCOM had every right to be informed of my leave and Work Cover claim, they should not have been informed of my, and other people’s, personal details.
163. A journal was sent to all members and was the first of what will be a quarterly edition named the “Health Workers Winter Journal”.

164. There is no photograph or mention of me in that journal or any other journal, except for where it has all officials and employees names inside the front cover.
165. I believe that Ms Asmar has deliberately excluded me from being seen or known by the membership.
166. There are photographs in the journal whereby I know that I was in the original photo, but I have been "cut" from the edited photo for the journal.
167. I was also informed by Mr Rob McCubbin (**Mr McCubbin**), an ex-Lead Organiser, who resigned from No. 1 Branch in early July 2014, that the white Rav 4 I was driving prior to being allocated a new vehicle, had a GPS (black box) fitted to it and hidden so that Ms Asmar, Ms Kitching and Mr Donohue could track where I was on any given day.
168. Mr McCubbin told me that Mr Dean Sherriff (**Mr Sherriff**) had 'bragged' that he was successful in attaching the GPS device to the base of my vehicle on the morning that he had affixed it.
169. Mr McCubbin also told me that I was deliberately allocated 'unwinnable' disciplinary matters.
170. I believe that Ms Asmar did not want me to be out amongst the membership as she was paranoid that I was going to oppose her in the next election. She did not want members to like me or for them to think I was getting successful outcomes with any of their industrial matters.
171. Mr McCubbin also informed me that Mr Walladge, who was employed as a 'Strategic Planner' was directed by Ms Asmar to get "warm" with me with the intention that Ms Asmar might ultimately lay charges against me for sexual harassment of another employee.
172. Mr Walladge was required to return to Western Australia due to a warrant for his arrest.
173. I am absolutely appalled by the lengths Ms Asmar intended to go to, to have me removed from my elected position.
174. Ms Asmar and Ms Kitching also spread rumours among staff that I had been having an affair with Mr Marco Bolano (**Mr Bolano**). This is not true. I had run on the same 'ticket' as Mr Bolano in the 2012 election.
175. Ms Jayne Govan (**Ms Govan**), an ex-Organiser asked me in mid-February 2013 if I had been in a relationship with Mr Bolano.

176. Ms Annie Lam (**Ms Lam**), an ex-receptionist, also told me in January that Ms Kitching had asked Ms Linda Depierro (**Ms Depierro**), the Membership Manager, whether she was aware that I had been in a relationship with Mr Bolano.
177. Ms Depierro had then queried of Ms Lam if she knew anything about a relationship.
178. I never confronted Ms Asmar or Ms Kitching about this, but it upset me that staff might look at me and think, "*Leonie is having an affair with Marco Bolano*" when it was completely untrue.
179. I am a happily married woman and I was extremely upset by this.
180. I left my workplace at No. 1 Branch at 2.00pm on 7 August 2013.
181. I had met with Mr Brown that morning.
182. My husband, Terry, attended my workplace as I was in definite need of support.
183. Terry noted that nobody would say "hello" or talk to me during his attendance at the No. 1 Branch.
184. Mr Brown was aware of Terry attending prior to the meeting and offered to meet with us elsewhere. I declined this offer as Ms Asmar's and Ms Kitching's husbands regularly attended the HSU office.
185. Mr Brown, once again, saw how distressed I was due to my concerns.
186. Mr Brown said to me words to the effect of, "*I am going on leave for about a week but when I return, I am going to personally review the Vic 1 financial records.*"
187. I requested that I be allowed to review the financial records with him.
188. Mr Brown said that he would prefer to review them first and, following that, then I could.
189. This worried me because I could not have comfort as to the transparency or accountability of this process or as to the integrity of the financial records.
190. I recorded my meeting with Mr Brown so that I could take notes of the meeting afterwards.
191. I was extremely upset following this meeting and told my husband, Terry, that I didn't think I could return to work after this. I believed that there was going to be a cover up.
192. That evening, Mr Brown phoned me, and told me that he was worried about my health and well-being.
193. He said that he thought I should "*talk to somebody*" and offered some counselling sessions through our Employee Assistance Program (EAP).
194. Mr Brown then said words to the effect of, "*I have been meaning to do this for a couple of months now. Diana will not have to know about it.*"

195. I accepted his offer and he organised for this counselling through the HACSU Branch and said that the National Office would "*foot the bill.*"
196. Mr Brown has since authorized a further three counselling sessions (six in total).
197. On 12 August 2013, I sent my final email communication to Ms Asmar explaining how unwell I was by reason of work related stress and bullying. A copy of my email to Ms Asmar is located behind **Tab 18** of **Flynn MFI-1**.

SIGNED:



LEONIE ELIZABETH FLYNN

DATED this 11th day of August 2014